Feedback from the Independent Review Panel
Review Round November 2015

16 December 2015

Dear Kumi Naidoo,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we "walk our talk" have never been more important. It is also against this background that the Charter has initiated an alliance with seven national CSO accountability frameworks to strengthen our collective voice as we devise a shared Global Standard for CSO Accountability.

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

Getting fit for the digital age
Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to *co-create* the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working *with*, not *for* stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the *Digital Accountability* project and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

Globalisation / National level accountability
Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs' global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

Inclusion and diversity
Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the employment of those with disabilities or from minority ethnic groups. Such inclusion is central to a human rights based approach, but may also improve results by tapping into a wider

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base of experience. For further advice, click here on the outcome of a Charter webinar on inclusion or here to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

Organisation-specific feedback to Greenpeace International

Generally, Greenpeace International's seventh accountability report is again very good, concise, and comprehensive. The report improved slightly from the previous year and some of the recent Panel feedback has been taken on board. The report covers both Greenpeace organisations worldwide (where possible and relevant) and Greenpeace International.

However, the Panel would like to highlight that Greenpeace was approved for biannual reporting in 2014 so that it would have been sufficient to submit a concise report only taking into account the areas mentioned in the previous Improvement Analysis as well as updates on any changes or relevant developments in other areas. Please have a look at how e.g. CBM or Sightsavers have submitted their interim accountability reports. Greenpeace is asked to submit an actual interim report of 4-6 pages on FY2015. The Panel will not assess a full report for that reporting year.

A great level of strategic and **institutional commitment** to accountability can again be observed in the opening statement and throughout the report. While Greenpeace's overall strategic development will support greater accountability towards regions and people they work with – progress made on relevant specific policies and practices to support this fall short of a bold move. At the same time, accountability and the report do not seem to be optimally used to drive change within Greenpeace. It is appreciated that Charter membership and the Charter logo are published on the organisation's website and in the Annual Report 2014 (page 33).

As an advocacy organisation which places high value on decentralised and unpredictable campaigns, Greenpeace's organisational approach is different to a lot of Charter Members in development and humanitarian work. Thus, globally agreed, written policies, which all national entities comply with in a comparable manner, are not the norm within Greenpeace. As in previous years, the organisation rather gives numerous practical and illustrative examples from the national and regional offices (NROs). Whereas good accountability practice seems to be in place and these examples are very stimulating for the reader of this report, the organisation acknowledges itself – and is supported by the Panel in this regard – that several areas will profit from some more formalised global guidance without compromising its surge towards globally dispersed leadership (e.g. a Global Complaints Policy). Alternatively, Greenpeace could annually choose a random selection of NROs to report within this main accountability report – if ensured that this is no cherry-picking of good examples.

The newly implemented greenhouse gas emissions management tool *Cloudapps Sustainability* enables NROs to receive detailed reports on their current and historic emissions and to receive a benchmark of their Environmental Performance against other NROs. This is regarded as **Good Practice.** There are again many promises made throughout the report and the Panel looks forward to progress in the next years (e.g. structural collaboration with other actors or local hiring procedures).
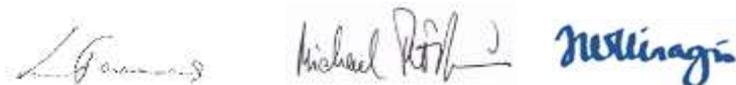
Whereas Greenpeace reflects upon some of the areas highlighted in last year's **Improvement Analysis** and promises progress in this regard (Global Complaints Policy in

NGO2 or systematic progress when working with partners in NGO6), other issues such as Workforce Training (LA10), Global Talent Management (LA12) as well as managing Greenpeace's impact on local communities (SO1) remain similarly weak as in the previous report. These areas will be the focus issues for improvement going forward. Since Greenpeace did not work with this document for the FY2014 report, the organisation is strongly encouraged to complete, adjust and complement this analysis from their perspective.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website along with your report. You can find the reports that were previously reviewed on our website. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 20 January 2016.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We are also available for bilateral conversations with Members' senior leadership team and look always forward to hearing your views.

Yours sincerely,

Louise James · Michael Röskau · Jane Kiragu

Rhonda Chapman · John Clark · Saroeun Soeung

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Review Round November 2015
Cover Note on Accountability Report

Greenpeace International

Interim Report 2014
(Based on the Improvement Analysis for the 2013 Report)

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	**Statement from the most senior decision-maker** *Fully addressed* The statement by Greenpeace International's CEO Kumi Naidoo provides thought-provoking and self-critical information about the overall strategic direction of the organisation. The organisation claims to have learned from internal errors and external turbulences in 2014 and is embarking on a fundamental shift from a staff-led to a supporter-led organisation. Not just linking, but "tailoring" global campaigns to local constituencies underpins this endeavour. "Working with others is becoming a central component of our credibility and legitimacy." This is a great strategic move towards building better relationships, which is at the heart of accountability. Thus, the Panel is very interested to understand in future reports how this is achieved in practice. Greenpeace is committed to be an organisation with the highest levels of credibility and accountability (both internally and externally) as this is what the world and their supporters ask of them, and it is what they ask of themselves. In this regard, Greenpeace has used Charter reporting as a tool for systematic and critical reflection on how accountability is best implemented within the organisation. The Panel appreciates the introduction of a Performance, Accountability & Learning (PAL) Unit in 2014 that brought together previously dispersed functions of strategy, planning, MEL and reporting from across Greenpeace. The Panel appreciates the link of accountability to strategy in this body. It emphasises Greenpeace understanding of accountability – seen as optimal connectedness with stakeholders – is central to achieving strategic impact.
II. Organisational Profile	
2.1 – 2.7	**Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience** *Fully addressed* More details on what "providing presence in over 55 countries" means in relation to "members and supporters across 40 countries" would be helpful in the next full report.
2.8	**Scale of organisation** *Fully addressed* Greenpeace provides relevant overview of its income and expenditure for

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	2014. The organisation can be commended for significantly increasing its supporter base (people who follow, like, tweet, take action etc.) from 30.7 in 2013 to 41.3 million in 2014. Visualisation and graphs as in the 2012 report might have helped the reader to grasp the information more quickly.
2.9	**Significant changes in the organisational structure** *Fully addressed* Greenpeace began its transition to a new operating model in 2014, i.e. all campaigns are moved to the National and Regional Offices (NROs). More explanation around this devolution process – in particular with respect to accountability – would be helpful for the reader. Following the foreign exchange losses in 2013, Greenpeace created the new role of Global Finance Director to strengthen the management team and ensure correct procedures are in place. Moreover, as mentioned in last year's feedback, the Panel commends Greenpeace for the creation of the PAL unit and would be interested to know more about their mandate and progress achieved in coming reports.
2.10	**Awards received** *Fully addressed* Greenpeace International and several NROs can be commended for having won a number of awards in the reporting period.
	III. Report Parameters
3.1 – 3.2	**Reporting period / Date of most recent report** *Fully addressed*
3.3	**Reporting Cycle** *Addressed* The response says that Greenpeace reports on an annual basis. While it is indeed true that Greenpeace has to submit annual reports to the Charter, the Panel approved Greenpeace for biannual *full* reporting after their very good 2013 report. This means that Greenpeace should only produce a concise 4-6 pages long *interim* report which focuses mainly on the identified areas for improvement from the Improvement Analysis, as well as on relevant changes or developments in the reporting year. A full report is sufficient every two years.
3.4	**Contact person** *Fully addressed*
3.5	**Reporting process** *Fully addressed* The report should be read alongside Greenpeace's Annual Report (see here). NROs are sent questions and asked for feedback which feeds into the report content. Does this happen on a systematic basis? As asked for in the last feedback, more evidence that the Greenpeace's year-end "Global management and Accountability" process to collect the reporting data works well in practice (i.e. triggers organisational development) is welcome for the

	next report. It is recommended to get in touch with CARE International who demonstrated a strong reporting process in their 2014 report (page 10). One of the key elements of the current Charter's branding efforts is that Members proudly share Charter membership in their own constituencies to strengthen the Charter's overall visibility in the public sphere. In this regard, the Panel appreciates Greenpeace's aim to expand communication of the Charter report to other (external) stakeholders and would like to hear more about *how* this is envisaged.
3.6 – 3.7	***Report boundary / Material content limitations*** *Fully addressed* This report covers both Greenpeace organisations worldwide, i.e. NROs, (where *relevant*) and Greenpeace International. Please indicate criteria for *relevance* in the next report and overall include more NROs in the report – especially in light of devolution of power towards NROs. Moreover, the response states that some NROs publish their own reports to the Charter. However, this has not occurred anymore since 2010.
3.8	***Basis for reporting on national entities, joint ventures and subsidiaries*** *Addressed* No report is given on joint ventures, subsidiaries and outsourced operations. As asked in last year's Panel feedback, please list the most significant of these operations in the next report and indicate how Greenpeace's general commitment to accountability is upheld. Moreover, if NROs have not reported in full, what systematic assurance does Greenpeace have to ensure that they comply with the overall accountability commitments? Finally, the Panel appreciates that Greenpeace envisages providing a more detailed report for 2015 but encourages postponing this for the next actual full report on FY2016.
3.10 – 3.13	***Reporting parameters*** *Fully addressed*
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	***Governance structure*** *Fully addressed* The report links to the organisation's website for very detailed information about the governance structure. As asked for in the last Panel feedback, Greenpeace is encouraged to mention in the next report how this *specific* structure optimally supports the achievements of their mission in practice (e.g. does the large Board lead to meaningful decisions?) or how the new strategy is also supported by changes in the governance structure to support success. Moreover, do you have an effective risk management that ensures compliance with relevant laws and regulations? Unlike many other ICSOs, Greenpeace's highest decision-making body is not an Annual General Meeting, but the Council with a representative from each country's Board. Are the board directors at country level elected by a broader constituency or is a similar model applied where a small group of leaders

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		elects the others?
4.2		**Division of power between the governance body and management** *Addressed* In addition to the relevant information provided in the report and on their website, the Panel would like to know how the chief executive is evaluated.
4.3.		**Independence of Board Directors** *Fully addressed* Information on the Board's responsibilities would better fit under 4.1 and details on appointment and term limits should rather be mentioned under 4.10. Is there clear guidance for NROs to set up a Board of Trustees?
4.4		**Feedback from internal stakeholders** *Addressed* Greenpeace International employees can address the International Board through formal management channels (e.g. the Works Council) and through their national Board represented at the AGM. This is a relatively indirect interaction practice. A link to and information on the usage of the mentioned Whistleblower Policy would be helpful for the reader – as already asked for in the last feedback. As explained in the last feedback, grievance channels should rather be reported on under NGO9. 4.4 is more about the question of how well it is ensured that all staff is able to fully bring in their knowledge to improve Greenpeace's work – also at the most senior decision-making body. As requested in both previous Panel feedbacks, more information on how Greenpeace ensures that this is a meaningful dialogue and *where* this has triggered positive management response is welcome for the next report.
4.5		**Compensation for members of highest governance body** *Fully addressed* Greenpeace can be commended for breaking down the costs and/or salaries for Board Directors and the Management Team in a very transparent way. Board Directors do not receive a salary but their expenses are refunded and they receive a compensation for time spent on Board activities such as meetings. The Board of Greenpeace International usually consists of seven Board Directors (see 4.3). However, this answer lists nine compensations in 2014 which requires some further explanation.
4.6		**Conflicts of interests** *Fully addressed* Greenpeace has solid policies on conflict of interest in place (e.g. Rules and Procedures); however, more information on evidence would be appreciated to demonstrate that these policies work well in *practice*.
4.10		**Process to support highest governance body's own performance** *Addressed* The International Board is assessed via thorough 360 degree evaluations which consist of three separate surveys (one for self-evaluation, one is sent to the Trustees and one to the GPI management). Results are shared with the Council and the Annual General Meeting. Via the "Greenpeace Board

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	Manual", Boards of NROs are generally encouraged to conduct annual self-evaluations. The whole answer is highly commendable. However, the Panel critically notes that the Council, the highest governance body, is currently not being assessed. Greenpeace is furthermore encouraged to provide evidence that these practices have led to good decisions for improvement.
4.12, 4.14	***Social charters, principles or other initiatives to which the organisation subscribes / List of stakeholders*** *Fully addressed* Stakeholder groups are described in a very generic way. Some concretisation, by way of examples, would be welcome.
4.15	***Basis for identification of stakeholders*** *Fully addressed* It is again appreciated that the importance of stakeholder analysis has been identified as a key element of Greenpeace's project design work and that this has been introduced into their standardised project management training (e.g. identification of motivation and needs, primary and secondary stakeholder groups etc.). As asked for last year, the Panel would welcome evidence in the next report how this has led to improvements in Greenpeace's work in practice.
4.16 – 4.17	*Moved to NGO1.*

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	***Involvement of affected stakeholder groups*** *Addressed* As in previous reports, Greenpeace states that it does not have an organisation-wide standardised process for the involvement of affected stakeholder groups. Instead, they provide interesting and illustrative examples of different formats, frequencies, and roles around stakeholder involvement from Greenpeace Brazil and Canada. While these are very convincing at an anecdotal level, the Panel highlights again the necessity for Greenpeace to *systematically* provide policies, practices and evidence that stakeholder engagement at all stages of its activities adds value to what you do. With Greenpeace's new strategy putting collaboration centre stage and a specific Global Engagement Director in the Management team – this should not be a problem. E.g. which recommendation is given to NROs in this regard?
NGO2	***Mechanisms for feedback and complaints*** *(Part of Improvement Analysis on 2013 Report)* *Partially addressed* Greenpeace was once again unable to complete a global complaints policy but is on track to deliver one in 2015. The Panel looks forward to speedy progress in this regard and appreciates that the number of NROs, which have complaints policies in place, has again increased from the previous year (17 out of 28). It is suggested that GPI provides NROs with some examples of good policy and

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practice to ensure coherence across the organisation – as a tool that provides valuable information for management decisions.

Overall, the high number of complaints is likely to be due to the nature of their "creative confrontation" approach. Nevertheless, this should be assessed by Greenpeace. Different types of complaints are listed and separated into 'Public' and 'Supporter Complaints'. Most complaints were around Non-Violent Direct Actions (NVDAs) or breaching core values (e.g. being violent). Is there evidence that these complaints have been resolved in a timely and satisfactory manner? Which responsibility layer did resolve which complaints?

NGO3	*Programme monitoring, evaluation and learning* *Addressed* The Panel appreciates the introduction of a Performance Accountability and Learning (PAL) function within Greenpeace in 2014. PAL has been integrated into Greenpeace's capacity strengthening approach for 2015 onwards. PAL is furthermore mandated to develop a global toolkit to inform a standardised approach to ME+L within Greenpeace which is strongly supported by the Panel. 18 out of 27 responding NROs have a formal ME+L process in place which is increase of 4 NROs in comparison to 2013. The other nine still have ad hoc informal systems in place and their commitment remains unclear. The Panel is interested to understand how progress towards strategic goals by these nine NROs is monitored. Can they learn from the other NROs? The Panel is further interested to understand if there is something to be learned from the informal systems e.g. in regard to a lighter touch but still rigid monitoring and quick adaptation. As asked for in the previous feedback, the Panel would like to know more about how results overall are publicised, targeted information is made available for decisions and adjustments are put into effect.
NGO4	*Gender and diversity* *Addressed* The answer given states that diversity is seen as a quality driver for Greenpeace. The People Committee and the Global HR Team have drafted a set of 10 Principles for Diversity & Inclusion. This will form the basis of further global work on practical tools for implementation in local contexts. It will be interesting to see if this document is not only influenced by whom Greenpeace would like to include, but also a reflection of who is potentially excluded from Greenpeace's work. The Panel looks forward to progress and more details on these principles. Only six NROs have integrated gender and diversity into their campaign / programme design and implementation. The Panel would like to ask again if Greenpeace has set itself particular targets to improve this low number. While the Greenpeace UK example and their recommendations from a Diversity and Inclusion Working Group to SLT is positively noted, other examples focus rather on staff diversity, which should be reported under LA13.
NGO5	*Advocacy positions and public awareness campaigns* *Addressed*

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	The answer given is very similar as in previous years. The broad framework within which policy positions are derived follows the hierarchical cascade from Greenpeace Mission (International Council), long-term priorities (the Global Programme) and short-term objectives (agreed in extensive internal debates and consultation with NROs). Information is provided about Greenpeace's firm process to ensure a robust evidence base for its policy positions and due diligence on legal risks.
	It is less comprehensible how stakeholder positions are responsibly reflected beyond the annual agreements between Greenpeace International with each NRO allowing for local priorities to be included in decision-making. As asked in the previous feedback, an example of such an annual development plan would be welcome in the next report. No information is provided on the organisation's process to identify corrective adjustments of advocacy positions where these become relevant or on how to exit a campaign. Since this is at the centre of Greenpeace's activities, one would expect more in this regard.
NGO6	**_Coordination with other actors_** _(Part of Improvement Analysis on 2013 Report)_ _Partially addressed_ Greenpeace collaborates with other actors in all of its campaign work; however, there is no standardised process for coordinating these activities. The Panel positively notes that Greenpeace have reflected upon last year's feedback and that they will seek to address this in the 2015 report. It is again suggested that this should include conducting a situational analysis to identify which other actors are already active in the same field or region, how to avoid duplication, how to best leverage each other's impact and how to ensure that partners meet high standards of accountability. Nevertheless, respectable examples of alliances with other actors are included in the answer.
	II. Financial Management
NGO7	**_Resource allocation_** _Fully addressed_ A commendable summary of Greenpeace's Financial Statement 2014 is provided. These accounts are a compilation of the individually audited accounts of all members of the whole Greenpeace federation. KPMG is engaged to verify that this summary is accurate. It is again positively noted that the allocation to campaigns is demonstrated very specifically.
NGO8	**_Sources of Funding_** _Fully addressed_ The biggest part of Greenpeace's funding comes from a very broad supporter base, safeguarding their financial independence. The top donors in 2014 are listed with relevant details. Greenpeace has a strict policy on the acceptance of donations in place: governments and companies are excluded, and major individual donors are vetted before accepting their contributions. This may explain the high proportion of fundraising costs in the budget (36%).

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	III. Environmental Management
EN16	**_Greenhouse gas emissions of operations_** _Fully addressed_ As the focus of Greenpeace's action is on the preservation of the environment, its credibility would be affected by any slippages in its own environmental management. Total emissions in 2014 are similar as in previous years. While decreasing emissions in this regard, approximately 23% of Greenpeace's greenhouse gas emissions continue to be due to their marine operations. 2012 and 2013 overall figures differ slightly from the number presented in last year's report. Is there any particular reason for this?
EN18	**_Initiatives to reduce emissions of operations_** _Fully addressed_ The newly implemented greenhouse gas emissions management tool Cloudapps Sustainability enables NROs to receive detailed reports on their current and historic emissions and to receive a benchmark of their Environmental Performance against other NROs. This can be regarded as **Good Practice**. The Panel asked last year for a link to Greenpeace's organisation-wide Environmental Policy and would welcome this in the next report. The Panel looks also forward to progress of the implementation of Greenpeace's Environmental Initiatives against the 11 Baseline Initiatives. Is this guided by senior management? How are NROs encouraged that have not progressed yet? Has Greenpeace set any concrete reduction targets? Evidence that this EMS and its roll out triggers improved environmental sustainability of operations is welcome in the next report.
EN26	**_Initiatives to mitigate environmental impact of activities and services_** _Fully addressed_ The environmental impact of Greenpeace activities is largely addressed and managed in an ad hoc manner. Initiatives are defined in Environmental Baseline. A link to the mentioned Global Meeting Policy would be appreciated in the next report. Moreover, the Panel looks also forward to developments from the Ships Unit to minimise greenhouse gas emissions.
	IV. Human Resource Management
LA1	**_Size and composition of workforce_** _Fully addressed_ Very interesting and comprehensive information on the size and composition of the total workforce is given (permanent vs. non-permanent contracts, gender ratio, fluctuation of staff etc.). There is a decrease in permanent contracts. Last year's response provided a relevant infographic of geographical representation and the Panel would also appreciate data on different responsibility levels as well as on volunteers.
EC7	**_Procedure for local hiring_** _Partially addressed_ Greenpeace states that it does not have specific policies in place for local hiring and does not provide any figures. However, it is evident that Greenpeace's current move to build and strengthen NROs particularly in the Global South will

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	favour employment of staff from these regions. It is important, as part of accountability to local communities, to ensure that hiring practices do not undermine local labour markets. Thus, the Panel strongly supports that Greenpeace will seek to evidence with concrete examples, steps and measures to build capacity for local CSOs and the public sector in the next report. The Panel suggests having a look at the website of Maliasili Initiatives or getting in touch with them directly since they support ICSOs in strategic efforts to build local capacity sustainably.
LA10	**_Workforce training_** *(Part of Improvement Analysis on 2013 Report)* *Partially addressed* While the Panel highlighted this specific area as one of the crucial issues for improvement in last year's Improvement Analysis, this response is very similar to the previous report. As also stated in the previous feedback, it is not overall significant to state the total hours of training but rather to understand how Greenpeace identifies the most eminent training needs, how much they invest on training as percentage of overall administrative expenditure and how it is evidenced that training is successful. The Panel strongly encourages Greenpeace to provide more information on the introduction of the mentioned Human Resources Information System (HRIS) and Learning and Development Programme over the next years.
LA12	**_Global talent management_** *(Part of Improvement Analysis on 2013 Report)* *Partially addressed* Similar to LA10, this area was part of last year's Improvement Analysis, but the report provides a similar answer this year. The answer states that staff development is currently fairly "ad-hoc" in nature and therefore difficult to measure in terms of success. This approach seems insufficient and it is key for success to have the right people in the right places which need to be identified and nurtured for this to happen. It will be interesting to hear if the new Human Resource Information System will help to systematically identify future HR needs and support staff development according to strategic priorities. What does Greenpeace overall plan to address this critical issue in the future? Finally, it is stated that all staff are *expected* to have an annual Personal Review Talk. Is there evidence that all staff *actually* receive such a review?
LA13	**_Diversity of workforce and governance bodies_** *Addressed* It is appreciated that Greenpeace is able to provide data on age in this report. There are slightly more males appointed in management positions or as Board members. It is stated that Greenpeace's data does not currently capture other diversity factors such as minority groups or disabilities. However, the PAL unit is working how to improve the year end management data collection process in time for the 2015 report. The Panel suggests thinking along these lines: Which groups of

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	people should be represented in the organisation's governance bodies and workforce to improve its legitimacy and effectiveness? Are there any improvement targets in place? Greenpeace is encouraged to have a look at SOS Children's Villages' 2014 report (pages 34/35) which provides a good response to this indicator.
NGO9	**Mechanisms to raise grievances** *Addressed* There is presently no global grievance policy in place. However, many offices have their own grievance policies and 4.4 mentions the Works Council meeting. Presumably, this is the body where staff grievances can be raised. The Panel welcomes the development of further global guidelines as part of their upcoming diversity and inclusion work, in particular with a view to anti-harassment. Finally, it would be relevant to know how the Whistleblower Policy has been used in practice.

V. Responsible Management of Impacts on Society

SO1	**Managing your impact on local communities** *(Part of Improvement Analysis on 2013 Report)* *Partially addressed* This was also one of the identified areas in last year's Improvement Analysis. Relevant examples from different country offices show (mostly informal) impact assessments of their interventions on local communities. While this is important evidence of ongoing practice in some NROs, it would be important to also make this a more explicit requirement for all NROs. Greenpeace needs to be accountable to the communities which are significantly affected by its work – in relation to awareness rising and actual policy changes. This necessitates as a minimum that human rights protection is ensured and that continuous feedback is collected from affected communities as well as this is acted upon in a responsible manner. The Panel looks forward to more concrete information in the next report on how this will be achieved by Greenpeace in the coming years.
SO3	**Anti-corruption practices** *Addressed* Greenpeace has a comprehensive anti-corruption policy in place that is adopted by only 18 NROs. This is an increase of five since 2013; however, how is anti-corruption practice ensured in the NROs where no policy is adopted? As already requested last year, please provide a link to this policy in the next report and explain why other NROs have not yet adopted the policy. Is there evidence that this policy is well known and used by staff?
SO4	**Actions taken in response to corruption incidents** *Fully addressed* The answer states that there is "in principle" a zero tolerance policy on bribery and corruption, effective internal controls and a whistleblower policy. In 2014, three NROs reacted to incidents of corruption. How were these incidents detected and what kinds of incidents were they?

VI. Ethical Fundraising

PR6	**Ethical fundraising and marketing communications** *Fully addressed*

| | Greenpeace has its own Fundraising Policy which all offices are expected to adhere to. This policy is currently being expanded upon to include improved guidance under Greenpeace's new ways of working, An overview of the revised policy will be shared in the 2015 report which is appreciated by the Panel. The Panel would also be interested to know if the complaints received about fundraising (see NGO2, p.19) are reflected in the revised policy.

Finally, as requested last year, evidence that the current policy is well known and practiced by all staff would be welcome. |