

# **GFCR Grant**

Programme Title: Terumbu Karang Sehat Indonesia	Recipient Organisation(s): Conservation International Foundation
Programme Contact:  Laure Katz, Senior Director Blue Nature Program,  Conservation International Ikatz@conservation.org	<b>Programme Location:</b> Bird's Head Seascape, Indonesia with potential to scale in other priority sites in the country.
Programme Description: The preparatory grant will be used by Conservation International Foundation (CI) to develop a full programme proposal aligned with GFCR values and approach using the framework of identified opportunities in the Bird's Head Seascape and a	Total Preparatory Grant Costs: USD 100,000  Proposed Project Start Date: March 2021 Proposed Project End Date:
strategy to scale innovative finance mechanisms in other priority coral reefs (i.e., BCUs) in Indonesia.  Key expected outputs  - Full Programme Proposal submitted to the GFC	December 31 <sup>st</sup> 2021  CR Executive Board in September 2021

- Key elements to be included in the full Programme Proposal: (a) Presence of resilient reefs; (2) Blended Finance to promote sustainable revenue streams with positive impact on coral reef ecosystems and dependent communities; (3) Consortium of partners convened by CI; (4) M&E Strategy; (5) Budget and workplan tied to clear milestones

# **Signature of Recipient Organisation - Conservation International:**

\*To confirm the organisation's approval of the programmatic document, please sign and date below.

Print: Aulani wilhelm Name	
Title_Senior Vice President, Center for Oceans	
Lulan	05-Apr-2021
Signature	Date



Signature of UN Partner			
Print: Name—	Andrew Hudson		
Title	Head of water and Ocean governance UNDP		
Signatu	re Andrew Hudson	Date29/04/2021	





# **Concept Note**

# **Terumbu Karang Sehat Indonesia**

Financial Innovation to Secure Earth's Most Biodiverse & Resilient Coral Reefs
Concept Note for The Global Fund for Coral Reefs, prepared January 2021

#### **Significance and Background**

In the heart of the Coral Triangle, the Bird's Head Seascape (BHS) spans over 22.5M ha of small islands and sea off Indonesia's West Papua Province. The BHS is the global epicenter of tropical shallow water marine biodiversity and has Earth's greatest hard coral diversity, with over 600 species—75% of all known species. As rising sea surface temperatures bleach swaths of some of Earth's most impressive reefs, those in the BHS, especially Raja Ampat, seem to be demonstrating higher resilience. Raja Ampat sea surface temperatures range naturally from 19.3 to 36.0°C, with living corals on many intertidal reef flats experiencing 7 - 8 °C temperature swings daily – essentially pre-adapting them to climate change impacts. Indeed, reefs in Raja Ampat have generally fared much better than reefs in other areas of Indonesia, only bleaching during the most extreme heating events and thereafter showing rapid recovery. The BHS also contains the world's most extensive and diverse mangrove communities.

These reefs and mangrove forests are the life support system of indigenous Papuans, providing food, jobs, and protection from storms and rising seas for +760,000 people living within the seascape. The diverse communities are made up of kinship groups with longstanding tenure. They remain connected to and reliant on the land and sea that has provided physical and spiritual sustenance for generations.

Over the last 25 years, development has moved increasingly eastward from western Indonesia towards Papua, leading to rapid change. Papua's abundant natural resources have become major target for new development investments, many focusing on short-term exploitation like destructive fishing and overfishing; oil and gas exploration; nickel mining; illegal logging; poorly planned roads; and other infrastructure development.

Since 2001, Conservation International (CI), local governments, Papuan communities, and a coalition of now 40+ partners, have worked to conserve this incredible seascape. This coalition secured the legal basis for 26 MPAs covering 5,229,782 ha. Designed with climate resilience considerations, the MPAs cover >50% of West Papua's coral reef ecosystems. These MPAs were co-developed with local communities aspiring to protect their natural resources from external threats in a way that promotes conservation and also local economic development.

This collaborative effort and extensive investment into building community-driven conservation across the seascape has inspired a different development trajectory for West Papua. In Raja Ampat, communities have a growing local economy based on ecotourism and sustainable fisheries and the MPAs have resulted in statistically significant increases in food security, education enrollment, and



economic opportunity. At the provincial level, the West Papua government recently declared the province as Indonesia's first "Conservation and Sustainable Development Province," making a bold commitment for the conservation of its intact forest and marine habitats, while seeking alternative and sustainable economic development pathways.

From the start, CI has prioritized unlocking sustainable financing for long-term management of the MPAs and community conservation activities. One key innovation laid the foundation for all other sustainable financing mechanisms. CI and The Nature Conservancy (TNC) helped the Raja Ampat MPA Management Authority become Indonesia's first environmental agency approved as a public service board, commonly referred to as having "BLUD status." Previously reserved for public hospitals, the status allows the MPA authority to receive and manage funds from nongovernment sources as well as to hire non-civil servant staff, in this case community rangers. CI is developing the BLUD application for the Bomberai MPA Management Authority—responsible for the Kaimana and Fakfak MPAs, south of Raja Ampat—and was recently asked to assist both the Tambrauw Regency government and the Cendrawasih Bay Marine National Park Authority to achieve BLUD status for their MPA management entities.

One significant source of revenue for the Raja Ampat BLUD is a tourist user fee system. Developed by CI, TNC, and the Raja Ampat government in 2007, this system requires all domestic and international visitors to pay the local MPA Management Authority a yearly entrance fee. Raja Ampat tourism has grown significantly in the past 13 years, increasing from under 1,000 registered visitors in 2007 (generating US\$54,000 in fees), to over 29,000 visitors from 95 countries in 2019 (generating over US\$2M in fees). According to a recent study, assuming a moderate pace of recovery of tourism after COVID-19 subsides, the number of annual marine tourists (divers, snorkelers, surfers) visiting the BHS is projected to exceed 65,000 in 2035, which could generate up to US\$4.4M for MPA management and community development per year.

Another CI-led initiative to provide access to sustainable funding is the Blue Abadi Fund, a dedicated conservation trust fund that makes grants to West Papuan organizations working on marine conservation in the BHS. Blue Abadi Fund launched in 2017 with US\$23M in philanthropic commitments—\$18M in an endowment and \$5M in a sinking fund. The Fund has since distributed over US\$3M in two grant cycles to support MPA management, monitoring and evaluation, and other sustainable development activities. As of last month, the Fund has awarded 39 grants to 27 organizations, including to the Raja Ampat BLUD to fill gaps not yet covered by user fees or due to tourism downturns like the pandemic. Blue Abadi's governance was designed to ensure representation by Indigenous Papuans and gender equity. A dedicated Community Advisory Committee ensures all grants are consistent with community aspirations.

## **Potential Investment Opportunities**

Building on the strong foundation established in the BHS, CI has identified 5 partnership opportunities for the Global Fund for Coral Reefs (GFCR). Unless specified, each opportunity is "shovel ready" with teams in place, and a full proposal could be developed very quickly.



- Blue Abadi—Ensuring Long-term Conservation Finance In-Perpetuity: The GFCR has a 1. highleverage opportunity to invest in the first coral reef-focused debt for nature swap under the U.S. Tropical Forest and Coral Reef Conservation Act (TFCCA), which will secure conservation financing for the BHS MPA network in-perpetuity. The U.S. government (USG) and government of Indonesia (GOI) are entering negotiations for a potential US\$18M debt for nature swap, to be supported and contributed to by CI and TNC. USG has a US\$15M appropriation for the TFCCA program this fiscal year. The NGOs collectively need to raise US\$3M (20%) in required match funding to the USG, plus added funding to cover their technical teams' work designing the deal and ensuring its effective implementation. The deal will result in the USG forgiving US\$18M of Indonesian debt, with the agreement that the GOI will reassign these debt payments to support in-country conservation. Under the swap, the GOI would then pay US\$18M with accrued interest into the Blue Abadi Sinking Fund, covering substantial grant-making and operational costs for Blue Abadi for 15+ years. This would allow most Blue Abadi endowment returns to be reinvested into the endowment until 2036, doubling the endowment and enabling it to reach its full capitalization target. The deal will ensure Blue Abadi has sufficient capital to distribute the US\$1.2M grants per year needed to maintain essential Bird's Head Seascape reef conservation activities in perpetuity. A \$2M investment from GFCR to CI would fulfill the match requirement and enable our full technical participation in the deal. CI previously participated in two successful U.S.-Indonesia debt for nature swaps. [Please note that as the negotiations for this debt for nature swap are currently underway between USG and GOI, this opportunity could evolve and should be kept confidential.]
- 2. Blue Abadi Impact Investment Window for Sustainable Business: Blue Abadi provides a potential vehicle for other investments into Raja Ampat and the BHS. GFCR and CI, including its Conservation International Ventures Fund, could collaborate to design and capitalize a dedicated impact investment window within Blue Abadi to provide technical assistance and loan-financing for local sustainable business development. While a more comprehensive assessment of market and investment opportunities is needed, channeling financing towards tourism sector adaptation to post-pandemic changes in visitor segments represents a key opportunity for regional investment. Examples of potentially eligible businesses could include the Raja Ampat homestay association, Eco Resorts, emerging surf businesses, sustainable pearl or seaweed farms, smallscale farming and fishing operations, and enterprises that address plastic and other waste streams generated by the tourism sector. Micro-hydro and solar electrification offer another significant opportunity. Working with Conservation International Ventures Fund, a technical assistance facility could be established to build the capacity of local businesses to ready them for private sector financing. Specific attention could be paid to building Papuan and/or women— owned businesses. This innovative opportunity would require a few months design phase.
- **3. Expansion of Finance Innovations for the Bird's Head Seascape:** As a result of focused work to establish and grow ecotourism in Raja Ampat, the industry is now the largest contributor to the local economy. Meanwhile, the Raja Ampat BLUD, the tourism user fee system, and the Blue Abadi Fund have created sustainable financing pathways for Raja Ampat coral reef conservation. Other parts of the BHS have similar potential for conservation-based economic development and sustainable financing but are further behind in building the enabling conditions to seize these opportunities. With a GFCR investment of approximately \$1M, CI could expand financing innovations to other critical areas in the BHS. Opportunities include:



- Develop a Sustainable Financing Plan for Cenderawasih Bay National Park: The 1,453,500 ha Cenderawasih Bay National Park is a unique environment with over 500 species of coral recorded, including 14 undescribed species endemic to Cenderawasih Bay, and a resident whale shark population that provides an outstanding opportunity for high-value marine tourism development. The park authority recently requested Cl's support to develop a sustainable financing plan. This would be an incredible opportunity to build on the foundations laid by the Park Authority and apply lessons learned from Raja Ampat to Cenderawasih Bay, including revitalizing their user fee system and supporting sustainable marine tourism (which generated over US\$5M for the local economy in 2019).
- Secure BLUD Status for Bomberai MPA Management Authority: The Kaimana and Fakfak MPAs are a network of six MPAs (covering 846,612 ha) notable for their remarkable number of endemic reef fish species, soft coral gardens, mangrove coverage, and high biomass of reef fishes. Obtaining BLUD status for the Bomberai MPA Management Authority responsible for this MPA network would allow it to replicate Raja Ampat's tourism user fee and access external funding sources including the Blue Abadi Fund and potentially carbon financing.
- Develop Sustainable Tourism: There is opportunity to support sustainable tourism development in select areas that would incentivize communities and government to conserve critical reef habitats. Areas could include potential dive and snorkel sites as well as surf zones, where tourism would grow provided the natural attraction is well managed. This may include working with communities, private sector, and government to identify and support private investment in new areas, including potentially Kaimana-FakFak, Cenderawasih Bay, and the Biak-Mapia corridor. Potential is significant, with a recent study estimating West Papuan marine tourism could generate US\$193M for Indonesia's economy by 2035 in a medium-growth scenario. Cl's focus is ensuring that tourism grows sustainably, incentivizes conservation, is well managed, and maximizes benefit to local communities.
- 4. Protect Mangroves and Build Foundations for Blue Carbon Finance: West Papua is the most important mangrove area in the world. With some of the largest contiguous mangrove forests, deep carbon rich soils, and spanning an estimated 482,000 ha, these forests' carbon storage capacity is immense. Conservative estimates of their carbon stock are 327.5 million Mg C, equivalent to 1.2 billion Mg of CO<sub>2</sub>. West Papua's mangroves are critical nursery grounds for local fisheries and for the Arafura Sea's highly productive and lucrative fisheries. The BHS is the home to resident whale shark populations attracted by schools of small bait fish from the mangroves and to blue water mangrove ecosystems, where mangroves blend directly into coral reefs. Both offer globally unique tourism attractions. With extensive paper and pulp concessions granted (but not yet executed) over a large swath of West Papua's mangroves, the threat is now imminent with a short time window to fully secure their protection.

Despite these mangroves' large carbon stock and eminent threats, ability to utilize carbon finance for their protection is hampered by low historic loss rates—which make proving future threat more difficult—and by everchanging national politics regarding voluntary market access and availability. Yet, CI has a strong track record and relationships in the country to address these challenges. Specifically, close partnerships with University of Papua, CIFOR, BAPPENAS, and IMRO MMAF ensure scientific



credibility, as well as being GOI's trusted technical advisors on blue carbon issues and leading mangrove carbon projects in Kaimana, West Papua.

GFCR investment could support Cl's efforts to protect West Papua's critical mangrove ecosystems, while supporting the development of foundational policies and a future-threat focused baseline assessment to capture anticipated deforestation increases, unlocking blue carbon finance opportunities. GFCR could additionally invest in blended finance approaches supporting carbon-based finance along with sustainable mangrove-based livelihood development like whale shark and blue water mangrove tourism, high value-mangrove crab fisheries, and nipa palm sugar production. An initial planning grant could support a thorough assessment of opportunities to generate economic value for local communities from the conservation of these high carbon areas.

- **5. Replication of BHS Financing Innovations:** The GOI has noted the impressive conservation outcomes in the BHS, especially Raja Ampat, and requests CI's support to replicate these mechanisms elsewhere in Indonesia, with a focus on MPA models that generate economic opportunities for local communities; the BLUD status; and revenue mechanisms like tourist fee systems for conservation. GFCR has the opportunity to invest in the replication of these approaches in other globally significant Indonesian reefs. Opportunities include:
  - Lesser Sunda Seascape: CI recently initiated conservation efforts in the Lesser Sunda Seascape, including CI's Surf Conservation Partnership (SCP) and a new project to develop a transboundary Indonesia-Timor-Leste Nature Peace Park. The seascape is globally critical for cetacean migration and has high coral biodiversity as well as ubiquitous upwellings and strong currents that enhance climate resilience of its reefs. Straddling Indonesian and TimorLeste waters, the Seascape includes the 3.35M ha Savu Sea National Park, providing a unique opportunity to work transnationally promoting a more regional approach to reef conservation and develop transboundary conservation financing models.

Similar to how BHS dive tourism has created local livelihoods and economic incentives for conservation, surf and related marine tourism has great potential to support sustainable conservation initiatives in the Lesser Sunda. SCP and the UCLA Institute of Environment and Sustainability identified the Lesser Sunda Islands as Earth's greatest confluence of highquality surfing waves and biodiverse coral reefs. SCP is already working in Sumba and Bali to create a network of Surf Protected Areas and there is additional potential for Lombok, Sumbawa, and Flores. Surf sites put millions of dollars Into local economies annually, and surfers are willing to pay for marine conservation. CI research from 2014 demonstrated that Bali's Uluwatu surf break annually added US\$35M to the local economy, and its 240,000 annual visitors were willing to pay ~US\$10 per visit for conservation—potential conservation revenue of US\$2.4M per year.

- Morotai and Halmahera, North Maluku: The SCP is developing a Provincial-level Surf Protected Area to protect over 30 miles of coastline, 30 surf breaks, and highly diverse reefs and forests in Morotai, North Maluku. The SCP has already supported 10 villages to create Locally Managed Marine Areas protecting their reefs and natural resources. Next steps are to develop conservation finance including the BLUD mechanism, user fees, sustainable surf and nature tourism regulations,



and diversified livelihoods opportunities. The SCP aims to expand to other important surf and dive tourism locations throughout Halmahera.

Further expansion potential: Surf Protected Area establishment is moving forward rapidly with massive demand across Indonesia and the world. This approach has excited Indonesian community members and local and national Government who say it, "breathes new life into the MPA approach," by starting with potential for sustainable tourism and livelihoods. With adequate resources, SCP can immediately expand across Indonesia in response to this demand. Our 5-year goal is to build an Indonesian Surf Protected Area network bringing at least 1M ha of coral reef into sustainably financed conservation. As well as North Maluku and the Lesser Sundas, Maluku Papua, West Papua, and Sumatra also boast world-class surfing, globally outstanding coral reefs, and massive potential for sustainable surf and dive tourism.



# **Annex 1: Budget**

<u>Link to full preparatory grant budget and workplan</u> (contact <u>maxime.philip@undp.org</u> for access)

# **Budget by UNDG Category**

	GFCR
1. Staff and other personnel	23,239
2. Supplies, Commodities, Materials	1
3. Equipment, Vehicles, and Furniture (including Depreciation)	•
4. Contractual services	66,000
5. Travel	2,000
6. Transfers and Grants to Counterparts	1
7. General Operating and other Direct Costs	2,218
Total Direct Costs	93,458
8. Indirect Support Costs (Max. 7%)	6,542
TOTAL Budget	100,000

# **Annex 2: Project Administrative Arrangement for Recipient Organizations**

On behalf of the Recipient Organizations, and in accordance with the UNDG-approved "Protocol on the Administrative Agent for Multi Donor Trust Funds and Joint Programmes, and One UN funds" (2008), the MPTF Office as the AA of the GFCR will:

- Disburse funds to each of the Recipient Organizations in accordance with instructions from the GFCR Global Team. The AA will normally make each disbursement within three (3) to five (5) business days after having received instructions from the GFCR Global Team along with the relevant Submission form and Project document signed by all participants concerned;
- Consolidate the financial statements (Annual and Final), based on submissions provided to the AA by Recipient Organizations and provide the GFCR annual consolidated progress reports to the donors and the GFCR Global Team;
- Proceed with the operational and financial closure of the project in the MPTF Office system once the completion is completed by the Recipient Organizations. A project will be considered as operationally closed upon submission of a joint final narrative report. In order for the MPTF Office to financially closed a project, each RO must refund unspent balance of over 250 USD, indirect cost (GMS) should not exceed 7% and submission of a certified final financial statement by the recipient organizations' headquarters);
- Disburse funds to any RO for any costs extension that the GFCR Global Team may decide in accordance with the GFCR rules & regulations.

#### Accountability, transparency and reporting of the Recipient Organization:

Each Recipient Organization will establish a separate ledger account under its financial regulations and rules for the receipt and administration of the funds disbursed to it by the Administrative Agent from the Fund Account. That separate ledger account will be administered by each Recipient Organization in accordance with its own regulations, rules, policies and procedures, including those relating to interest



The Recipient Organization will assume full programmatic and financial accountability for the funds disbursed to them by the Administrative Agent. Such funds will be administered by each recipient in accordance with its own regulations, rules, directives and procedures.

The Recipient Organization will have full responsibility for ensuring that the Activity is implemented in accordance with the signed Project Document;

In the event of a financial review, audit or evaluation recommended by the Executive Board, the cost of such activity should be included in the project budget;

Ensure compliance with the Financing Agreement and relevant applicable clauses in the Fund MOU.

## Reporting:

Each Receipt Organisation will provide the Administrative Agent and the Fund Secretariat (for narrative reports only) with:

<u>y</u>	) with:		
	Type of report	Due when	Submitted by
	Bi-annual project progress report	15 June	Convening Agent on behalf of all implementing or recipient organizations and in consultation with/ quality assurance by the GFCR Global Team, where they exist
	End of project report covering entire project duration	Within three months from the operational project closure (it can be submitted instead of an annual report if timing coincides)	Convening Agent on behalf of all implementing or recipient organizations and in consultation with/ quality assurance by the GFCR Global Team, where they exist
	Annual progress report, which may contain a request for additional GFCR allocation if the context requires it	15 December	Convening Agent on behalf of all implementing or recipient organizations and in consultation with/ quality assurance by the GFCR Global Team

For the preparatory grant financing, the full programme document will be considered as the annual reports. The GFCR Global team might request a summary of the preparatory activities.

## Financial Reports and timeline

The financial reporting requirements for the below follow the 8 UNDG budget categories.

Timeline Event
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28 February	Annual reporting - Report <b>Q4 expenses</b> (Jan. to Dec. of previous year)
30 April	Report Q1 expenses (January to March)
31 July	Report <b>Q2 expenses</b> (March to June)
31 October	Report <b>Q3 expenses</b> (January to September)
Certified final financial report to be provided at the quarter following the project financial closure	

Unspent Balance exceeding USD 250 at the closure of the project would have to been refunded and a notification sent to the Administrative Agent, no later than three months (31 March) of the year following the completion of the activities.



#### Ownership of Equipment, Supplies and Other Property

Matters relating to the transfer of ownership by the Recipient Organization will be determined in accordance with applicable policies and procedures defined by the Fund.

#### **Public Disclosure**

The Fund Secretariat and Administrative Agent will ensure that operations of the GFCR are publicly disclosed on the GFCR website (https://globalfundcoralreefs.org) and the Administrative Agent website (http://www.mptf.undp.org)

#### Final Project Audit for recipient organization projects (Not Applicable to Preparatory Grant)

An independent project audit will be requested by the end of the project (For multi-year projects the GFCR Executive Board might request add. audit reports). The audit report needs to be attached to the final narrative project report. The cost of such activity must be included in the project budget.

## Special Provisions regarding Financing of Terrorism

Consistent with UN Security Council Resolutions relating to terrorism, including UN Security Council Resolution 1373 (2001) and 1267 (1999) and related resolutions, the Participants are firmly committed to the international fight against terrorism, and in particular, against the financing of terrorism. Similarly, all Recipient Organizations recognize their obligation to comply with any applicable sanctions imposed by the UN Security Council. Each of the Recipient Organizations will use all reasonable efforts to ensure that the funds transferred to it in accordance with this agreement are not used to provide support or assistance to individuals or entities associated with terrorism as designated by any UN Security Council sanctions regime. If, during the term of this agreement, a Recipient Organization determines that there are credible allegations that funds transferred to it in accordance with this agreement have been used to provide support or assistance to individuals or entities associated with terrorism as designated by any UN Security Council sanctions regime it will as soon as it becomes aware of it inform the head of Fund Secretariat, the Administrative Agent and the donor(s) and, in consultation with the donors as appropriate, determine an appropriate response.

# Annex 3: Provisions Related to the Prevention of and Response to Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) involving Implementing Partners (IPs)

- The Implementing Partner acknowledges and agrees that UNDP will not tolerate sexual harassment and sexual exploitation and abuse of anyone by the Implementing Partner, and each of its responsible parties, their respective sub-recipients and other entities involved in Project implementation, either as contractors or subcontractors and their personnel, and any individuals performing services for them under the Project Document.
  - a. In the implementation of the activities under this Project Document, the Implementing Partner, and each of its sub-parties referred to above, shall comply with the standards of conduct set



forth in the Secretary General's Bulletin ST/SGB/2003/13 of 9 October 2003, concerning "Special measures for protection from sexual exploitation and sexual abuse" ("SEA").

- b. Moreover, and without limitation to the application of other regulations, rules, policies and procedures bearing upon the performance of the activities under this Project Document, in the implementation of activities, the Implementing Partner, and each of its sub-parties referred to above, shall not engage in any form of sexual harassment ("SH"). SH is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.
- 2. A) In the performance of the activities under this Project Document, the Implementing Partner shall (with respect to its own activities), and shall require from its sub-parties (with respect to their activities) that they, have minimum standards and procedures in place, or a plan to develop and/or improve such standards and procedures in order to be able to take effective preventive and investigative action. These should include: policies on sexual harassment and sexual exploitation and abuse; policies on whistleblowing/protection against retaliation; and complaints, disciplinary and investigative mechanisms. In line with this, the Implementing Partner will and will require that such sub-parties will take all appropriate measures to:
  - i. Prevent its employees, agents or any other persons engaged to perform any services under this Project Document, from engaging in SH or SEA;
  - ii. Offer employees and associated personnel training on prevention and response to SH and SEA, where the Implementing Partner and its sub-parties have not put in place its own training regarding the prevention of SH and SEA, the Implementing Partner and its sub-parties may use the training material available at UNDP;
  - iii. Report and monitor allegations of SH and SEA of which the Implementing Partner and its subparties have been informed or have otherwise become aware, and status thereof;
  - iv. Refer victims/survivors of SH and SEA to safe and confidential victim assistance; and
  - v. promptly and confidentially record and investigate any allegations credible enough to warrant an investigation of SH or SEA. The Implementing Partner shall advise UNDP of any such allegations received and investigations being conducted by itself or any of its sub-parties referred to in with respect to their activities under the Project Document, and shall keep UNDP informed during the investigation by it or any of such sub-parties, to the extent that such notification (i) does not jeopardize the conduct of the investigation, including but not limited to the safety or security of persons, and/or (ii) is not in contravention of any laws applicable to it. Following the investigation, the Implementing Partner shall advise UNDP of any actions taken by it or any of the other entities further to the investigation.
- 2. B) The Implementing Partner shall establish that it has complied with the foregoing, to the satisfaction of UNDP, when requested by UNDP or any party acting on its behalf to provide such confirmation. Failure of the Implementing Partner, and each of its sub-parties, to comply of the



foregoing, as determined by UNDP, shall be considered grounds for suspension or termination of the Project.