ESIA Consulting LLC Ethics Integrity and Reporting Policy

Code: ESIA–PEID–01
Version: 1.0
Approval date: March 20, 2024
Approved by: President of ESIA Consulting LLC

1. Purpose

This Policy establishes the ethical principles that guide the activities of ESIA Consulting LLC and the mechanisms for reporting, assessing, investigating, and resolving complaints, reports, or suspected misconduct involving its personnel, consultants, contractors, subcontractors, suppliers, and other persons associated with its operations.

2. Scope

This Policy applies to all directors, employees, consultants, specialists, contractors, subcontractors, and suppliers of ESIA Consulting, regardless of the country, contractual arrangement, or project in which they participate.

Clients, participants in training activities, and other stakeholders who become aware of possible misconduct related to ESIA Consulting's activities may also use the reporting mechanisms established in this Policy.

3. Ethical principles

ESIA Consulting will conduct its activities in accordance with the following principles:

- Integrity, honesty, and transparency.
- Compliance with applicable laws, contracts, and standards.
- Professional independence, objectivity, and impartiality.
- Respect for human rights and human dignity.
- Equal opportunity, inclusion, and non-discrimination.
- Prevention of harassment, exploitation, abuse, and violence.
- Confidentiality and responsible protection of information.
- Prevention of conflicts of interest, fraud, corruption, bribery, and prohibited practices.
- Protection of health, safety, and the environment.
- Accountability and continuous improvement.

4. Matters that should be reported

The following matters, among others, may be reported:

- Fraud, corruption, bribery, collusion, coercion, or obstruction.
- Actual, potential, or apparent conflicts of interest.
- Falsification, alteration, or concealment of information.
- Misuse of resources, information, or intellectual property.
- Failure to comply with legal, contractual, or professional obligations.
- Discrimination, workplace or sexual harassment, exploitation, abuse, or violence.
- Retaliation against a person who raises a concern in good faith.
- Failure to comply with environmental, social, labor, health, or safety requirements.
- Breaches of confidentiality or data protection.
- Any other conduct contrary to this Policy or ESIA Consulting's values.

5. Channels for inquiries and reports

Inquiries, complaints, or suspected misconduct may be communicated through:

- Email: contactinfo@esiaconsulting.org.
- The form is available on ESIA Consulting's website.
- Written communication addressed to the President or to the ethics officer designated by ESIA Consulting.
- Direct communication with the relevant Project Director, unless that person is involved in the reported matter.

A report should describe the facts in as much detail as possible and include, when available, dates, persons involved, witnesses, and documents or other evidence. Incomplete information will not prevent its receipt and assessment. ESIA Consulting's website allows inquiries to be submitted without disclosing the reporter's identity.

6. Confidentiality and protection against retaliation

ESIA Consulting will treat reports confidentially and restrict access to information to those persons who must participate in the assessment, investigation, and resolution of the matter.

Retaliation will not be tolerated against any person who, in good faith, raises a concern, submits a complaint or report, provides information, or participates in an investigation. This protection will remain in effect even when the investigation does not substantiate the reported facts.

The deliberate submission of false or malicious information may result in disciplinary or contractual measures.

7. Receipt and initial assessment

Every communication received will be:

1. Securely recorded.
2. Reviewed to determine its nature, seriousness, and potential risks.
3. Assessed to identify any conflicts of interest.
4. Assigned to a competent and impartial person.
5. Referred for investigation when sufficient grounds exist.

When possible and appropriate, ESIA Consulting will acknowledge receipt of the communication and may request additional information.

8. Investigation

Investigations will be objective, timely, confidential, and proportionate to the nature of the allegations. They may include:

- Review of documents, communications, and records.
- Interviews with the reporting person, the persons involved, and witnesses.
- Analysis of contracts, deliverables, decisions, and evidence.
- Consultation with legal, technical, or institutional specialists.
- Preparation of findings and recommendations.

The person under investigation will have an opportunity to respond to the allegations, while preserving confidentiality, the safety of the persons involved, and the integrity of the investigation.

When a report concerns the President or a conflict of interest exists, the assessment will be assigned to an independent senior professional or external adviser with no involvement in the reported matter.

9. Resolution and corrective measures

When misconduct is substantiated, ESIA Consulting may take the following measures, as appropriate:

- Corrective or preventive actions.
- Training or strengthening of controls.
- Warnings or disciplinary measures.
- Replacement or removal of personnel.
- Suspension or termination of contracts.
- Recovery of resources or correction of information.
- Notification to the client, the IDB, or the competent authority.
- Other measures proportionate to the seriousness of the misconduct.

Decisions, supporting grounds, responsible persons, and follow-up actions will be documented.

10. Management of matters related to multilateral development banks

When a communication relates to a contract, selection process, or operation financed by a multilateral development bank, ESIA Consulting will comply with the reporting obligations established in the applicable contract and will cooperate with any investigation conducted by the relevant institution in accordance with its applicable procedures.

11. Records and information protection

ESIA Consulting will maintain records of communications received, assessments, investigations, decisions, and measures adopted. These records will be protected against unauthorized access, alteration, or disclosure and retained in accordance with applicable legal and contractual obligations.

Confidential, personal, or sensitive information concerning a report must not be entered into publicly available artificial intelligence tools.

12. Communication and compliance

This Policy will be communicated to personnel and consultants participating in ESIA Consulting projects. Where appropriate, it will be incorporated into induction processes, agreements with specialists, and contracts with subcontractors.

Failure to comply with this Policy may result in disciplinary, contractual, or legal measures. The resolution mechanisms established herein will not interfere with any applicable legal action.

13. Review and improvement

This Policy will be reviewed periodically and whenever relevant regulatory, institutional, or contractual changes occur. Lessons from its implementation will be used to strengthen internal controls and prevent recurrence of misconduct.

Approval

ESIA Consulting LLC hereby approves this Ethics, Integrity and Reporting Policy and commits to providing the resources and independence necessary for its implementation.

Name: Juan Carlos Vásquez Castro
Title: President, ESIA Consulting LLC



Signature: _____
Date: March 20, 2024