Assessment of Internal Management and Control of Stiftelsen INTOSAI Development Initiative (IDI)

June 26th, 2025

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List of Abbreviations

Term	Definition
ARABCIIA	Arab Confederation for Institutes of Internal Auditors
ARABOSAI	Arab Organization for Supreme Audit Institutions
ASOSAI	Asian Organization of Supreme Audit Institutions
AWCA	African Women Chartered Accountants
AWAK	Association of Women Accountants in Kenya (AWAK)
CS	Corporate Support Department
CISA	Certified Information Systems Auditor (CISA)
C&AG	Comptroller & Auditor General
SSU	Strategic Support Unit
DDG	Deputy Director General
DG	Director General
EEA	European Economic Area
EURSAOI	European Organisation of Region of External Public Finance Audit Institutions
FX	Foreign Exchange
EY	Ernst & Young
GAO	Government Accountability Office
GCA	General Court of Audit
GDPR	General Data Protection Regulation
ICPAK	Institute of Certified Public Accountants of Kenya
IDSC	INTOSAI-Donor Steering Commitee
IIA	Institute of Internal Auditors
ISA	International Standards on Accounting
NAO Norway	National Audit Office of Norway
NOK	Norwegian krone
NORAD	The Norwegian Agency for Development Cooperation
NPO	Non-Profit Organizations
OAGN	Office of the Auditor General of Norway
PFAC	Policy, Finance and Administration Committee
PhD	Doctoral Degree

1 Report of Assessment of Internal Control of IDI

Term	Definition
SAI	Supreme Audit Institution
SECO	Swiss State Secretariat for Economic Affairs
Sida	The Swedish International Development Cooperation Agency
SP	Strategic Plan
USAID	U.S. Agency for International Development

2 Report of Assessment of Internal Control of IDI

Table of content

Introduction

EY ("we") has been asked to perform an assessment of the internal control systems of Stiftelsen INTOSAI Development Initiative (IDI). The main objective has been to determine whether these can guarantee quality and accuracy in the entire organizational chain. The assignment includes a review in which routines and systems for operational and financial control are described and analysed.

In this report, we present the results from our assessment which was carried out in June 2025.

In accordance with the Terms of Reference (ToR), we have focused on the following areas:

- Organizational structure, governance, and legal status
- Funds flow management
- Accounting policies, procedures, and practice
- Risk management
- Audit
- Reporting and monitoring
- Procurement policies, procedures, and practice
- Anti-corruption
- Respect for restrictive measures

Within this report we have described any findings we have encountered. These have been accompanied with recommendations to further strengthen the internal control system of the organization (see Annex 1). As the performed work does not constitute an audit or review in accordance with ISA, no assurance is given.

Approach

We have performed the following activities during our assessment:

- Desk study of relevant documentation such as policies and manuals, audit reports and correspondences.
- Interviews with key staff (see Annex 2 for the list of people interviewed).
- Evaluate relevant processes in scope using the questions specified in the ToR.
- Confirm our understanding of existing controls and processes by performing limited testing on transactions selected based on our professional judgement.

Prior to submitting the report, we have given IDI the opportunity to validate the content and findings presented within this document.

Executive Summary

The below table indicates a summary of our overall risk assessment following our assessment of each area in scope (our findings per assessment area are further detailed in each section of the report and the recommendations are summarized in Annex 1):

Section number	Assessment area	Overall risk assessment
1	Organizational structure, governance, and legal status	(Green)
2	Funds flow management	(Green)
3	Accounting policies, procedures, and practices	(Green)
4	Risk management	(Yellow)
5	Audit	(Green)
6	Reporting and monitoring	(Green)
7	Procurement policies, procedures, and practice	(Yellow)
8	Anti-corruption	(Yellow)
9	Respect for restrictive measures	(Yellow)

The overall risk assessment scale is defined as below:

Risk scale	
High	Significant risks, or critical deficiencies identified in related processes/controls which require immediate remediation to ensure a proper level of internal control.
Moderate	Risks or weaknesses identified in related processes/controls which require remediation, but which alone are not likely to result in a significant deficiency in the internal control.
Low	Risks or weaknesses in related processes/controls which have a limited IDI on the internal control environment.

EY's assessment of each area has been summarized below.

Organizational structure, governance, and legal status

We have assessed the organizational structure and governance of IDI and deem that the decision-making procedures and mandates are adequate for accountability and decision making.

IDI statutes stipulate the mandate of the Board. Reviewing minutes from the meetings of the board we deem that the mechanisms in place to ensure the boards insight in the operation of the organization to be adequate. Based on the information provided by the organization, we deem that the members of the board have relevant competency.

Based on our assessment, we have considered the overall risk in the context of organizational structure and governance as low.

Funds flow management

Our assessment indicates that the organization has implemented well-defined policies concerning the funds flow management process including budgetary routines. The organization has multiple different flows of income with the majority being restricted.

Based on our assessment, we have considered the overall risk assessment in the context of funds flow management as low.

Accounting policies, procedures, and practice

Our overall assessment indicated that the organization has established guidelines or routines related to accounting policies, travel, overhead costs and foreign exchange (FX) gains and losses.

Based on our review we have considered the overall risk in the context of accounting policies, procedures, and practice as low.

Risk management

We assess that IDI has a written guideline for the risk management process along routines and a matrix to support the staff in their continuous risk assessment.

We deem that IDI on an overall level has suitable staffing regarding resources and knowledge to ensure preventive and proactive work with different types of risks. However, we recommend that IDI ensures that all staff has sufficient training to conduct risk analysis by implement annual mandatory training and keeping a log.

Based on our assessment, we have considered the overall risk in the context of risk management as moderate.

Audit

EY has evaluated that the organization has implemented adequate procedures concerning the audit of the organization and the external partners. The auditor is independent, qualified, and external.

Based on our assessment, we have considered the overall risk assessment in the context of the audit as low.

Reporting and monitoring

EY has assessed that the organization has established sufficient procedures related to the reporting and monitoring of the organization's financial performance. The structured approach to financial follow-ups, from individual projects to the overall organizational level, facilitates proactive management of financial performance.

Based on our assessment, we have considered the overall risk in the context of reporting and monitoring as low.

Procurement policies, procedures, and practice

Our assessment shows that IDI has a procurement policy that includes adequate rules and regulations to manage planned procurement. We deem that the procurement policy is compliant with applicable regulations. We have compared the policy with Sida's Procurement Provisions, version August 2018 and found that IDI's policy use lower thresholds than Sida. We deem that IDI's procurement policy is compliant with Sida's Procurement Provisions, and that IDI has established a procurement policy with clear roles for approvals. However, out of the samples reviewed, one was assessed as non-compliant.

Based on our assessment, we have considered the overall risk assessment in the context of procurement as moderate.

Anti-corruption

We have assessed the policies and routines for preventing, detecting, and taking measures on corruption and deem that they on an overall level are sufficient. IDI has policies to cover topics regarding anti-corruption and an established Code of Conduct. The organization has a whistle-blowing function which we deem adequate. However, in our opinion IDI should implement a channel that ensure that whistle-blowing reports stays anonymous and confidential to make sure that individuals feel comfortable coming forward with any concerns or complaints.

IDI discuss anti-corruption regularly during courses, seminars, webinars but does not have any formal mandatory recurrent training. We therefore recommend the organization to ensure that all staff and governance members receive recurrent training, not only through the onboarding process.

Based on our assessment, we have considered the overall risk in the context of anti-corruption as moderate.

Respect for restrictive measures

EY has assessed that the organization has sufficient procedures and routines related to the restrictive measures. Due to the nature of the business and the involvement and interaction of IDI with individuals and entities globally, it is crucial for the organization to ensure compliance with the imposed restrictions and sanctions. While IDI endeavors to identify procurements or planned payments to organizations linked to individuals on sanctions lists, it currently lacks an automated contracts and payment system for this purpose, although plans to explore such a system are in place for 2025.

Based on our assessment, we have considered the overall risk assessment in the context of respect for restrictive measures as moderate.

1. Organizational structure, governance, and legal status

1.1 About IDI

The INTOSAI Development Initiative (IDI) was established by the Norwegian parliament in 1999 and is a Norwegian not-for-profit autonomous implementing body based in Oslo and hosted by the National Audit Office of Norway. The organization's purpose is to support independent, credible, and sustainable supreme audit institutions (SAIs) in developing countries to enhance their performance and capacity. Its purpose is furthermore to enhance the institutions' role in the societal mission of improving the public sector in the countries in which they serve.

IDI is registered as a foundation with organization number 980 997 278 in the Brønnøysund Register Centre. The organization is an independent entity within INTOSAI, which is an umbrella organization for all SAIs worldwide, with approximately 190 member countries. IDI does not have any regional offices, and there is only one legal entity established in Norway. Any staff working outside of Norway are legally employed by Globalization Partners, a global outsourcing firm used to ensure legal compliance and provide administrative support in the country where staff are legally based.

1.2 Organizational structure

1.2.1 The IDI Secretariat

The IDI Secretariat is one of two permanent institutional bodies of the IDI Foundation, the other being the Board. According to the financial manual of IDI it is the responsibility of the IDI Secretariat to oversee the day-to-day running of the organization. The IDI Secretariat is led by a Director General (DG) who reports to the IDI Board.

It's the Secretariats responsibility to make recommendations for Board approval and deliver plans/reports to the Board in the following areas in relation to financial management:

- Annual budget.
- Policies related to financial management.
- External auditor selection and evaluation criteria.
- The external auditor's report and Letter to Management.

Additionally, it is the Secretaries responsibility to provide information to the Board on the following matters:

- Significant financial planning, management and reporting issues
- Interim financial reports.
- Reports from auditors and administration on internal control issues and other matters.

1.2.2 The Board

The board of IDI is governed by the foundation's statutes and the board's rules of procedure. According to the statutes the board shall consist of ten board members, of which at least four are of each gender. At least half of the board members shall be citizens of EEA (European Economic Area) member countries or citizens of the United Kingdom of Great Britain and Northern Ireland. The chairperson of the Norwegian Board of Auditors General shall chair the IDI board. In addition, at least two members shall be selected from a list of persons nominated by the Norwegian Board of Auditors General. Furthermore, the Board should strive to include four members from developing countries.

According to IDI's Board Rules of Procedures all appointments to the Board shall be done by the Board in plenary sessions. Every nomination of members to the IDI Board are handled by a separate Nomination and Remuneration Committee comprising the Chair of the Board and two additional IDI Board members. All members to the IDI Board shall be appointed on an honorary basis with a three-year term which may be renewed for another term only, except for the Chair and INTOSAI Secretary General who are permanent members to the Board. The rules of procedure further states that Board members shall remain in office until new members are elected, even if their terms of office have expired. The Board may also appoint members for a shorter duration if it so desires. All new Board members shall be invited to undergo an induction program for IDI Board members.

The Board shall be convened at least one time per year, and preferably two times every year. In case neither physical nor virtual meetings are possible to conduct, decisions can be taken by written approval. In case any Board members or the DG request additional meetings to discuss pertinent issues, they can request the Chair of the Board to call a meeting. A quorum of more than 50 percent of the Board members is necessary for enabling the Board to take decisions. However, the Board may not decide on any issue unless all the board members have, as far as possible, been given the opportunity to participate in the proceedings. Decisions within the Board are made by simple majority voting. In the event of any stalemate in decision, a casting vote shall be exercised by the Chair.

According to the rules of procedure, it is the responsibility of the Board to ensure that the objectives and mandate of the IDI foundation are complying. The Board is also responsible for the management of the foundation and setting the strategic direction of IDI. Furthermore, the Board shall ensure that the accounts and asset management of IDI are subject to adequate control, in addition to appointing IDI's external auditor. The external auditor is appointed for a three-year term which can be renewed only once subject to evaluation by the IDI Board of satisfactory performance. More of the Board's responsibilities are as follows:

- The Board shall ensure that IDI processes personal data in accordance with the General Data Protection Regulation (GDPR) (EU2016/679).

- The Board shall decide on all statutory issues and ensure the operations of the IDI in accordance with the Norwegian Act relating to foundations as well as the resolutions and conditions laid down by the Norwegian Parliament.

- The Board shall approve the IDI Strategic Plan (SP) and decide on other issues of strategic importance as well as approve key IDI policies.

- The Board shall approve the IDI Annual Financial Statements, IDI Operational Plans, the IDI Budget and Annual Performance and Accountability Reports as well as the IDI Corporate Risk Register.

- The Board shall monitor regularly the performance of the IDI and the extent to which agreed plans and budgets have been achieved and risks managed.

- The Board shall hold the DG and IDI management team accountable for the implementation of the IDI SP.

- The Board shall determine the remuneration of the DG and the Deputy Director Generals (DDG), as well as the remuneration structure and framework in the IDI.

- With regards to any complaints from within the IDI, the Board shall maintain a complaints monitoring framework including complaints against the Board and the DG.

The rule of procedures is updated per requirement but at least once every three years. However, neither the foundation statutes nor the Board's rules of procedures set out clear rules regarding whose responsibility it is to approve and revise policies. It has been informed that in post organisational reviews; all administrative policies are under the responsibility of DDG Corporate Support. What is agreed to still be missing is an overview of all IDI policies and their planned revision schedule.

Recommendation:

▸ We recommend IDI to create an overview of all IDI policies where it states who is responsible and their planned revision schedule

1.2.3 Board composition

Table 1 illustrates the current board composition, as of April 2025.

Table 1 Board composition

Chair of the Board	Karl Eirik Schøtt-Pedersen is the Auditor General of Norway and became Chair of the IDI Board on 1 January 2022. He was previously a member of the Norwegian Parliament from 1981 to 2009, during which time he chaired the Finance Committee from 1993 to 1996. He was the Norwegian Minister of Fisheries from 1996 to 1997, Minister of Finance from 2000 to 2001, and served as Chief of Staff in the Prime Minister's office from

	2009 to 2013. From 2014 to 2017 Schøtt-Pedersen served as the Vice Chair on SAI Norway's Board of Directors.
Vice-Chair of the Board	Tsakani Maluleke is the first female Auditor General in the SAI of South Africa and is Vice-Chair of the Board, with her term ending in November 2006. She is a chartered accountant and has worked in diverse public and private sector environments before joining the South African SAI. Maluleke was awarded the 2020 Public Sector Leader of the Year by the African Women Chartered Accountants (AWCA) in recognition of her contribution towards good governance and clean administration in the public sector. As a supporter of development, education and transformation, Maluleke has been actively involved with developmental formations such as the Association for the Advancement of Black Accountants in Southern Africa, of which she is a past president. She is also currently the chairperson of the country's foremost accountancy body, the South African Institute of Chartered Accountants.
Board member	As the INTOSAI Secretary General, Margit Kraker is a permanent member of the Board. Kraker became the President of the Austrian Court of Audit and Secretary General of INTOSAI in July 2016. She holds a Doctoral Degree (PhD) in Law from the University of Graz in Austria. Kraker has served in several positions in the Austrian public service such as Director of the Court of Audit of the Province of Styria, head of the Styrian Provincial Vice-Governor's Office, member of Styrian Provincial Government's Constitutional Service and Legal expert at the Austrian Parliament and the Provincial Parliament of Styria. In addition, she was a member of the Management Committee of the European Organisation of Region of External Public Finance Audit Institutions (EURSAOI) from 2014-2016.
Board member	Tashi is the Auditor General of Bhutan and Chairman of the Accounting & Auditing Standard of Bhutan. He is a member of the IDI Board until his term ends in October 2025. During the Board Minutes from April 2025, Tashi's effort and contributions as a Board member was recognized as that was his last IDI Board meeting. Tashi first joined the Royal Audit Authority (SAI Bhutan) in 1994, working until 2009 as Auditor, Senior Auditor Deputy Chief Audit Officer and Assistant Auditor General, Performance Audit Division and Thematic Audit Division, as well as a period as Head of Human Resource and International Relations Division

	(2003-2006). He holds a Bachelor of Commerce from Dehli University, an advanced Diploma in Management Accounting from the Chartered Institute of Management Accountants, UK, and several diplomas from leadership programs.
Board member	Nancy Gathungu is a Board member and her term ends in December 2025. She was appointed to the position of the Auditor-General of the Republic of Kenya on July 17, 2020. As well as being Vice Chairperson of AFROSAI-E and Chair of the AFROSAI Technical and Institutional Capacity Building Committee, Gathungu is a certified member and trainer with the Institute of Certified Public Accountants of Kenya (ICPAK), a Certified Information Systems Auditor (CISA) and a member of Association of Women Accountants in Kenya (AWAK) where she mentors young female accountants.
	She holds a bachelor's degree in commerce, an MBA, and is currently pursuing a PhD in Business Administration (Strategic Management). Prior to her appointment, Gathungu served as Director of Audit and provided leadership in various Directorates at the Office of the Auditor General, Kenya, namely Quality Assurance, Forensic Audit, IT Audit, and Learning and Development.
Board member	Hussam Alangari sits on the Board until his term ends in December 2025. Alangari was appointed as the President of the General Court of Audit (GCA) in 2016.
	Within the INTOSAI domain, he is currently the Second Vice-Chair, Chairman of the Policy, Finance and Administration Committee (PFAC), Co-Chair of the INTOSAI-Donor Steering Committee (IDSC), and member of the IDI Board of Directors. He is also the Chair of the Arab Organization for Supreme Audit Institutions (ARABOSAI) and a member of the Asian Organization of Supreme Audit Institutions (ASOSAI) Governing Board and ASOSAI's Capacity Development Committee. In addition, Alangari chairs the Arab Confederation for Institutes of Internal Auditors (ARABCIIA) as well as the Saudi Institute of Internal Auditors (IIA) Board of Directors, and he is a member of the IIA Global Board of Directors.
	Alangari received his PhD in Accounting and Financial Management from the University of Essex in 2000. Subsequently, based on his extensive research record, he was promoted to Full Professor at King Abdulaziz University in Saudi Arabia in 2008. During his tenure, he served as a lecturer and academic scholar, as well as Dean of both the College of Economics and Administration and the College of Law.

	Additionally, he was appointed as a chair or member of various boards and committees within the private and public sectors, as well as local and regional professional bodies.
	Following his academic career, Alangari was appointed by Royal Decree as a member of Shura Council (the Saudi Parliament) for a four-year term from 2013 to 2016. During this time, he was elected Vice-Chair of the Financial Committee for the first two years and then Chair for the third and fourth years. He submitted five proposals for new laws and amendments to existing laws based on Article 23 of Shura Council Law, all of which were accepted for further study by the council.
Board member	Bruno Dantas is a member of the IDI Board with his term ending in June 2026. Dantas became the president of the Brazilian Court of Audit in December 2022. He was appointed by Senate as Minister of the court in 2014. Within INTOSAI, he is currently the Chair of Governing Board, Chairman of the SCEI, Vice-chair of PSC and member of the OLACEFS Governing Board.
	Dantas holds a PhD and a master's degree in law from the Pontifical Catholic University of São Paulo and is a visiting researcher at different research centres, namely the University of Paris 1 Panthéon-Sorbonne, the Max Planck Institute, and the Cardozo School of Law. He is a professor at the State University of Rio de Janeiro and in master's and doctoral programs at the Getúlio Vargas Foundation and Nove de Julho University. He chaired the Jurists' Commission on improving governmental management and the public administration control system and was a member of the Jurists' Commissions that prepared and elaborated drafts of the new Civil Procedure and Commercial Codes.
Board member	Gareth Davies's term as Board member ends in June 2026. He was appointed the United Kingdom's Comptroller & Auditor General (C&AG) in 2019. Before his appointment as C&AG, he was Head of Public Services at Mazars, a global accountancy firm specialising in audit, tax and advisory services. Prior to this, he was managing director of the UK Audit Commission's Audit Practice. Davies is a Fellow of the Chartered Institute of Public Finance and Accountancy and a Fellow of the Institute of Chartered Accountants in England and Wales.
Board member	Tom-Christer Nilsen is the Vice-Chair of the Board of the Office of the Auditor General of Norway (OAGN) since 2022, and his term as member of the IDI Board ends in December 2026. He has served as a Member of Parliament in Norway, as a State Secretary to the Prime Minister and the Minister of Transport.

	He was also the Mayor of Hordaland from 2011-2015. In addition, Nilsen has served as President of the North Sea Commission and has been involved with the Children's International Summer Villages in different capacities. He presently is the Chief Operating Officer of the Bergen Chamber of Commerce and Industry. He holds a Master of Business degree from the Norwegian School of Business, Economics and Administration.
Board member	Merethe Nordling is a Board member with her term ending in December 2026. Nordling is DDG and Chief of Staff at the OAGN. She has been involved in capacity building of SAIs and was seconded to IDI from OAGN in 2013. She became a Certified Internal Auditor in 2019 and served on the Board of the IIA of Norway from 2018-2022. She led a peer review of the SAI of Denmark in 2021 and a peer review of the U.S. Government Accountability Office (GAO) in 2022. She has a master's degree in economics from the University of Oslo and has been working at OAGN since 2008.

EY assesses that the board has relevant competence connected to the purpose of IDI. Terms of reference for the nomination and remuneration committee of the IDI board are listed in the Board of Procedure. However, there are no specific requirements regarding the competencies that Board members should possess. For instance, their educational background, professional qualifications, and the duration of their experience in their field. The guidelines seem to be more for consideration and optional rather than mandatory. For example, while it is encouraged that at least two board members come from developing country Supreme Audit Institutions, but this is not a requirement. During the interview, it was noted that all Board members are heads of their respective areas. There is a fixed requirement that 40% of the members must be female, and while there should be a regional balance, this is considered more of a guideline than a strict rule.

Recommendation:

▶ We recommend IDI to formalize which competencies the Board members are required to have, if any.

1.2.4 Conflicts of interest

The Board's rules of procedure state that IDI shall maintain an IDI Register of Related Parties and Related Entities, in which the definition of Related Parties and Related Entities is provided in the International Standards on Accounting (ISA) 24. At each Board meeting, and at any other time whenever a conflict arises, Board members and the DG are requested to confirm the information contained in the Register of Related Parties and Related Entities, and to disclose any perceived and actual conflicts of interest.

A Board member or the DG is disqualified from participating in proceedings or decisions concerning matters that are of such great importance to him or her or to his or her closely

related parties that he or she must be deemed to have a prominent personal or financial interest in the matter. A Board member or the DG is also disqualified from participating in proceedings or enterprise with a financial or other prominent interest in the matter, or if he or she has previously participated processing the matter. A Board member is disqualified from participating in proceedings or decisions concerning their own re-election to the IDI Board.

When a member is in conflict, they are excused from the meeting. During the meeting between EY and IDI, IDI informed that this typically occurs when the re-election of a respective member is being discussed.

1.3 Organizational structure

The organization of IDI is presented in the organogram below:
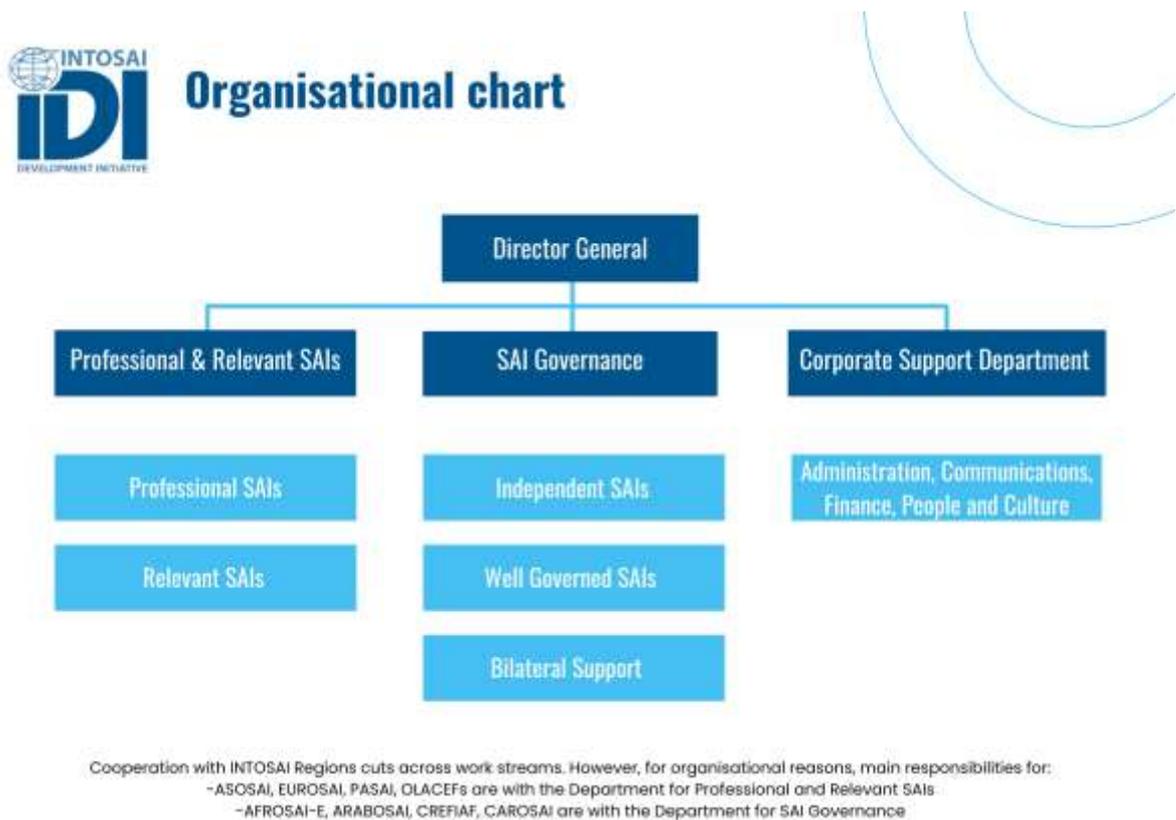
The Head office of IDI is in Oslo, Norway and is headed by the DG. IDI employs a total of 54 individuals from more than 30 countries. The staff consists of 46 employees in Norway and eight professionals hired via the Employer of Record, Globalization Partners. The organization is structured into three key departments, (1) the Professional and Relevant SAI Department, (2) the SAI Governance Department, and (3) the Corporate Support Department. As mentioned, IDI is governed by the DG who has support from three DDGs and a Strategic Support Unit. While most staff are based at IDI's offices in Oslo, the organization also has employees working remotely from Austria, Costa Rica, India, Kenya, Madagascar, Latvia, Luxembourg, and the United Kingdom.

1.4 Governance and delegation of authority

Decision-making mandates and delegation procedures are described both in the organization's initiative procurement policy and their financial manual. According to IDI's financial manual all bank transfers/transactions are required to have at least two signatures of which one should be the DG or the DDG CS. The Controller is responsible for ensuring that documentation accompanying electronic transfers are correct and includes approval from the DG or DDG.

1.5 Conclusion

We have assessed the organizational structure and governance of IDI and deem that the decision-making procedures and mandates are adequate for accountability and decision making.

Both IDI's foundation statutes and the Board's rules of procedure stipulate the mandate of the Board. Reviewing minutes from the meetings of the board we deem that the mechanisms in place to ensure the boards insight in the operation of the organization to be adequate. Based on the information provided by the organization, we deem that the members of the board have the relevant competency. IDI have clear written routines connected to secondary occupations of board members, minimizing risk for perceived or actual conflict of interests.

Based on our assessment, we have considered the overall risk assessment in the context of organizational structure and governance as low. Refer to Annex 1 for a summary of recommendations and their priority.

2. Funds Flow Management

2.1 Financial flow

IDI receives a combination of financial and in-kind contributions from a wide range of bilateral and multilateral development partners. Effective from April 2025, IDI has implemented *Policy and Guidance for financial partnerships* and *Policy and Guidance for issuing small accountable grants* to have clear principles and risk assessments of financial flows.

Key financial donors have been USAID, SECO, Sida, NORAD and several others such as different world banks, the European Commission, and Global Affairs Canada. In case of fund withdrawals, like the USAID announced on the 10th of March 2025, IDI will get current partners to fill in the gap. In this case they will most likely get to fully replace the gap from Saudi Arabia on the GSAI, but not the project in Madagascar. In addition to monetary support, IDI benefits from significant in-kind contributions provided by the international SAI community. These include the provision of technical expertise, secondment of staff, training materials, logistical support, and the hosting of events.

Most funds raised by IDI are in the form of restricted funds, accounting for around 99 % in 2024. EY notes that this is an overview of whether donors include conditions on their donations. Therefore, a restrictive donation could still include parts that are unrestrictive. As such, 99 % of all donations come with some form of condition on how the donations are spent. Unrestricted funds consist of, among other things, the founding capital used to set up the foundation in 1999 and cumulative interest earned upon this. In addition, under 'other equity' is the cumulative funds received by IDI that they have been allowed to treat as unrestricted reserves. This is very limited and mostly consists of the contribution received annually from INTOSAI. In the past it has also included a small contribution from the SAIs of Kuwait and Saudi Arabia. In 2024, there was some additional income from FCDO (UK) that they were able to add to their unrestricted reserves. In general, donors that fund IDI do not allow IDI to put their funds into unrestricted reserves, but insist it is spent for the purpose of the grant within the time period of the grant. Such funds are treated as donor liabilities/deferred grants in the financial statements. Table 2 shows the distribution for 2024.

Table 2 Restricted & Unrestricted funds 2024

Source	Restricted/Unrestricted	Amount, NOK	Percentage of funding, NOK
INTOSAI GS	Unrestricted	841.354	1 %
Other Income	Unrestricted	224.669	0 %
GCA, Saudi Arabia	Restricted	7.963.144	5 %
NAO, Norway	Restricted	28.700.000	19 %
Sida, Sweden	Restricted	9.180.863	6 %
GIZ, Germany	Restricted	-	0 %
DFATD, Canada	Restricted	9.912.856	6 %

MFA, France	Restricted	6.134.879	4 %
Asian Development Bank	Restricted	5.699.357	4 %
USAID, USA	Restricted	10.547.463	7 %
Norwegian Embassy South Sudan	Restricted	4.638.114	3 %
ADA, Austria	Restricted	4.103.120	3 %
Norwegian Embassy Kenya	Restricted	2.575.500	2 %
SECO, Switzerland	Restricted	40.575.593	26 %
European Commission	Restricted	15.187.077	10 %
State Audit Bureau, Qatar	Restricted	-	0 %
NORAD, Norway	Restricted	2.300.000	1 %
MFA (Irish Aid), Ireland	Restricted	2.940.675	2 %
State Audit Office, Latvia	Restricted	169.859	0 %
INTOSAI Journal	Restricted	1.094.750	1 %
USAID, USA	Adjustment for grants paid in arrears	1.823.643	1 %
Norwegian Embassy South Sudan	Adjustment for grants paid in arrears	361.886	0 %
Total		**154.974.802**	**100 %**

EY have reviewed the financial statements of IDI for 2023 and 2024. Only grants used in 2024 are accounted for as revenue. All excess funds, including accrued interest, are accounted for as donor liabilities at the end of each year and will be spent on activities in future years or be returned to the donors. Hence, most of the organization's liabilities are excess funds. Furthermore, the organization has MNOK 63 in cash and an additional MNOK 11,7 in receivables. In 2024, IDI's total operating expenditure reached MNOK 129, reflecting a modest increase from MNOK 110 in 2023. The largest expense category for the foundation in 2024 was payroll, amounting to MNOK 52, along with related costs such as consultants and contractors, each totaling MNOK 15. We have not noticed any red flags.

2.2 Budgetary Routines

IDI's budget routines are described in the *IDI Financial Manual* under section 8, *Exercising budgetary control.* The budget routine for the organization is an extensive process that begins with the preparation of the budget for each activity by the designated project manager in consultation with the DDG. This budget is based on previous expenditures adjusted for inflation, conservative revenue projections, and estimated costs according to regional rates, following a bottom-up approach that involves the entire team. The budget is verified and certified by the DDG to ensure realism in cost estimates and is subsequently approved by the Board meeting held towards the end of the year, where it is presented alongside the Operational Plan. Revenue is projected based on more conservative assumptions than the long-term framework. IDI only project revenue that is contracted or where we have a high degree of certainty that we will have an agreement.

The budget undergoes revisions twice a year, in May and October, with management responsible for approving updates related to exchange rates and changes in plans or staffing. It encompasses all activities classified into various cost types, and expenses are

reviewed monthly against the budget, with management analysing variances and taking appropriate actions.

Project budgets are prepared separately to secure specific funding and require approval from the DG before being presented to donors. However, it remains unclear whether budget revisions necessitate approval from funders such as Sida, and the specific system used for the budget process, as well as any regulating policies, have not been detailed in the provided information.

Liquidity forecast is performed when needed, usually in times of high risks. EY was informed, during our meeting with IDI, that due to significant advanced funding from SECO, liquidity is not currently a significant concern. The focus is rather on how to invest the cash balances. However, when liquidity is a concern IDI generally receives a few key grants, especially from NAO Norway, in advance if needed.

2.3   Conclusion

Our assessment indicates that the organization has implemented well-defined policies concerning the funds flow management process including budgetary routines. The organization has multiple different flows of income with the majority being restricted.

EY has noted that the procedures and routines implemented by IDI drive the overall risk assessment related to funds flow management, to be considered low. Refer to Annex 1 for a summary of recommendations and their priority.

3. Accounting policies, procedures, and practice

3.1 Accounting Software

Since May 2020, IDI has used X-ledger as its accounting software, which facilitates double-entry bookkeeping and offers capabilities for project accounting. Currently, the organization use Semine for invoice approval, however, this system is being phased out in favour of increased reliance on X-ledger. Income and expenditure budgets are prepared externally and subsequently uploaded into X-ledger. Additionally, X-ledger is utilized for staff time recording, although staff time planning is not yet integrated within the system across IDI. This integration is anticipated to occur by late 2025. X-ledger is not employed for the management of donor grants nor is it used for commitment recording.

Accounting and payroll functions have been outsourced to AMESTO. Based on our assessment, we find no issues with this arrangement.

3.1.1 Travel costs, per diems and travel advances

The *Travel Policy 2023* applies to all trips undertaken by IDI employees and Board members, both domestically within Norway and internationally. Travel must be conducted in the most efficient, safe, and economical manner for IDI, while also considering environmental factors. IDI has a contract with G-travels, which will select the route that best aligns with these factors.

All travel arrangements require pre-authorization from the employee's manager via a travel authority form, which must detail the travel proposal. This form must be signed by both the manager, who approves the journey, and the employee, who acknowledges the travel terms. The chosen mode and class of transportation must be specified, with the default being economy class for commercial air travel. Premium economy or business class may be authorized only in exceptional cases. IDI has clarified that these circumstances are primarily related to the nature of the work rather than the individual's title. For instance, this may occur when there are no alternative options available due to time constraints such as a flight that arrives only in the morning before a board meeting, and the individual does not require rest or due to medical reasons. Travel for courses and studies must always be in economy class. Employees are entitled to lounge access if the stopover exceeds three hours. Employee can pay for lounge access upfront and will be reimbursed upon submission of receipts. Meals consumed in the lounge will be deducted from the per diem, similar to meals provided on the aircraft. If an employee intends to use their own vehicle instead of scheduled transportation, prior consent from their manager is required. Train or bus travel can be undertaken using the cheapest available business or premium class tickets.

Currently IDI does not have an effective way to ensure that no Sida funds are spent on business- and first-class travels. Sida explicitly prohibits the use of its funding for this higher class of travel.

Travel expenses will be reimbursed according to the Norwegian Government Travel Regulations, UNDP regulations, EoR procedures, or IDI Board Rules of Procedure. For employees not traveling under Norwegian Special regulations, food allowances will be based on applicable UNDP or national rates and regulations, or EoR procedures. All travel expenses must be documented, and meal allowances will be calculated based on the rates for the relevant country.

Travel advances will only be granted in exceptional circumstances, and IDI will cover the annual credit card fee. During EY's meeting IDI clarified that exceptional circumstances would be cases of no bank access, internet service or that they were not able to make the transaction trough a Norwegian bank. Oslo employees previously utilized corporate American Express cards; however, these will be phased out by the end of June 2025 due to Amex exiting the Norwegian market. After this date, employees will need to use their personal credit cards and reclaim expenses. IDI will retain one corporate credit card, registered to DDG Corporate Support, for necessary credit card payments.

Any changes to a pre-authorized journey must be explained in writing as part of the expense claim. The employee's manager (DG/DDGs) is responsible for ensuring that a proper audit trail exists for all authorized travel and approved expenditures. Travel claims should be submitted as soon as possible, and no later than 10 working days after the trip.

Currency conversion to Norwegian kroner (NOK) will be based on the bank's sales price at the time of travel, and the conversion rate must be included in the travel expense claim, supported by currency exchange receipts or bank statements. All travel claims require approval from DG/DDGs, and the net amount will be paid to the employee through IDI's payroll system.

Compensation for travel time for independent positions of Managers and Senior Managers is included in their salaries. For coordinator positions, compensation is provided hourly for actual networking time exceeding normal working hours or for time spent traveling during personal time. This compensation can be taken as time off in lieu or paid at the regular hourly rate.

Using the general ledger, EY selected three random travel costs to check if the invoices are in accordance with their policy. EY found no deviation and found they all to be in line with their policies.

Recommendations:

▸ We recommend that IDI updates it's policies and procedures to ensure that no Sida funding is spent on business- or first-class travels

3.1.2 Salaries

Guidelines for salaries is found in *Financial Manual* under section 4.11 Salaries and Advances and *Remuneration Policy*. IDI operates two distinct payroll systems, one for domestic employees in Norway and another for employees based outside the country. Employees residing outside Norway are employed by the Employer of Record in their respective tax jurisdictions and are treated accordingly. All employees are compensated under the same salary framework, which is based on an assessment of positions using the Korn Ferry Hay Group's methodology. Each position is assigned a "Hay score", and benchmark salary levels are set below the market median in Norway, excluding the leading oil and gas sector. The salary table receives approval from the IDI Board's Nomination and Remuneration Committee, which also determines the salaries of the DG and DDGs. The HR manager is responsible for maintaining records of fixed salaries and updating them as necessary.

Base salary adjustments will be made annually towards the end of the calendar year. To manage risks concerning IDI's ability to finance salary adjustments, the IDI Management will recommend a salary budget, for approval by the Nomination and Remuneration Committee, at the end of the fiscal year, to adjust fixed pay based on the projected financial performance and position in the following fiscal year. Please see Table 4 for pay bands. These are set in accordance with the IDI Remuneration Policy and approved annually by the Board - Remuneration and Nomination Committee.

Table 4 IDI Pay Bands for 2024

Position	• Lower band (NOK)	• Upper band (NOK)
Director General	1 191 000	1 787 000
Deputy Director General Capacity Development	1 047 000	1 570 000
Deputy Director General Admin and Global Foundations	953 000	1 429 000
Senior Manager	804 000	1 206 000
Manager	708 000	1 063 000
Senior Coordinator	507 000	760 000
Coordinator	478 000	718 000

EY has collected a salary list and made comparisons to similar organizations and found all salary levels to be within comparative intervals.

Payroll processing is managed by an external accounting service provider, with data for fixed payroll supplied by HR and variable pay or deductions provided by the Controller. Salaries are paid monthly, with an overview detailing gross pay, advances, deductions, and net pay prepared by the outsourced accountant. This overview is then checked and verified by the Controller and approved by the DDG of Corporate Support before payment vouchers

and bank transfers are prepared. Each staff member has a personal file, and salaries are paid electronically in their respective bank accounts. Employees receive an electronic pay slip each month, outlining the computation of their net salary. The approval process for salary payments includes authorization of payment vouchers for net pay and monthly transfer sheets, ensuring a structured approach to transaction control and approval.

3.1.3 Salaries and benefits

As the report states above, payroll functions have been outsourced to AMESTO. The policy however states that all employees are obliged to fix play (annual salary), employee benefits and overtime/flexi time. Overtime is compensated according to the Norwegian Central Government regulations. The stated components are applied dependent on position.

Positions at the manager's level and above are not entitled to overtime, calculated flexible working hours, or travel time compensation. While these roles offer flexible working hours, they are not based on hours worked beyond the standard working hours. Instead, employees in these positions receive five additional flexible days off each year. Positions classified as senior coordinator or below remain eligible for overtime, flexible time, and travel time compensation as previously stated. Employees at the manager's level or above who travel frequently will receive a fixed salary increase, which will vary based on the number of days travelling.

Employee benefits include pensions, flexible working hours, company phone, travel insurance, accident insurance, life insurance, opportunities for further professional development (up to an approved limit), and reimbursements for home broadband, gym memberships, eyewear necessary to perform office functions etc. All regional employees receive the same benefits. Expatriate employees have additional benefits to ease the transition of moving to Norway. If the transition to Norway is under time-bound contract, rent and childcare expenses is also covered by the IDI.

No IDI employee receives bonuses.

Recommendations:

▸ We recommend that IDI reviews and controls whether all employees understand and have read the Remuneration policy.

3.1.4 Overhead costs

The costs associated with the IDI DG and Corporate Support Units, including both overhead and staff expenses, which are allocated across various IDI work streams and will soon be detailed down to the initiative level. The allocation method is based on the amount of staff time dedicated to each work stream and initiative. For budget planning, these allocations are derived from estimates, while actual expenditures are calculated using staff time records maintained in X-ledger.

Overhead costs are modeled based on a price-per-employee framework, where applicable. These costs are estimated using historical expenditure data, with necessary adjustments

made for inflation to ensure accuracy and relevance in the current financial context. This approach helps maintain transparency and accountability in the allocation of resources across IDI's initiatives.

3.1.5 Foreign exchange gains /losses

Exchange rate risk poses a challenge for IDI, as most of its expenses are incurred in NOK, while income is received from foreign donors. However, this risk is somewhat reduced because the largest portion of core funding is also in NOK. Additionally, there is a "natural hedge" effect as the Norwegian kroner weakens, costs in foreign currencies rise, but income from foreign donors also increases. The budget revisions allow for adjustments to plans if significant changes in exchange rates require modifications to activities.

IDI records foreign currency transactions at the exchange rate on the date of the transaction and recognizes any realized gains or losses from these exchanges. Expenditures in foreign currencies are recorded based on the invoice date, which can lead to discrepancies in payment amounts later on, resulting in FX gains or losses. For income, IDI records the actual amount received, with an exception for payments made in arrears after the IDI year-end. In such cases, the accounts and financial statements are based on the payment request issued, which may differ from the final amount received, leading to potential FX gains or losses. Net FX gains and losses are appropriately reflected in the financial statements.

EY evaluates IDI's management of foreign transactions as reasonable and adequate, aligning with best practices.

3.2 Conclusion

Our overall assessment indicated that the organization has established guidelines or routines related to accounting policies, travel, overhead costs and FX gains and losses.

Based on our assessment, we have considered the overall risk assessment in the context of accounting policies, procedures, and practice as low. Refer to Annex 1 for a summary of recommendations and their priority.

4. Risk management

4.1 Risk management framework

IDI's risk management strategy is outlined in a report presented at the Board meetings held each spring and autumn, specifically the *IDI Corporate and Development Risk Register* with the latest version dated April 2025. The Strategic Support Unit (SSU), and now with Corporate Support Department (CS), is responsible for maintaining the risk register on behalf of the DG. The risk register is reviewed biannually prior to the Board meetings. Additionally, IDI maintains more detailed risk registers at the work stream level, which are regularly updated as risks change.

The more general risk register details the risk management approach and includes the current risk register which categorizes risks into two main groups, corporate risks and development risks. Corporate risks encompass operational, reputational, and natural risks, which are areas where IDI has greater control. In contrast, development risks refer to the potential that IDI's support may not lead to sustainable performance improvements in SAIs, and that enhancements in SAIs may not result in better living conditions in developing countries.

This register is outlined as a matrix and lists the different risks. The two main groups of risks are then considered on two dimensions, impact (severity) and likelihood (probability). Both dimensions are assessed on the scale of high, medium, and low. There are four options for responding to the corporate risks, tolerate (accept the risk with no further controls), treat (apply control measure to reduce or mitigate the risk), transfer (shift the risk to another body) and terminate (remove the risk by ending the activity which gives the risk to the risk). When control measures are proposed, responsibility for implanting the control is shown. The residual risk, after applying the risk response, is indicated in the final column. Any changes from the residual risk rating in the previously approved risk register is indicated with an arrow. Residual risk is also colour coded: high – red, moderate – yellow, and low – green.

EY has reviewed the most recent version of the Corporate and Development Risk Register, with corporate risks last updated in March 2025 and developmental risks in November 2024. The matrix appears to be quite general, nonetheless together with the work stream reports it seems adequate.

Monitoring developmental risks is essential, as they are part of the environment surrounding SAIs and play a critical role in IDI's efforts to support these institutions. Additionally, developmental risks are closely linked to SAI performance and, therefore, to the achievement of IDI's mission and vision. While IDI has included its strategic response and referenced its strategic priorities where relevant, residual risks associated with developmental risks are not rated as corporate risks are. This decision was made at the IDI Board's instruction to avoid implying control over areas largely beyond IDI's influence.

Each risk entry provides an explanation of how its realization could impede the delivery of the SP. The likelihood rating assesses the probability of an event occurring within the SP

period, rather than estimating the frequency of such occurrences. More frequent reviews may be necessary in response to special or emerging situations that could significantly affect IDI's corporate risks. As risks evolve and may be effectively mitigated, they are removed from the active corporate risk register but retained as previous risks in an annex.

Upon request, IDI may share the risk register with interested partners on a case-by-case basis, excluding sensitive information to protect the security and privacy of individuals and organizations, in compliance with the GDPR (EU2016/679). The classification of information as "sensitive" will be determined on a case-by-case basis, balancing IDI's commitment to transparency with the potential risks of disclosure.

Recommendation:

- ▸ We recommend implementing routines that allow all risk registers to always be up to date and improve specificity and clarity in risk identification.

4.2 Training and competence regarding risk analysis

According to interviews, there is no recurrent training concerning risk analysis conducted on a regular basis.

Recommendation:

- ▸ Create routines for more consistent risk management throughout the year which are logged and documented. In case of subsequent events that is known to affect the foundation, there should be logs of routines that forces a smaller risk assessment to see if immediate responses are necessary.

4.3 Conclusion

We assess that IDI has a written guideline for the risk management process along routines to support the employees in their continuous risk assessment. Risks are followed up on a re-occurring basis with the assistance of a risk matrix. We note however that the risk mitigating processes are not documented on a consistent basis.

Based on our evaluation and recommendations above, we have assessed the overall risk as moderate. Refer to Annex 1 for a summary of recommendations and their priority.

5. Audit

5.1 Organizational audit

IDI is subject to annual audits. The audit of annual accounts of the organization is performed in accordance with ISA and Norwegian Accounting Act. EY have reviewed the audit reports for the past two years. These audit reports were unmodified, and no management letters were issued for the period. In Norway management letters are only issued in case there would be any identified issues

Based on the organization's procedures, the audits are performed annually, and the financial statements are submitted by June 30th. During the last two years the audit was completed in Mars and April.

The authority responsible for appointing the external auditors is PricewaterhouseCoopers AS (PwC). The previous external audit firm was KPMG, which held the position until 2017, when PwC was appointed. PwC is an independent and qualified external auditor.

Regarding the country offices, the audit is performed in accordance with ISA and ISRS 4400.

5.2 Conclusion

EY has evaluated that the organization has implemented adequate procedures concerning the audit of the organization and the external partners. The auditor is independent, qualified, and external. Although IDI appear to rotate signing auditors on a regular basis, we have not identified that this is a stated requirement by the organization.

Based on our assessment, we have considered the overall risk assessment in the context of the audit as low. Refer to Annex 1 for a summary of recommendations and their priority.

6. Reporting and monitoring

6.1 Reporting Structure

IDI has a guideline, *IDI Financial Manual,* that outlines the accounting, administrative procedures, and regulations for IDI. The guideline ensures internal control and compliance with financial routines.

Finance prepares reports every four months detailing expenditures against the budget for all IDI departments. These reports are reviewed by managers and DDGs and serve as the foundation for internal monitoring discussions with the DG, leading to necessary adjustments. Additionally, there is an annual financial report at the end of the year, and for certain grants, specific financial reports are required by donors. These donor reports can vary in frequency from quarterly to annually and may align with the donor's financial year rather than IDI's. The responsibility for these reports is delegated to work stream managers, who can also access supplementary financial reports as needed.

Traditionally, the financial monitoring and reporting for donor grants has been assigned to those managing the respective grants, utilizing Excel and figures from the x-ledger accounting system. In the latter half of 2025, IDI plans to initiate a significant digitalization project aimed at enhancing budgeting, financial monitoring, reporting, and the management of donor grants. The goal is to facilitate and automate improved financial monitoring and reporting for grants.

At the IDI level, the official report is the *IDI Annual Report 2024*. Additionally, each work stream generates a report specific to its activities. These reports are based on templates established by *IDI - Corporate Support* and are generally designed to fulfill the overall reporting requirements of most of our donors, particularly Sida. However, some donors have unique reporting needs, which necessitate the preparation of specific reports, especially financial ones, for the execution of individual grants (e.g., EC, Canada, USAID). The formats for these reports vary, and specific examples can be provided upon request.

Additionally, there is the *IDI Budget Report* and the *Portfolio Review*, which includes financial scenarios. Notably, IDI made slight adjustments to its financial reporting to the Board for the 2024 financial year, incorporating a financial report into the new IDI Annual Report. Furthermore, in response to changes in the donor funding landscape, IDI focused its annual portfolio review on mid-term financial scenarios.

6.1.1 Tools to monitor the operations

IDI uses a limited number of tools to monitor operations.

Tool	Functionality
X-Ledger	An accounting & financial management cloud-based software system.
Semine	An accounting & financial management cloud-based software system.

Report of Assessment of Internal Control of IDI

6.2   Conclusion

EY has assessed that the organization has established sufficient procedures related to the reporting and monitoring of the organization's financial performance. The structured approach to financial follow-ups, from individual projects to the overall organizational level, facilitates proactive management of financial performance.

Based on our assessment, we have considered the overall risk assessment in the context of reporting and monitoring as low.

7. Procurement policies, procedures, and practice

7.1 Procurement policy

IDI has developed its own procurement policy based on the Norwegian government's procurement principles, adjusted to IDI's organization and its legal status of a not-for-profit foundation. The policy also incorporates the necessary principles required by international development agencies for making procurements out of development grants and is aligned to good international procurement practices. The current procurement policy was issued on the 4th of May 2023 and was approved by the IDI DG. The procurement policy is reviewed, and updated, if necessary, on an annual basis.

The applicability of the policy encompasses several key areas. It applies to all procurement of goods and services by IDI from vendors or suppliers. The policy also includes the procurement of services from Non-Profit Organizations (NPOs) or SAIs that involve the use of IDI funds for payment or reimbursement of costs. Additionally, it is relevant to any agency or stakeholder of IDI that engages in procurement activities on behalf of the organization. All IDI staff must follow the policy while making procurements. The DG has the ultimate responsibility for implementing this policy.

IDI has a set of basic principles in which all procurements should follow:

- **Competition**. All procurements should be to the extent possible based on competition to ensure the most competitive value for procurement.
- **Transparency**. All procurements shall be made in a transparent manner to ensure proper information for all stakeholders including vendors.
- **Ethics**. The IDI Code of Ethics, IDI anti-corruption policy and IDI safeguarding policy shall be followed in procurements to prevent unethical and corrupt procurement practices.
- **Environment**. While making procurements the IDI Environment Policy shall be considered. Efforts may be made to prioritize the procurement of recycled products.
- **Social Responsibility, inclusiveness and gender equality**. All procurements should be based on fair trade practices and guard against discrimination or exploitation of any community or group including minorities, women and children.
- **Value for Money**. Procurements shall be subject to cost-benefit analyses in terms of the cost of the product and value it brings to IDI and risk assessments. Quality and durability and warranty conditions shall be given due importance along with the price, as cheaper delivery may not necessarily yield greater value for money. Value for Money analysis in the form of a simple matrix with weightage for different criteria may be developed at the planning stage of the procurements.

IDI operates with four main types of procurement with separate related processes:

1. Direct procurement
2. Procurement through framework agreements
3. Relaxations to the policy (Exceptions)
4. Contract Management

Direct procurement

All major procurements are normally included in the IDI Operational Plan and the corresponding budget. There may however be situations where procurements that were not in the Operational Plan may be necessary. A procurement memo shall be prepared and presented for approval/ information followed by archival as per the thresholds.

Threshold	Quotes	Procurement Memo	Approval
<10,000	No	Yes (Not for petty emergent purchases)	As per delegation, inform responsible DDG/DG
10,000 – 50,000	Three quotes sought where possible	Yes (with details of multiple quotes if obtained)	As per delegation; Segregation of duties to be followed; Initiator of purchase cannot approve; If initiated by (Sr.) Coordinator then approval by (Sr.) Manager with delegation and inform responsible DDG/DG; If initiated by Manager then approval by DDG/DG.
50,000 – 150,000	Minimum three quotes sought	Yes	As per delegation; Segregation of duties to be followed; Initiator of purchase cannot approve; If initiated by (Sr.) Coordinator then approval by (Sr.) Manager with delegation and inform responsible DDG/DG; If initiated by (Sr.) Manager then approval by DDG/DG.
150,000 – 500,000	Open tender or minimum five quotes sought	Yes	Purchase Committee comprising two members of the IDI Management Team (two DDGs/DG)
500,000 – 5,000,000	Open tender/ or minimum five quotes sought	Yes	Purchase Committee comprising two members of the IDI Management Team which must include DG
>5,000,000	Open tender/ or minimum five quotes sought	Yes	IDI Board, routed through the Purchase Committee which must include DG

The initiator of the procurement is to keep a detailed procurement memo in support of the justification of the procurement and archive it in terms of the IDI archiving policy of saving in MS Teams/SharePoint. While approving the procurement memo, the availability of budget shall be ensured. Any deviation from the amounts indicated in the budget shall be

justified. In case it is not included in the budget, the same will have to be justified and availability ascertained from Administration. However, intra workstream reappropriation of budget between different initiatives shall be authorized by the responsible DDG.

Wherever more than one quotation is considered, the details must be included in the procurement memo. This will be done by the initiator of procurement. Well-intentioned negotiations in the interest of IDI are welcome in all procurements. However, these must be done in a transparent manner, and documentation must be maintained as part of the approval process.

The procurement memo needs to be more stringent in case of higher value procurements with due weighting of criteria based on which the procurements are being made. All bidders who have taken part in the tender must be informed regarding the outcome of the selection process. It can be a simple email stating whether the vendor has been successful or otherwise. Any questions raised by the competitors during the tender process, and the IDI's response, should be distributed to all who take part in the competition.

Open tendering may be done by publishing the Tender Notice in newspapers, trade journals, on the IDI website or other bulletins. Efforts should be made to obtain international quotations. However, the criteria and specifications for the good/service to be procured should justify whether open tendering is being followed (e.g. Need to diverge in the case of hotel procurements).

Procurements through Framework Agreements

IDI enters into framework agreements to access skilled vendors at agreed rates with due diligence, at short notice to meet its professional requirements. These are used typically for translations, interpretation, design and pools of consultants for other professional services. Hotel and travel services are covered separately in this policy. Framework agreements help in avoiding the cumbersome process of inviting multiple bids/ open tender necessary for direct procurements and ensure a reliable pool of consultants/service providers.

IDI framework agreements shall normally last for a period of four years or as deemed fit by the initiator of the agreement. In the case of specific services which require a period of trial or review these may be operated on a 1+3- or 2+2-year basis. Framework agreements shall be established through an open competitive procurement process, under which consultants will be assessed against the required skill set of the framework agreement. Daily/ hourly/ deliverable-based fee rates shall be agreed for the duration of the framework agreement, in either NOK or another specified currency.

The monetary threshold requirements for procurements from vendors on framework agreements are given in the table below:

Threshold	Quotes	Procurement Memo	Approval
<10,000	No Requirement	Yes	As per delegation, inform responsible DDG/DG
10,000 – 50,000	No Requirement	Yes (With justification for selecting the vendor)	As per delegation; Segregation of duties to be followed; Initiator of purchase cannot approve; If initiated by (Sr.) Coordinator then approval by (Sr.) Manager with delegation and inform responsible DDG/DG; If initiated by (Sr.) Manager then approval by DDG/DG.
50,000 – 150,000	It is an option to obtain three quotes from amongst those on framework agreements in case there is no clear justification for single source procurement.	Yes (with details of multiple quotes if obtained)	As per delegation; Segregation of duties to be followed; Initiator of purchase cannot approve; If initiated by (Sr) Coordinator then approval by (Sr.) Manager with delegation and inform responsible DDG/DG; If initiated by (Sr.) Manager then approval by DDG/DG.
150,000 – 500,000	Minimum three quotes sought from amongst those on framework agreements. Tender may be extended if there are less than three vendors on framework agreements.	Yes	Purchase Committee comprising two members of the IDI Management Team (two DDGs/DG)
500,000 – 5,000,000	Minimum five quotes sought from amongst those on framework agreements. Tender may be extended if there are less than five vendors on framework agreements.	Yes	Purchase Committee comprising two members of the IDI Management Team which must include DG.
>5,000,000	Minimum five quotes sought from amongst those on framework agreements. Tender may be extended if there are less than five vendors on framework agreements.	Yes	IDI Board, routed through the Purchase Committee which must include DG

Necessary justification is required for selecting a single vendor from the framework agreements if quotes are not being called for from among the framework agreement vendors. This implies that draw down contracts may be done through justified selection from the consultants on the framework agreement, or through a competitive process between consultants on the framework agreement. A vendor shall not be considered for draw down contracts in the event of demonstrated poor performance in any previous contract. In case of unsatisfactory performance or ethical issues with the vendor, the framework agreement may be terminated. Approvals for framework agreements may be obtained from a purchase committee comprising two DDGs or one DDG+DG.

Current permanent employees of SAIs on an individual basis, IDI staff and organizations on sanctions lists shall not be eligible for bidding. SAIs can submit bids and depute their employees on assignments. All bidders and IDI staff initiating or approving a procurement shall make a 'No conflict of interest' declaration in their bids or in the procurement memo respectively.

Relaxations to the Policy

In some cases, relaxations to the Procurement Policy are necessary. This can be regarding single source procurements, procurement of hotel services and travel arrangements, procurement through local and other partners, and procurement of services from NPOs or SAIs.

In some situations, there may be emergent requirements to hire specialists or subject matter experts with specific skills who are otherwise not part of the framework agreement and do not have any substitutes for IDI to approach for requesting multiple quotes. Services of such individuals may be obtained through single source procurement after justification that they are singularly placed to deliver the services. Such procurements must be approved by a purchase committee including the DG. Single source procurement may also be made in case of patented goods or books from relevant publishers. However, in case of purchasing these goods from resellers, the policy provisions will be applicable.

Procurement of hotel services and travel arrangements are also viewed differently than other IDI procurements. These procurements are generally not well suited for open tendering owing to localized requirements. In case five hotels cannot be contacted (due to fewer hotels at the location), this shall be justified in the procurement memo but a minimum of three shall be contacted. This provision may be relaxed with full justification and approval by DG/DDG in case less than three hotels are available at a venue. As procurement of hotel services is required to be confirmed at the earliest owing to the high possibility of price changes/ unavailability, the complaint clause may be waived for procurement of hotel services. However, all bidders must be informed. Procurement of air/rail tickets/ taxi services for official travels of IDI staff/ resource persons or participants shall be done in terms of IDI travel policy after getting the necessary approvals from the appropriate approval authority irrespective of the working provisions of this policy.

Contract Management

Contract Management begins with the signing of the contract with the selected vendor. The contract is signed by the responsible DDG/DG of the Department making the

procurement. The IDI staff initiating the procurement will be responsible for managing the contract and ensuring the inclusion of the necessary clauses in the contract. Special attention shall be given to the specifications, quality and timeliness of delivery. Further, a GDPR clause should be included in all terms of reference and procurement contracts. While signing contracts with service providers who are going to process personal data (IDI staff and/or participants etc.), a Data Process Agreement needs to be signed at the same time.

Regarding Scope Creep and Cost Overrun, all efforts must be made to manage the procurement within the agreed and contracted timelines and amounts. In the unlikely event of mid contract scope creep and cost overrun or time overrun, a detailed justification may be sent to the authority that has approved the procurement for concurrence. In case this involves a shift to a higher threshold, the approval may be obtained from the approving authority of the higher threshold with due justification.

For high value contracts above 500,000 NOK provision for Bank Guarantee shall be included in cases where upfront payments of at least 100,000 NOK is made prior to delivery of any good or service. In case of non-inclusion of Bank Guarantee, this shall be suitably justified. This is to protect the IDI from any breach in contract by the vendor.

Comparison of IDI's guidelines with Sida's Procurement Provisions

In the table below we have compared IDI's guidelines with Sida's Procurement provisions for use by Non-Governmental Organizations (NGOs) in the context of Sida-financed Project/Core Activities (Sida's Procurement Provisions), version 1.0 of August 2018.

Key conditions	Sida	IDI Direct Procurements	IDI Procurements from Framework Agreements
Threshold and documentation requirement for different types of procurement	Less than 60 000 EUR – negotiated procedure on basis of a single tender. Less than 300 000 EUR but more than 60 000 EUR – simplified procedure without publication. Three supplier quotations are required. More than 300 000 EUR – open tender procedure and publication of a procurement notice in all appropriate international media or a restricted procedure following publication of a procurement notice.	Less than 10,000 - No quote Between 10,000 and 50,000 - Three quotes sought where possible Between 50,000 and 150,000 - Minimum three quotes sought More than 150,000 - Open tender/ or minimum five quotes sought	Less than 50,000 - No quote Between 50,000 and 150,000 - Optional to obtain three quotes Between 150,000 and 500,000 - Minimum three quotes More than 500,000 - Minimum five quotes
Grounds for exclusion from participation in procurement	The Contracting Party may decide to use a negotiated procedure on the basis of a single tender when the contract does not exceed € 60	Current permanent employees of SAIs, IDI employees, and organizations on sanctions lists are not eligible to participate in the bidding process. Vendors with poor performance in previous contracts	

	000 or in the following exceptional and duly justified cases: a) humanitarian aid, civil protection or crisis management aid, b) in extreme urgency not attributable to the Contracting Party, following approval by Sida c) tender procedure has been unsuccessful, that is where no qualitatively and/or financially worthwhile tender has been received. For all and more specific regulations, see Sida's procurement provisions.	are excluded from consideration for drawdown contracts. If there are any breach with The IDI Code of Ethics, IDI anti-corruption policy or IDI safeguarding policy associated with a vendor, the framework agreement or contract may be terminated. IDI Environment Policy shall be considered. Efforts may be made to prioritize the procurement of recycled products.	

7.2   Review of procurement policy compliance

In order the verify compliance to IDI's procurement policy we have used the general ledger to sample procurements performed in the last years and selected three samples. IDI proved EY with another two best practice samples. IDI keeps no list of procurements, so using the general ledger was the only option. Having no list of procurements limits the organization option to perform internal control. During the site visit it was only clear that there are no one place to store all procurements documents as they had to ask around. This increases the risk of costs exceeding contract values.

In the table below the total sample is listed along with the assessment of compliance, based on the criteria and scale noted in section 7.1.

Item description	Actual contract value	Findings	Compliance
BIS Madagascar - C8 Project Management and Coordination	NOK 390 000	An open tender was advertised on various websites and emailed directly to all consultants in the IDI database, in line with the policy requiring either an open tender or a minimum of five quotes. By the submission deadline, two service providers submitted bids. A procurement memo was signed by two DGs, in accordance with the policy that mandates approval from two DDGs or DGs. As EY Stockholm won this bid, hence, IDI were not able to share the detailed assessment of the bids received. Nonetheless, it was informed to be a part of the procurement memo page 4-9.	Yes
974000 - GFU - Advocacy and	Unsure, general ledger amount NOK 85 132	EY has not received any documentation of this procurement and cannot verify that it	No

Communications		exists. It has been informed that the contract involves two consultancies who received payments to a former staff member that they retained for consultancy work until we had new communications staff in place.	
511120 - SAI-CSO-Facilitate engagement in selected countries	Unsure, general ledger amount NOK 46 678	EY has received documentation for this procurement. IDI informed EY that the amount is a reimbursement of graphic design costs of Paradigm Leadership Support Initiative (PLSI) in Nigeria. It is part of a larger invoice including several other costs. EY has received an administrative agreement with PLSI, under which they provide certain support services for a small initiative in Nigeria, and we reimburse their costs against receipts.	**Yes**
Interpretation from ENG to Spanish, Arabic and French	NOK 281 715	A best practice sample sent by IDI. The purpose of the procurement was to make direct contact with the interpreters in IDI database. More specifically interpretation from English to Spanish, Arabic and French. It has an open tender approach and was approved by one DDG and one DG, in line with IDIs policies. There were 9 bidders in total for the different languages. The decision was mainly based on highest quality interpretation service possible due to the high-profile nature of event in question.	**Yes**
Translation of exam questions to Spanish	NOK 12 500	A best practice sample sent by IDI. The purpose was to establish direct communication with the translator within the framework agreement. Three quotes were obtained, and the approval was signed by a senior coordinator and a senior manager. In accordance with delegation protocols, if the purchase is initiated by the coordinator, the manager must approve it with delegation and inform the responsible DDG/DG to ensure compliance with policies.	**Yes**

Recommendation:

▸ We recommend IDI to track procurement and have an updated list of these items as it allows for better internal control. It is also recommended to do spot tests to make sure that all employees follow and understand *IDI Procurement Policy*.

7.3   Conclusion

Our assessment shows that IDI has a procurement policy that includes adequate rules and regulations to manage planned procurement. We deem that the procurement policy is compliant with applicable regulations. We have compared the policy with Sida's Procurement Provisions, version August 2018 and found that IDI's policy has lower thresholds than Sida. We deem that IDI's procurement policy is compliant with Sida's Procurement Provisions, and that IDI has established a procurement policy with clear roles for approvals.

However, out of the samples reviewed, one was assessed as non-compliant. There is an overall perception that IDI does not have an organized structure on how to archive documents making it difficult to perform internal reviews on procurements being in line with the contracts.

Based on our evaluation we have assessed the overall risk assessment as moderate. Refer to Annex 1 for a summary of recommendations and their priority.

8. Anti-corruption

8.1 Anti-corruption policy and framework for reporting suspicions of corruption

IDI has an *Anti-corruption policy,* which outlines IDI's commitment to preventing corruption and fostering a culture that discourages it. This policy defines key terms related to fraud, bribery, and corruption, clarifies the legal framework, and delineates roles and responsibilities for compliance within IDI's governance structure. The policy also clarifies rules regarding gifts or invitation that could be intended to influence decision making for IDI staff. The policy stipulates that all gifts valued at over NOK 500 should be handed over to IDI.

This policy applies to all employees and individuals working on behalf of IDI, including Board members, management, staff, resource persons, and contractors. All are expected to familiarize themselves with related policies and apply them in all aspects of their work for IDI. In the event of a policy breach, potential actions may vary based on the individual's position and may include removal from the initiative, contract termination, filing a formal complaint with their employer, blacklisting from future work with IDI, and determining the need to report the matter to relevant authorities.

The *Anti-corruption policy* document displays, among other things, key risks one might face and how they should respond. However, the document does not include procedures or detailed descriptions for incident reporting, it only says to report to different people and not how. All reported suspicions will be thoroughly investigated, and all offenses, regardless of their severity, will be reported to the relevant authorities and subject to appropriate disciplinary measures.

Light touch updates are planned to be incorporated following the approval of the IDI Strategic Plan 2024-2029.

8.1.1 Whistle-blowing procedure

IDI has established a complaints framework, *IDI Complaints Framework 2018*, that encompasses suspected cases of fraud and corruption among various complaint types. This framework outlines the procedures for reporting and investigating complaints from both internal and external partners. All complaints are thoroughly investigated and followed up on. This type of framework is also grounded in Norwegian Labor Law, which grants individuals the right to file complaints and offers legal protection for whistleblowers.

Employees are encouraged to include their names when raising concerns; however, anonymity must be upheld. The *IDI Complaints Framework* 2018 contains several annexes, which includes template of written complaints, tips for whistleblowers and the individual receiving complaint, and details the steps to take after a complaint is submitted. EY is not aware of any channels being used that ensure the confidentiality of whistleblowers or facilitate anonymity. The framework outlines the procedures for handling and submitting complaints but not where to submit them in terms of confidentiality.

The employees are also instructed to submit the complaints to the next level of management of the person the complaint is regarding. The DG is to be notified of all formal complaints within the IDI. Any formal complaint against the DG or a member of the IDI Board is to be directed to the Chair of the IDI Board. Complaints against the Chair of the Board is to be addressed by a committee consisting of three Board members, which will be formed by the Deputy Chair of the Board. Such complaints may also be submitted to the DG or any member of the IDI Board. EY want to emphasize that board members are under Chair of the Board and thus incapable to handle such complaints, external assistance should be considered in case.

EY is not aware of any channels or external suppliers that guarantee anonymity and confidentiality, as there should be no storage of identifiable information that could potentially link back to the individual submitting the report.

Recommendations:

- ▶ We recommend IDI to implement a channel that allows whistleblowing to be anonymous and incidents to be confidential. This also allows for feedback and correspondence with the complainant without being in breach of anonymity.

8.2   Linked policies

The Code of Ethics outlines the ethical standards expected of IDI as an organization and its employees. This latest version of 2023 builds on the *2018 IDI Code of Ethics*, maintaining detailed requirements regarding sexual harassment, exploitation, and abuse. It also incorporates changes from the INTOSAI Code of Ethics (ISSAI 130). This Code should be read alongside other IDI policies and the Norwegian Ethical Guidelines for the Public Service, which collectively establish IDI's ethical framework.

This Code applies to all IDI staff, as well as to IDI's Board Members and partners working on behalf of IDI when representing the organization. In cases where a conflict arises between an ethical value outlined in the Code and any other IDI guideline, the ethical value of the Code takes precedence. The ethical values specified in the Code are mandatory. However, this Code does not supersede any rules, regulations, or laws of Norway, or those of other applicable countries. The overall conduct and behaviour of IDI staff are governed by the Ethical Guidelines for the Public Service published by the Norwegian Ministry of Local Government and Modernisation.

In line with the *IDI Code of Ethics* section 5.3, IDI assesses the potential effects of secondary employment on its staff and ensures that employees do not engage in such work that could compromise stakeholder trust in IDI's operations. Employees are expected to evaluate their impartiality regarding secondary jobs and to communicate any potential concerns to IDI management. IDI informs EY that very few instances of this nature have occurred within IDI. There is currently no IDI employees engaged in secondary employment.

8.3 Reported incidents

There have been no instances of fraud at IDI, and they do not maintain a log to track such occurrences. While there have been some attempted phishing scams, no erroneous payments were made. During the interview, they recalled an incident from years ago involving a transaction that was successfully halted. IDI also mentioned that there have been cases of internal whistleblowing; however, they do not keep records of these incidents, making it challenging to provide specific details.

<u>Recommendation:</u>

▸ Although there have been no significant incidents, we recommend establishing a log. If an incident does occur, the designated individual will know where and how to report it. This will help ensure a systematic approach to addressing any future issues and provide a clear reference for reporting.

8.4 Anti-corruption training

IDI offers training on the IDI Code of Ethics through its e-learning program for new employees. They address topics such as corruption, bribery, fraud, ethics, and compliance during staff meetings.

Additionally, IDI conducts periodic refresher courses, seminars, and webinars that cover various internal policies. Recent refresher sessions took place on August 31, 2022, and November 13, 2024, with attendance being optional for staff. IDI is planning another refresher event in late 2025, which will encompass procurement, sanctions, anti-corruption, and related subjects, following an update to the procurement policy to incorporate the responsibilities of the new ADG positions.

<u>Recommendation:</u>

▸ We recommend that IDI implement a system to provide all staff members with ongoing training on anti-corruption, including maintaining a log to track who has received the training and who has not.
▸ We suggest the introduction of annual e-learning programs for all employees to ensure that everyone is fully updated on any changes. This will also serve as a valuable reminder of the content.

8.5 Conclusion

We have assessed the policies and routines for preventing, detecting, and taking measures on corruption and deem that they on an overall level are sufficient. IDI has policies to cover topics regarding anti-corruption and an established Code of Conduct. The organization has a whistle-blowing function which we deem adequate. However, in our opinion IDI should ensure that whistle-blowing reports can be submitted anonymously and with confidentiality.

In addition, we also recommend IDI to update procedure for incident reporting, so it reflects how the organization reassure employees that any complaints is not to be traced back to the individual making the report.

IDI runs refresher courses, seminars, webinars covering various internal policies on a periodic basis. Nonetheless, it is recommended to plan these refresher courses or trainings to make sure that there is not too much time in-between. Additionally, they should maintain logs to prevent certain employees from falling behind on essential information.

Based on our evaluation and recommendations above, we have assessed the overall risk assessment as moderate. Refer to Annex 1 for a summary of recommendations and their priority.

9. Respect for restrictive measures

IDI employs a comprehensive routine to ensure that suppliers and implementing partners financed by grant funds are not subject to sanctions or restrictions under the European Union's sanctions list. The organization utilizes a sanctions scanner to identify key individuals associated with relevant sanctions lists and maintains an internal list of countries, SAIs, and SAI Heads affected by sanctions, assessing how these issues impact IDI's operations.

While IDI endeavors to identify procurements or planned payments to organizations linked to individuals on sanctions lists, it currently lacks an automated contracts and payment system for this purpose, although plans to explore such a system are in place for 2025. For downstream partners, IDI has established two new policies, Issuing Small Accountable Grants and Financial Partnerships, approved in April 2025, which address the screening of organizations receiving funds. IDI only provides funding to implementing partners when specifically received for that purpose, ensuring that no funds are passed to implementing partners unless initiated by the donor. Currently, IDI has accountable grant agreements with select implementing partners, and the responsibility for tracking and managing these grants is delegated to work streams, with Corporate Support reviewing assessments of potential new partners and draft grant agreements.

Recommendations:

▶ We recommend that the organization establish procedures for recurring checks throughout the year, on the vendors, donors, partners to identify any change on the sanction status.

▶ We recommend the organization ensure that in case of any promotion within the organization these policies and routines are acknowledged by the employees prior to their starting date in the organization.

▶ We recommend that the organization perform trainings at least annually to its employees, and more specific to teams involved with managing funds and procurement, regarding the routines and procedures in place for restrictive measures.

9.1 Conclusion

EY has assessed that the organization could improve more sufficient procedures and routines related to the restrictive measures. Due to the nature of the business and the involvement and interaction of IDI with individuals and entities globally, it is crucial for the organization to ensure compliance with the imposed restrictions and sanctions.

- **Based on our evaluation and recommendations above, we deem the overall risk in the context of restrictive measures as moderate. Refer to Annex 1 for a summary of recommendations and their priority.**

10. Conclusion

We have in this report assessed IDI's internal control systems with special emphasis on the following main areas as per the ToR:

- ▸ Organizational structure, governance, and legal status
- ▸ Funds flow management
- ▸ Accounting policies, procedures, and practice
- ▸ Risk management
- ▸ Audit
- ▸ Reporting and monitoring
- ▸ Procurement policies, procedures, and practice
- ▸ Anti-corruption
- ▸ Respect for restrictive measures

Following our observations and based on our interviews with IDI representatives, we consider the organization to have a sufficient internal control environment on an overall level. The personnel interviewed had sufficient insight into the organization to provide us with the necessary input.

EY has provided recommendations concerning all weaknesses identified in the assessed areas.

Stockholm, June 26, 2025
Ernst & Young AB

Jennifer Rock-Baley
Authorized Public Accountant

Annexes

Table of Annexes

Annex	Description
Annex 1	Recommendations in priority order
Annex 2	List of persons met

Annex 1 – Recommendations in priority order

Report section	Recommendation	Priority reference
1.2.2	We recommend IDI to create an overview of all IDI policies where it states who is responsible and their planned revision schedule.	█
1.2.3	We recommend IDI to formalize which competencies the Board members are required to have, if any.	█
3.1.1	We recommend that IDI updates it's policies and procedures to ensure that no Sida funding is spent on business- or first-class travels	█
3.1.3	We recommend that IDI reviews and controls whether all employees understand and have read the Remuneration policy.	█
4.1	We recommend implementing routines that allow all risk registers to always be up to date and improve specificity and clarity in risk identification.	█
4.2	Create routines for more consistent risk management throughout the year which are logged and documented. In case of subsequent events that is known to affect the foundation, there should be logs of routines that forces a smaller risk assessment to see if immediate responses are necessary.	█
7.2	We recommend IDI to track procurement and have an updated list of these items as it allows for better internal control. It is also recommended to do spot tests to make sure that all employees follow and understand IDI Procurement Policy.	█
8.1.1	We recommend IDI to implement a channel that allows whistleblowing to be anonymous and incidents to be confidential. This also allows for feedback and correspondence with the complainant without being in breach of anonymity.	█
8.3	Although there have been no significant incidents, we recommend establishing a log. If an incident does occur, the designated individual will know where and how to report it. This will help ensure a systematic approach to addressing any future issues and provide a clear reference for reporting.	█
8.4	We recommend that IDI implement a system to provide all staff members with ongoing training on anti-corruption, including maintaining a log to track who has received the training and who has not.	█
8.4	We suggest the introduction of annual e-learning programs for all employees to ensure that everyone is fully updated on any changes. This will also serve as a valuable reminder of the content.	█
9	We recommend that the organization establish procedures for recurring checks throughout the year, on the vendors, donors, partners to identify any change on the sanction status.	█
9	We recommend the organization ensure that in case of any promotion within the organization these policies and routines are acknowledged by the employees prior to their starting date in the organization.	█
9	We recommend that the organization perform trainings at least annually to its employees, and more specific to teams involved with managing funds and procurement, regarding the routines and procedures in place for restrictive measures.	█

The table below illustrates the risk assessment criteria as per the ToR:

Priority Scale		
Priority Reference	**Description of Priority**	**Suggested timeframe for implementation**
	Critical	Within 6 months
	Recommended	Within 12 months
	Desirable	Within 12-24 months

Annex 2 – List of persons met

Function within IDI
Deputy Director General
Senior Manager
Senior Coordinator

EY | Assurance | Tax | Transactions | Advisory

About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

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