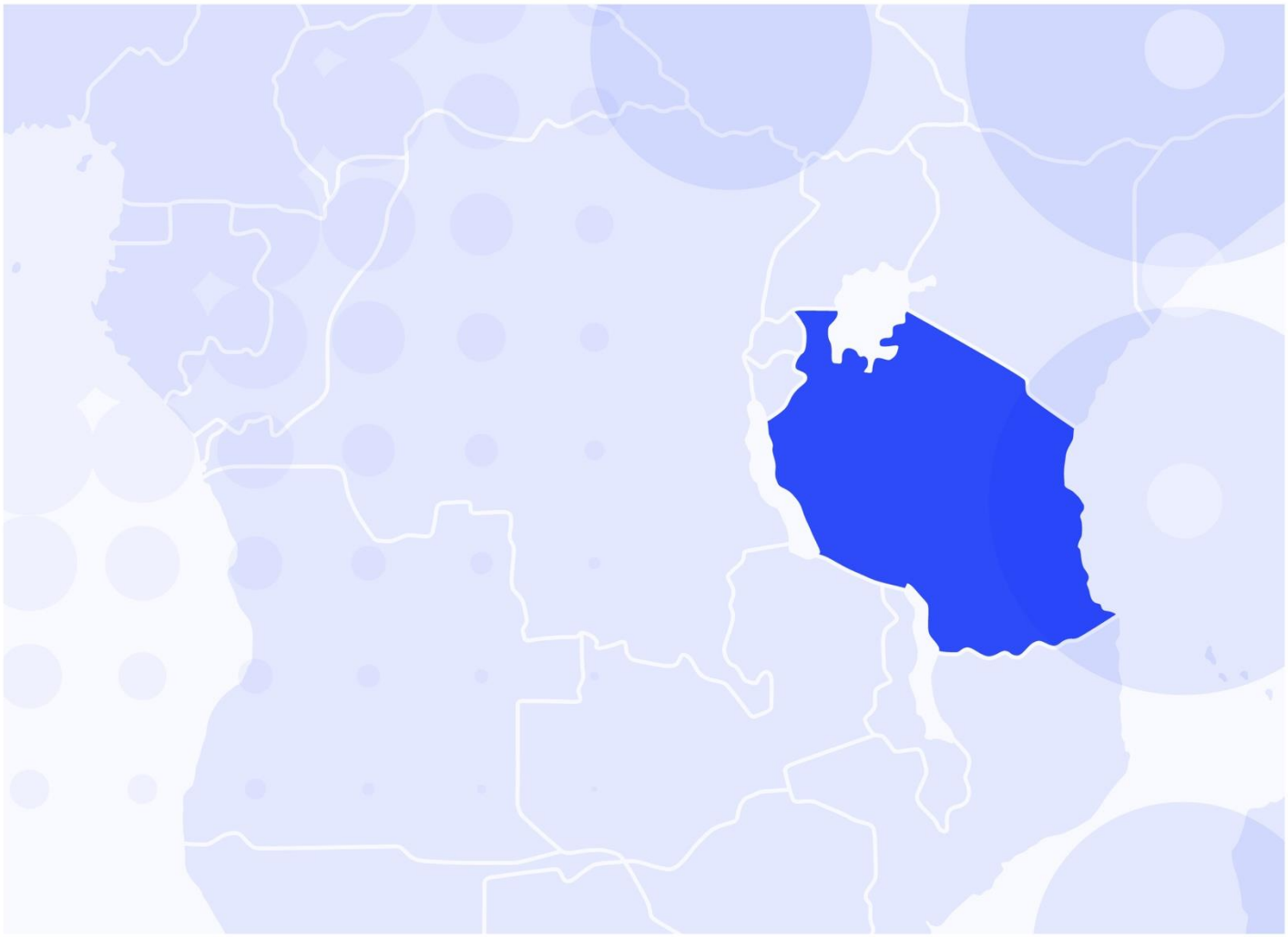




Investigation Report

Global Fund Grant in

Tanzania (United Republic)

Fraudulent Practices in the Selection of Sub-recipients by a Principal Recipient (a Non-Governmental Organization)

GF-OIG-25-004
3 June 2025
Geneva, Switzerland

THE GLOBAL FUND
Office of the Inspector General

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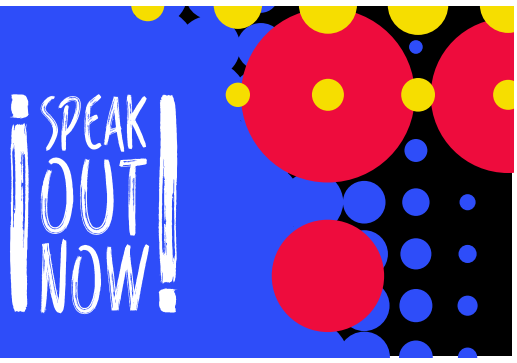
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1. Executive Summary

1.1 Investigation at a glance

Between September and December 2023, a Non-Governmental Organization and Global Fund Principal Recipient in Tanzania (the Principal Recipient), carried out a selection process to contract five Sub-recipients to implement HIV and tuberculosis intervention activities. This selection process, conducted independently by the Principal Recipient, was compromised by fraudulent practices and considered non-compliant with the Grant Agreement.

The Sub-recipient selection process undertaken by the Principal Recipient was not transparent, fair and well-documented as required by the Global Fund.[1] Specifically, the Principal Recipient misrepresented to the Global Fund that a candidate Sub-recipient was one of the five Sub-recipients selected by an Evaluation Committee pursuant to a competitive process. the Principal Recipient also failed to declare conflicts of interest with the Sub-recipient and one of its bidding partners.

1.2 Genesis and Scope

In early 2024, OIG received allegations that the Principal Recipient had not carried out this Sub-recipient selection process competitively and had improperly favored certain bidders with whom it had conflicts of interest. The OIG opened an administrative investigation and conducted an extensive records review of the Sub-recipient selection process. This entailed an in-country review, in which the Principal Recipient cooperated by facilitating access to staff and records.

1.3 Findings

- The Principal Recipient misled the Global Fund by misrepresenting the outcome of its Sub-recipient selection process, specifically by proposing to award a Sub-recipient contract valued at over US$4 million to a Sub-recipient which had received a low score by evaluators. This misrepresentation was intended to benefit the Sub-recipient and one of its bidding partners, with both of whom the Principal Recipient had conflicts of interest, by selecting them as Sub-recipient in the Global Fund program.
- The Principal Recipient misled the Global Fund by failing to declare conflicts of interest between its executive management, the selected Sub-recipient and its bidding partner.

[1] As required by the Global Fund Grant Regulations, v.2 of 14 June 2023, section 4.3(1); and the Global Fund Code of Conduct for Recipients, version of 11 February 2021, article 3.2

1.4 Context

Tanzania[2] is a key country in the global fight against the three diseases, being among the top countries in the world for malaria incidence and mortality[3] and with an estimated 1.7 million people living with HIV.[4] Since 2003, the Global Fund has disbursed US$3.32 billion in grants to the country, including US$1.99 billion to fight HIV.[5]

Tanzania country data[1]	
Population	66.6 million (2023)
GDP per capita	US$1,225 (2023)
Transparency International Corruption Perception Index	82/180 (2024)
UNDP Human Development Index	167/193 (2022)
Health expenditure (% of GDP)	3.11% (2022)

The Principal Recipient implements Global Fund grant TZA-C-MDH for the 2024 to 2026 grant cycle, having previously been a Sub-recipient under earlier cycles.

1.5 Impact of the investigation

As a result of its risk assessments, the Global Fund Secretariat took preliminary mitigating actions in early 2024 to pause implementation of certain activities. Service delivery was impacted as a result, and certain essential community services were transferred to another Principal Recipient in-country.

[2] Tanzania country data in right-hand table: population and GDP from World Bank data for Tanzania, accessed on 31 March 2025 and available at https://data.worldbank.org/country/tanzania; transparency index from Transparency International, accessed on 31 March 2025 and available at https://www.transparency.org/en/countries/tanzania; development data from UNDP index for Tanzania, accessed on 31 March 2025 and available at https://hdr.undp.org/data-center/country-insights#/ranks; health expenditure from WHO data for Tanzania, accessed on 31 March 2025 and available at https://apps.who.int/nha/database/country_profile/Index/en

[3] Source: WHO Factsheet on malaria of 11 December 2024, accessed on 31 March 2025 and available at https://www.who.int/news-room/fact-sheets/detail/malaria. See "Disease burden" section.

[4] Source: UNAIDS Country Factsheet on Tanzania of 2023, accessed on 31 March 2025 and available at https://www.unaids.org/en/regionscountries/countries/unitedrepublicoftanzania. See "HIV and AIDS Estimates" section.

[5] Source: Global Fund Data Explorer, Financial Insights section for Tanzania, accessed on 31 March 2025 and available at https://data.theglobalfund.org/location/TZA/financial-insights.

2. Findings

2.1 The Principle Recipient misrepresented the selection of a Sub-recipient to the Global Fund, constituting a fraudulent practice

(a) The Principal Recipient misrepresented that Sub-recipient A was a duly selected Sub-recipient pursuant to a transparent, fair and well-documented selection process

The Principal Recipient had the obligation to select each Sub-recipient in a transparent and well-documented manner,[6] and to uphold fair and transparent practices in doing so.[7]

On 28 November 2023, The Principal Recipient's Evaluation Committee convener, a senior Principal Recipient employee, informed the Global Fund Secretariat by email that, following a competitive process involving 90 candidate bidders, Sub-recipient A was among five Sub-recipients selected to implement grant activities. On 23 January 2024, the same staff member sent the Evaluation Committee's evaluation report to the Global Fund Secretariat. The report, dated 14 November 2023, represented Sub-recipient A as ranking fifth with a score of 97.2, and being among the five Sub-recipients selected.

OIG identified records demonstrating that the Evaluation Committee evaluated bids in physical meetings between 13 and 16 November 2023,[8] in the presence of two independent observers from the Tanzania National Coordinating Mechanism (TNCM) and Non-State Actors group (NSA) respectively. Versions of the Evaluation Committee's report shared internally by the Principal Recipient on these dates recorded another candidate, Sub-recipient S, as being awarded 97.2 points and being selected by the Evaluation Committee. At the time, Sub-recipient A had been awarded 65.1 points and was not selected.

On 16 November 2023, the Evaluation Committee provided its report listing Sub-recipient S as a selected Sub-recipient, with the score of 97.2, to the Principal Recipient executive manager. The reports of the two independent observers also recorded Sub-recipient S as being selected with the score of 97.2.

OIG found that the Evaluation Committee's report was manipulated by the Principal Recipient after the Evaluation Committee had finished its evaluation, by replacing Sub-recipient S with Sub-recipient A, and awarding it the score originally given to Sub-recipient S. The report's metadata indicated that it was manipulated by an Evaluation Committee member. It was then emailed to the Evaluation Committee convener (both the Principal Recipient employees) on 22 November 2023. In this version of the report, the ranking of all candidates in alphabetical order provided in annex showed Sub-recipient A in line 62 with a score of 97.2 instead of Sub-recipient S, and Sub-recipient S in line 4 with a score of 65.1 instead of Sub-recipient A. This was a direct inversion of Sub-recipient A and Sub-recipient S, these being the only two not in alphabetical order.

The version of the report listing Sub-recipient A as a selected Sub-recipient was signed off by the Principal Recipient Tender Board on 1 December 2023 and provided to the Global Fund on 23 January 2024.[9]

[6] Global Fund Grant Regulations, v.2 of 14 June 2023, section 4.3(1)

[7] Global Fund Code of Conduct for Recipients, version of 11 February 2021, article 3.2.

[8] The Principal Recipient could not provide a precise timeframe of the Evaluation Committee's evaluation, other than the indication that it lasted two weeks in November 2023. Based on evidence, OIG found that the Evaluation Committee had sat between 13 and 16 November 2023.

[9] Between 22 November 2023 and 23 January 2024, when the Evaluation Committee's report was shared with the Global Fund Secretariat, it remained materially unchanged regarding the Sub-recipient selection (including the selection of Sub-Recipient A), although OIG observed minor typographical edits to the document that did not relate to the selected Sub-recipients or their scoring.

During the investigation, the Principal Recipient confirmed to OIG that Sub-recipient S was initially selected by the Evaluation Committee. According to the Principal Recipient, despite evaluating Sub-recipient S with a score of 97.2, the Evaluation Committee found its application "*too good*" to be trusted and doubted its staffing and track record in relevant areas. The Principal Recipient stated that Sub-recipient S and Sub-recipient A were switched as selected Sub-recipients following a physical verification of Sub-recipient S carried out in November 2023, after its initial selection (the Principal Recipient referred to this exercise as a "*post-scoring capacity assessment*"). The Principal Recipient also stated that it scored applications on component-specific criteria, prior to ranking them in a consolidated list. The Principal Recipient stated that the verification revealed that Sub-recipient S did not meet the qualifications, and Sub-recipient A was selected in replacement.

No evidence (beyond the statements by the Principal Recipient) was found to support the existence of a post-scoring verification of Sub-recipient S. The Principal Recipient did not provide OIG with any documentary evidence of this verification, such as verification reports, communications with Sub-recipient S or internal communications. Furthermore, Sub-recipient S was the only candidate supposedly subjected to a verification in November 2023, prior to the Tender Board review of 1 December 2023. All other selected candidates, including Sub-recipient A, were verified in December 2023, after the Tender Board review – all with supporting verification reports.

Further, and even supposing that a verification of Sub-recipient S occurred, no evidence (beyond the statements by the Principal Recipient) was provided to support that Sub-recipient A scored next highest in the Evaluation Committee's rankings. No component-specific rankings were provided to OIG, nor did OIG find any documentary evidence of re-evaluations supporting Sub-recipient S's downgrade from a score of 97.2 to 65.1, or Sub-recipient A's upgrade from a score of 65.1 to 97.2. OIG also noted that Sub-recipient A and Sub-recipient S did not apply for the same modules, that Sub-recipient A was selected for a larger scope than it had applied for, and that its original score of 65.1 was lower than 66 other candidates according to the general ranking in annex to the evaluation report.[10]

The OIG finds the Principal Recipient misrepresented to the Global Fund that Sub-recipient A was duly selected in line with its obligations to conduct the selection in a transparent and well-documented manner,[11] and that the Principal Recipient did not maintain fair and transparent practices during the process.[12]

(b) The Principal Recipient knowingly misled the Global Fund in order to benefit Sub-recipient A and Partner A, with both of whom its executive management had conflicts of interest

The Evaluation Committee convener was aware of Sub-recipient S's selection when he shared the original evaluation report with the Principal Recipient executive manager on 16 November 2023. In this correspondence, the convener requested the executive manager to review the selection and to share any comments before the Committee signed the evaluation. In reply, on 20 November 2023, the executive manager requested to discuss the report. According to the convener, the two met and discussed the replacement of Sub-recipient S with Sub-recipient A. This account was supported by an email later the same day, whereby the executive manager informed the convener that "*this is approved*".[13]

[10] Noting that only a general, and not module-specific, ranking was provided in annex to the Evaluation Committee's evaluation report.
[11] Global Fund Grant Regulations, v.2 of 14 June 2023, section 4.3(1)
[12] Global Fund Code of Conduct for Recipients, version of 11 February 2021, article 3.2.
[13] In an interview with OIG, the executive manager provided a different account, stating that he was approving the process in general and not opining on the Sub-recipient selection or details related to Sub-Recipient A. This does not match the Evaluation Committee convener's account, which is supported by the above mentioned email exchange and change to the evaluation report two days later.

On 22 November 2023, an Evaluation Committee member emailed the Evaluation Committee convener the modified evaluation report in which Sub-recipient A replaced Sub-recipient S as a selected Sub-recipient. On 28 November 2023, the convener then shared the list of Sub-recipients allegedly selected by the Evaluation Committee, including Sub-recipient A, to the Global Fund Secretariat.

In the absence of evidence (beyond the statements by the Principal Recipient) to support that a re-evaluation or verification occurred, OIG finds it more likely than not that the Principal Recipient senior employees, including the Evaluation Committee convener, were aware that Sub-recipient A was not selected by the Evaluation Committee and that a change was made to the selection list without due cause. The OIG therefore finds that the Principal Recipient knowingly or recklessly misled the Global Fund when it communicated the Sub-recipient selection list and later the evaluation report to the Global Fund.

The OIG identified that Sub-recipient A had submitted its bid jointly with two partner entities, Partner A and Partner B, although this was not mentioned in the selection list or evaluation report provided to the Global Fund.

The OIG identified several conflicts of interest between the Principal Recipient's executive management, Sub-recipient A and Partner A, evidencing the Principal Recipient's intent to benefit these entities by selecting them as Sub-recipient under the Global Fund program. The spouse of the Principal Recipient executive manager was a board member of Sub-recipient A, and an executive manager of Partner A. Partner A had submitted a commitment letter supporting the bid, which was signed by its CEO and stated that Partner A *"expresses its commitment to* [Sub-recipient A] *to serve as a key partner in the GFATM opportunity"*. Other conflicts of interest between the Principal Recipient executive manager, Sub-recipient A and Partner A were identified by the OIG, as detailed in section 2.2.

Considering the conflicts of interest identified, and steps taken by the Principal Recipient to favor Sub-recipient A and its partners, OIG concluded that the Principal Recipient misled the Global Fund in order to benefit Sub-recipient A and Partner A, by selecting them as Sub-recipient under the Global Fund program.

After being presented with the OIG's preliminary findings, the Principal Recipient stated it had "*no intention to commit fraud*" and invited OIG to consider the matter as an issue of non-disclosure rather than a fraudulent practice. It contended that the Sub-recipient selection process began prior to the signing of contractual agreements with the Global Fund, and that it followed its own internal procedures without falsification or ill-intent.

However, OIG noted that the Sub-recipient selection process occurred between 13 and 16 November 2023, and that the misrepresentation to the Global Fund first occurred on 28 November 2023. A Framework Agreement was signed on 10 November 2023 and included the Global Fund Grant Regulations and Global Fund Code of Conduct for Recipients, which were therefore applicable to the Principal Recipient at the time of the selection. The OIG found evidence indicating that the Principal Recipient was aware that Sub-recipient A had not been properly selected when it shared its results with the Global Fund. This supported a finding that the Principal Recipient knowingly misrepresented the selection outcome to the Global Fund.

The Principal Recipient also stated that it did not consider Sub-recipient A's partners when evaluating the bid because it was looking for single organizations to implement each component. OIG found no evidence demonstrating such a decision being taken by the Principal Recipient or communicated to Sub-recipient A or its partners.

Based on the above, OIG concludes that the Principal Recipient knowingly misled the Global Fund in order to benefit Sub-recipient A and Partner A, with whom it had conflicts of interest. This constitutes a fraudulent practice as defined in the Global Fund Code of Conduct for Recipients.

2.2 The Principal Recipient avoided its obligation to disclose conflicts of interest constituting a fraudulent practice

(a) The Principal Recipient failed to notify the Global Fund of actual, apparent or potential conflicts of interest between an executive manager and Sub-recipient A and Partner A

The Global Fund requires implementers to take all necessary precautions to avoid conflicts of interest, namely "*in connection with the decision, awarding and administration of contracts*".[14] The Principal Recipient had an obligation to immediately disclose actual, apparent or potential conflicts of interest to the Global Fund.[15] Obligations regarding disclosure of conflicts of interest were included by reference in a Framework Agreement signed by the Principal Recipient on 10 November 2023, and predated the Sub-recipient selection process.

OIG found that an executive manager of the Principal Recipient had multiple ties with Sub-recipient A and Partner A. As highlighted above, the spouse of this executive manager was a board member of Sub-recipient A and an executive manager of Partner A. In addition, between September and December 2020, and between October 2021 and March 2022, prior to his role as the Principal Recipient executive manager, said executive manager had worked as a consultant for Sub-recipient A and Partner A respectively, to develop their strategic plans. In addition, in January 2024, Partner A listed this executive manager as a "Partner Scientist" in an application for research funds on a program unrelated to Global Fund activities; however, the Principal Recipient was (separately) implementing the Global Fund grant at this time.

OIG assessed the above as cumulatively amounting to actual, apparent or potential conflicts of interest, as defined by the Global Fund,[16] between the Principal Recipient's executive management, Sub-recipient A and Partner A. OIG found no record of the Principal Recipient disclosing any conflicts of interest with Sub-recipient A or Partner A to the Global Fund.

(b) The Principal Recipient knowingly or recklessly misled the Global Fund in order to avoid the obligations to disclose this conflict of interest.

Both during the investigation and in its responses to the OIG's preliminary and final findings, the Principal Recipient denied that it had avoided its obligation to declare conflicts of interest, based on its view that no conflict of interest existed.

The Principal Recipient stated that as the spouse of the Principal Recipient executive manager was a board member of Sub-recipient A, and not working in an operational capacity, no conflict should be seen as existing. The Principal Recipient recognized that this relationship could create a perception of conflict but considered that it did not result in an undue advantage for Sub-recipient A, and that no evidence existed to suggest this relationship had influenced Sub-recipient A's selection.

[14] Global Fund Code of Conduct for Recipients, Article 3.3.3
[15] Global Fund Code of Conduct for Recipients, Article 3.3.4
[16] Conflicts of interest are defined by Article 1.1 of Annex I to the Global Fund Code of Conduct for Recipients as arising when "*a Recipient or Recipient Representative participates in any particular Global Fund matter that may have a direct and predictable effect on a financial or other interest held by: (a) the Recipient; (b) the Recipient Representative; or (c) any person or institution associated with the Recipient or Recipient Representative by contractual, financial, agency, employment or personal relationship*. […] *A conflict of interest may also exist if a Recipient or Recipient Representative's financial or other interest compromises or undermines the trust that Global Fund Resources are managed and utilized in a manner that is transparent, fair, honest and accountable*."

The Principal Recipient also stated that as partnerships were excluded from the selection process and Sub-recipient A had been selected alone, any conflicts with Partner A were irrelevant. The Principal Recipient executive manager also denied being aware of Partner A's intent to be involved with Sub-recipient A at the time of selection.

Further, the Principal Recipient contended that the Principal Recipient executive manager's consultancies with Sub-recipient A and Partner A did not represent a conflict because they were completed years prior to the Sub-recipient selection process and pre-dated his role as the Principal Recipient executive manager, with no ongoing benefits or financial ties since then. Likewise, the executive manager's role as a "Partner Scientist" of Partner A was contingent on obtaining funding approval for the project in question. As this approval had not materialized, this tie did not represent a conflict either. The Principal Recipient however acknowledged "*the seriousness of the issues identified*" and "*significant lapses in adherence to conflict-of-interest policies*" during Sub-recipient selection and expressed its commitment to integrity and transparency.

Global Fund obligations unequivocally require the declaration of actual, apparent and potential conflicts of interest. Board membership affiliation of the Principal Recipient executive manager's spouse was not excluded from these obligations. In addition, there was no evidence to support the claim that the Principal Recipient intended to preclude Sub-recipient A from working with its partners to implement the grant. The OIG therefore finds that Partner A would have more likely than not remained involved in the program, and that conflicts of interest with this entity required declaration to the Global Fund.

The past commercial relationships between the executive manager, Sub-recipient A and Partner A also represented apparent or potential conflicts of interest. Likewise, the planned collaboration between Partner A and the executive manager, in his personal capacity, during the Global Fund grant implementation also represented an apparent or potential conflict of interest, even if this collaboration did not later materialize.

Despite the explanations provided by the Principal Recipient, OIG finds that the Principal Recipient was adequately informed that it was under an obligation to disclose actual, apparent, and potential conflicts of interest, given that such obligation was included by reference in a Framework Agreement already signed by the Principal Recipient at the time of the Sub-recipient selection process. OIG also finds that the Principal Recipient had knowledge of the numerous ties described above. As such, OIG determines that the Principal Recipient knew, or was, at a minimum, recklessly indifferent as to whether these ties constituted actual, apparent or potential conflicts of interest, and consequently, whether its omission to declare these ties to the Global Fund was misleading.

Based on the above, the OIG concludes that the Principal Recipient engaged in a fraudulent practice by omission, by knowingly or recklessly misleading the Global Fund in order to avoid its obligation to disclose conflicts of interest, which would have resulted in further scrutiny, including potential restrictions against the award of contracts to conflicted Sub-recipients.

3. Global Fund Response

Action to be taken	Due date	Owner
The Global Fund Secretariat will take the necessary measures in response to the wrongdoing identified in this investigation report, including regarding the Principal Recipient's role in implementation of Global Fund grants.	31 August 2025	GMD Head
The Ethics Office will recommend to the Ethics and Governance Committee of the Global Fund Board that the definitions of conflicts of interest be harmonized in the Global Fund Policy on Conflicts of Interest, the Global Fund Code of Conduct for Recipients, and any other Global Fund policy referring to conflicts of interest.	31 December 2025	Ethics Head

Annex A: Summary of Subject Response

On 29 November 2024, the OIG provided the Principal Recipient with its Letter of Preliminary Findings, which contained the full record of relevant facts and preliminary findings. The Principal Recipient was given an opportunity to respond and did so on 13 December 2024. On 20 February 2025, the OIG provided the Principal Recipient with its Notice of Findings, which contained OIG's conclusions taking into consideration the Principal Recipient's response. The Principal Recipient was given an opportunity to provide additional clarifications and to respond regarding the tone and balance of the Notice of Findings; and did so on 6 March 2025.

All points made in these responses were duly considered by the OIG and appropriate revisions were made as part of this final report.

Regarding the finding of fraudulent practice in connection with the selection of Sub-recipient A, the Principal Recipient invited OIG to consider the matter as one of non-disclosure rather than fraudulent practices, stating that it had no intent to commit fraud and that there was no falsification or ill-intent. The Principal Recipient acknowledged inconsistencies with Global Fund standards, stating that these were a result of the Principal Recipient applying its own internal policies, and added that the Sub-recipient selection process had begun prior to the signing of contractual agreements with the Global Fund. It stated that a post-scoring assessment revealed that Sub-recipient S did not meet necessary qualifications, and that Sub-recipient A was selected as a replacement based on track history and institutional capacity.

Regarding the finding of fraudulent practice in connection with the non-disclosure of conflicts of interest, the Principal Recipient acknowledged the concerns raised by OIG. However, the Principal Recipient stated that no conflicts of interest existed. The Principal Recipient also contended that the Principal Recipient executive manager had no obligation to disclose conflicts of interest under the Principal Recipient's policies because he was not a member of the Principal Recipient's Evaluation Committee or Tender Board.

The Principal Recipient informed the OIG that it had considered and would commit to undertake several initiatives to strengthen its processes, including:

- Revise its procurement manual to ensure comprehensive conflict of interest disclosures at all levels of procurement processes.
- Implement mandatory training for all staff involved in grant management and procurement, regarding conflict-of-interest policies, Global Fund grant implementation guidelines, and ethical procurement practices.
- Implement rigorous and frequent disclosure requirements, supported by regular audits.
- Establish clearer protocols for maintaining accurate and complete records of all evaluation and selection processes.

The Principal Recipient further expressed its willingness to "*improve gaps*" in the Sub-recipient selection by:

- Submitting a notice of cancellation of the selection of Sub-recipient A to the TNCM.
- Engaging in a recruitment process for a new Sub-recipient and adhering to the Global Fund Code of Conduct and Framework Agreement.
- Updating its standard operating procedures for Sub-recipient selection and management to fully align with Global Fund guidelines.

The Principal Recipient further informed the OIG that it had cancelled Sub-recipient A's selection.

While these do not alter the OIG's findings, they may be considered by the Global Fund Secretariat in any operational decision taken regarding the Principal Recipient.

Annex B: Methodology

Why we investigate:

Wrongdoing, in all its forms, is a threat to the Global Fund's mission to end the AIDS, tuberculosis and malaria epidemics. It corrodes public health systems and facilitates human rights abuses, ultimately stunting the quality and quantity of interventions needed to save lives. It diverts funds, medicines and other resources away from countries and communities in need. It limits the Global Fund's impact and reduces the trust that is essential to the Global Fund's multi-stakeholder partnership model.[17]

What we investigate:

The OIG is mandated[18] to investigate any use of Global Fund funds, whether by the Global Fund Secretariat or grantees, Principal Recipients and their sub-recipients, Country Coordinating Mechanisms, Local Fund Agents, or suppliers who work to support Global Fund-funded programs, and report its findings in a transparent and accountable manner.[19] The Global Fund Secretariat ensures this oversight is included in related agreements.

Investigations aim to identify instances of wrongdoing, such as fraudulent and corrupt practices, but also failure to uphold the applicable human rights standards and instances of sexual exploitation and abuse. Investigations are predicated by whistle-blower allegations[20], routine escalation of business information, risk analysis or referrals from other entities.

The OIG bases its investigations on the contractual commitments undertaken by grant recipients and suppliers. Requirements with respect to the management of funds and performance of activities are notably defined in the Global Fund's Code of Conduct for Suppliers and Code of Conduct for Recipients.[21]

OIG investigations aim to:

- identify the nature and extent of wrongdoing affecting Global Fund grants and the entities accountable and, if applicable, determine the amount of grant funds that may have been compromised by wrongdoing; and
- place the Global Fund in a position to understand the root causes for the wrongdoing, to recover funds, and to take remedial action and preventative measures by identifying where and how the misused funds have been spent.

Who we investigate:

The OIG investigates wrongdoing by the entities accountable for performance and execution of activities funded by the Global Fund. These are grantees, Principal Recipients and their sub-recipients, Country Coordinating Mechanisms or Board Constituencies who receive financial support from the Global Fund, Local Fund Agents, recipients of Catalytic Funding, and other suppliers to the

[17] Global Fund Policy to Combat Fraud and Corruption, §1.1.
[18] Charter of the Office of the Inspector General, as amended from time to time.
[19] Policy for the Disclosure of Reports Issued by the Office of the Inspector General, as amended from time to time.
[20] Whistle-blowing Policy and Procedures for the Global Fund to Fight AIDS, Tuberculosis and Malaria, as amended from time to time.
[21] Global Fund Code of Conduct for Suppliers, and the Code of Conduct for Recipients of Global Fund Resources, as amended from time to time. Grants are typically subject to the Grant Regulations (2014), which incorporate the Code of Conduct for Recipients and mandate communication of the Code of Conduct for Suppliers. Terms may vary however in certain agreements.

Global Fund or to recipients. Secretariat activities linked to the use of funds are also within the scope of the OIG's work.

Principal Recipients are accountable to the Global Fund for their compliance with all applicable contracts, Codes and policies in the use of all grant funds, including those disbursed to sub-recipients and paid to suppliers.[22] They ensure the appropriate requirements are made applicable to those entities.

How we investigate:

The OIG conducts administrative, not criminal, investigations. It is not a law enforcement or judicial authority. It is the recipients' and suppliers' responsibility to demonstrate that their actions and those of their agents and employees comply with applicable agreements. OIG findings are based on facts and related analysis, which may include drawing reasonable inferences. Findings are established by a preponderance of evidence. All available information, inculpatory or exculpatory, is considered by the OIG.[23]

Investigations into allegations of sexual exploitation and abuse are conducted with a victim-centered, trauma-informed methodology, following a case-specific risk assessment, and are guided by the Global Fund's Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power.[24]

The investigation will attempt to quantify the extent of any non-compliant expenditures, including an amount proposed to the Secretariat as recoverable.

The OIG may also discharge its mandate by overseeing the activities of recipients or other parties having the appropriate capacity and mandate to perform investigative tasks. It may also share allegations and evidence with third parties, pursuant to its confidentiality obligations, where it is relevant to their work.

What happens after an investigation?

The OIG ensures the relevant entities have the opportunity to review and provide evidence or comments on the findings and on the draft report.[25]

The OIG has a fact-finding role and does not determine what remedial and preventative measures the Global Fund may take as a result of its findings. The OIG is required to make final investigation reports available publicly in full.[26]

Following an investigation, the OIG and the Secretariat agree on management actions that will mitigate the risks that wrongdoing poses to the Global Fund and its recipients' or suppliers' activities. These may include specific managerial decisions, financial recoveries, instructions applicable to implementers and suppliers, internal process changes, or other contractually available remedies. With respect to suppliers, this can include recommending a referral to the Sanctions Panel.[27] The scope of such actions is subject to the mandate and capacity of the Global Fund, and does not directly amend or otherwise deviate from the existing terms of agreements and contracts.

[22] Compliant expenditures are defined in the Global Fund Guidelines for Grant Budgeting, as amended from time to time.
[23] These principles comply with the Uniform Guidelines for Investigations, 2nd edition, Conference of International Investigators.
[24] See The Global Fund's Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power, in particular sections IV. *2. Investigations* and IV. *3. Support to survivors & victims*, as amended from time to time.
[25] See the OIG Investigations Stakeholder Engagement Model, as amended from time to time.
[26] See the Policy for the Disclosure of Reports Issued by the Office of the Inspector General, as amended from time to time.
[27] See the Sanctions Panel Procedures Relating to the Code of Conduct for Suppliers, as amended from time to time.

OIG may make referrals to other organizations which have an interest in the investigation outcome, or to national authorities for criminal prosecutions or other regulatory and administrative actions, and support such processes as appropriate. The Global Fund, in its sole discretion, may share also information related to its findings, including regarding individuals identified in this report, with third parties, as deemed appropriate.