CEB

COUNCIL OF EUROPE DEVELOPMENT BANK
BANQUE DE DEVELOPPEMENT DU CONSEIL DE L'EUROPE

Integrity and Compliance Report 2022



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About the CEB

The Council of Europe Development Bank (CEB) is a multilateral development bank, whose unique mission is to promote social cohesion throughout Europe. The CEB finances investment in social sectors, including education, health and affordable housing, with a focus on the needs of vulnerable people. Borrowers include governments, local and regional authorities, public and private banks, non-profit organisations and others. As a multilateral bank with an excellent credit rating, the CEB funds itself on the international capital markets. It approves projects according to strict social, environmental and governance criteria, and provides technical assistance. In addition, the CEB receives funds from donors to complement its activities.

The CEB has 43 member states. It was established originally as a resettlement fund in 1956 by eight of the 15 member states that made up the Council of Europe at the time. The CEB is Europe's oldest multilateral development bank, and is legally and financially separate from the Council of Europe.

For more about CEB, visit
coebank.org/en/about/

Highlights in 2022

- CEB signs InvestEU guarantee agreement after passing the EU Pillar assessment
- Share of high and medium risk in overall exposure of CEB projects declines
- Adoption of a new Regulation on Data Protection
- Training on compliance and cybersecurity continues
- 10 Compliance Liaison Officers (CLO) continue as key contact points in CEB Directorates
- Co-operation continues strong, notably within key fora of the Council of Europe addressing money laundering and terrorist financing (MONEYVAL) and corruption (GRECO), as well as with other international bodies such as the OECD.

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Message from the Governor

Integrity is essential for the CEB's operations and its ability to support its member states, particularly in today's difficult times.



The Office of the Chief Compliance Officer (OCCO), as a stalwart in the Bank's "second line of defence", continued to play a key role in helping the Bank carry out its social mandate in 2022.

It achieved this first by strengthening the integrity due diligence process for projects related to the Bank's asset side and by supporting such process for its bond issuances, and second by contributing to the Bank successfully passing the EU Pillar Assessment. This achievement, in which the Compliance Office played a leading role as coordinator of three of the five pillars assessed, was instrumental for the CEB to become an InvestEU implementing partner, which will boost the Bank's risk-taking capacity and increase its loans for social projects.

By promoting the highest standards of integrity, the Compliance Office has continued to make a crucial contribution to the CEB's compliance risk management, helping it address major challenges, such as the COVID-19 crisis and the Ukraine refugee crisis in 2022. Its responsibilities encompass the management of both the Bank's financial and non-financial risks, such as money laundering, corruption, international tax evasion and avoidance, terrorist financing, misconduct, mis-procurement and fraud. OCCO also works hard to help guard the CEB against data breaches and cyberattack risks, which have multiplied in recent years, and in 2022 delivered a new Information Security Strategic Plan and Personal Data Protection Action Plan. In addition, the Compliance Office is entrusted with the principal investigative role in cases of possible non–compliance and, for training and building compliance awareness among the CEB's staff.

In 2022, OCCO concluded its work on the new CEB's Personal Data Protection Regulations approved by the Bank's Administrative Council, and on

OCCO continued to deliver high-quality solutions and successfully tackled all cybersecurity risks and crises.

the creation of a data classification and archival policy framework, for implementation at Bank level. Further progress was made in improving the effectiveness of the Complaints Policy and in finetuning the Complaints Handling Internal Procedure Project. In terms of information security, cybersecurity and personal data protection, OCCO continued to deliver high-quality solutions and successfully tackled all cybersecurity risks and crises. Moreover, in its capacity as information security safeguard, it developed and delivered the Information Security Strategic Plan and the Personal Data Protection Action Plan.

In 2022 the Bank's continued its active participation in international fora focused on integrity and compliance, thanks to its permanent observer status at MONEYVAL, GRECO, OECD Global Forum meetings, MDB Investigations meetings, MDB Personal Data Protection meetings, and ECCO and ENMO meetings with a particular focus on environmental, social and governance (ESG) factors in its core functions.

OCCO's actions in 2022 ensured that the CEB continued to operate in line with the highest standards of compliance, and maintained the full confidence of its counterparties, shareholders and other stakeholders. It set and reinforced ethical standards, and acted as an independent check, which is essential for integrity, and the Bank's own financial resilience, reputation and mission.

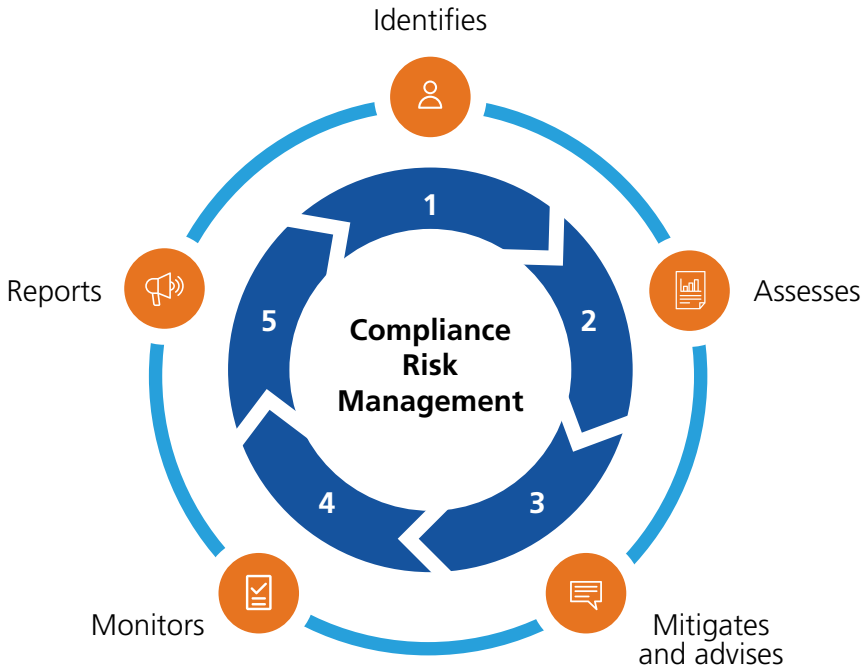
Carlo Monticelli
CEB Governor



Compliance: a key function of the CEB

The Council of Europe Development Bank (CEB) is deeply committed to promoting high standards of integrity, ethics, personal data protection and information security, with respect to its counterparties, procurement and business procedures, and internal activities. The success of CEB's social development projects relies on ensuring high standards in how it governs its institution, chooses the projects it invests in and engages with its shareholders, stakeholders, and partners. Integrity and compliance are essential for building public trust, and a key part of the CEB's environmental, social and governance (ESG) responsibilities. They are therefore important for guiding the CEB's Strategic Framework 2023-2027, which was endorsed by member states in December 2022.

Figure 1: **Compliance Risk Management**



As a financial institution with an exclusively social mandate, the Framework for CEB's Compliance Policy defines the priority objectives based on "prevention and advice" on the one hand and "control and investigation" on the other.

> **The compliance function is independent from all operational divisions of the Bank.**

To that effect, the mission of the Compliance Office is "to ensure that the Bank conducts its activities in compliance with its own rules, current legislation, Codes of Conduct, good practices and standards in order to avoid any risk of irregularity in the functioning of the Institution, of its Organs or its Staff".

The compliance function's purpose is hence to enable the CEB, as a multilateral development bank, "to limit its exposure to the risk of legal, administrative or regulatory sanctions, material financial loss or loss of reputation incurred in the event of non-compliance."



Compliance risks

The CEB's Compliance team assesses and manages the compliance risks for projects, grants, treasury operations and Bank's internal activities, according to three types of risk:

- Compliance risks: are risks of financial loss or loss of reputation that the CEB may suffer as a result of its failure to comply with laws, regulations, codes of conduct and best international practices;
- Conduct risks: are risks of losses to our institution arising from inappropriate conduct towards counterparties; stakeholders and the financial system, including cases of fraud, corruption, collusion, coercion, obstructive practices or misconduct;
- Reputational risks: are risks arising from a negative perception on the part of clients/counterparties, shareholders, stakeholders, investors, market analysts, rating agencies or other parties that can adversely affect the CEB's ability to maintain existing business relationships, establish new ones, and enjoy continued access to sources of funding.

The Office of the Chief Compliance Officer is specifically in charge of identifying, assessing, mitigating and reporting these risks on the basis of a number of Policies and Guidelines publicly available on our website. It oversees ethics and Codes of Conduct (updated in June 2021) that apply to colleagues, including to the Governor's office, staff and contractual partners, as well as to the Governing Board, Administrative Council and Auditing Board.

To find out more about the CEB Codes of conduct, please visit:
coebank.org/en/about/integrity-and-compliance/compliance-policies/codes-conduct/

The Compliance Office is also CEB's principal investigative unit specifically tasked with internal investigations for projects and staff misconduct (see also Ethics and integrity, page 13).

Compliance work in 2022

From data protection to governance and due diligence, to training and awareness, in 2022 the CEB completed a major process of modernisation and alignment with best international practices.

New governance of personal data protection

In 2022 OCCO underwent a significant regulatory overhaul regarding the field of Personal Data Protection, with the aim of aligning CEB regulations with best international practices generally and the 2018 upgrade of Convention 108+ of the Council of Europe on data protection in particular.

A **new CEB Regulation on Personal Data Protection** entered in force on 1 July 2022. It defines clear rules and principles regarding the management of personal data within the Bank. It takes into consideration globalisation and rapid technological developments, as well as fast-evolving international and European legal frameworks with respect to data protection.

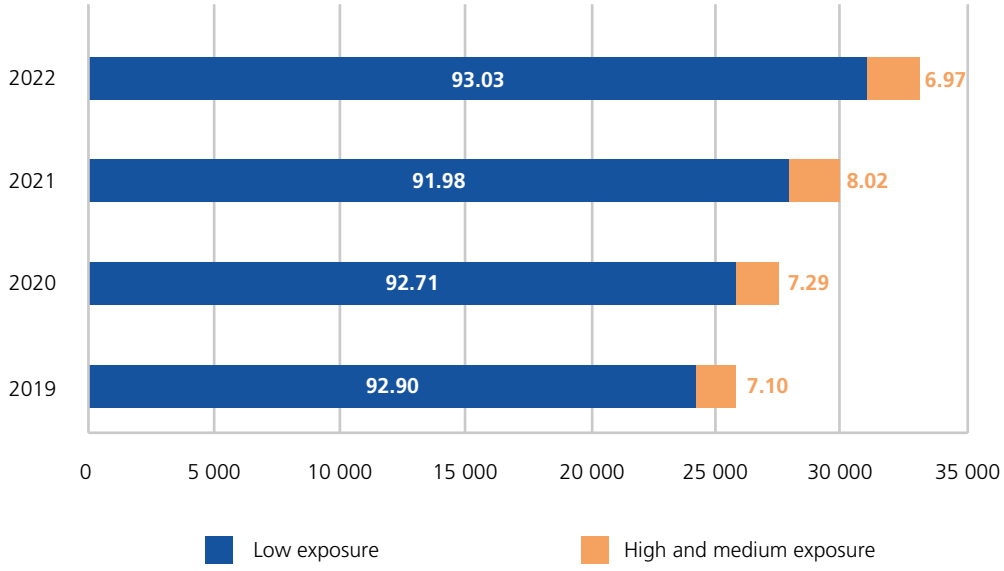
The new Regulation replaces the former Regulations on a System for the Protection of Personal data. In parallel, a **new governance was introduced**: the Data Protection Officer (DPO) role and responsibility now lie within the Compliance Office, while the functions and powers of the Data Protection Commissioner (DPC) were appointed to an independent Commissioner.

To find out more about the CEB Data Protection Regulations, please visit: coebank.org/en/about/policies-and-guidelines/regulations-system-protection-personal-data-ceb/

Project integrity

According to the annual **compliance risk assessment** (CRA) portfolio report conducted by the Compliance Office, overall risk exposure of CEB projects rose slightly in 2022, but the share of high and medium exposure declined from over 8% to below 7% (see Figure 2). The CRA exercise strengthens the prevention and detection of compliance risks, by subjecting each of the Bank's counterparties to a detailed compliance risk assessment resulting in an individual low, medium or high rating. For each case, the Compliance Office determines an individual type and level of due diligence to be applied on a risk-based approach.

Figure 2: **Compliance risk exposure**
Exposure to low, high and medium compliance rated counterparties for project loans and financing, in %



As well as the CRA, the Compliance Office conducts an AML/CFT tax good governance portfolio risk assessment each year. Its purpose is to identify, assess, and understand the risks and vulnerabilities in the areas of money laundering, terrorist financing, bribery and corruption, as well as tax and sanctions aspects.
Key inputs to this annual risk assessment are provided by CEB staff in banking services – these form the so-called "first line of defence". The Compliance Office analyses the inputs, and presents the findings in a final report to all internal stakeholders, including the Governor and the Auditing Board, as well as the CEB's collegial organs.

Whistleblowing

In 2022, the Compliance Office handled seven (7) complaints related to CEB projects; two (2) compliance missions were made; four (4) complaint cases were closed- and two (2) are open and ongoing.

The CEB received one (1) complaint related to data protection redirected to the Data Protection Commissioner.

The CEB aims to raise awareness and understanding of the issues of fraud and corruption, and related wrongdoings. The goal of CEB's **whistleblowing policy** is to ensure that information related to CEB projects is communicated in an efficient and professional way.

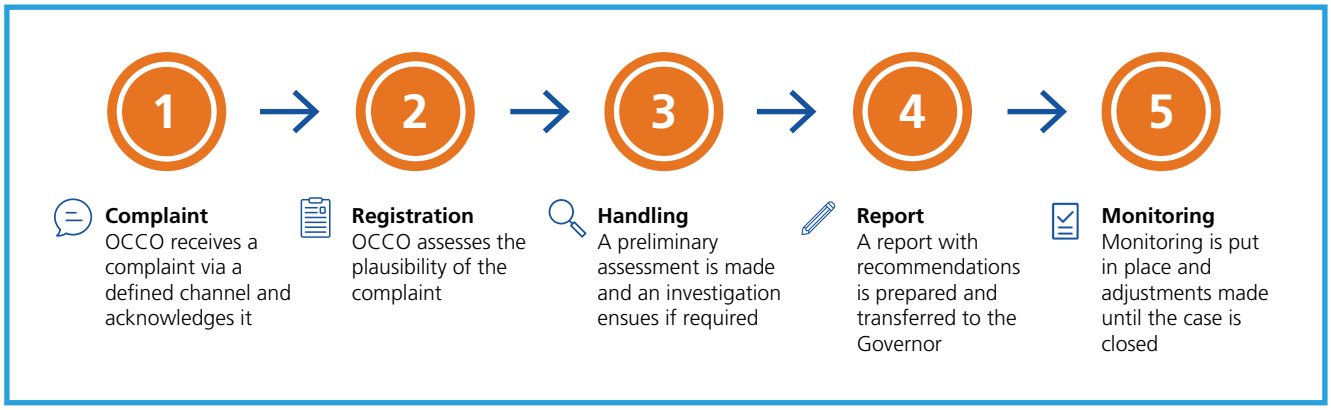
CEB whistleblowing policy aims to protect the institution from any kind of financial or reputational loss or misconduct, aligned with all the best international practices already adopted from peer institutions.

It does so by upholding professionalism and a culture of co-operation among all levels of personnel.
The policy also provides guidance on protection for internal and external whistleblowers. A dedicated public email address OCCO-whistleblowing@coebank.org has been established to facilitate contact, and is posted on the CEB website at coebank.org/en/about/policies-and-guidelines/whistleblowing-policy/.

To find out more, read the CEB Whistleblowing Policy, implemented in December 2015, by visiting: https://coebank.org/media/documents/Whistleblowing_Policy.pdf.

The Compliance Office is in charge of the handling of complaints related to projects on suspicions of fraud or corruption issues. A dedicated public email address compliance@coebank.org is available on CEB website and are monitored by the compliance team.

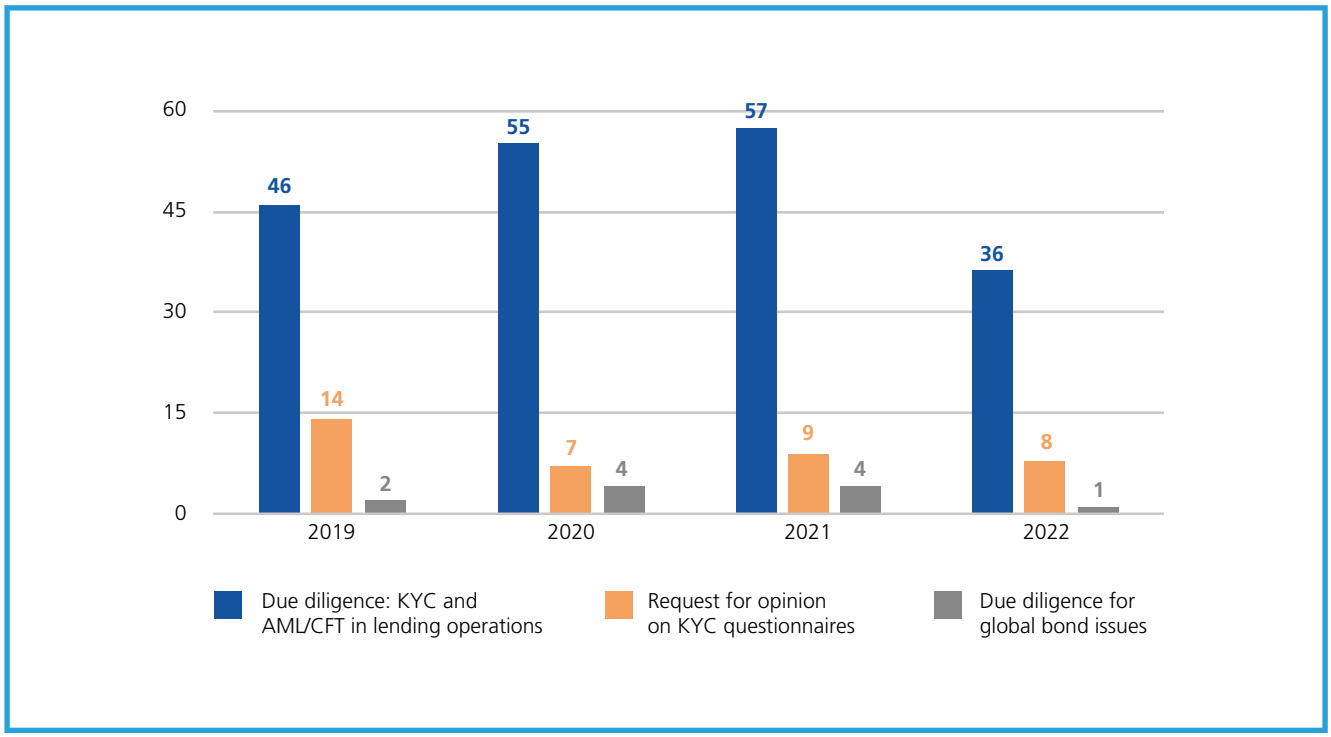
Figure 3: **The CEB complaint handling process**



Integrity due diligence

Out of the 36 projects approved by the Administrative Council, five (5) were classified as complex and required enhanced due diligence, 16 required standard due diligence, eight (8) required simplified due diligence, one (1) project was approved according to the COVID fast track procedure, and six (6) were Ukraine-related projects (see figure below).

Figure 4: **Due diligence**



Regarding the prevention in borrowing and treasury operations, the Compliance Office also helps with the interpretation and evaluation of Know Your Customers (KYC) questionnaires filled in by CEB counterparties and upon requests from operational divisions. In practice, this involves prior verification as to whether, in the case of interbank relations, the counterparties comply with the international rules on the prevention of money laundering (ML), terrorist financing (TF), fraud and corruption and whether they apply satisfactory standards to their own customers and counterparties regarding integrity due diligence and compliance with AML/CFT rules.

The CCO participates in the **due diligence process** of all CEB global bond issues covering sanctions, notably under the Office of Foreign Assets Control (OFAC) regime, anti-bribery and anti-corruption; the CCO also sets the policy framework, the internal procedures and the required compliance training, which the Compliance Office organises. In 2022, OCCO participated in one (1) due diligence process for CEB global bond issues.

Table 1: **Integrity due diligence checks of counterparties**

2019	2020	2021	2022
1 355	1 339	1 285	1 204

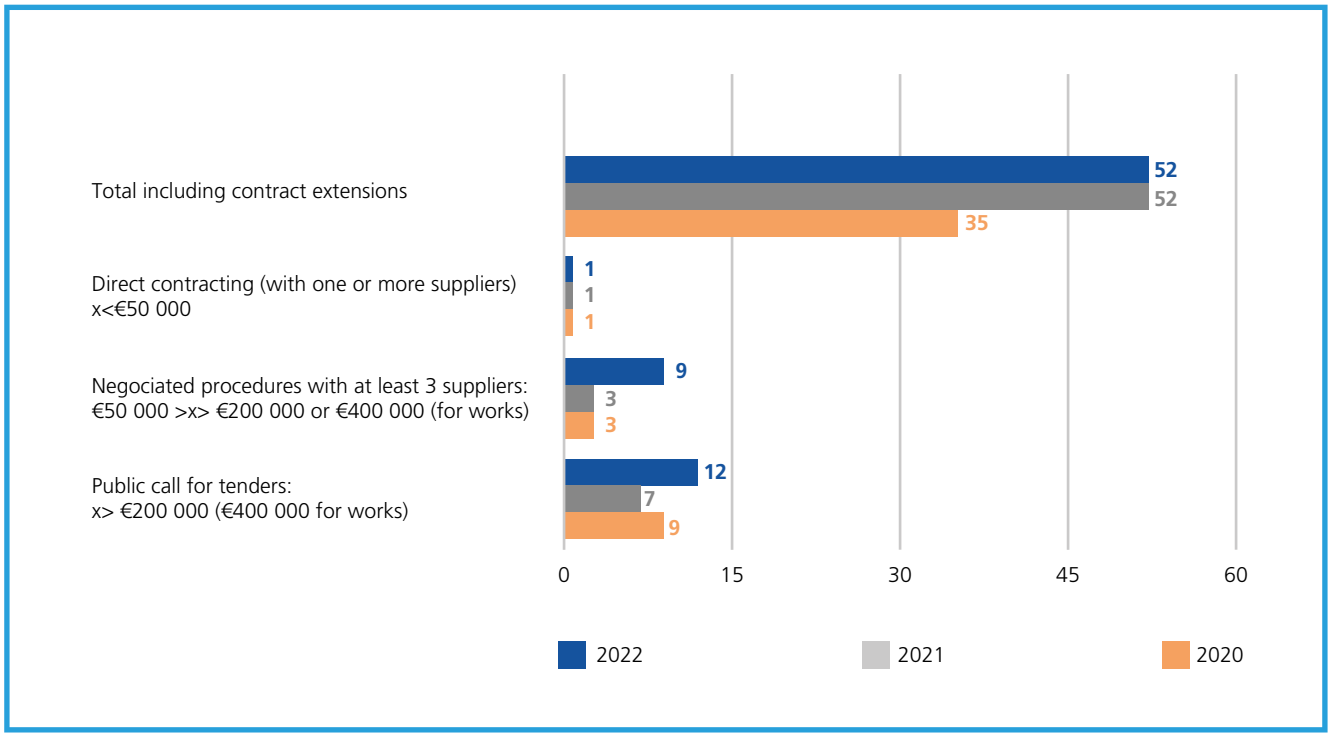
Compliance in procurement

The Compliance Office is involved in the procurement business cycle of the CEB with the aim to ensure validation of business needs according to amount thresholds, and acts as a control point at the preliminary stages of procurement processes, including for due diligence. The office contributes to the mitigation of procurement risks and endeavours to ensure transparency, fairness and integrity towards suppliers and third parties.

A total of 52 validations of the choice of procedure were approved by the CCO in 2022, including contract extensions (see Figure 5) and 12 public calls for tender, up slightly on 2020-22.

The Compliance Office receives all internal requests for validation of procurement contracts starting from the threshold of €50 000. It also issues advice and recommendations and is present as an observer in the internal evaluation committee.

Figure 5: **Procurement**
OCCO approval of the choice of selection procedure



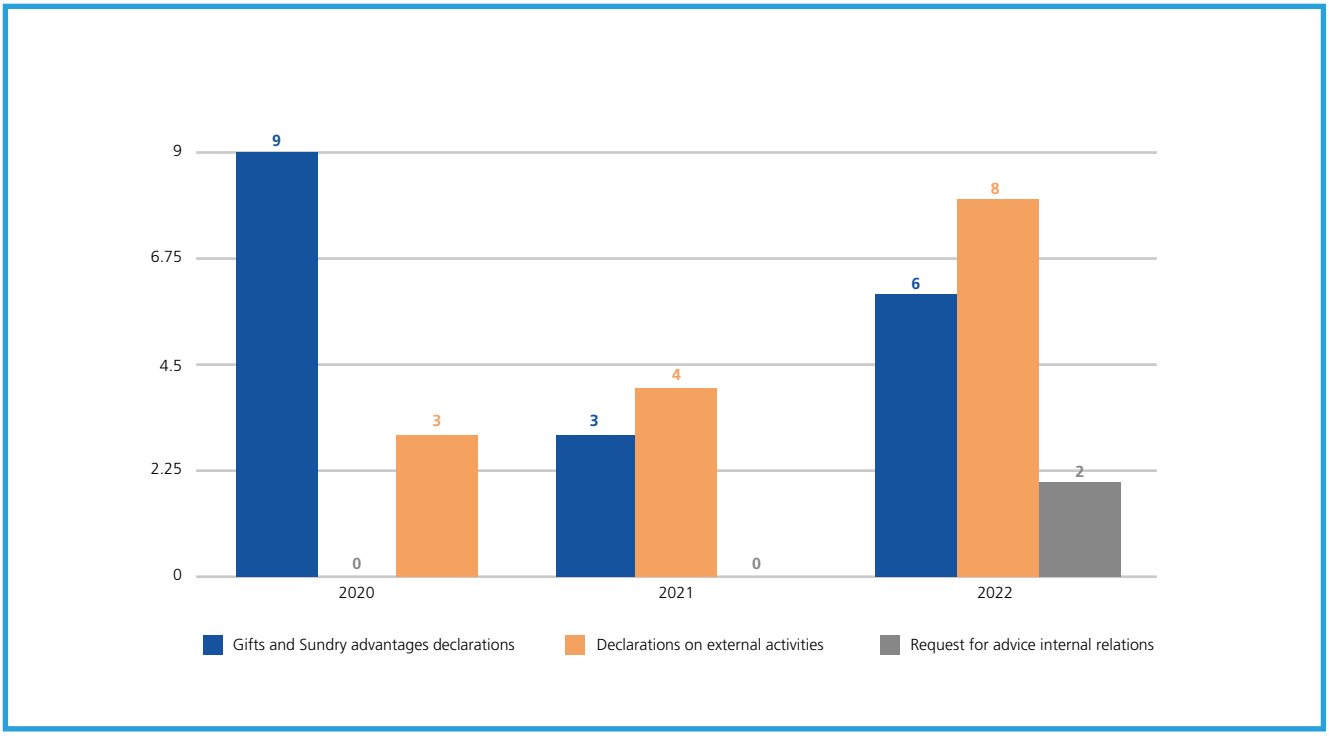
Ethics and integrity

The CEB's Code of Conduct tackles the issue of reputational risks arising from conflicts of interest, gifts or sundry advantages, market abuse incidents, external activities and confidentiality related to staff members and elected officials on a round-the-clock basis.

Once a year, staff members are requested to reaffirm their alignment with the CEB Code of Conduct as a reminder of their duty, obligations and adherence to internal ethical rules and corporate values i.e. commitment, co-operation, creativity, transparency and professionalism.

To find out more about the CEB Codes of conducts, please visit:
coebank.org/en/about/integrity-and-compliance/compliance-policies/codes-conduct/

Figure 6: **Ethics and conduct**
Gifts, external activities, internal relations



Investigations

No internal investigations for misconduct-related issues were carried out in 2022.

The Compliance Office is the Principal Investigation unit of the CEB, conducting investigations in relation to CEB financed activities and investigations linked to allegations of misconduct by CEB staff members under CEB Code of Conduct, the Rule on the Protection of Dignity at Work and CEB Staff Regulations.

In this regard, the CEB aligns with the joint commitment of international financial institution (IFI) on investigation principles and best practices, and participates in an annual conference of international investigators with the aim of upholding its standards.

Training and awareness raising

Raising awareness and fostering a culture of compliance within our institution remains our team's prime goal. The role of the Compliance Office to provide training and effective communication to all staff members is of high importance. To maintain this high level of accountability and awareness, OCCO undertakes various initiatives.

Tone from the top

On the occasion of the International Anti-Corruption Day on 9 December 2022, the CEB's CCO produced a video message reaffirming its "zero-tolerance policy" towards corruption, joining alongside other international organisations in this regard. "Corruption erodes trust, weakens democracy, institutions and the rule of law, while aggravating inequality, poverty, social division and environmental crisis", the CCO stated in the video, which was posted on YouTube and LinkedIn.

> **The video was an example of the importance the CEB attaches to communication and awareness raising when it comes to compliance matters.**



Marking International Anti-Corruption Day, 9 December 2022, with a message from the CEB's Chief Compliance Officer, Katherine Delikoura. Watch the video at https://youtu.be/6sJ-ZcTjg74.

The Chief Compliance Officer reports directly to the Governor and has access to the Auditing Board and the Collegial Organs (Administrative Council and Governing Board).

The CCO regularly updates the Executive Office and management Committee members on all latest compliance/regulatory trends and updates, and alerts them of any red flags or detrimental information related to fraud, corruption, fines, sanctions of our counterpart that could arise all along the project cycle that CEB finance.

The Compliance Office, which is known within the Bank as OCCO, keeps personnel informed throughout the year and maintains regular communication on compliance via the CEB's intranet.

Mandatory induction training class for all new staff

The Compliance Office runs annual induction sessions for new staff to present them with the key compliance rules, policies, guidelines and forms to fill out when they join the Bank. These are also available on CEB intranet. The office handles questions from new staff members regarding anti-money laundering (AML), combating the financing of terrorism (CFT), fraud, corruption, bribery, misconduct, compliance issues, information security risk and/or topics related to personal data.

Newly appointed officials as well as newly recruited directors receive "one-to-one" bespoke targeted ethics briefings and Code of Conduct awareness sessions upon their arrival.

In 2017 the CEB introduced the role of Compliance Liaison Officers, or compliance "ambassadors", at middle management level. These ambassadors are based in the directorates and help promote a compliance culture across the house.

The CEB currently has ten (10) Compliance Liaison Officers trained by the CCO, who meet with the Compliance Office at least once a year. These "compliance ambassadors" convey compliance messages and updates whenever necessary to their respective directorates and divisions. They are easy to reach and remain available should any issue need to be raised by colleagues.

Featured recurrent topics covered in training are:

- External compliance risks, i.e. fight against corruption and money laundering, harmful tax practices
- Integrity due diligence internal procedures
- Internal compliance risks, i.e. key aspects of the integrity control systems of banks
- Co-operation with peer group and linkages with other IFIs on compliance issues
- Compliance mission, goals and basic concepts
- Ethics, deontology, integrity, confidentiality

The CEB introduced the role of Compliance Liaison Officers, or compliance "ambassadors", at middle management level.



Information security

2022 was an intensive year for the CEB as the institution faced a very high level of cybersecurity threat. The year presented the Chief Information Security Officer (CISO), who is part of the Compliance Office, with opportunities to test the efficiency of the information security framework and to prove the efficiency of current rules and procedures currently in place.

It was a year of action:

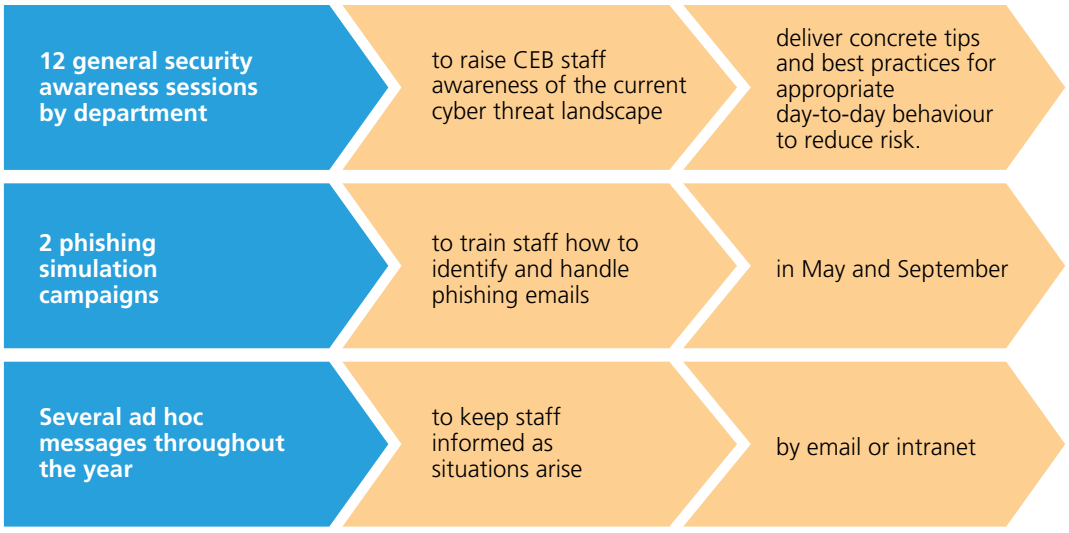
- a new generation anti-virus protection (EDR) was deployed to replace the old generation software;
- security for remote access was enhanced in a context of ongoing working from home;
- authentication, including multifactor authentication, was reinforced;
- a tender process to select a new backup solution for IT was launched, involving the Compliance Office.

As an example, a **serious security threat in July 2022 was resolved**: the Bank was alerted about compromised access codes by a specialised external provider and promptly initiated a crisis mode to remediate the issue.

A compromised server was shut down, and additional investigations conducted before resuming operations safely and successfully. The outcome confirmed the effectiveness of the new online security procedure initiated within our Bank in the event of serious cyberattacks.

The incident also served as a reminder to remain constantly vigilant towards new threats. Throughout 2022, the Compliance Office worked closely with the Information Technology Division, particularly to identify and implement up-to-date security solutions and to strengthen the CEB's online security.

Figure 7: **CISO actions in 2022**



Cyber resilience

Vulnerabilities on CEB IT systems are a main point of focus, which hackers seek out and exploit to attack the Bank. As a consequence, the Bank has defined a priority patch management policy focusing on the most critical vulnerabilities concerning internet exposure, while checking for the vulnerabilities on internal servers as well. In addition, a dedicated IT system penetration test, or pen-test, was conducted in summer 2022, whereby a specialised security company was mandated by the CEB to try to hack its system and provide a checklist of technical weaknesses.

Awareness

In order to prepare the staff for cybersecurity threats and enhance awareness raising to external information security risks, the Compliance Office and IT colleagues foster an information security culture within the organisation as a key aspect of the Bank's cybersecurity strategy. A series of awareness actions were delivered throughout 2022, focusing on how to recognise and avoid fraudulent attempts via email known as "phishing", and to enhance cyber safety when on leave.

The Bank is also strengthening its rapid response capabilities to limit the impacts of cyberattacks as soon as they happen. A dedicated project on cyber resilience was launched within the Bank in 2022, with the assistance of specialised consultants, to identify the critical capabilities of the Bank's main business units and define how each of them could continue to operate if the CEB's whole information system were to go down for a period of time.

Personal data protection

In line with the publication of the new data protection regulations, the CEB has formally changed the governance structure regarding the roles and responsibilities in the personal data protection field of activity. To modernise the proper management of personal data, in line with peer group institutions, the CEB has taken the following steps:

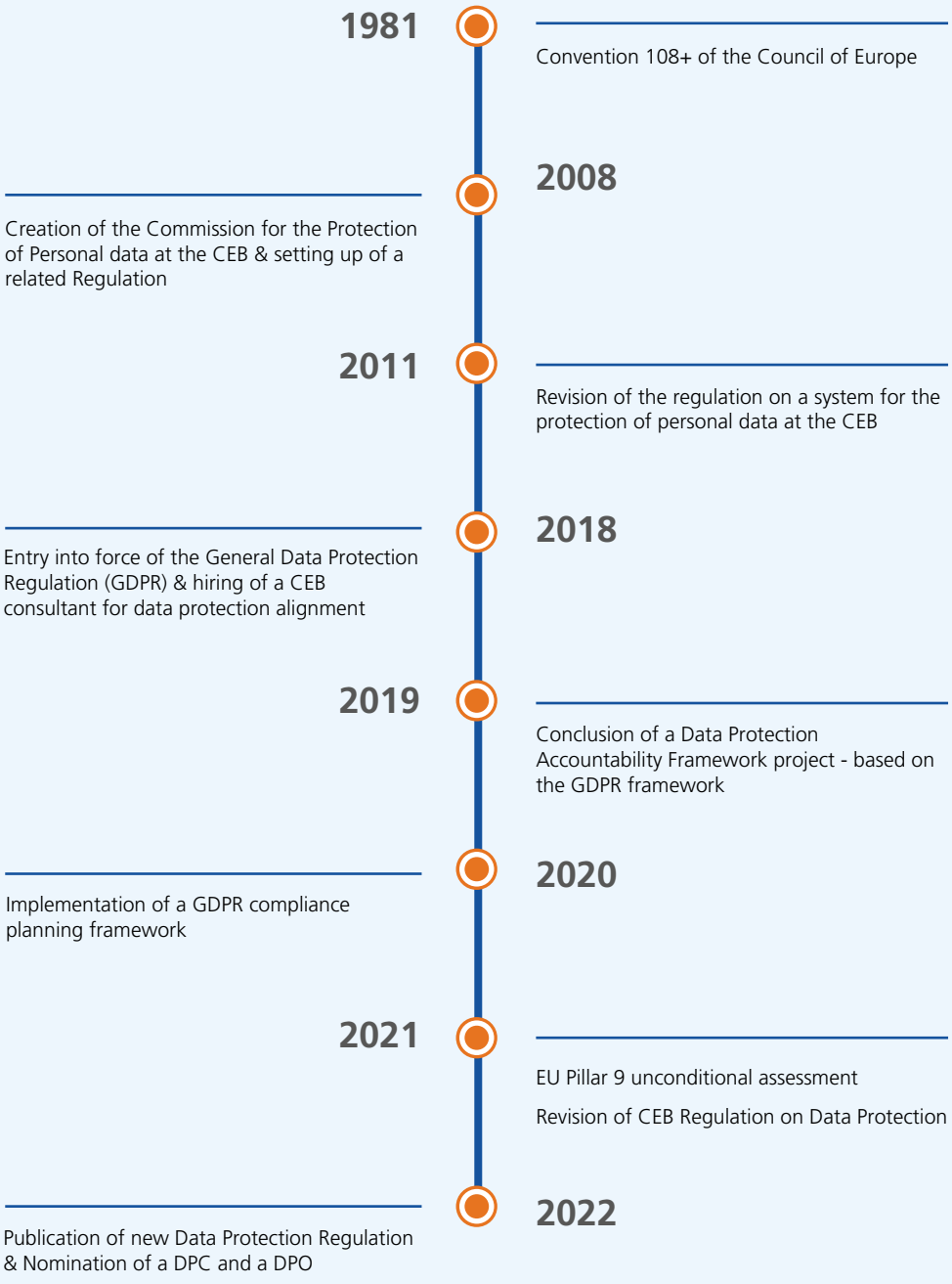
- The CISO was appointed to the role and responsibility of Data Protection Officer (DPO), both being certified by the University of Maastricht. In this role, the DPO provides day-to-day advice and guidance to various data controllers within the Bank to ensure a proper personal data management framework is well applied.

- The CEB Governor appointed an independent Data Protection Commissioner (DPC) for a four-year term. In this role, the DPC acts as an independent supervisory authority overseeing the compliance of all personal data processing carried out by the Bank, as defined in the new regulations.

Their respective roles under the CEB Data Protection Regulations adopted in 2022 are detailed below:

Functions of CEB Data Protection Officer	Functions of CEB Data Protection Commissioner
(a) to inform and advise the controllers, processors and data subjects of their rights and obligations pursuant to these Regulations and to keep records of such communications;	(a) to monitor and ensure the application of the provisions of these Regulations;
(b) to ensure that data subjects are informed of their rights and obligations;	(b) to examine complaints from data subjects concerning alleged infringement of their rights under the present Regulations and to order remedial action as necessary;
(c) to advise on the implementation, interpretation and application of these Regulations, in particular as to the requirements related to transparency, effective exercise of data subject rights and security of personal data processing;	(c) to conduct inquiries into the application of these Regulations, either on her or his own initiative, or in order to examine a complaint from a data subject;
(d) to advise on the adoption and implementation of the Bank's legal framework in relation to the protection of personal data;	(d) to formulate opinions at the request of the Data Protection Officer or a controller on any matter relating to the implementation of these Regulations;
(e) to identify and evaluate the Bank's data processing operations and maintain records thereof;	(e) to make recommendations to a controller who shall subsequently report to the Commissioner on their implementation;
(f) to monitor the documentation, notification and communication of personal data breaches;	(f) to co-operate with national or international data protection authorities or with data protection authorities of international organisations to the extent necessary for the performance of her or his functions and the exercise of her or his powers.
(g) to provide advice and assistance in order to allow the controllers to comply with the obligations under Article 9, paragraph 2 of the Data protection Regulation;	
(h) to act as the contact point for and to cooperate with the Data Protection Commissioner on issues related to processing of personal data and to monitor and co-ordinate the response to requests from the latter;	
(i) to advise on the processing of personal data ;	
(j) to promote awareness in the Bank of data protection principles, such as rights of data subjects and obligations in the processing of personal data.	

Figure 9: **Timeline of personal data protection implementation**



International co-operation

The CCO's missions uphold and showcase the CEB's work as a multilateral development bank that maintains high standards of integrity and business ethics. This engagement aims at keeping our institution abreast of its peers while supporting the efforts made by other international organisations and other intergovernmental reference bodies. The fight against money laundering, terrorist financing, corruption and fraud is a global matter, in both the physical and digital worlds, and can only be effective if global organisations, including IFIs, work together multilaterally. This co-operation bolsters the CEB's own efforts and improves its social impact.

The CEB is deeply committed to a multilateral approach to international co-operation. The CCO represented the CEB at several relevant international events in 2022, including as a guest speaker on a panel on "Best practices and innovation on awareness raising; training on Business ethics in a hybrid environment", at the 14th meeting of Ethics Network of Multilateral Organisations (ENMO), hosted by UNESCO in Paris. The same speech was delivered by the CCO to the ECC Thematic Session webinar organised by the ECB for Central Banks in Europe.

The Compliance Office enjoys ongoing close co-operation with multilateral development banks as well as with reference bodies of the Council of Europe, such as the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) and the Group of States against Corruption (GRECO), at which the CEB has observer status. The evaluations, peer reviews, best implementation standards, and effectiveness reports prepared by these two reference bodies constantly feed into the due diligence assessment for all CEB projects.

EU Pillar Assessment

On 28 November 2022 the CEB signed an InvestEU guarantee agreement, worth up to €159 million and expected to mobilise approximately €500 million in loans for social projects and unlock significant social investments. InvestEU effectively provides an EU budgetary guarantee to implementing partners to increase their risk-taking capacity and their reach. This important agreement is the successful outcome of a concerted compliance effort undertaken since 2018. In January 2022, the European Commission had judged that the CEB "unconditionally and with no supervisory measures" passed "the "pillar assessment" which tests ability and capacity to manage EU funds in compliance with the 2018 revised EU Financial Regulation. The Compliance Office coordinated the assessment of three of the five pillars: A. "exclusion from access to funding", B. "publication of information on recipients of funds and other information", and C. "protection of personal data", as well as advising on the other pillars, in particular by assisting with matters related to tax issues within the pillar related to financial instruments.

The EU pillar assessment was conducted by an independent auditor. The CEB had already passed two previous pillar assessments, the previous one in 2015.

Table 2: **CEB Compliance Officer representation in key international fora 2022**

As member/observer	Other international fora
Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL)	22nd Conference of International investigators (CII)
Group of States Against Corruption (GRECO)	Ethics Network of Multilateral Organisations (ENMO) hosted by UNESCO
The plenary meeting of the OECD Working Group on Bribery	The Multilateral Development Bank private sector integrity meeting, Heads of Integrity Due Diligence meeting hosted by Black Sea Trade and Development Bank (BSTDB)
OECD Global Anti-corruption & Integrity Forum	16th Annual MDB European Anti-money Laundering (AML) & Financial Crime Event: Participation of the CCO on a panel "A global AML & Anti Financial Crime for MDBs"
OECD World Bribery Network	The 11th Annual Anti-Bribery & Corruption Forum
The 27th Steering Group Meeting of the Anti-corruption Network for Eastern Europe and Central Asia (ACN)	European Central Bank, ECC Thematic Session online webinar, the CCO honorary invitation as speaker
High-Level Meeting of Anti-Corruption Decision Makers in Eastern Europe and Central Asia	Online "Athens Democracy Forum" organised by the Democracy & Culture Foundation, at European Commissioner invitation, with participation of CoE Secretary General spokesperson
OECD plenaries on Transparency and Exchange of Information for Tax Purposes and follow-up meetings	Online Finance in Common Summit, "Green and Just Transition for a Sustainable Recovery"
	6th Annual MDB Privacy Symposium: Privacy and the Information Age organised by International Finance Corporation (IFC)
	Conference with Gide Loyrette Nouel Partner: "Anti-Corruption enforcement, compliance and investigations international update"

Abbreviations

AML	Anti-money laundering
CCO	Chief Compliance Officer
CEB	Council of Europe Development Bank
CFT	Combating the financing of terrorism
CLO	Compliance Liaison Officer
CRA	Compliance risk assessment
CRM	Compliance risk management
CISO	Chief Information Security Officer
DPC	Data Protection Commissioner
DPO	Data Protection Officer
ECB	European Central Bank
EDR	Endpoint Detection and Response
ENMO	Ethics Network of Multilateral Organisations
GDPR	General Data Protection Regulation
GRECO	Group of States against Corruption
IFI	International financial institution
KYC	Know Your Customer
MDB	Multilateral development bank
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
OCCO	Office of the Chief Compliance Officer
OFAC	Office of Foreign Assets Control
UNESCO	United Nations Educational, Scientific and Cultural Organization

Contact Information

The Office of Chief Compliance Officer
Council of Europe Development Bank
55, Avenue Kléber
75116 Paris - France
Tel: +33 (0) 1 47 55 55 00
Fax: +33 (0) 1 47 55 55 74
Email: compliance@coebank.org
Web: www.coebank.org

Notes

Member countries

The CEB has 43 member states who are the Bank's shareholders. All countries that are members of the Council of Europe are eligible to join the CEB.

Albania ★
Andorra
Belgium
Bosnia and Herzegovina ★
Bulgaria ★
Croatia ★
Cyprus ★
Czech Republic ★
Denmark
Estonia ★
Finland
France
Georgia ★
Germany
Greece
Holy See
Hungary ★
Iceland
Ireland
Italy
Kosovo ★
Latvia ★
Liechtenstein
Lithuania ★
Luxembourg
Malta ★
Republic of Moldova ★
Montenegro ★
Netherlands
North Macedonia ★
Norway
Poland ★
Portugal
Romania ★
San Marino
Serbia ★
Slovak Republic ★
Slovenia ★
Spain
Sweden
Switzerland
Türkiye ★
Ukraine ★

★ Target countries

CEB
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BANQUE DE DEVELOPPEMENT DU CONSEIL DE L'EUROPE

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55, avenue Kléber
FR-75116 PARIS - France
Tel.: +33 (0)1 47 55 55 00
Email: info@coebank.org
www.coebank.org

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