



Mercy Corps Commitments to Action Progress Report

In October 2019 Mercy Corps and its Board of Directors requested that investigative firm Vestry Laight conduct an independent, external review into what steps were taken when reports of abuse by Mercy Corps' late co-founder Ellsworth Culver were brought to the organization's attention in 2018.

Mercy Corps also engaged law firm Nichols Liu to conduct a separate evaluation of the organization's policies and procedures on sexual exploitation and abuse. Both reports were published by Mercy Corps on February 5, 2020 and can be found in full on Mercy Corps' website [here](#).

Mercy Corps' Management and Board of Directors unanimously accepted the findings and recommendations contained in both reports, and Mercy Corps' Board of Directors and Executive Team – under the leadership of Interim CEO Beth deHamel – announced Mercy Corps' [commitments to action](#) to address the reports' recommendations.

The Mercy Corps Board of Directors and Executive Team pledged to review the commitments to action at each board meeting until all matters have been implemented and report on progress to the public twice a year during that time. The Board of Directors reviewed the agency's progress on the commitments to action at its June and November 2020 board meetings. This is the second biannual report on Mercy Corps' implementation of its commitments to action. The first report, released in July 2020, can be found [here](#).

Further Investigation

Commitment 1: Investigate Handling of Case in 1990s

Conduct an investigation of how this case was handled by Mercy Corps in the 1990s

Commitment 2: Investigate Extent of Sexual Abuse

Conduct an investigation to determine the extent of sexual abuse committed by Ellsworth Culver during his time at Mercy Corps.

Progress Update on Commitments 1 and 2

Mercy Corps' Executive Team and Board of Directors collectively committed to conducting an investigation, in partnership with a qualified firm, to determine the extent of sexual abuse and exploitation committed by Ellsworth Culver in connection with his role at Mercy Corps and to evaluate how Mercy Corps in the 1990s handled reports of sexual abuse perpetrated by Ellsworth Culver.

After a thorough review, Mercy Corps selected Freeh Group International Solutions (FGIS or "Freeh Group") to conduct the investigation. Freeh Group specializes in areas of integrity, compliance and investigations and is led by Louis Freeh, former director of the FBI and federal judge. Freeh Group began its investigation in July 2020 and it is still ongoing.

Commitment 3: Examine and Reassess Culver's Role in Organization History

Develop an inclusive process to examine and reassess how we reflect the role of Ellsworth Culver and others in our organization's history.

Progress Update on Commitment 3

Mercy Corps is researching best practices to develop a thoughtful approach to examine and reassess the organization's history. This is a priority for the CEO and the Board, led by the newly formed Joint Ethics and Safeguarding Committee (JESC), and will follow the conclusion of the Freeh Group's investigation into how Mercy Corps handled reports of abuse in the 1990s and the extent of sexual abuse and exploitation committed by Ellsworth Culver in connection with his role at Mercy Corps.

Restructuring the Legal, Ethics and Safeguarding Functions

Commitment 4: Hire a Chief Ethics and Compliance Officer

Hire a Chief Ethics and Compliance Officer (CECO), independent of both the legal and human resource departments, reporting to the CEO and to the Board of Directors. Safeguarding intake and investigations will report to the CECO, not the General Counsel or Human Resources. All Human Resources investigations of sexual misconduct or harassment cases, whether between team members or others, will also be the responsibility of the safeguarding team and fall under the auspices of the CECO. In addition, the new department led by the CECO will be staffed and resourced appropriately and will implement survivor-centered and trauma-informed best practices, such as case management by a multidisciplinary team that includes a qualified mental health professional.

Progress Update on Commitment 4

Steve Linick started as Mercy Corps' first Chief Ethics & Compliance Officer (CECO) on October 15, 2020. Steve previously served as Inspector General for the U.S. Department of State and the U.S. Agency for Global Media (USAGM) between 2013 and June 2020. He brings extensive experience providing oversight for large entities and leading sensitive and complex investigations. As Inspector General, Steve was the senior official responsible for identifying operational risk within the Department of State and the USAGM, assessing the sufficiency of internal controls, and conducting investigations of waste, fraud, mismanagement and misconduct.

In his role as CECO, Steve leads a new stand-alone Ethics and Compliance Department that supports and monitors ethical, legal and contractual compliance across Mercy Corps' global operations. He also oversees the Intake and Investigations division, responsible for all reports of ethics violations including fraud, corruption, safeguarding misconduct and human resources complaints relating to the code of conduct policies. Steve will ensure implementation of an ethics and compliance program designed to prevent, detect, respond to and mitigate illegal, unethical, or improper conduct and promote a culture of integrity and compliance. He works collaboratively with relevant departments to ensure efficient and effective compliance measures and prompt and successful resolution of audits and investigations of alleged noncompliance and/or ethical issues and works to foster a culture of trust and confidence in Mercy Corps' reporting, investigation, and follow up systems. He is responsible for investigating, reviewing and approving final determinations on reports of fraud, corruption and safeguarding misconduct. The CECO role is independent of both the legal and human resource departments and reports to the CEO and Board of Directors.

Commitment 5: Strengthen Safeguarding Systems including by Hiring Staff

Make a significant additional investment over the next 18 months to strengthen our systems that support the intake, case management and investigative oversight for alleged ethics violations, including safeguarding. This includes adding additional staff to handle the caseload.

Progress Update on Commitment 5

Mercy Corps has dedicated additional resources to strengthen our safeguarding system. The agency's prevention efforts are led by a global safeguarding team comprising multiple permanent staff now overseen by the Director of Safeguarding, reporting through the Interim Chief People Officer. Several new positions have been added to the Safeguarding team to allow us to expand our impact, including a Safeguarding Advisor for Mercy Corps Europe, a Safeguarding Associate Program Officer and a Safeguarding Partner Accountability Advisor (starting in January 2021). In addition, several of our largest country programs now have full time Safeguarding Managers in place or coming on board in early 2021. The Safeguarding Team reports quarterly to the new Joint Ethics and Safeguarding Committee (JESC). In addition, a Global Safeguarding Task Force (GST) has replaced the former Safeguarding Working Group to provide a forum for cross-organizational input, guidance, and solution development in order to ensure the continued mainstreaming and elevation of safeguarding across the agency.

In addition, multiple in-country safeguarding support roles are now in place, overseen and coordinated by the global safeguarding team, including Safeguarding Focal Points, Co-investigators and Champions. These positions act as an extension of the global safeguarding and investigative teams and are active in over 30 countries. Focal Points and Co-investigators attend four day, in-person training courses co-designed and delivered by Mercy Corps and Global Child Protection Services (GCPS), an international consultancy focused on safeguarding and prevention of sexual exploitation and abuse. Due to the Covid-19 pandemic, additional in-person training is currently on hold. To compensate for this we have developed the Safeguarding Champion role with training that can be conducted remotely. Safeguarding Champions play a pivotal role in ensuring appropriate survivor support resources are in place and safeguarding awareness raising efforts continue for our country teams. Virtual Training for Safeguarding Champions is ongoing and we expect to have local, in-country safeguarding support established in all Mercy Corps countries by the end of Fiscal Year 2021 (June 30, 2021). We plan to continue to utilize both Champions and Focal Points going forward to ensure adequate safeguarding technical expertise is maintained in each country. Training of additional Co-Investigators will commence

once the necessary in-person training in survivor-sensitive investigative response can be resumed.

Mercy Corps continues to make significant additional investments in handling safeguarding reports and investigations. Previously, incoming reports and investigative responses were handled by the Ethics Team with oversight by the Legal Department. In order to strengthen oversight and ensure independent reporting to the Board and CEO, Mercy Corps has completely restructured this process and structure, replacing it with the new Intake and Investigation (I&I) Division. The I&I Division is now led by the Chief Ethics & Compliance Officer (described in Commitment 4) independent of both the legal and human resource departments. The I&I Division consolidates all ethics response and investigative responsibilities into a single, independent unit covering all internal investigations relating to fraud and corruption, sexual exploitation and abuse, sexual misconduct, and human resource issues relating to code of conduct violations.

The I&I Division now includes a multilingual safeguarding investigations team consisting of a DC based case manager, and two full time investigators based in Nairobi and Amman. Similar investigative teams exist for human resources and fraud and corruption and new team members are being added in 2021. The I&I Division continues to engage external independent investigators as needed to address a backlog of fraud/corruption cases, cases involving senior leadership, and as investigative circumstances necessitate.

The I&I Division works closely with the prevention-focused global safeguarding team to increase awareness of and access to reporting mechanisms and to ensure effective gathering and analysis of data to inform program and country teams' safeguarding efforts.

Commitment 6: Identify a Third-Party Investigation and Safeguarding Firm

Identify a third-party investigation and safeguarding firm to be put on retainer to support Mercy Corps in responding to safeguarding events, to be used as needed on a case-by-case basis.

Progress Update on Commitment 6

After a thorough review, Mercy Corps retained OSACO Group, an investigative consultancy with expertise in compliance, governance, safeguarding, and anti-corruption, as well as the law firm Stoel Rives, to support Mercy Corps in

responding to particularly complex safeguarding events that require independent review, including cases involving senior management or Board members.

Commitment 7: Create PSEA Capacity-Building Plan

Create a comprehensive safeguarding and Protection from Sexual Exploitation and Abuse (PSEA) capacity-building plan for field-based and headquarters-based senior management members and board members in addition to ongoing onboarding and safeguarding focal point trainings. The capacity building plan would include: knowledge and practice around Mercy Corps' safeguarding policies and process; best practices and procedures for working with gender-based violence survivors; psychosocial first aid; investigations of sexual exploitation and abuse; and referral/reporting cases to local services, authorities and donors.

Progress Update on Commitment 7

In addition to our in-country safeguarding support roles and training for those individuals noted in Commitment 5 above, we have created a Safeguarding and PSEA capacity building plan for our field-based and headquarters-based senior management members and country leadership teams. This plan includes targeted training for each designated group to build capacity in the following areas and is tailored for each audience type and attendee roles/duties:

- knowledge and practice around Mercy Corps' safeguarding policies and process specific to each attendee's role;
- best practices and procedures for working with gender-based violence survivors;
- psychosocial first aid;
- investigations of sexual exploitation and abuse;
- referral/reporting cases to local services & authorities;
- safeguarding risk assessments templates and overview for each country;
- overview of minimum standards for safeguarding at Mercy Corps; and
- specific content on in-country safeguarding support roles including Safeguarding Focal Points, Champions and Co-investigators (understanding these roles and how to engage with them in your work).

The Executive Team, including our new CEO and CECO, received training from internationally recognized PSEA/Safeguarding experts, Global Child Protection Services (GCPS), in November 2020, covering the topics above specific to their executive team roles. Similar training tailored for Country and Regional leadership is

planned for February 2021, with sessions for the Humanitarian, Program Performance and Quality and Technical Support leadership to follow.

This targeted capacity building training for leadership is in addition to the mandatory agency wide PSEA training course included in our full Code of Conduct elearning suite. In addition, the in-country safeguarding support roles of focal points and champions target capacity building, awareness raising and deeper understanding and engagement in safeguarding policies, practices and systems at Mercy Corps for team members at all levels.

Commitment 8: Implement Community Accountability Reporting Mechanisms (CARM)

Accelerate implementation of Community Accountability Reporting Mechanisms and training of local investigators.

Progress Update on Commitment 8

CARM is a channel for any and all community members to provide feedback, suggestions, complaints, and concerns, in a manner that is safe, confidential, transparent, and accessible, enabling Mercy Corps to respond and make any necessary programmatic or safeguarding adaptations and to ensure the safety, security, and empowerment of program participants.

In June 2020, Mercy Corps' Executive Team approved the new Community Accountability Reporting Mechanisms (CARM) Policy, which outlines nine new minimum standards for community accountability and requirements for Partners. A comprehensive CARM Toolkit was simultaneously published, which contains the guidance, tools, and templates needed to comply with the CARM Policy.

All Mercy Corps country programs and entities are required to meet the standards within this global policy to ensure CARM is in place in all Mercy Corps countries and a standardized approach to community accountability is taken globally. The Performance and Quality (PaQ) Unit awarded CARM start-up grants to 14 countries to provide the necessary resources to initiate CARM team hires and the design and rollout process while long-term, sustainable funding is secured at the country level. Additionally, four regional CARM advisors have been hired, joining three HQ-based team members, to provide targeted technical support to Mercy Corps country programs. Technical CARM support is provided to country programs in various areas

including designing context-appropriate feedback mechanisms, adaptive management, CARM in emergencies, CARM with Partners, and CARM with children.

The roll out of this policy has been underway for six months, and the CARM policy became effective on January 1, 2021. Mercy Corps is in the process of verifying compliance across all countries, and will continue rolling out CARM over the coming months. The CARM Policy is available on the Mercy Corps website [here](#).

Mercy Corps' training for local safeguarding focal points and co-investigators is outlined in the progress update on Commitment 5.

Commitment 9: Increase Transparency of Safeguarding Program

Improve transparency generally by communicating changes to the safeguarding program, including information about additional resources, clearly to all employees and specifically by informing those who have come forward about the status of their investigations.

Progress Update on Commitment 9

Mercy Corps leadership provides regular updates to the organization around our Safeguarding work via quarterly “compass objective” or agency priority updates. The Safeguarding Team also communicates regularly with Mercy Corps teams using Workplace (a platform for internal communication), articles, team emails, town hall meetings (via zoom), and on-going training. New e-learning courses, policies and corresponding guidance documents, posters and flyers are being created and shared with teams to deepen understanding and operationalize critical Mercy Corps values and expectations as they relate to safeguarding. New and updated tools are added on an ongoing basis.

Mercy Corps continues to work with focal points to develop and disseminate additional tools, ensuring teams have access to clear and timely information and guidance. The focal points help teams evaluate how safeguarding can be incorporated across workstreams and disseminate updated information.

During investigations, Mercy Corps provides updates and information to those who have come forward about the status of investigations without compromising confidentiality. The development of additional standards of practice around case management and communications will be ongoing in 2021.

Commitment 10: Produce Annual Public Safeguarding Report

Publish an annual public report on safeguarding that provides sufficient detail to identify the type of case and status of investigation while also maintaining confidentiality. Mercy Corps has previously committed to publishing an annual safeguarding report.

Progress Update on Commitment 10

Our second annual public [Global Safeguarding Report](#) was released in November 2020. This report provides transparency around safeguarding reports and investigations while maintaining confidentiality and provides an overview of our safeguarding prevention, adaptation, and survivor-sensitive response efforts for fiscal year 2020.

Our Fiscal Year 2019 Safeguarding Report, was released in two parts. Part I, released in November 2019, is available on the Mercy Corps website [here](#). Part II of our Fiscal Year 2019 Safeguarding Report was released in July 2020 upon completion of the external review, and included analysis of findings, recommendations and concrete commitments to action made by Mercy Corps based on these findings and recommendations. Part II of the report is available on the Mercy Corps website [here](#).

Updates to Policies

Commitment 11: Assess Efficacy of Safeguarding Policies

Conduct an investigation into how Mercy Corps' safeguarding policies are working in practice to ensure that policies are implemented effectively and sufficiently resourced.

Progress Update on Commitment 11

[Part II](#) of the Fiscal Year 2019 Safeguarding Report outlined measures Mercy Corps has undertaken to improve its safeguarding processes and practices. As discussed in the updates to Commitments 4 and 5, we have added significantly to our in-country safeguarding resources and have made important structural changes to our legal, ethics and investigative functions. Key aspects include: the implementation of trained in-country Safeguarding Focal Points and Co-investigators and increased capacity of the global Safeguarding Team; strengthened governance, and the creation of a stand-alone Intake and Investigations Division and Ethics and Compliance Department.

In our last update, we reported that within Fiscal Year 2021 we would engage a third party to review the effectiveness of our safeguarding program and the implementation of our safeguarding policies. At this point, it has been determined collectively by the CECO and the Interim Chief People Officer that more time will be needed for the safeguarding team to be operational before the effectiveness of its structure and implementation of its policies are assessed. The timeline and planning for this review will be revisited and reported on in the next Progress Report, and will likely cover both the prevention (People Team) and investigation (Ethics & Compliance) components of our safeguarding structure.

FY20 and FY21 budgets included requested resources to adequately fund all safeguarding activities. Resource discussions also take place on an ongoing basis to monitor resourcing needs.

Commitment 12: Review and Revise Mercy Corps' Policies and Procedures

Review and revise Mercy Corps' policies and procedures with appropriate expertise to address gaps and strengthen their application, especially to include policies to address past sexual misconduct, abuse and gender-based violence perpetrated by former employees or current employees that happened at prior institutions or outside of the workplace. As part of the review, conduct an audit of past investigations.

Progress Update on Commitment 12

In February 2020, Mercy Corps' Board of Directors approved updates to the agency's safeguarding policies, including the Ethics Complaint and Whistleblower, Child Safeguarding, and Prevention of Sexual Exploitation and Abuse policies. These policy changes reflect the recommendations of the Nichols Liu report (available [here](#)), and they clarify applicability of Mercy Corps' policies to former team members and past activities, as well as requiring the referral of cases involving senior management or board members to an external investigator. Additional updates are planned for review in 2021, and annually thereafter, to ensure our policies are consistent with global best practices, requirements of major donors, and to allow for deeper, comprehensive modifications and additions to our policies, and inclusion of clear safeguarding definitions. In this annual review process Mercy Corps will continue to draw on best global practice, align with major donors and ensure ongoing clarity. The current policies can be found on the Mercy Corps website [here](#).

In addition to updating safeguarding policies, Mercy Corps developed corresponding policy guidance documents for use by teams and individuals as quick guides,

conversation starters, and references for policy adherence or as training supplements. The policy guidance documents are available on the Mercy Corps website [here](#).

In June 2020, Mercy Corps' Executive Team approved the new Community Accountability Reporting Mechanisms (CARM) Policy as outlined in the progress update on Commitment 8. The CARM Policy is available on the Mercy Corps website [here](#).

Our policies and investigative processes and procedures have recently been reviewed by a range of donor and sector assessments including USAID, UNICEF and FCDO and found in compliance with donor requirements. The findings from these assessments are being implemented, including minimal updates to our policies and monitoring mechanisms.

In addition to our policies, an audit of safeguarding investigations from the last five years, within programs and teams funded by USG, has been conducted by a third-party. As part of the audit and final assessment, it was determined that Mercy Corps' survivor centered approach and methodical approach to investigations met industry standards.

Additionally, Mercy Corps has undergone a comprehensive assessment by Keeping Children Safe, at the request of DFID and UNICEF. Overall, it was determined that Mercy Corps meets global best practices and we have implemented the KCS recommendations.

Commitment 13: Adopt a Clear and Robust Definition of Safeguarding

Adopt and incorporate into our policies a clear and robust definition of safeguarding, drawing on best global practice and in alignment with Mercy Corps' major donors.

Clarify within Mercy Corps' policies their applicability to former team members, activities in the distant past and if policies are applicable anywhere.

Progress Update on Commitment 13

Mercy Corps defines Safeguarding as the responsibility to ensure that our team members, operations and programs do no harm to those with whom we work, and do not put vulnerable populations at risk of abuse or exploitation. As outlined in the progress update on Commitment 12, Mercy Corps' Board of Directors approved updates to the agency's safeguarding policies in February 2020. These updates clarify applicability of policies to former team members and past activities. Our policies

have recently been reviewed by a range of donor assessments, including UNICEF and FCDO, and found in compliance with donor requirements. Policies will be reviewed annually to ensure they are consistent with best global practices and the requirements of major donors.

Commitment 14: Adopt Policy to Refer Cases Involving Senior Staff and Board

Put in place a policy requiring referral of cases involving senior management or board members to an external, outside investigator.

Progress Update on Commitment 14

In February 2020, Mercy Corps' Board of Directors approved updates to the agency's safeguarding policies, including the Ethics Complaint and Whistleblower policy, which requires allegations against senior leadership to be investigated by external expert investigators. After a thorough review, Mercy Corps retained OSACO Group, an investigative consultancy with expertise in compliance, governance, safeguarding, and anti-corruption, as well as the law firm Stoel Rives, to support Mercy Corps in responding to particularly complex safeguarding events that require independent review, including cases involving senior management or Board members. The Ethics Complaint and Whistleblower policy can be found on the Mercy Corps website [here](#).

Commitment 15: Communicate to Staff on Safeguarding Policies

Provide clear, effective and regular communication of Mercy Corps policies regarding sexual abuse and exploitation to employees. Ensure that anyone approaching the organization with allegations regarding sexual exploitation and abuse is treated in accordance with the values inherent in these policies, even if the policies do not apply to the organization's engagement with them.

Progress Update on Commitment 15

Mercy Corps leadership provides regular updates to the organization around our GDI and safeguarding work, including policies regarding sexual abuse and exploitation, communicates any changes to our safeguarding program, provides information about additional resources, and seeks feedback from team members. During investigations Mercy Corps provides updates and information to those who have come forward about the status of investigations without compromising confidentiality.

Communication to team members about our policies and understanding safeguarding at Mercy Corps is a key part of the duties associated with the in-country safeguarding

support roles of Champions and Focal Points. See Commitments 5 and 7 for more information.

Strengthen the Board’s Governance

Commitment 16: Create Culture & Ethics Oversight Committee; Appoint Safeguarding Director on Board

Review board governance and committee structures to ensure best safeguarding practices with external expert advisers. Create a board committee charged with oversight of ethics and culture, including safeguarding efforts. This board committee will have appropriate skills tasked at reviewing all safeguarding cases and overseeing ethical culture. Appoint a lead safeguarding director on the Mercy Corps Board.

Progress Update on Commitment 16

At its June 2020 meeting, the Mercy Corps Board approved the creation of the Joint Ethics and Safeguarding Committee (JESC), which is responsible for overseeing management and advising the board on ethics matters. The Committee will oversee ethics-related policies, including safeguarding, and management’s implementation of ethics systems. The Committee will be mindful of international best practices and will consist of about six members. The Board will appoint a permanent Safeguarding Director to this Committee by fall of 2021.

The inaugural JESC meeting was November 19, 2020.

Commitment 17: Strengthen Board Members Skills on Safeguarding

Provide training to the board on safeguarding as well as ensure that new board member onboarding and ongoing training reinforce directors’ understanding of governance.

Progress Update on Commitment 17

In collaboration with the consulting firm Global Child Protection Services (GCPS), Mercy Corps created a safeguarding training tailored specifically for our Board of Directors. This training focuses on safeguarding in the sector as a whole, how we approach safeguarding at Mercy Corps, expectations for board members on safeguarding oversight, and assessment of safeguarding risks. The Board of Directors completed this safeguarding and protection from sexual exploitation and abuse (PSEA) training in June 2020.

In addition, all Mercy Corps Board members completed online training courses in fiscal year 2019 on subject areas including Reporting Ethics Violations, Sexual Misconduct, Child Safeguarding, Sexual Exploitation and Abuse and Anti-Trafficking, and Fraud and Corruption.

Mercy Corps will provide training to all future Board members.

Commitment 18: Honor Board Term Limits

Put in place and honor term limits, both for board and committee tenures, while allowing the flexibility to make exceptions when important for the organization’s strategy. This will provide an opportunity to add new skills and perspectives to the board.

Progress Update on Commitment 18

At its February 2020 meeting, the Mercy Corps Board established a new Joint Nominating and Governance Committee (JNGC) and set the goal of establishing criteria for Board membership on each of the respective Boards with a view towards maximizing effectiveness and diversity. At its June 2020 meeting, the Mercy Corps Board ratified approval of the Recruiting and Nominating Task Force for the purpose of moving with urgency to recruit candidates for Mercy Corps Boards. The JNGC is overseeing a thorough review of all governance matters (see progress update on Commitment 19) and the Board has agreed to a phased implementation of a three, 3-year term limit (a maximum of nine (9) years), while providing for flexibility to make exceptions if necessary to achieve the organization’s mission and ensure that the Boards are able to retain the skills and experience they need while recruiting new directors.

Commitment 19: Define Board Accountability and Communication

Clearly define accountability and communication so directors understand how decisions are made and who has responsibility.

Progress Update on Commitment 19

Mercy Corps’ Board has undertaken a Governance Review with guidance from a leading advisory firm. The purpose of this review is to receive a comprehensive review of Mercy Corps’ governance practices, entity structuring, and global operating model to advise Mercy Corps on (1) global and local legal requirements and best practices regarding governance, and, (2) how well participants in Mercy Corps’ governance structure understand their roles within the structural, legal, donor,

financial and operational constraints facing Mercy Corps. Phase 1 of the review has been completed and the report and recommendations have been presented to the Board. While many of the recommendations outlined in the report will need further reflection upon completion of an agency-wide strategic review, some of the recommendations in the report are already being implemented, including term limits (see progress update on Commitment 18) and addressing the composition and diversity of the Board through recruitment of new directors.

Additional Commitments

Commitment 20: Drive Leadership Accountability

Review and update relevant policies and position descriptions of Executive Team members to ensure that, when applicable, responsibilities around safeguarding, ethics, diversity, inclusion and culture are included when the Board Compensation Committee performs their annual review.

Progress Update on Commitment 20

Under the leadership of our CEO and CECO, Mercy Corps has begun to explore workplace culture more widely, and specifically how we embody a culture of integrity in our values, beliefs, and practices - how we do what we do and how this contributes to the legacy we want to leave behind. This has a direct correlation to how we define accountability to our ethical objectives, including safeguarding, equity, and culture. As we explore this, Mercy Corps' Interim Chief People Officer (with the support of the People Team and in collaboration with members of the Executive Team) will conduct a review of all senior management position descriptions to ensure that upholding and advancing the agency's safeguarding, ethics, diversity and inclusion, and culture objectives are part of senior leaders' core work responsibilities on which they will be evaluated during their annual performance reviews. Once this is in place for the Executive Team, we expect to go through this exercise with the next level of our leadership across the agency.

In addition to this review, Mercy Corps' People Team has developed a Mitigating Bias training for leaders and hiring managers which was delivered to the Executive Team in February 2020.

Commitment 21: Ensure Accountability for 2018 Mishandling

Hold accountable those who were involved in the 2018 case mishandling through appropriate disciplinary actions.

Progress Update on Commitment 21

Those individuals identified by Vestry Laight’s independent, external review as having full information and responsibility for Mercy Corps’ handling of this case in 2018 have either left Mercy Corps or received appropriate disciplinary actions.

Where processes and systems failed, we are committed to addressing these and making improvements through the Joint Ethics and Safeguarding Committee (JESC). The JESC has the responsibility of overseeing, managing and advising the Mercy Corps Global and Mercy Corps Europe Boards (“Joint Boards”) on ethics matters as well as overseeing ethics-related policies (excluding fraud and corruption), including safeguarding policies, and management’s implementation of these systems.

Mercy Corps has hired Steve Linick, Chief Ethics and Compliance Officer, who is independent of both the legal and human resource departments and reports directly to the CEO and the Board of Directors. Steve oversees intake and investigation of safeguarding, fraud and corruption, and code of conduct allegations and is a member of the JESC.

Commitment 22: Review Mercy Corps Culture

Conduct a review of Mercy Corps culture and address issues and cultural norms that contributed to the failures identified in Vestry Laight’s investigation.

Progress Update on Commitment 22

In FY21, Mercy Corps’ CEO and Executive Team, with support from the Board of Directors, will oversee a global team survey that will gain insight into the team’s views of Mercy Corps’ culture. Questions on the survey will explore past, current and desired cultural norms that feed into our culture. A Request for Proposal (RFP) is being finalized to identify an independent consultant(s) to conduct the global survey. The survey results will be shared internally and on-going conversations, training and guidance will follow to build and support the culture that makes Mercy Corps unique, a great place to work and enables our global team to do our very best work to carry out our mission.



Commitment 23: Review Progress at Every Board Meeting

Review the above commitments to action at each board meeting until all matters have been implemented and report on progress to the public twice a year during that time.

Progress Update on Commitment 23 - Complete & Ongoing

Mercy Corps' Board has reviewed the organization's commitments to action and progress against them at each board meeting since the acceptance of these commitments and will do so until all matters have been implemented. Mercy Corps' Board meetings are scheduled on a quarterly basis. This progress update is the second biannual public report. The [first](#) was released in July 2020.