

PROCEDURES

FOR THE

ETHICS COMMITTEE

OF

THE

INTER-AMERICAN DEVELOPMENT BANK

March 1, 2006

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**PROCEDURES
FOR THE
ETHICS COMMITTEE
OF THE
INTER-AMERICAN DEVELOPMENT BANK**

I. Responsibilities, Composition and Functions of the Committee.

100. Responsibilities and Authority.

The Ethics Committee (the “Committee”) is responsible for interpreting, implementing and enforcing the Code of Ethics of the Inter-American Development Bank (the “Bank”), as such Code was adopted by the Bank on March 1, 2006 (the “Code”). These responsibilities are exercised pursuant to authority granted to the Committee by the Code. The Committee may act on its own initiative, at the request of an employee or other office, department or body of the Bank, or on the basis of information provided by a another party. The Committee shall carry out its responsibilities in accordance with the procedures set forth in this document (“Procedures”).

101. Relationship to other Bank Bodies.

a. In order to coordinate activities and to avoid overlaps and/or conflicts in jurisdiction, the Committee shall, at its discretion, consult with other offices, departments and bodies of the Bank, including but not limited to the Oversight Committee on Fraud and Corruption and other Bank Committees (each, a “Bank Body”).

102. Composition, Selection and Organization.

a. The Committee is composed of five (5) members, all of whom are appointed by the President of the Bank. The composition of the Committee will reflect the diversity of Bank staff.

b. The President (i) shall directly appoint three (3) members of the Committee and an alternate for each such member; and (ii) shall appoint two (2) members and an alternate for each such member from a list of candidates presented by the Bank’s Staff Association (the “Staff Association”). The list drawn up by the Staff Association shall contain at least three (3) candidates per member and alternate. The appointment of a member to succeed a member who was selected by the President shall be made directly by the President. The appointment of a member to succeed a member who was selected from the list drawn up by the Staff Association shall also be made from a list drawn up by the Staff Association.

c. Appointments to the Committee shall be made keeping in mind conflicts of interest so as to preserve the integrity of the Committee’s process. Employees assigned to the Office of Institutional Integrity (“OII”); the Legal Department; the Office of the

Auditor General; the President, Vice President and members of the Board of Directors of the Staff Association; and in general, persons dealing with counseling management on labor matters are not eligible to be members of the Committee.

d. Only employees with at least five (5) years of service to the institution will be appointed as Committee members. In appointing the members of the Committee, the President shall appoint at least one member at an executive level and at least one member having extensive field office experience.

e. Members of the Committee serve for a period of three (3) years, with the possibility of reappointment, and may not serve more than two consecutive periods. For the purpose of continuity, the terms of the members of the Committee shall be staggered. One of the first members and his or her alternate appointed by the President and one of the first members and his or her alternate appointed from the Staff Association list shall serve an initial term of two (2) years. Thereafter, they may be appointed for a second term of three years. In the absence of a member, the alternate member appointed shall serve in the Committee.

f. If a position shall become vacant prior to ninety (90) calendar days before the expiration of the term, then the President shall appoint a successor to complete the term following the procedures of Section 102.b. Such a successor shall be eligible for one additional three-year appointment.

g. The Committee shall elect its Chairperson and Alternate Chairperson (“Chair” and “Alternate Chair”) from among its members. In the absence of the Chair, the Alternate Chair shall serve as acting Chair. No member shall serve as Chair, or as Alternate Chair, for more than three (3) years.

103. Functions.

a. The Committee has the following functions:

- 1) interpret the Code and provide guidance, support and counseling to Bank employees in all matters related to the Code;
- 2) consult with employees and issue authorizations to engage in conduct subject to the Code as required or permitted by the Code;
- 3) receive allegations of violations of the Code, determine whether the allegations require investigation, and obtain the information needed to determine whether the Code has been violated through hearings or investigations by OII or other appropriate mechanisms;
- 4) review the results of any investigation, hold hearings and make a decision as to whether there has been a violation of the Code;

- 5) in the case of a violation of the Code, impose an administrative sanction, prescribe remedial action, or recommend disciplinary action to the Vice President for Finance and Administration (“VPO”);
 - 6) administer and monitor the implementation of its decisions and recommendations and receive reports, requests, and information as indicated in the Code;
 - 7) recommend amendments to the Code;
 - 8) approve an Annual Report of the activities of the Committee, promote availability of relevant public information on the Committee’s activities, and provide assistance as requested by the President in training and awareness-raising programs for Bank employees concerning the application of the Code; and
 - 9) perform such other functions as may be necessary to carry out the implementation and oversight of the Code including through the functions enumerated above.
- b. In carrying out these functions, the Committee may coordinate with other Bank Bodies.

104. The Secretary of the Committee.

- a. The President shall appoint as a Bank staff member a person of professional competence and integrity to serve as Secretary to the Committee. The Secretary shall not be a member of the Committee and shall not have a vote on the Committee, but shall have the following responsibilities:
- 1) receive, on behalf of the Committee, any allegations, complaints, consultations, information, reports and requests for authorizations, and notify members of the Committee of their receipt;
 - 2) provide, when circumstances so warrant, immediate assistance or preliminary guidance, or a response to concerns, questions or doubts concerning the Code. When applicable, the Secretary will inform the person contacting him or her that the assistance provided is preliminary and subject to review by the Chair and/or the Committee;
 - 3) prepare the agenda and detailed minutes of the meetings of the Committee, notify interested parties of the decisions of the Committee, and maintain the Committee’s files and records;
 - 4) keep record of the decisions of the Committee;

- 5) draft the Committee's Annual Report for consideration and approval of the Committee; and
- 6) perform other responsibilities as determined by the Committee, including activities to support the effective application of the Code.

II. Process and Procedures for the Committee's Advisory Activities.

201. Consultations and Authorizations.

a. Employees shall consult the Committee on all questions arising under the Code or relating to its interpretation and application ("Consultations"). Consultations shall be made with the Secretary of the Ethics Committee. Consultations to the Secretary may be made verbally or in writing; however, only written Consultations shall receive written responses or shall be considered by the Committee. All Consultations shall be recorded by the Secretary upon receipt and reported to the Chair. The fact that the employee requested a Consultation, and the response thereto of the Secretary or the Committee, shall be treated as confidential.

b. In the event that the Secretary of the Committee concludes that a written request for Consultation is not within the jurisdiction of the Committee, he or she will recommend to the Committee that the request be transferred to the appropriate Bank Body for consideration. If the Committee agrees, the employee will be advised of the decision to transfer the request.

c. The Secretary may, in his or her discretion when circumstances so warrant, provide an immediate response to a verbal inquiry on which the inquiring employee may rely, subject to a subsequent decision of the Committee, if appropriate. In those cases where the Secretary concludes that consideration of a written Consultation by the Committee is not required, the Secretary shall advise the Chair and, in consultation with the Chair, endeavor to provide a written response to such Consultation within ten (10) business days following the date of its receipt. When such a Consultation is reasonably characterized as urgent by the employee, and actions or decisions on the part of the employee depend on the response of the Committee, the Secretary shall endeavor to provide a more immediate response. In all such cases, the response shall indicate that the Committee has not considered the Consultation, and that the employee who requested the Consultation may request reconsideration by the Committee.

d. An employee who is not satisfied with the guidance received in response to a Consultation pursuant to paragraph (c) above may request, and shall be granted, reconsideration by the Committee, pursuant to paragraph (e) below, and for purposes of such reconsideration and the time-frames for responses thereto, the "date of receipt" shall be deemed to be the date of the receipt by the Secretary of the request for reconsideration. For the avoidance of doubt, such requests for reconsideration are neither related to nor governed by the procedures discussed in Section 402.4.

e. In those cases where the Secretary concludes that consideration of the Consultation by the Committee is appropriate, or where a request for reconsideration by the Committee pursuant to paragraph (d) above has been received, the Secretary shall advise the Chair and he or she shall convene a meeting of the Committee at such time as to allow the Secretary to provide a written response to such Consultation within thirty (30) calendar days following the date of its receipt by the Secretary. When a Consultation is reasonably characterized as urgent by the employee, and actions or decisions on the part of the employee depend on the response of the Committee, the Committee shall support the Secretary in providing a more immediate response.

f. Decisions of the Committee concerning interpretation of the Code shall be made by majority vote in the manner established in Section 402.1.

g. Employees who have consulted the Committee shall not be subject to administrative, remedial, or disciplinary measures for proceeding with actions that a reasonable person would believe to be consistent with the Code while a response from the Secretary is pending.

h. Decisions of the Committee concerning interpretation of the Code shall, to the maximum extent practicable and subject to maintenance of confidentiality, create precedent for the Committee's application of the Code in similar circumstances. Consistent application of the Code shall be promoted by publication of Committee interpretations and rulings as the Committee from time to time deems appropriate.

i. The Committee shall retain the authority to subsequently review and modify its decisions, including those authorizing employees to engage in particular activities when such modification is in the Bank's interest and in accordance with the Core Values established by the Code. When a previously-issued decision is modified or revoked, an employee shall not be sanctioned for having acted in reliance on such a decision. Notification that an authorization has been revoked shall indicate a time-frame for the revocation to take effect. The time-frame shall be determined on a case-by-case basis, providing the maximum notice possible to the employee consistent with the interests of the Bank and with the Core Values.

III. Process and Procedures for the Committee's Adjudicatory Activities.

301. Alleged Violations of the Code.

- a. The Code provides general guidelines for the reporting of alleged violations of the Code, and for the protection of employees who report a suspected violation in good faith with reasonable grounds for such suspicion.
- b. When the Committee receives an allegation of a violation of the Code (an "Allegation"), the Committee shall consider the Allegation in accordance with the procedures set forth in Sections 301.1 through 301.10 below.
- c. The Committee shall conduct its affairs, to the maximum extent possible, in a manner that ensures the privacy of both the person who submitted the Allegation and the person or persons alleged to have engaged in a violation of the Code.
- d. In the event the Committee decides that a violation has occurred, it may, pursuant to these Procedures, (i) impose an administrative sanction, (ii) prescribe remedial action, or (iii) recommend that the VPO take disciplinary action.

301.1 Receipt of Allegations.

Allegations may be submitted in person, by telephone, by email, by facsimile, or by regular mail to the Secretary, or to any member of the Committee who shall forward such Allegations to the Secretary. Individuals who report Allegations may do so anonymously or on a confidential basis. It is the Bank's policy to protect all employees from reprisal, including retaliation or other adverse action, when they act as "whistleblowers" and report alleged violations of the Code or other wrong-doing. Therefore, employees will not be subject to reprisal as a result of reporting a suspected violation of the Code. The reporting individual should have reasonable grounds for an allegation. Knowingly reporting of false information is contrary to the Code and may be the basis for disciplinary action. Allegations shall be deemed to have been received by the Committee as of the date they are received by the Secretary.

301.2 Acceptance of Jurisdiction.

Upon receipt of an Allegation, including a matter transferred to the Committee by the Oversight Committee on Fraud and Corruption, the Secretary shall immediately notify the Chair and the other members of the Committee. The Committee shall normally meet within ten (10) business days after receipt of an Allegation to review such Allegation and to determine, in its sole discretion whether such Allegation is within its jurisdiction, and if factually correct, whether it states a violation of the Code. Such determinations shall be made by majority vote in the manner established in Section 402.1.

301.3 Transfer to Another Bank Body.

If the Committee determines that an Allegation is not a matter within its jurisdiction, it shall transfer the matter to the appropriate Bank Body. In such cases, any applicable notices to affected employees shall be provided by the transferee Bank Body in accordance with its own rules and procedures. The Committee shall maintain a confidential written record of the action taken including the reason for the transfer.

301.4 Options for Action upon Acceptance of Jurisdiction.

When the Committee determines that a matter is properly within its jurisdiction, it shall proceed as follows:

- a) If the Committee determines that an Allegation does not state a violation of the Code, it shall dismiss the Allegation and notify, within five (5) business days of the determination, the submitting party and the person or persons alleged to have engaged in a violation of the Code (the “employee under review”) of the Allegation and the Committee’s determination. The Committee shall maintain a confidential written record of the action taken including the basis for such action.
- b) If the Committee determines that an Allegation, if factually correct, would state a violation of the Code, the Committee may request an investigation by OII.

301.5 Notice of Acceptance of Jurisdiction and Proposed Action.

In those cases where the Committee has determined that an Allegation, if factually correct, would state a violation of the Code and is within its jurisdiction, the Committee shall promptly notify the employee under review of: (i) the substance of the Allegation, (ii) the fact that the Committee has accepted jurisdiction of the matter, and (iii) the steps the Committee intends to take in connection with its investigation of the matter. In such cases where the Committee believes that such notification may jeopardize the Committee’s consideration or the investigation of the matter, the Committee shall defer notification to a later date; provided, however, that such notice shall not be given later than thirty (30) business days before the hearing described in Section 301.7.

301.6 Investigation.

- a. Initiation of the Investigation and Procedures. When the Committee requests an investigation by OII, it shall consult with OII regarding the scheduling, conduct and scope of an investigation (“Investigation”).
- b. Final Investigation Report. OII’s final report of any Investigation, which shall include findings of fact as well as a copy of all supporting evidence on which such findings are based (collectively, the “Final Investigation Report”), shall be submitted to

the Committee before it conducts any hearings on an Allegation, and before it makes a final decision in respect of an Allegation.

c. Leave with Pay during an Investigation. If the Committee determines, following consultation with the employee under review and other appropriate parties, that it is in the best interest of the Bank that the employee under review be relieved of his or her duties pending the outcome of an Investigation, the Secretary shall inform the Manager of the Department to which the employee under review is assigned, and shall notify the Manager of the Human Resources Department (“HRD Manager”) of the need to make the necessary arrangements for administrative leave with pay. Any determination that the employee under review should be placed on administrative leave prior to the Committee’s final decision in respect of an Allegation shall not be categorized as punitive and may not be used as evidence of violation of the Code.

d. Access to the Final Investigation Report. The employee under review shall be notified that the Committee has received from OII the Final Investigation Report no later than five (5) business days after the Committee has received such report. The employee under review shall also be notified of the opportunity to review the Final Investigation Report and any supporting material, including, if requested, translations and copies thereof.

301.7 Hearing.

a. A hearing before the Committee (“Hearing”) shall be held to offer the employee under review an opportunity to respond to an Allegation before the Committee makes a final decision in respect of an Allegation. The Committee shall endeavor to hold the Hearing at least thirty (30) business days after the employee under review has been notified of the possibility to review the Final Investigation Report and any supporting material, but no later than sixty (60) business days after such notification. The employee under review may waive the right to a hearing.

b. The employee under review may be accompanied by legal counsel or another representative when reviewing the files or appearing at the Hearing. However the counsel or representative may not answer on behalf of the employee under review.

c. The employee under review may present evidence relevant to the matter, including the testimony of witnesses and the submission of affidavits. If the witnesses have been heard as part of an Investigation prior to the Hearing, they shall be heard by the Committee only if the Committee determines that there is new information to be provided. In accordance with the duty of all employees to cooperate with the Bank on official Bank matters, witnesses called by the Committee shall be required to provide information requested by the Committee.

d. The employee under review shall be notified of the date and time of the Hearing no less than twenty (20) business days in advance thereof. The notice shall include:

- 1) any modifications to an Allegation or additional allegations resulting from the Investigation or that otherwise may have come to the attention of the Committee; and
- 2) procedures to be followed in relation to the Hearing, including a description of the process by which the employee under review may access information in the Bank's possession, and which is needed to prepare a response to the Allegation.

301.8 Decisions Related to Alleged Violations of the Code.

a. Conduct of Decisions. All decisions related to an Allegation shall be made by majority vote of the Committee in the manner established in Section 402.1. In order to decide whether the Code has been violated and what actions to take, the Committee shall consider the Final Investigation Report submitted by OII, the evidence presented by the employee under review at the Hearing, as well as any other factors or information it deems relevant, including the probative value of all the evidence and the opportunity given to the employee under review to respond to the Allegation and to present evidence in his or her favor.

b. Timing of Decisions. No final decision concerning an Allegation shall be made prior to the Hearing and consideration of the response, if any, presented by the employee under review.

The Committee shall reach a final decision in respect of an Allegation, and any action to be taken in accordance with that decision, within thirty (30) calendar days following the closing of the Hearing. The Committee may, in its sole discretion and upon notification to the employee under review, extend this time period for a period not to exceed an additional thirty (30) calendar days.

c. Penalties. In the event that the Committee decides that there has been a violation of the Code, the employee under review may be subject to (i) an administrative sanction, (ii) remedial action, and/or (iii) disciplinary action, at the determination of the VPO (each, a "Penalty").

As used in these Procedures, the term "administrative sanction" means an official letter of reprimand or censure from the Committee that is permanently placed in the personnel file of the employee under review; the term "remedial action" means the actions described in Section 302; and "disciplinary action" means disciplinary actions taken by the VPO, including but not limited to suspension without pay or with reduced pay, demotion or termination of employment.

The Committee is authorized to make all decisions with respect to the imposition of an administrative sanction or the prescription of remedial action. The VPO shall make any determination with respect to disciplinary action, based on the recommendation of the Committee.

The decision whether to impose a Penalty shall take into consideration all relevant facts and circumstances of the case, including but not limited to (i) the nature and seriousness of the violation, including the degree of damage to the Bank, (ii) the degree of intent of the employee under review to violate the Code, (iii) the prior record of overall conduct of the employee under review and whether the Code violation is a first time or repeat offense, and (iv) any other mitigating or aggravating facts or circumstances.

d. Content of the Decisions. The Committee's decision shall include a statement of (i) the conclusion reached as to whether the employee under review violated the Code, along with the evidence supporting that conclusion, and (ii) any Penalty. In issuing its decision, the Committee shall set forth the considerations on which its decision is based, including material evidence presented by the parties, and any other facts or circumstances that in the opinion of the Committee justify such decision.

301.9 Action Subsequent to the Committee's Decisions.

a. Notice of the Decision. A copy of the decision shall be provided by the Committee to the employee under review no later than ten (10) business days after the decision has been reached. The copy of the decision shall constitute formal notice to the employee under review of the decision.

b. Effective Date of the Decision. For the purpose of applicable time limits for requests for clarification and appeals, the effective date of the decision ("Date of the Decision") shall be deemed the date of the notice of decision, as described in paragraph (a) above.

c. Clarification or Reconsideration of the Decision. The employee under review may request clarification or reconsideration of the Committee's final decision as provided in Sections 402.3 and 402.4.

d. Disciplinary Action Taken by the Vice President for Finance and Administration. In the event that the Committee recommends disciplinary measures, the recommendation shall be submitted to the VPO for a determination on the disciplinary action to be taken, along with the complete file of the case. The decision by the VPO shall be made on the basis of the recommendation and record submitted by the Committee.

The VPO shall endeavor to determine the disciplinary action to be taken no later than ten (10) business days after receiving the case file from the Committee.

The decision of the VPO shall be submitted to the HRD Manager, for implementation, and to the Committee for its records. The HRD Manager shall provide a copy of the VPO's decision to the employee under review not more than five (5) business days following receipt of the decision.

e. Filing of the Decision and Supporting Documentation. If the Committee decides that an Allegation is unfounded, or that, if true, the violation does not merit imposition of a Penalty, a copy of the final decision made by the Committee shall be retained in the official records of the Committee but shall not be included in the employee's personnel file unless specifically requested by the employee.

In cases where the Committee decides that a violation of the Code has occurred and a Penalty is either imposed or recommended, a copy of the final decision made by the Committee shall be forwarded to the Human Resources Department ("HRD") for inclusion in the personnel file of the employee under review no later than three (3) business days following the expiration of the period during which the employee under review may request a clarification of the decision. In addition, a copy of the decision shall also be retained in the official records of the Committee.

When an administrative sanction is imposed, a copy of the letter of reprimand or censure shall be provided to the HRD Manager, for inclusion in the personnel file of the employee under review, along with a copy of the Committee's decision.

Copies of all supporting documentation shall become part of the personnel file of the employee under review, but, in the event that a copy of the Committee's case file is too large for physical inclusion in the personnel files maintained in HRD, such file shall be incorporated by reference into the personnel file of the employee under review.

f. As provided in Section 403, decisions made by the Committee and disciplinary measures taken may be appealed to the Bank's internal grievance system.

301.10 Confidentiality.

a. All information in the Committee's possession (that is not already public), including that related to the process of submitting, analyzing, investigating or deciding upon an Allegation, shall be treated as confidential. For the purposes of these Procedures, confidential treatment shall mean that the distribution of such information shall be limited to those individuals who require knowledge of the matter in the performance of their functions and to the employee directly affected by the decision of the Committee. Unauthorized disclosure of information or distribution of such material by any party, including those working with the Committee, may of itself be cause for disciplinary action.

b. Confidential Bank information made known to the employee under review for the purpose of preparing a defense to an Allegation shall remain confidential and the property of the Bank. Such information may not be made public or be used by the employee under review for any purpose other than preparation of defenses against an Allegation, or defenses of his or her rights before Bank authorities.

302. Remedial Actions.

a. The Committee may prescribe remedial action directed to reverse or reduce the effects of a violation of the Code, or to assure compliance with the Code. Remedial action may include, but is not limited to, prescriptions for:

- a) re-assignment of professional duties;
- b) revocation of authorizations previously issued; or
- c) requiring the employee under review to take actions designed to ensure compliance with the Code, including recusal, divestiture of assets, waivers and authorizations.

b. Decisions issued by the Committee requiring remedial action shall include a clear and detailed description of the basis for the required action and the time-frame for its implementation. Parties responsible for taking the corresponding remedial action shall report back to the Committee on the implementation of such action within five (5) business days following the deadline for such action established in the decision.

303. Reassignments, Excuse from Duties and Transfer of Functions.

When the Committee becomes aware, at the initiative of the employee under review or otherwise, of a situation where the Code requires an employee to be excused from a particular work assignment or reassigned to another Bank unit, the Committee shall issue the appropriate recommendations to the Manager of the Department concerned, or, where necessary, to the HRD Manager.

IV. Other Administrative and Procedural Matters.**401. Reports and Notices.**

- a. Information required to be reported to the Committee in compliance with the Code shall be received, recorded and maintained by the Secretary. Confidentiality of information shall be protected to the maximum extent practicable.
- b. Notices required to be given under the Procedures shall be made in writing.

402. Administration of Decisions.**402.1 Quorum and Voting.**

- a. Quorum for a meeting of the Committee for purposes of deciding upon Consultations or acceptance of jurisdiction shall be four (4) Committee members (or alternates). Quorum for a meeting of the Committee for purposes of deciding upon an Allegation shall be five (5) Committee members (or alternates). Alternate members shall have authority to vote only if members are absent.
- b. Decisions of the Committee shall be taken by simple majority vote, and any dissenting vote shall be recorded. The Secretary shall record all decisions.

402.2 Recusal by Members of the Committee.

Members of the Committee whose objectivity may be impaired by a personal or job-related interest in any matter before the Committee shall recuse themselves, or may be asked by the Committee to recuse themselves from participating in decisions on those matters.

402.3 Requests for Clarification.

Employees directly affected by a decision of the Committee in respect of Consultations or Allegations may submit to the Committee a written request for clarification of such decision within ten (10) business days following the date of response to a Consultation or the Date of the Decision regarding an Allegation. Such request shall specifically identify the matter requiring clarification. The Committee shall endeavor to respond to the request within five (5) business days following the date of receipt of the request.

402.4 Requests for Reconsideration.

Decisions of the Committee in respect of Consultations or Allegations may be reconsidered upon the request of the interested employee on the basis of new facts unknown to the parties, and unavailable to the parties through reasonable diligence, at the time the decision was made. Such requests must be submitted to the Committee within

thirty (30) calendar days of receipt of the information or notice that the information exists, and in any event not later than one (1) calendar year following the date of response to a Consultation or the Date of the Decision regarding an Allegation. The Committee shall endeavor to make a final determination on whether to reconsider its decision no later than thirty (30) calendar days following the presentation of the request for reconsideration. In the event that the Committee revises a previous decision, the revised decision shall include recommendations for appropriate means to remedy the actions that were taken.

403. Appeals and Records of Administrative Tribunal Decisions.

a. Decisions made by the Committee, or disciplinary actions taken by the VPO based upon recommendations of the Committee, may be appealed to the Bank's internal grievance system, subject to the terms of the applicable regulations.

b. The final decision of the Administrative Tribunal shall be included in the personnel record of the employee under review in the event a decision of the Committee, or a determination by the VPO based on a recommendation of the Committee, is appealed to the Administrative Tribunal, without regard to the Administrative Tribunal's resolution of the matter.

404. Amendments to the Code.

The Code and its Procedures may be amended by the President of the Bank. The Committee may propose amendments to the Code directly to the VPO. The Committee shall be consulted concerning any proposed amendments to the Code.

405. Annual Report and Dissemination of Information.

a. An Annual Report of the activities of the Committee shall be prepared by the Secretary of the Committee and approved by the Committee. The Annual Report shall be presented to the President during the first calendar quarter of every year.

b. To assure consistent application of the Code, the Report shall include a summary of all decisions made by the Committee and all interpretations of the Code issued during the calendar year. The summary of decisions finding that the Code was violated shall include a reference to the section of the Code found to have been violated and the Penalty imposed, if any, but shall not include the identity of the employee under review and any other employees affected by the decision.

c. Subject to the confidentiality provisions included in these Procedures, the Committee shall ensure wide dissemination of the Annual Report, and shall facilitate dissemination of other information contributing to a better understanding of the Code and its implementation. Dissemination may be made via the Internet, via distribution of the Annual Report to each employee, via periodic bulletins to staff or other appropriate means.

406. Travel Expenses.

Whenever the Committee requires the presence of an employee stationed in a Bank Country Office for proceedings of the Committee, it may require that arrangements be made for travel to the Bank's Headquarters as well as for payment of per diem in accordance with Bank rules for official travel.

407. Other Questions of Procedure.

The Committee shall determine any question of procedure necessary for the Committee to carry out its functions that is not specifically addressed in these Procedures.