Compliance at the CEB

Compliance at the CEB is envisaged as aiming for the highest standards of integrity and transparency both within the organisation and in our activities with our stakeholders. During the last 10 years, the compliance system at the CEB has evolved alongside portfolio growth and changes in the IFI sector, while following the latest unfolding in compliance and international development.

Compliance – Key ingredient for responsibility

The Office of Chief Compliance Officer (OCCO) ensures that the CEB’s commitment to the highest standards of integrity and ethics, its anti-fraud and anti-corruption framework, and its dedication to the prevention of money laundering and terrorist financing are integrated into all phases of the Bank’s project cycle. Back in 2008, the CEB decided to create the Office of Chief Compliance Officer, an independent function that provides a solid framework for integrity, and compliance within the CEB’s activities. Today, the work of the Office of the Chief Compliance Officer is underpinned by an internal regulatory framework and practices that cover all key segments of compliance in an international financial institution.

Over the past year, OCCO further advanced in the risk based approach to portfolio risk in terms of Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) and integrity risks. In addition to the annual AML/CFT portfolio risk assessment, counterparty scoring has been implemented; counterparties are screened for a broad range of compliance risks, including alerts related to environmental issues, production or supply chain issues, discrimination, workforce rights, human rights as well as health and safety issues.

Given its mandate and responsibility towards its shareholders, i.e. member states, and investors the CEB takes serious measures to tackle tax avoidance and evasion. The CEB has introduced specific rules in the form of a Policy of Non-Compliant and Non-Cooperative Jurisdictions, following established international standards set by the European Union (EU), Financial Action Task Force (FATF), Group of States Against Corruption (GRECO), MONEYVAL, and OECD Global Forum on Transparency and information exchanged for tax purposes.

Highlights

Within OCCO, in 2018 the Chief Information Security Officer launched a project to upgrade and update rules pertaining to personal data protection; the highest standards in this field will be applied in order to ensure proper treatment of the data of CEB employees, collaborators and all subjects that confide their personal data to the CEB. OCCO has virtually fully digitalised its archives and document management, significantly reducing the quantity of printed material and thereby aligning with the best practice of a “paperless office”.

In order to maintain CEB staff members’ high awareness of compliance, and to ensure sharing of the latest developments and current affairs in the compliance sector, OCCO organises induction classes, annual training sessions, corporate games as well as awareness events and publishes regular newsletters. In addition to this, the role of a “compliance liaison officer” in each Directorate was recently launched as a means to promote compliance horizontally within the organisation, and ensure efficient awareness raising and communication.

“Compliance is a shared responsibility of all CEB services, staff members and elected officials. Beyond written policies, rules, procedures and their proper implementation, formulating and supporting a strong compliance culture, will further contribute to our motto ‘compliant people, compliant projects’.”

— Katherine Delikoura, Chief Compliance Officer