

**INTEGRITY MEASURES POLICY**



**United Nations**  
Global Compact

## **1. Background**

The United Nations Global Compact is a voluntary initiative that seeks to advance universal principles on human rights, labour, environment and anti-corruption through the active engagement of the corporate community, in cooperation with civil society and representatives of organized labour. The initiative is not designed, nor does it have the mandate or resources, to monitor or measure participants' performance. Nevertheless, with the aim of assuring that the integrity of the UN Global Compact is safeguarded at all times, the Secretary-General has adopted the following measures.

## **2. Misuse of Association with the UN and/or UN Global Compact**

The use of the United Nations name and emblem and any abbreviation thereof is reserved for official purposes of the Organization in accordance with General Assembly resolution 92(I) of 7 December 1946. That resolution expressly prohibits the use of the United Nations name and emblem for commercial purposes or in any other manner without the prior authorization of the Secretary-General, and recommends that Member States take the necessary measures to prevent the unauthorized use thereof.

The United Nations emblem may be authorized for use by non-UN entities in exceptional circumstances, such as for illustrative and educational purposes. All uses of the UN emblem by non-UN entities require the prior written authorization of the Secretary-General. Requests for such authorization should be submitted to the Office of Legal Affairs, United Nations, New York, NY 10017 or Fax: +1-212-963-3155. Any suspected misuse of the UN name or emblem similarly should be referred to the Office of Legal Affairs.

The use of the UN Global Compact's name and logos are limited to certain authorized users and instances only. The full logo policy is available on the UN Global Compact website and should be consulted<sup>1</sup>; questions should be addressed to the UN Global Compact Office. The UN Global Compact Office reserves the right to take appropriate action in the event of a breach of this policy. Possible actions may include, but are not limited to, delisting a participant, requesting the assistance of the relevant UN Global Compact governmental authorities and/or instituting legal proceedings. Any suspected misuse of the UN Global Compact name or logos should be referred to the UN Global Compact Office.

## **3. Failure to Communicate Progress**

To remain an active participant of the UN Global Compact, each entity must fulfil the initiative's reporting requirement detailing its efforts to implement the Ten Principles. Business participants are required to submit an annual Communication on Progress ("CoP").

As of March 2024, the CoP consists of a statement by the highest level executive of continued support for the UN Global Compact and the completion of a digital questionnaire on corporate actions related to the Ten Principles and the Sustainable Development Goals (SDGs) (*preferred option*) or the submission of a sustainability

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<sup>1</sup> Logo policy available at <https://www.unglobalcompact.org/participation/getting-started/brand-guidelines>.

report (*alternative option*). Non-business participants are required to submit a biennial Communication on Engagement (“CoE”), a report that discloses specific activities adopted in support of the UN Global Compact. Please refer to the 2024 [CoP Policy](#) and the [CoE Policy](#) for more information.

The initiative fosters transparency and enables stakeholders to hold participants accountable to their commitment to the Ten Principles by making the CoP/CoE publicly available on the UN Global Compact website under the participant’s profile.

As of March 2024, business participants are required to submit their CoP between 1 April and 31 July of each calendar year. Failure to submit the CoP and respond to all mandatory questions in the CoP or submit a sustainability report within the submission period will change the participant’s status from “active” to “non-communicating” on the UN Global Compact website. Non-communicating participants can become active participants by submitting a complete CoP by 31 December of the same calendar year. However, if a complete CoP is not submitted by this date, the participant will be delisted from the initiative for “failure to communicate progress” and this will be reflected on the UN Global Compact website in accordance with the [Delisting and Rejoining Policy](#).

Participants in non-business categories will be required to submit a CoE biennially. Failure to do so will change their status to “non-communicating” on the UN Global Compact website and subsequently to be delisted for “failure to communicate progress” if no CoE is submitted within a year.

Companies and non-business entities that have been delisted can apply to rejoin the initiative and their application must be accompanied by an updated CoP/CoE, in addition to other requirements outlined in the [Delisting and Rejoining Policy](#).

#### **4. Allegations of Systematic or Egregious Abuses**

The UN Global Compact welcomes any participant that pledges to work towards implementation of the UN Global Compact Ten Principles through learning, dialogue, projects, process improvements or other such measures. Moreover, it is not now and does not aspire to become a compliance based initiative. Nevertheless, safeguarding the reputation, integrity and good efforts of the UN Global Compact and its participants requires transparent means to handle credible allegations of systematic or egregious abuse of the UN Global Compact’s overall aims and principles. The UN Global Compact Office can assist or provide guidance in this regard, by means of the measures described below. The purpose of these measures in the first instance always will be to promote continuous quality improvement and assist participants in aligning their actions with the commitments they have undertaken with regard to the Global Compact Ten Principles. It should be noted that the UN Global Compact Office will not involve itself in any way in any claims of a legal nature that a party may have against a participating company or vice versa. Similarly, the measures set out below are not intended to affect, pre-empt or substitute for other regulatory or legal procedures or proceedings in any jurisdiction.

Thus, when a matter is either presented in writing to the Global Compact Office or is raised by the Global Compact Office or a Local Network (active or advanced in status only), the Office will:

- a. (In the case of matters raised by third parties) use its judgement to filter out prima facie frivolous allegations. If a matter is found to be prima facie frivolous, the party raising the matter will be so informed and no further action will be taken on the matter by the Global Compact Office. For courtesy reasons, the matter will nevertheless be shared with the company concerned if it is a Global Compact participant.
- b. If an allegation of systematic or egregious abuse is found not to be prima facie frivolous or if it is raised by the Global Compact or a Local Network, the Global Compact Office or Local Network will contact the participating company concerned, requesting
- i. written comments, which should be submitted directly to the party raising the matter, with a copy to the Global Compact Office or the Local Network (if the matter is raised by the Local Network), and
  - ii. that the Global Compact Office or the Local Network (if the matter is raised by the Local Network) be kept informed of any actions taken by the participating company to address the situation which is the subject matter of the allegation. If the matter was raised by a third party, the Global Compact Office will inform the party raising the matter of the above-described actions taken by the Global Compact Office.
- c. The Global Compact Office would be available to provide guidance and assistance, as necessary and appropriate, to the participating company concerned, in taking actions to remedy the situation that is the subject of the matter raised in order to align the actions of the company with its commitments to the Global Compact principles.

The Global Compact Office may, in its sole discretion, take one or more of the following steps, as appropriate:

- i. Use its own good offices to encourage resolution of the matter;
- ii. Ask the relevant country/regional Global Compact Network, or other Global Compact participant organization, to assist with the resolution of the matter;
- iii. Refer the matter to one or more of the UN entities that are the guardians of the Global Compact principles for advice, assistance or action;
- iv. Share with the parties information about the specific instance procedures of the OECD Guidelines for Multinational Enterprises and, in the case of matters relating to the labour principles, the interpretation procedure under the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- v. Refer the matter to the Global Compact Board, drawing in particular on the expertise and recommendations of its business members;
- vi. As a last resort, after consultation with the Global Compact Board, in cases where the alleged abuse is admitted by an authorized company representative or is the subject of a finding of guilt by a competent court or other body, and meets the criteria in the FAQs of a systematic or egregious abuse, delist the company from the UN Global Compact.

The Global Compact Office or a Local Network should only proactively raise a matter under the dialogue facilitation process where there has been an admission by an authorized company representative or a finding of guilt by a competent court or other body relating to a matter that meets the definition of systematic or egregious

as set out in the Integrity Measures Policy and FAQs. However, this does not preclude either the Global Compact Office or a Local Network raising a matter of concern informally with a company outside the scope of the dialogue facilitation procedure. Where a Local Network wishes to raise a matter with a company based in another country that has a Local Network, it must first discuss the matter with that other Local Network and the Global Compact Office.

If the participating company concerned refuses to engage in dialogue on the matter within two months<sup>2</sup> of first being contacted by the Global Compact Office under subparagraph (b) above, it may be regarded as “non-communicating”, and would be identified as such on the Global Compact website until such time as a dialogue commences. If, as a result of the process outlined above and/or based on the review of the nature of the matter submitted and the responses by the participating company, the continued listing of the participating company on the Global Compact website is considered to be detrimental to the reputation and integrity of the Global Compact, the Global Compact Office reserves the right to remove that company from the list of participants and to so indicate on the Global Compact website.

A participating company that is designated “non-communicating” or is removed from the list of participants will not be allowed to use the Global Compact name or logo if such permission had been granted.

If the participating company concerned has subsequently taken appropriate actions to remedy the situation that is the subject matter of the allegation, and has aligned its actions with the commitments it has undertaken with regard to the Global Compact principles, the company may seek reinstatement as an “active” participant to the Global Compact and to the list of participants on the Global Compact website. If there is a local network in the country where the company is based, the company should first approach the local network; in all other cases the Global Compact Office should be contacted directly. Only the Global Compact Office can make a final determination of reinstatement.

The Global Compact Office is committed to ensuring a fair process for the parties involved. In order to promote the productive resolution of matters raised, no entity involved in the process should make any public statements regarding the matter until it is resolved or there is an admission by an authorized company representative or a finding of guilt by a competent court or other body.

*These Integrity Measures will be reviewed periodically by the Global Compact Board, the Annual Local Networks Forum and the Global Compact Leaders Summit.*

*Last Update: March 2024*

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<sup>2</sup> The requisite two-month period during which a participating company must engage in dialogue with parties raising a matter was changed from three-months by decision of the Global Compact Board on 24 July 2009.