Redress

GREEN CLIMATE FUND | Independent Redress Mechanism

Compliance Appraisal Report

Case C-0015 – Colombia

FP203: Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals

24 October 2025

ABOUT THE INDEPENDENT REDRESS MECHANISM

The Independent Redress Mechanism (IRM) is an accountability and redress mechanism established by the Green Climate Fund (GCF) to increase the effectiveness of the GCF's operations, and to be responsive to the concerns of people adversely affected by GCF funded projects or programmes.

The IRM is mandated to receive and consider complaints from people who believe they have been, or may be, adversely impacted by GCF projects or programmes failing to implement GCF policies and procedures.

The IRM is independent of the GCF Secretariat, and reports directly to the GCF Board, which oversees GCF's investments and management.

ABBREVIATIONS

Abbreviation	**Definition**
AE	Accredited Entity
AMA	Accreditation Master Agreement
APR	Annual Performance Report
Board Decision	Decision taken by the Board of Directors of the GCF
EE	Executing Entity
ESAP	Environmental and Social Action Plan
ESIA	Environmental and social impact assessment
ESMP	Environmental and Social Management Plan
ESMFS	Environmental and Social Management Framework and System
ESSF	Environmental and Social Safeguard Framework (WWF)
ESP	GCF 2021 Environmental and Social Policy
ESS	Environmental and Social Safeguards
FAA	Funding Activity Agreement
FP	Funding Proposal
FP203	Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals
FPN	Fondo Patrimonio Natural para la Biodiversidad y Áreas Protegidas
GAP	Gender Action Plan
GBV	Gender-based Violence
GCF	Green Climate Fund
HECO	Heritage Colombia
IESC	Independent Environmental and Social Consultant
IIU	Independent Integrity Unit
IFC	International Finance Corporation
Interim ESS	GCF Interim Environmental and Social Safeguards
IRM	Independent Redress Mechanism
IT	Information Technology
MAF	GCF 2015 Monitoring and Accountability Framework

NRCC	Regional Climate Change Nodes
PFP	Project Finance for Permanence
PGs	Procedures and Guidelines of the Independent Redress Mechanism
PMU	Project Management Unit
PNN	Parques Naturales Nacionales
PS	IFC 2012 Performance Standards
RMF	GCF Risk Management Framework
Secretariat	GCF Secretariat
Secretariat Response	Written revised response of the Secretariat dated Oct. 2, 2025, to the IRM Request for Response in Case C-0015 –Colombia dated Sep. 2, 2025
SEAH	Sexual Exploitation, Sexual Abuse, and Sexual Harassment
SIRAP	Colombia's Regional System of Protected Areas
SINAP	Colombia's National System of Protected Areas
TOR	Terms of Reference of the Independent Redress Mechanism of the GCF
USD	US Dollars
WWF	World Wildlife Fund

Contents

I. EXECUTIVE SUMMARY

On 6 June 2025, the Independent Redress Mechanism (IRM) declared eligible a complaint submitted in relation to GCF Project FP203: "Heritage Colombia (HECO) Project: Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals." The Accredited Entity is the World Wildlife Fund US. The complainant requested confidentiality, and the IRM has granted it in accordance with its Terms of Reference and Procedures and Guidelines.

IRM Case C-0015 consists of a Complainant who has raised issues that involve 1) labor and working conditions; 2) provision of a grievance mechanism; and 3) sexual exploitation, abuse and harassment (SEAH). In the initial steps phase, the complainant indicated their preference to handle the above-mentioned matters through a compliance review process. The IRM observed that dispute resolution was not seen as the appropriate channel by some parties for handling the concerns in the complaint and decided at the conclusion of the initial steps phase on 18 August 2025, to refer the case for compliance review.

FP203 aims to introduce a paradigm shift in Colombia's approach to sustainable management of ecosystems. GCF financing is part of a broader Project Finance for Permanence (PFP) project from WWF, Heritage Colombia (HECO). HECO is a public-private partnership model that seeks to secure financial sustainability for the management of key ecosystems and large-scale landscapes across the country. It anchors an ambitious, national level program to protect or restore 20 million hectares over the next 20 years, under the leadership of the Ministry of Environment and Sustainable Development and the National Parks Agency. GCF financing is a cornerstone of the HECO PFP and is expected to meaningfully address structural funding gaps in protected area finance. FP203 is intended to finance the sustainable and integrated management of five landscape mosaics, comprising 6.6 million hectares of protected landscapes in Colombia's territory and representing one third of the total 20-million-hectare goal.

The Complainant, who was previously employed as a subject matter specialist for the GCF-funded project, describes a progression of alleged events and circumstances that ultimately led to the non-renewal of their one-year contract with the relevant Executing Entity (EE). The Complainant alleges that these actions constituted workplace harassment and retaliation for work carried out as requested by the EE. Furthermore, the complaint faults the EE for failing to provide a suitable workplace grievance redress mechanism and in turn not providing adequate response to alleged cases of Sexual Exploitation, Abuse and Harassment.

The complainant asserts that these actions toward them by EE staff were violations of GCF policy, and that the actions were harmful, causing adverse impacts to both the complainant directly and to others in the organization and placed the GCF-funded HECO project at significant reputational risk. The complainant believes that they are entitled to compensation for what they consider to be unfair and arbitrary dismissal.

The complaint raises questions about the potential non-compliance of the Project with several GCF Policies and Procedures, including Performance Standards 1 and 2 of the GCF's interim environmental and social safeguards policy (Interim ESS); the GCF's 2021 Revised Environmental and Social Policy (ESP); the GCF Gender Policy and Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH Policy); and the GCF's 2015 Monitoring and Accountability Framework for Accredited Entities (2015 MAF).

After consideration of the information currently available, the IRM finds that there is *prima facie* evidence that adverse impacts on the complainant resulted from the non-compliance of FP203 with GCF operational policies and procedures. Consequently, as stipulated in Para. 55 of its Procedures and Guidelines, the IRM will commence a compliance investigation.

II. INTRODUCTION

1. This report documents the Green Climate Fund (GCF) Independent Redress Mechanism (IRM) compliance appraisal in IRM Case C-0015-Colombia.[1] It concerns a complaint received by the IRM on 7 May 2025 regarding labour and working conditions; sexual exploitation, abuse and harassment (SEAH); and grievance redress related to the FP203 Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals.[2] The complainant requested confidentiality, and the IRM has granted it in accordance with its Terms of Reference (TOR) and Procedures and Guidance (PG).

2. This report provides a background to FP203 and to the complaint; describes relevant GCF operational policies and procedures; and assesses whether there is *prima facie* evidence of adverse impacts through non-compliance of the Project with GCF operational policies and procedures. Since the IRM concludes that there is such evidence and recommends a compliance investigation, the report also includes terms of reference for a compliance investigation.

3. The compliance appraisal and this report have been prepared in accordance with the updated Terms of Reference (TOR) and Procedures and Guidelines (PG) of the IRM.[3]

III. PROJECT BACKGROUND

4. On 16 March 2023, the GCF Board approved FP203 "Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals."[4] FP203 aims to introduce a paradigm shift in Colombia's approach to sustainable management of ecosystems. GCF financing is part of a broader Project Finance for Permanence (PFP) project from WWF, Heritage Colombia (HECO).

5. HECO is a public-private partnership model that seeks to secure financial sustainability for the management of key ecosystems and large-scale landscapes across the country. It anchors a national-level program to protect or restore 20 million hectares over the next 20 years, under the leadership of the Ministry of Environment and Sustainable Development and the National Parks Agency. GCF financing is a cornerstone of the HECO PFP and will be used to "address structural funding gaps and systemic barriers to protected area finance"5 and attract new investment as direct co-finance.

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[1] See C0015 Colombia https://irm.greenclimate.fund/case/c0015-colombia
[2] See FP203-GCF-World Wildlife Fund US https://www.greenclimate.fund/project/fp203
[3] See Procedures and Guidelines of the IRM https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm
[4] See GCF/B.35/02/Add.05 : Consideration of funding proposals - Addendum V Funding proposal package for FP203 | Green Climate Fund
[5] See FP203 funding proposal, p. 3

6. The Accredited Entity of this Project is the World Wildlife Fund, Inc (WWF-US). The Executing Entities for the project are WWF-Colombia and Fondo Patrimonio Natural (FPN). As of the writing of this report, the Project is 'Under Implementation' with an expected completion date of 14 July 2033. At the time of approval by the GCF Board, the Project was assessed as belonging to environmental and social risk Category B. [6]

7. The total project cost is USD 145.2 million, which includes USD 42,974,559 in GCF grant financing. The Project is co-financed via two additional grants totalling USD 102,117,951, from WWF-US and the Government of Colombia. FP203 builds on a commitment by the Government of Colombia and various public and private sector partners, including WWF, to launch an initiative dedicated to the long-term conservation of the country's protected areas and landscapes.[7] The five selected landscape mosaics in FP203 represent more than 5.8% of Colombia's territory and account for a third of the overall goals of the HECO PFP initiative. The areas of intervention selected are located within the Caribbean, San Lucas, Central Andes, Orinoco and Amazon to reconnect and strengthen the protected area network to ensure delivery of ecosystem services, carbon sinks, climate hazards risk reduction and water security.[8]

8. The objectives of the Project are anchored under three major components:
   1) Governance Structures for Climate Responsive Planning and Development;
   2) Participatory Monitoring Systems Generate Climate Information used for Improved Decision-Making in Territorial Planning; and 3) Land Management Improved and Restoration Implemented to Reduce Carbon Emissions and Strengthen Adaptive Management Capacity of Vulnerable Communities. The Project aims to build the capacity of the local, regional and national institutions within each of the five target landscapes in order to assess and respond to the climate adaptation and mitigation dimensions of landscape management, including a specific focus on incorporating of indigenous knowledge and mainstreaming of a gender-responsive planning approach.

Project Implementation Arrangements[9]:

9. The Funding Proposal for FP203 outlines project implementation arrangements, including detailing the roles and responsibilities of the Accredited and Executing Entities with regard to specific project components and the underlying funded activities. Institutions acting as Accredited Entities in GCF projects, including WWF-US, undergo a process of 'accreditation,' designed to assess whether they are capable of strong financial management and of safeguarding funded projects and programmes as well as the ability to manage environmental and social risks that may arise at the

[6] See FP203, pg. 180
[7] On June 23, 2022, the Government of Colombia, WWF-US and other signatories, signed a joint declaration to launch the Heritage Colombia Program's (HECO) Permanence Funding Project (PFP) which seeks to secure public and private funding to permanently protect nearly 29 million hectares of iconic landscapes and seascapes.
[8] See FP203, Para. 7-8, pg. 4.
[9] See FP203, Section B.4, pages. 75-80.

project level. As part of the accreditation process, Accredited Entities are assessed against GCF policies and standards, including the Gender Policy.[10]

10. Under the accreditation process applicable at the time of the accreditation of WWF-US, the relationship between GCF and an Accredited Entity was formalized through the signing of Accreditation Master Agreement (AMA) that set out the general terms and conditions at a framework level. The GCF and WWF-US entered into an Accredited Master Agreement in December 2017 for a period of 5 years. Following reaccreditation, the original AMA was subsequently restated and amended as of 12 December 2022. Under the terms of the AMA, WWF-US is expected to comply and, where needed, contractually require compliance of an Executing Entity with its own rules, policies and procedures in order to enable its compliance with GCF's own standards, policies and procedures.

11. Importantly, WWF-US is expected to assess, through appropriate due diligence processes, the integrity and capacity of each Executing Entity to implement a funded activity. WWF-US is further responsible for providing support, guidance and backstopping to the two Executing Entities. The Executing Entities and their responsibilities are listed below:

    - *El Fondo Para La Biodiversidad y Áreas Protegidas - Patrimonio Natural (Fondo Patrimonio Natural*), a Colombian private organization, is tasked with administering the "Heritage Colombia Transition Fund", a restricted account that finances conservation activities in HECO priority landscapes. Fondo Patrimonio Natural is responsible for project execution, including management of the Project Management Unit (PMU).

    - WWF Colombia, an independent Colombian private organization under the WWF Network,[11] is also an Executing Entity for this project. WWF Colombia is responsible for coordination with the PMU, management of procured third parties and their activities, providing resources to beneficiary Community Associations, reporting to the AE, and ensuring alignment with Government of Colombia policies in order to achieve Project objectives.

12. The IRM has reviewed project documentation that indicates that, as part of the AE's due diligence, WWF-US had assessed the capacity of the executing entities (Patrimonio Natural and WWF Colombia) and determined that both organisations were capable of applying WWF-US and GCF standards and policies in the execution of this Project.

[10] See overview on accreditation and related GCF Policies, Entity accreditation | Green Climate Fund

[11] WWF Colombia is not controlled by the AE, does not control the AE, and is not under common control with the AE, where "control" means ownership of a majority of the voting power of the either entity. Both organizations are independent entities with bilateral contractual and licensing relationships with World Wide Fund for Nature, a Swiss foundation that serves as the secretariat for the global network of WWF National Organizations.

Project Components with relevance to the GCF Gender Policy and Policy on the Prevention of SEAH

13. WWF-US is expected to comply or (where applicable) require compliance of the Project with the its own Standard on Environment and Social Risk Management, the Standard on Grievance Mechanisms, the Standard on Stakeholder Engagement, as well as the Guidance Note regarding Gender-based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEAH) in a manner that enables compliance with comparable GCF standards, policies and procedures, in line with all relevant legal arrangements[12].

14. The Funding Proposal package for FP203 included a gender assessment and Gender Action Plan. The gender assessment highlighted risks associated with 1) structural gender inequalities, 2) a weak articulation between national gender mechanisms and the institutions in charge of gender issues, 3) observed gender gaps in terms of wages and access to work for women, and 4) the shortcomings of sector initiatives to remediate these problems and steer more than a small share of benefits to women.[13]

15. The Gender Action Plan (GAP) subsequently aims to guide the design of gender-responsive Project activities and outcomes, highlighting the role of the Project gender specialist within the Project Management Unit (PMU). The Project gender specialist is responsible for supervising gender/social inclusion activities, providing support to gender focal points in each project mosaic, and providing capacity building to project staff and stakeholders as needed on gender throughout the life of the project. The GAP places emphasis on activities such as:[14]

    - Developing institutional capacity-building for the integration of gender dimensions in environmental management, protected areas and climate policy and actions;
    - Developing a continuous process of comprehensive training on the inclusion of a gender approach in all aspects of Protected Areas management as part of a specific gender strategy;
    - Ensuring authorities, technical experts and representatives of government and civil society institutions recognize and validate the action and knowledge of women and women-led organizations, promote and support their empowerment and agency;
    - Ensuring accountability and transparency in the management of climate governance agreements and measures that do no harm and take gender dimensions into account;
    - Actively involving men and women in gender mainstreaming processes at different levels of management, who are trained in the subject, including how to recognize and address GBV and SEAH, and recognize that gender

[12] See Clause 13.01, AMA
[13] See FP203, pg. 183 and Gender Assessment.
[14] FP203, pg. 184 and Gender Action Plan

structures are also present in relationship norms in professional environments.

16. Per the Gender Action Plan, a gender and SEAH-responsive project-level grievance mechanism was foreseen for this Project. Per internal documentation reviewed by the IRM, this project-level grievance mechanism is currently under development in the second year of implementation. IRM notes that the use of the existing National Parks of Colombia (PNNC) grievance redress procedure is also being considered by GCF, although the PMU is expected to play a more active role on processing such grievances.

17. In internal project documents reviewed by the IRM, WWF Colombia and WWF-US report that that their existing institutional grievance mechanisms should be accessible to project stakeholders and project-affected peoples. Based on a review of preliminary non-public information, the IRM has learned that petitions related to the Project have been filed through national communication and/or grievance channels, although the IRM does not have sufficient information on the role of the AE and EEs, if any, in registering and processing the same or similar grievances under their respective mechanisms.

18. Additionally, the IRM takes note of a recent piece of legislation, Colombian Law 2365, that came into effect on 20 June 2024 and imposed new requirements for employers to prevent sexual harassment in the workplace, protect victims of harassment and publicly report on the number of harassment complaints.[15] Under Law 2365, all employers are required to implement measures to prevent sexual harassment in the workplace, and, in the event of a harassment complaint, to protect the complainant and any witness or whistleblower. The IRM understands that these recent changes in the national legal framework may have spurred organisations to develop or strengthen measures to identify and address Sexual Exploitation, Abuse and Harassment in the workplace. Relevance of this Law and its integration into Project operations will be further considered in the investigation phase.

Summary of the complaint

19. On 7 May 2025, the IRM acknowledged a complaint relating to GCF Project FP203. The complainant requested confidentiality, and the IRM has granted it in accordance with its Terms of Reference (TOR) and Procedures and Guidelines (PG). On 6 June 2025, the IRM determined the complaint eligible under its TOR and PG.

20. The complainant raised several concerns related to labour and working conditions, including related to the management of grievances, associated with their term of employment as a subject matter specialist for FP203 within the relevant Executing Entity. The issues raised include the following:

    - Disparity in pay on the basis of personal characteristics;

[15] Gonzalo Vértiz Díaz, "Colombia: New employer obligations to prevent and report sexual harassment," *WTCCO*, November 28, 2024.

- Inadequacies in ensuring proper functioning of grievance redress mechanisms;
- Improper or unauthorised access to confidential materials maintained by complainant;
- Impacts on health and well-being as a result of workplace-related tension; and
- Non-renewal of contract as a retaliatory measure following complainant's notification to the Executing Entity of several reports of alleged sexual harassment and alleged gender-based violence.

Procedural History

21. On 6 June 2025, the IRM determined the complaint to be eligible. Consequently, between June and August 2025, the IRM conducted several meetings with the complainant, Secretariat, AE and EE during the Initial Steps Phase to better understand the issues raised in the complaint and to provide information on complaint handling modalities.

22. On 18 August 2025, the IRM published the outcome of the Initial Steps Phase, noting that the complaint had been referred to Compliance Review. The IRM observed that dispute resolution was not seen as the appropriate channel by some parties for handling the concerns in the complaint, hence the decision to refer the case for compliance review.[16] On 26 August 2025, the IRM met with WWF, FPN and the Secretariat to brief the parties on the IRM decision to refer the case to compliance review.

23. On 3 September 2025, the IRM requested the Secretariat to provide a response to the complaint.[17] The IRM also informed the National Designated Authority, AE and EE, that a request for response had been submitted to the Secretariat and informed them of the option to liaise with the Secretariat regarding the response.

24. In addition to the issues outlined above, the IRM highlighted the following potential non-compliances of the project with GCF's operational policies and procedures, which if proven, may have potentially adversely affected the complainant:

    - Non-compliance with the GCF's Interim Environmental and Social Safeguards [Performance standards (PS) of the International Finance Corporation] (Decision B.07/02, paragraph (c) and Annex III), in particular with Performance Standards 1 and 2.
    - Non-compliance with the GCF's Revised Environmental and Social Policy (Decision B.BM-2021/18)
    - Non-compliance with the GCF's Monitoring and Accountability Framework (Decision B.11/10)

[16] See paragraph 37 of the IRM's PGs.
[17] IRM, Request for Secretariat Response in relation to Case C-0015-Colombia concerning FP203, "Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals."

- Non-compliance with the GCF Gender Policy (Decision B.24/12)
- Non-compliance with the GCF's Revised Policy on the Prevention of Sexual Abuse, Exploitation and Harassment (Decision B.BM-2021/08) and the Action Plan for Addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment (March 2022).

25. As indicated in the PGs, the Secretariat was requested to provide information: (i) related to the factual statements and allegations in the complaint; (ii) about the steps taken by the Secretariat to ensure compliance with applicable GCF operational policies and procedures, including those identified by the complainant(s) or IRM; and (iii) about remedial actions, if any, that the Secretariat may have taken or intends to take to ensure compliance with such policies or procedures, as appropriate. A copy of the Request for Response was also forwarded to the AE and EE for their review and response, if necessary.

26. On 2 October 2025, the Secretariat submitted a response to the complaint outlining ongoing measures to mitigate the risks associated with the alleged policy violations. In summary, the Secretariat highlighted that secondary due diligence conducted at the funding proposal appraisal stage considered an Environmental and Social Management Framework (ESMF) designed by the AE to guide risk management for activities that encompass provisions for a gender-sensitive project-level GRM and a Gender Action Plan, for which the specific location, scale, scope and other design aspects or the dedicated staffing, procedures and other mitigation measures had not yet been fully developed. In the Secretariat's view, during the funding proposal appraisal stage, the requirements under the applicable GCF policies relating to SEAH and gender due diligence were satisfied.

27. The Secretariat notes that prior to the IRM informing the Secretariat of the complaint, it had no prior knowledge of the complaint or the acts that are alleged to have occurred following Board approval of the Project.[18] The Secretariat's Response further refers to ongoing project monitoring activities with respect to issues raised in the complaint. The Secretariat stated that at the time of the writing of the response to the IRM complaint, it had not received reports or information on any potential non-compliance with the contractual provisions associated with SEAH.

28. Having received the response, the IRM undertook its compliance appraisal to consider whether there is *prima facie* evidence that the complainant has been affected by adverse impacts through non-compliance of the GCF funded project or programme with GCF operational policies and procedures.

29. It is important to note that a *prima facie* finding at the Compliance Appraisal stage is a conclusion that the IRM makes to decide whether or not to proceed to a full investigation. In this context, a *prima facie* finding is not conclusive nor is it the final finding by the IRM. When assessing the limited material available to the IRM, the IRM

[18] Secretariat's Response to IRM Request in relation to Case C-0015-Colombia concerning FP203, "Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals", Oct. 1, 2025. Ref. OCIO/2025/015.

may make an initial finding at this preliminary stage that may well be contradicted by further evidence collected during an investigation that may follow.

IV. COMPLIANCE APPRAISAL

30. This compliance appraisal report considers whether there is *prima facie* evidence that the complainant has been affected or may be affected by adverse impacts through non-compliance of FP203 with GCF operational policies and procedures. For these purposes, the IRM has focused on adverse impacts on the complainant associated with labour and working conditions issues, lack of meaningful access to a worker grievance redress mechanism and EE capacity to address Sexual Exploitation, Abuse and Harassment.

Procedural steps taken by the IRM

31. The IRM's compliance appraisal has included the following steps:

- Review of the complaint and public outputs from the IRM Case Register;
- Engagement with the complainant to prepare a summary of issues raised for the Request for Secretariat Response;
- Initial review of Project documentation held electronically by the Secretariat and/or disclosed publicly, including the FP203 funding proposal and Board decision; the Environmental and Social Management Framework (ESMF) applicable to FP203; AMAs between GCF and WWF-US;
- Non-public documentation such as confidential annexes, the Funded Activity Agreement and draft progress reports;
- Consideration of the Secretariat's Response;
- Analysis of relevant GCF operational policies and procedures;
- Virtual meetings including between the IRM and the complainant; between the IRM and the Secretariat, WWF-US and EEs;
- Requests for additional documents from the complainant, the Secretariat and the AE, and consideration of responses and additional documents received;

Applicable GCF Policies and Procedures

Interim ESS (Performance Standard 1) in relation to FP203

32. Performance Standard 1 of the GCF's interim ESS establishes an overall framework for assessment and management of environmental and social risks and impacts, including the prevention and mitigation of adverse impacts.[19] The IFC Performance Standards do not use the term 'accredited entity' or 'executing entity'. They are addressed to 'clients'. The question that therefore arises is which entity or entities should be considered the 'client' for purposes of applying the provisions of PS 1.

[19] See IFC Performance Standard:1 https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-1-en.pdf

33. In this project, WWF-US in its role as AE represents the GCF's 'client' for purposes of applying PS 1. GCF's commitment to ensuring that environmental and social risks of funded activities are identified, measured and mitigated based on IFC standards is only meaningfully realised if WWF-US is considered within the scope of 'client' responsibilities set out in PS 1, which extends to the EE through direct subsidiary agreements between the AE and EEs. Both WWF-US as the AE and the subcontracted EEs that execute GCF-funded activities in five landscapes within Colombia can appropriately be considered when considering the responsibilities of 'clients' under PS 1.

34. The IRM has also considered whether the scope of PS 1 extends to workers of the EE. PS 1 requires 'clients' to "*establish and maintain an ESMS appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts*." For the purposes of FP203, the WWF-US Environmental and Social Safeguards Frameworks (ESSF) is equivalent to the ESMS under PS1 for FP203.[20] The investigation will further explore what the EE has in place as an ESMF and its relevance to compliance with required policies.

35. Under relevant legal arrangements, clarifications are provided that WWF-US is expected to undertake and/or put in place measures in order to ensure that the management of the environmental and social risks and impacts comply at all times with the recommendations, requirements and procedures set forth in the Project ESMF. The ESMF further identifies and clarifies which EE houses the Project Management Unit, and has primary responsibility for implementing the ESMF through the hiring and management of a Project Manager and a team that includes Safeguards and Gender subject matter specialists.[21]

36. As a contractor over which WWF-US has a significant degree of influence, the IRM understands PS 1 to support the expectation that Project environmental and social management systems will extend to the EE. PS1 requires the client to *"establish management programs that, in sum, will describe mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project."*[22] Depending on the nature and scope of the project, such 'programs' may apply broadly across the client's organization *"including contractors... over which the organization has control or influence."*[23] As a contractor over which WWF-US has a significant degree of influence, the IRM understands PS 1 to support the expectation that Project environmental and social management systems will extend to the EE.

37. There is sufficient nexus between WWF-US and the EEs to support application of the provisions of PS 1 to the issues raised in the complaint regarding the GRM and the

[20] See https://www.worldwildlife.org/pages/wwf-s-environmental-and-social-safeguards-framework
[21] WWF-US, HECO Project ESMF (2023) pgs. 68-70.
[22] Performance Standard 1, para. 13
[23] Performance Standard 1, para. 14

identification, management and mitigation of labour and workplace risks,[24] the provision of a suitable GRM[25] and differentiated measures to address gender discrimination or GBV[26] within the HECO Project. The IRM therefore concludes that GCF policies and procedures extend to WWF-US and the EE with respect to identification, prevention and mitigation of environmental and social risk; labour and workplace conditions; gender; and grievance redress.

Interim ESS (Performance Standard 2) in relation to FP203

38. The GCF's Interim ESS, namely Performance Standard 2, elaborates on how 'clients' should address Labour and Working Conditions.[27] The scope of PS 2 depends on the type of employment relationship between 'the client' and the worker.[28] In FP203, if 'the client' is to be understood to be limited to the AE and/or the EE as defined in the relevant legal arrangements, the 'client' to whom PS 2 must be applied will include the EE. The EE's workers would therefore fall within the scope of the PS 2 definition of 'contracted workers'.

39. PS 2 ensures that a workplace grievance mechanism: be provided to all workers, including contract workers (Para 20, 24-26); promotes non-discrimination and equal opportunity with regard to all aspects of employment (Para 15); requires the client to take measures to prevent and address harassment, intimidation, and/or exploitation, especially to women (Para 15); addresses concerns promptly, allows for anonymous complaints and provides timely feedback to those concerned without any retribution (Para 20). The IRM therefore concludes that PS 2 applies to workers of the EE as a matter of GCF policy.

GCF's 2021 Revised Environmental and Social Policy

40. Under the guiding principle of 'Equality and non-discrimination,' the ESP states that "*all activities financed by GCF will require that, where they are unavoidable, adverse impacts do not fall disproportionately on women and girls, persons in vulnerable positions and situations and marginalised groups, and individuals that are affected or potentially affected by GCF-financed activities, and avoid prejudice and discrimination in providing access to development resources and benefits*."[29]

41. Under the revised ESP, GCF requires that a gender-sensitive approach contributes to gender equality and inclusiveness (Para 8j) has zero tolerance for all forms of SEAH in GCF-financed activities (Para 8k). All activities financed by GCF will promote decent

[24] PS 1 requires the client to have the organizational capacity and competency to ensure a functional Environmental and Social Management System, anchored by the capacity to properly identify risk and impacts (Para 7, 17-18).
[25] PS 1 ensures that an effective grievance mechanism be provided and be properly communicated to stakeholders (Para. 25, 34-36).
[26] PS 1 (Para. 12, 4) see also PS 2.
[27] See Performance Standard 2: https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-2-en.pdf
[28] Performance Standard 2, Scope of Application, paragraph 4: "The Standard applies to workers directly engaged by 'the client' ('direct workers'); workers engaged through third parties to perform work related to core business processes of the project for a substantial duration ('contracted workers'); as well as workers engaged by the client's primary suppliers ('supply chain workers')."
[29] GCF ESP Para 8e.

work, fair treatment, non-discrimination and equal opportunity for workers, and be free of Sexual Exploitation, Sexual Abuse and Sexual Harassment and guided by the core labour standards of the International Labour Organization.[30]

42. The revised ESP also outlines that GCF is responsible for "confirming that […] *during the design and implementation of the activities […]that effective grievance redress mechanisms to receive complaints and feedback are established and function in a collaborative manner and in a way that is complementary to GCF Independent Redress Mechanism, and requiring that any gaps or weaknesses be addressed*" and ensures that in relation to SEAH-specific complaints, "*grievance redress mechanisms need to be survivor-centered and gender-responsive."*[31]

43. The revised ESP also requires AEs to undertake all necessary measures to ensure that activities financed by the GCF are developed and implemented in such a manner that aligns with the SEAH provisions of the ESP (or similar requirements employed by the Accredited Entities that are equivalent to those of the GCF in all material respects) (Para. 19). This includes having in place an effective environmental and social management system (noted above) to assess the environmental and social risks and impacts associated with the activities and the means to subsequently manage these effectively and equitably (Para. 23).

44. The Complainant alleges that the risk of gender discrimination and tolerance of SEAH are evident by the manner in which the Protocol implementation was handled by the EE. Furthermore, these events as described in the Complaint suggest a wider practice at the EE of potential discrimination that appears to be at odds with the Project ESMF and associated risk management plans. The IRM will explore whether these alleged gaps were identified in the due diligence stages of the project in accordance with the ESP requirements.

GCF Gender Policy

45. The complaint raises concerns about the AE and EE commitments to implementing FP203 in a manner that is consistent with the requirements of GCF Gender Policy, which seeks to "(a) *enhance gender equality within its governing structure and day-to-day operations; and (b) Promote the goals of gender equality and women's empowerment through its decisions on the allocation of funds, operations and overall impact as outlined in the Gender Action Plan*." [32]

46. Consistent with the GCF Gender Policy and SEAH Prevention Policy, WWF-US and the EEs are required to ensure zero tolerance for Sexual Exploitation, Abuse and Harassment (SEAH), through proactive measures to build awareness, training, monitoring and reporting on incidents, as well as through the provision of a gender-sensitive GRM.

47. GCF requires under the Gender Policy that women and men be provided with equal opportunity to take an active part in stakeholder consultations and decision-making

[30] GCF ESP Para 8p.
[31] GCF ESP Para 12b, 12c and Para. 76-81.
[32] GCF Gender Policy Para. 20

during project preparation, implementation and evaluation; ensures that the design and implementation of GCF-financed activities are informed by the results of the gender assessments undertaken by the AE during the preparation of the activities; and requires that annual performance reports submitted by AEs on GCF-funded activities include progress made in implementing project-level gender action plans.[33]

48. At the project level, the Gender Policy outlines that AEs will be responsible for meeting the principles and requirements of the policy and supporting the implementation of the project-level gender action plan as it relates to the GCF-approved activity. GCF requires that AEs take the necessary measures to ensure periodic updates on the gender assessments and notify GCF when there are major changes in the design and execution of projects, or other circumstances that may affect the implementation of the gender action plan. AEs will also notify GCF of any changes in the project-level gender action plan; and GCF will require AEs to monitor and report on the progress made in implementing the project-level gender action plan.[34] At the project/portfolio level, GCF requires funded activities to address and reduce gender inequality, deepen stakeholder engagement and deliver better accountability to both men and women to generate sustainable livelihood opportunities, health and well-being, and resilience against climate-induced shocks and risks.[35]

GCF Revised Policy on the Prevention of SEAH and GCF Action Plan for Addressing SEAH

49. Under the SEAH Action Plan, GCF, when reviewing and approving proposals, requires AEs to undertake all necessary measures to ensure that activities financed by GCF are developed and implemented in a manner that aligns with the SEAH provisions of the revised ESP (or similar requirements employed by the AEs that are equivalent to those of the GCF in all material respects).

50. GCF also requires AEs to identify and reflect SEAH risks in relevant safeguards instruments, and include measures to enhance gender equality and to prevent, address and eliminate SEAH in relevant projects and programs. GCF requires AEs to implement, monitor and improve measures to mitigate and manage such risks, as well as to establish and operate accessible and inclusive survivor-centered and gender responsive GRMs, with procedures such as confidential reporting and ethical documenting of such cases and provision of timely services and redress to survivors.[36]

51. The SEAH Action Plan also outlines that the Secretariat will carry out monitoring, review and reporting in relation to the environmental and social performance (including SEAH) of GCF-financed activities, as may be required pursuant to the MAF, interim ESS, and the revised ESP.

Governance and Monitoring of Environmental and Social Risks and Impacts

52. As outlined in the ESMF, FP203 applies WWF's Social and Environmental Safeguards Framework (ESSF) in a manner that is consistent with the relevant GCF policies

[33] GCF Gender Policy Para. 20, 25d and 25e.
[34] GCF Gender Policy Para 27, 30c and 30d.
[35] GCF Gender Policy, Para. 12b.
[36] GCF SEAH Action Plan, Para 20, 21a and 21b.

outlined above and adheres to Colombian law. The ESMF provides a detailed approach to achieving these social and environmental risk management objectives for the HECO Project.[37] The ESMF indicates how landscape-level environmental and social impact assessments and management plans and other E&S risk management instruments will be completed in the early stages of project implementation.

53. Complementary to the ESMF, high-level coordination among Project stakeholders, continuous training, and a gender-sensitive grievance mechanism are pillars of the Gender Action Plan (GAP), anchored by the leadership of a dedicated Gender Specialist.[38] An ambitious GAP includes over 60 indicators to be monitored and reported in the APR, but without a specifically defined activity budget.[39]

54. The ESMF states that the EE holds primary responsibility for environmental and social risk management at the project activity level, under the supervision of WWF-US and the guidance of a five-member Project Steering Committee.[40] The contract between the EE and WWF-US, which the IRM has not seen, is an important governance link for transmitting the WWF-US environmental and social expectations to the EE and any observations or adjustments regarding the alignment between the safeguard policies of the EE and those of WWF-US.

55. The Complaint references actions taken by the EE and AE to carry out these social and environmental risk management responsibilities in the first year of project implementation, which focus on staff recruitment, the design and consultation of safeguard procedure and guidance materials, and related training activities.

56. From internal documentation, the IRM understands that activities during the first year of implementation focused on establishing and training the PMU, mapping and dialogue with potential stakeholders, and updating or designing safeguard instruments, including a project grievance mechanism. As an important milestone, the EE approved and launched a Protocol for Prevention and Attention to Gender-Based Violence and Sexual Harassment (the Protocol) in June 2024.[41] According to the Complainant, the Protocol was viewed as foundational to the progress made in implementing and mainstreaming the gender-sensitive perspective across the Herencia Colombia Project.

57. Based on reviewed preliminary non-public information, the IRM observes that relevant aspects of the reported progress on implementation of environmental and social safeguards are contested, in part by allegations raised in the Complaint. The Complaint draws attention to the differences in what is reported by the EE in terms of the systems in place to identify and respond to the risk of GBV and SEAH as well as

[37] WWF, Herencia Colombia Marco de Gestión Socio-Ambiental (ESMF) Feb. 2, 2023. https://files.worldwildlife.org/wwfcmsprod/files/Publication/file/72rwdlv78l_Environmental_and_Social_Management_Framework_ESMF_.pdf

[38] WWF, HECO FP 203, pgs. 182-184 and Gender Action Plan, pgs. 5-6.

[39] The Gender Action Plan outlines these indicators and states that GAP activity budget is integrated within the overall HECO Project activity budgets.

[40] WWF HECO ESMF, pgs. 78-83.

[41] See https://patrimonionatural.org.co/wp-content/uploads/2024/07/Protocolo-de-Prevencion-y-Atencion-de-Violencias-Basadas-en-Genero-y-Acoso-Sexual-08-07-2024.pdf

the accessibility of the newly launched Protocol as a Gender-sensitive GRM to project staff and external stakeholders.

58. At this compliance appraisal stage, the Complainant's assertions, when viewed alongside currently available internal documents, provide *prima facie* evidence of Project non-compliance with PS 1 of the interim ESS regarding management of environmental and social risk during Project FP203 implementation. The IRM observes that while the WWF-US and the Project EEs have made progress to address advance actions in the overall environmental and social management framework, gender action plan, grievance mechanisms, and labour and working conditions, information provided by the Complainant and other sources suggests that the reporting of implementation progress may not provide a complete picture of monitoring in this period.

59. The IRM has outstanding questions about the roles of WWF-US and GCF in assessing and monitoring the design and implementation of a) the gender action plan; b) the grievance mechanisms to be made available to stakeholder and workers; and c) the minimum labour and workplace requirements for EE staff.

60. Particularly with regard to the Gender Action Plan, the IRM has reason to believe that early impediments to the launch of the Protocol may have been indicative of the misalignment between the scope of an ambitious Gender Action Plan and the dedicated institutional capacity of the EE to implement it. The IRM will therefore examine the level of due diligence of EE capacity to assume the responsibilities for effectively carrying out the Gender Action Plan during the compliance investigation.

61. Furthermore, the IRM will explore whether the Secretariat's monitoring of Project performance has been adequately informed by the risk represented by the existence of complaints regarding EE-related labour issues to the accountability mechanisms of different institutions. The IRM concludes that there is *prima facie* evidence of Project non-compliance with relevant policies under the Interim ESS and 2021 Environmental and Social Policy.

Project grievance redress mechanism(s)

62. PS 2 includes requirements for the establishment of workplace grievance mechanisms for all workers, including contracted workers. It further requires clients to ensure that in cases where third parties employing such contracted workers are not able to provide a grievance mechanism, the client will extend its own grievance mechanism to serve the workers engaged by the third party.[42]

63. Other pertinent provisions of PS 2 include para. 24, which provides that with respect to contracted workers (which as discussed above may arguably include the workers of the EE), 'the client' is to take commercially reasonable efforts to ascertain that the third parties who engage these workers are *"reputable and legitimate enterprises and*

[42] IFC Performance Standard 2, para. 26

have an appropriate ESMS"[43] that will allow them to operate in a manner consistent with key provisions of PS 2, including its requirements for grievance mechanisms.[44]

64. GRM performance also relates to Project compliance with PS 1, and with GCF's responsibilities under the ESP regarding identification and mitigation of risk; the GCF Gender Policy and SEAH Action Plan required provision of a gender-sensitive GRM; and associated monitoring responsibilities.

65. The Complainant states that allegations of gender-based violence were not properly addressed by the recently-launched Protocol (Protocol) or the existing workplace GRM. The Protocol, which was approved by the EE and WWF-US, defines the scope of application to "*employees, contractors, subcontractors, suppliers, and personnel who provide services or are involved in Natural Heritage projects or programs, and its application is related to work or as a result of work*." [45] Based on preliminary, non-public information, the IRM understands that the Protocol was developed in response to requirements, both from the GCF and the country's national regulations, to create a grievance mechanism that is sensitive to the needs for preventing and handling gender and sexual harassment complaints. The IRM concludes that the Project GRM encompasses or integrates the Protocol and should be treated similarly regarding assessment of compliance with GCF policies.

66. The Complainant was instrumental in the design and rollout of the Protocol, including a staff survey that revealed multiple alleged cases of SEAH/GBV among the responses by EE staff. The complainant alleges that trainings designed to raise awareness among EE staff about the Protocol and its integration in the design of Project activities were abruptly cancelled after a tense exchange between a workshop participant and the facilitator regarding disagreement over the definition of SEAH. Recommendations to activate the Gender-Based Violence and Sexual Harassment Prevention and Response Committee to address the allegations of GBV/SEAH were unsuccessful due to apparent disagreement among Committee members over the ability to process anonymous reports. These events indicated for the Complainant a lack of institutional commitment to implement the Protocol in response to a circumstance for which it was specifically designed.

67. These statements, along with internal documents reviewed by the IRM, call attention to the inconsistency between Complainant and WWF-US accounts for the actual progress of development and operationalizing a gender-sensitive GRM that meets GCF policy requirements. Beyond warranting further investigation, these inconsistencies suggest shortcomings in the initial stages of GRM and Protocol development and evidence of performance that does not satisfy GCF policies, raising questions about EE's capacity to provide an adequate GRM to Project stakeholders.

[43] IFC Performance Standard 2, para. 24
[44] IFC Performance Standard 2, paragraphs 20, 24 and 26
[45] FPN, Protocolo para la prevención y atención de violencias basadas en género y acoso sexual. 8 July 2024.

68. The IRM is aware that the PMU has not finalized the design of a project-level GRM, within which the Protocol should be integrated. These issues are *prima facie* indicative of potential shortcomings in the Project GRM at the EE.

69. Based on reviewed, preliminary non-public information, the IRM believes that WWF-US has not yet fully accounted for these aspects of the process of developing the Protocol. The IRM concludes that there is *prima facie* evidence of Project non-compliance with PS 1 and PS 2, as well as GCF Gender Policy and SEAH Action Plan regarding the worker grievance mechanism available to project workers at the time of the Complainant's employment.

Assessment and management of risks regarding labour and working conditions

70. The HECO Project Gender Action Plan, the ESMF, the GBV/SEAH Prevention and Response Protocol and internal documentation all suggest that these commitments are a central pillar in the project theory of change. Internal documentation suggests to the IRM that the Project team has indicated to GCF positive progress toward establishing the foundation of achieving these workplace labour and working condition commitments in practice.

71. However, the issues raised by the Complainant paint a different picture. The Complainant identified actions taken by the EE that they believe constitute harassment and retaliation for efforts taken to implement the Gender-Based Violence and Sexual Harassment Prevention and Response Protocol. The Complainant describes an escalation of events (noted above) that began with the apparent resistance by EE management to address the allegations of SEAH/GBV by current or former staff.

72. The Complainant alleges unauthorized IT department access to their computer, which contained sensitive information related to confidential GBV/SEAH complaints. On 2 October 2024, the Complainant reported the theft of headphones from their workspace. On 15 October 2024, the Complainant was locked out of their computer system. The apparent reason for losing access to their files was reported as an unannounced removal from the EE online system by the IT administrator, which led to a decision by IT to reformat the Complainant's computer.

73. These events are perceived by the Complainant as harassment and retaliation for their efforts to address GBV and SEAH within the EE. Statements by the EE to the IRM that suggest that these events were not unusual and were authorized by the Complainant.[46] The concern raised by the Complainant alleges that the instances of IT access to information on their computer occurred at the time of heightened tensions surrounding the use of the Protocol to address alleged GBV/SEAH allegations. The IRM is satisfied that this claim regarding the events leading to computer access that the Complainant views as unauthorized is *prima facie* evidence of workplace harassment and retaliation that deserves further investigation.

74. On 18 January 2024, the Complainant was informed that their one-year contract would not be renewed. The EE has indicated that the rationale for the contract

[46] IRM' - Case C0015-Colombia – formal letter of response to the Green Climate Fund 'GCF'. Aug. 1, 2025.

termination was related to contract language that justifies the decision based on the risk due to unnecessary tensions that the Complainant would create with project partners.

75. Following the events leading up to this decision, the Complainant believes that the decision by the EE to not renew their contract was another measure of retaliation for the work that the Project hired them to do. This perception is reinforced by the abrupt cancellation of Protocol training workshops and the apparent resistance to addressing the GBV/SEAH allegations. The IRM considers that taken as a whole, these acts can communicate a failure to meet the requirements under relevant policies related to GBV/SEAH within the EE, contributing to what the complainant has described as an increased sense of perpetrator empowerment and victim resignation.

76. The Complainant also learned upon joining the HECO Project Team at the EE that their position was compensated at a significantly lower level than other staff within the Specialist category, despite the perception of having higher qualifications and greater experience. The perceived pay gap was exacerbated by the higher cost of living in Bogota compared to the city from which they were asked to relocate without financial assistance. Despite a request to renegotiate salary, the Complainant was advised that no adjustment would be made prior to contract renewal. Furthermore, the EE alleges that the terms of the contract were determined through an objective methodology based on the specific job description and responsibilities for a senior professional role with no reporting staff and limited autonomy.[47] The IRM therefore takes the Complainant claim of pay inequity as *prima facie* to warrant further examination of potential non-compliance with PS 2 requirements of ensuring workplace non-discrimination and equality of opportunity.

77. The Complainant notified EE management of their complaint regarding alleged harassment and submitted a grievance through a WWF-US complaints channel. However, the Complainant declined to submit a grievance through the EE, including the Protocol, based on a lack of trust in the EE track record of complaint management and the expectation that their complaint would not be handled properly.

78. The IRM notes that the Complainant contract with EE makes no mention of a workplace grievance mechanism, although a clarification note by the EE claims that multiples channels were available to the Complainant at the time. The Complainant declined to use the Protocol. The EE cites the non-use of the GBV/SEAH Prevention and Response Protocol by the Complainant as the reason why the aspects of the complaint were not known or responded to by the EE.

79. Finally, the Complainant has indicated to the IRM that HECO Project stakeholders have sought to undermine the reputation of the Complainant within the relevant community of practice with the intention of creating barriers to future employment. The IRM has no current documentation to affirm this claim, however, it observes that it is consistent with reasonable claims of workplace harassment that suggest that such potentially retaliatory measures post-contract non-renewal deserve greater scrutiny.

[47] IRM' - Case C0015-Colombia – formal letter of response to the Green Climate Fund 'GCF'. Aug. 1, 2025.

80. IRM finds that this account of events and the lack of evidence to the contrary provide *prima facie* evidence that the EE allowed actions toward the Complainant that can be viewed as harassment and retaliation.

81. The Complainant alleges that the acts of retaliation, harassment and lack of proper support by Project supervisory staff have contributed adverse personal impacts in the form of an extreme level of stress in the final months of employment and greater difficulty in transitioning to subsequent employment.

82. The IRM concludes that *prima facie* evidence of WWF-US and EE actions that may be perceived as harassment and retaliation toward the Complainant may constitute Project non-compliance with GCF operational policies and procedures, particularly alignment with provisions of PS 2 regarding 'reasonable terms of employment'.

83. The complainant's assertions raise questions about the adequacy of management systems at the EE and WWF-US to ensure compliance with applicable provisions of PS 2 and Colombian Labour Law, and therefore the effectiveness of workplace risk mitigation under PS 1 at the EE, as well as implementation of the GCF's monitoring requirements under the 2015 MAF and the 2018 ESP.

Conclusions

84. The IRM concludes that there is *prima facie* evidence of Project non-compliance with provisions of PS 1 regarding the assessment and management of risk relating to labour and working conditions and grievance mechanisms. There is also *prima facie* evidence of Project non-compliance with provisions of PS 2 regarding contract workers in relation to the grievance mechanism available to workers at the Project EE, and provisions of PS 2 relating to the labour and working conditions of contract workers. There is also *prima facie* evidence of Project non-compliance with provisions of the GCF Gender Policy, which calls for a gender-sensitive GRM to be provided to all project stakeholders.

85. The complainant told the IRM that since their employment with the EE ended, they have not found a new role. The complainant refers to psychological distress and social problems resulting from their dismissal, and perceived efforts by the EE to disparage their professional reputation as a way of preventing them from obtaining new employment in their field. They have provided documentary support to the IRM in support of certain aspects of their claim. In the absence of a site visit at this stage, it has not been possible for the IRM to discuss in detail the adverse social impacts that the complainant has referred to. The IRM is at this stage satisfied that the averred adverse impacts are plausible and merit further clarification.

86. The complainant has suggested to the IRM that they have been discriminated against based on gender. Based on its conversations with the complainant, the IRM has formed the preliminary view that the manner of the complainant's dismissal has gender implications which may have exacerbated the adverse impacts that the complainant has described. These implications also merit further clarification.

87. The IRM finds that there is *prima facie* evidence that adverse impacts to the complainant resulted from the non-compliance of FP203 with GCF operational

policies and procedures reflected in GCF's applicable responsibilities under the 2021 Environmental and Social Policy, Performance Standard 1 of the interim ESS and (to the extent determined applicable upon further consideration to labour and working conditions and the worker grievance mechanism at the EE), Performance Standard 2 of the interim ESS, the Gender Policy and SEAH Action Plan.

88. With respect to the issues that the appraisal has assessed for compliance investigation, the IRM will review the design, due diligence and monitoring actions of Project teams to identify if there is non-compliance with GCF operational policies and procedures and if so, determine the link that may exist between these areas of possible non-compliance and the adverse impacts that the complainant has described. Additionally, where non-compliance is identified, the IRM may make broader recommendations or suggestions to promote lesson learning and systematic improvements to address future risks of non-compliance.

89. Considering its findings and conclusions, the IRM will now commence a compliance investigation, the scope of which is set out below, to investigate the matter further and reach final findings on the issues.

V. SCOPE OF THE COMPLIANCE INVESTIGATION

90. The purpose of compliance investigation is to assess the merits of the Complainant's allegations. The questions that will be investigated through the compliance investigation are as follows:

    a. Were the adverse impacts experienced by the Complainant because of the non-renewal of their employment with the EE caused by the non-compliance of Project FP203 with applicable provisions of the 2021 Environmental and Social Policy, and/or PS1 and/or PS2 of the GCF's Interim Environmental and Social Safeguards and Gender Policy?

    b. Did the requisite due diligence on overall ESS governance arrangements in relation to FP203 meet the requirements of the Updated Project and Programme Cycle and/or GCF's Interim Environmental and Social Safeguards, so far as relevant to the issues raised by the Complainant in respect to the GBV and SEAH Prevention Protocol, the Project Grievance mechanism, and the institutional capacity to achieve the wider commitments in the project Gender Action Plan?

    c. Was an adequate assessment of the capacity of the AE and EEs to adhere to GCF policy requirements conducted with regard to provision of suitable GRM and SEAH protections to external stakeholders in the HECO project?

    d. Did the Secretariat undertake adequate monitoring of AE reporting and of Project performance regarding the GRM and labour and working conditions at the EE as required under the 2015 Monitoring and Accountability Framework and the 2021 Environmental and Social Policy?

e. Were site-level GRM and labour and workplace conditions aligned at relevant times with applicable GCF policies and procedures; in particular under PS 1 and PS 2 of the GCF interim Environmental and Social Safeguards, the Gender Policy and related guidance notes?

91. As part of its compliance investigation, the IRM will seek information, as appropriate, from all relevant stakeholders and witnesses, including the Complainant, the Secretariat, the NDA, AE (WWF-US), Executing Entities (WWF-CO, FPN), other stakeholders in possession of relevant evidence, and other independent panels of the GCF. The compliance investigation may include document review, meetings, discussions, site visits, gathering physical and documentary evidence, and obtaining expert opinions.

92. At the conclusion of its investigation the IRM shall prepare a compliance investigation report for submission to the Board of the GCF. The report shall include such recommendations on remedial actions as are appropriate in the light of the findings of the IRM.

93. The timeframe for completion of the compliance investigation report shall adhere to the timebound requirements of the IRM, with provision for comment by the Complainant, the AE, and the Secretariat.[48]

VI. OBSERVATIONS

94. The IRM would like to draw the following observations to the attention of the Board and the Secretariat.

95. The IRM takes note that some grievance-handling processes may be ongoing in parallel to the IRM process that could be seeking to address raised concerns. The IRM understands that some matters may be referred to the Accredited Entity (AE) for further review and action.

96. The IRM is aware that WWF-US has initiated a review into some aspects of the complaint. WWF-US provided relevant information for the IRM to consider during its investigation. Such information will be used in accordance with relevant confidentiality requirements, if needed, in the course of the compliance investigation. The IRM is in communication with the AE to ensure mutually efficient and proactive communications on key procedural steps.

97. The IRM calls attention to the statement published by the Green Climate Fund on 19 August 2025 reaffirming the GCF's commitment to providing a space where individuals feel safe to raise objections to and concerns about GCF-financed projects.[49]

98. The IRM recalls the requirements of GCF's Policy on the Protection of Whistleblowers and Witnesses, specifically the zero-tolerance policy for any form of retaliation, which

[48] See IRM PGs, para. 50-70.

[49] The Green Climate Fund reaffirms its commitment to zero tolerance against retaliation | Green Climate Fund

includes intimidation, against current or former employees who engage in protected activities, including interacting with the IRM to provide relevant information under its case processing mandate

Disclosure of environmental and social performance

99. Under paragraph 12 of 2021 ESP, GCF is responsible for confirming that information related to environmental and social safeguards of activities is appropriately disclosed under relevant policies and working with AEs to address any gaps or weaknesses.

100. The current draft version of the first APR (2024) for FP203 is under review by the GCF. Eventual disclosure of the APR is expected to provide additional insight into the nature of Project compliance with GCF policies.

101. The IRM has not yet reviewed the revised GRM proposal that is being prepared by the EE. The centrality of effective GRM operation to the compliance review underscores the IRM's interest in the steps underway to finalize and launch the proposed Project GRM.

Approved by:

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