

Document: EB 2020/131(R)/R.24/Add.1
Agenda: 7(g)
Date: 9 November 2020
Distribution: Public
Original: English

E



Investing in rural people

Control Framework for IFAD Investments

Note to Executive Board representatives

Focal points:

Technical questions:

Alvaro Lario
Associate Vice-President
Chief Financial Officer and Chief Controller
Financial Operations Department
Tel.: +39 06 5459 2403
e-mail: a.lario@ifad.org

Alberto Cogliati
Director
Office of Enterprise Risk Management
Tel.: +39 06 5459 2048
e-mail: a.cogliati@ifad.org

Benjamin Powell
Director and Treasurer
Treasury Services Division
Tel.: +39 06 5459 2251
e-mail: b.powell@ifad.org

Jon Thorsteinsson
Deputy Treasurer
Tel.: +39 06 5459 2811
e-mail: j.thorsteinsson@ifad.org

Jose Joaquin Morte Molina
Lead Financial Risk Officer
Office of Enterprise Risk Management
Tel.: +39 06 5459 2561
e-mail: j.mortemolina@ifad.org

Dispatch of documentation:

Deirdre Mc Grenra
Chief
Institutional Governance and
Member Relations
Tel.: +39 06 5459 2374
e-mail: gb@ifad.org

Executive Board — 131st Session
Rome, 7-9 December 2020

For: **Information**

Contents

Abbreviations and acronyms	ii
Preamble	iii
I. Overview of internal control best practices	1
II. Control environment: organizational structure, roles and responsibilities	1
A. Actors and their roles	1
B. Investment-related roles and responsibilities in IFAD	3
C. Investment policies and procedures	9
III. Risk assessment, control, information and communication, and monitoring activities pertaining to the investment portfolio	11
A. Risk identification	11
B. Risk measurement and management	13
C. Control, information and communication, and monitoring activities	18
Annexes	
I. Rules of procedure and terms of reference of the Investment and Finance Advisory Committee (FISCO) (high-level committee)	19
II. Reference to the new principles in the COSO Internal Control-Integrated Framework in the context of IFAD's investment-related activities	21
III. Glossary of risk measures and related terms	24

Abbreviations and acronyms

ADM	Administrative Services Division
ALM	asset and liability management
AML/CFT	anti-money laundering, counter-terrorism financing
AVP	Associate Vice-President, Chief Financial Officer and Chief Controller
CM	Cash Management and Back Office Unit
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CRO	Chief Risk Officer
CVaR	conditional value at risk
ERM	enterprise risk management
FCD	Financial Controller's Division
FISCO	Investment and Finance Advisory Committee
FMD	Financial Management Services Division
FOD	Financial Operations Department
ICFRs	internal controls over financial reporting
IFI	international financial institution
IM	Investment Management and Front Office
IPS	Investment Policy Statement
IFRS	International Financial Reporting Standards
MLR	minimum liquidity requirement
RMO	Office of Enterprise Risk Management
TRE	Treasury Services Division
VaR	value at risk

Preamble

1. The Control Framework for IFAD Investments¹ was first presented to the Executive Board at its 104th session in December 2011, in conjunction with IFAD's Investment Policy Statement (IPS). While the IPS provides overall guidance for the management of IFAD investments, the Control Framework encompasses the control structures, practices and procedures in place.
2. The first annual review of the IPS was presented to the Executive Board for approval at its 107th session in December 2012. Prior to that session, at its 125th meeting in November 2012, the Audit Committee requested that the annually revised Control Framework accompany the annually updated IPS for completeness.

¹ The "Control Framework for IFAD Investments" was first adopted as the "Internal Control Framework for IFAD's Investments". In order to avoid confusion with the "Internal Control Framework" (EB 2019/127/R.39) approved during the 127th session of the Executive Board, this document has been renamed "Control Framework for IFAD Investments".

Control Framework for IFAD Investments

I. Overview of internal control best practices

1. Internal controls form an integral part of any organization's financial and business policies and procedures. The Control Framework for IFAD Investments is based on the widely used Internal Control-Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission (the COSO Framework). Although not independently audited or certified as compliant with the COSO Framework, the Control Framework refers to the COSO Framework for guidance on content and format.
2. The COSO Framework sets out five components with 17 associated principles. These components are defined as follows:
 - (i) **Control environment:** organizational values and culture; policies; organizational structure. The control environment is the foundation for all other components of internal control;
 - (ii) **Risk assessment:** identification and measurement of threats, and responses to them;
 - (iii) **Control activities:** the policies and procedures that help ensure management directives are carried out;
 - (iv) **Information and communication:** reliability, timeliness, clarity and usefulness; and
 - (v) **Monitoring activities:** processes used to assess the quality of internal control performance over time.
3. This paper describes how these five components pertain to activities related to the Control Framework. Section II focuses on aspects of the control environment, specific organizational structure, and the roles and responsibilities of the various key players. Section III describes the risk assessment, control, information and communication, and monitoring activities.
4. Annex II links the 17 COSO Framework principles to various investment-related policies and procedures as well as to relevant sections of the Control Framework itself.

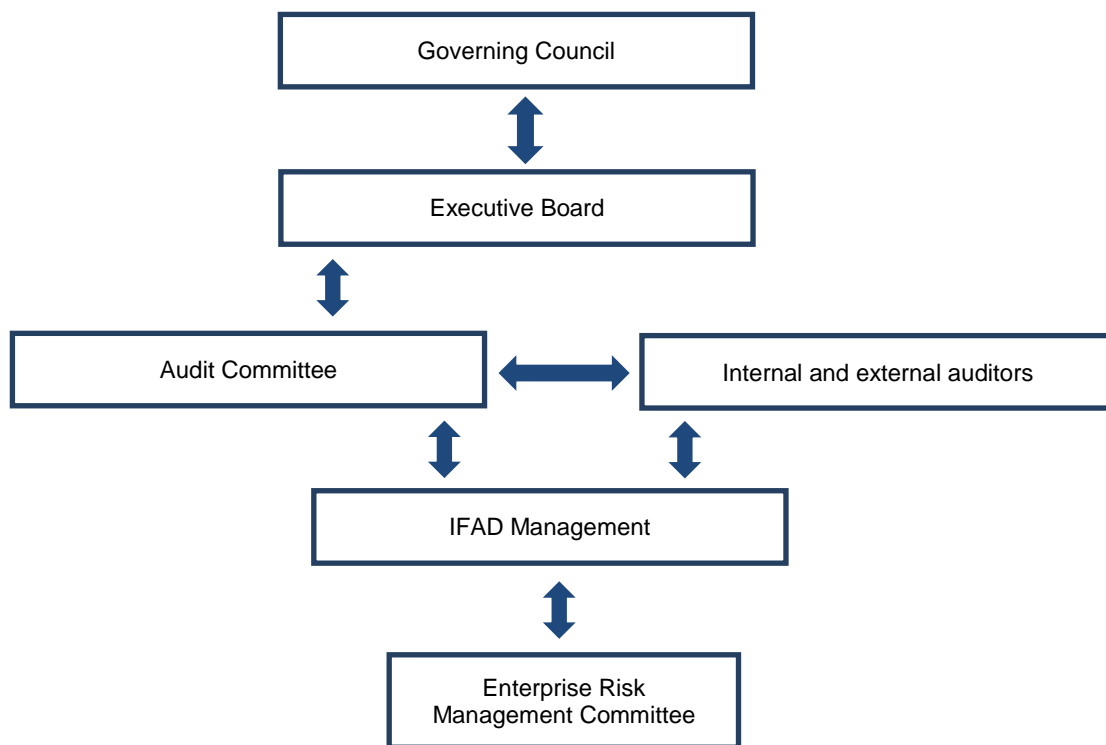
II. Control environment: organizational structure, roles and responsibilities

A. Actors and their roles

5. According to the framework, everyone in an organization has responsibility for internal control to some extent. Virtually all employees produce information used in the internal control system or take other actions needed to effect control. This responsibility extends to corporate governance, and translates, in the case of IFAD, to the following roles:
 - (i) The **Governing Council**, which is the supreme plenary organ of the Fund. It is composed of representatives of the Member States. All powers of the Fund are vested in the Governing Council. Subject to the limitations stated in the Fund's charter, it may delegate powers to the Executive Board.
 - (ii) The **Executive Board**, and the **Audit Committee**, which is appointed by the Board, supervise internal control and risk management. Assisted by the Audit Committee, the Board is informed and updated on any changes to the operating principles of internal control including the main features of the risk management process, a summary of risks, control objectives and common control points for financial reporting.

- (iii) The **internal and external auditors** of the organization also measure the effectiveness of internal control. They assess whether the controls are properly designed, implemented and working effectively while making recommendations on how to improve internal control.
 - (iv) **Management** is responsible for designing, approving and implementing the internal control and risk management process together with the Fund's financial operations management team.
 - (v) The **Enterprise Risk Management Committee**² is responsible for supporting and overseeing the risk management activities of the Fund. It is a critical element for the management of operational risk as it affects the investment activities of the Fund.
6. Management and staff are committed to IFAD's Code of Conduct,³ which was established to regulate their conduct and align it with the organization's interests.
7. The governance structure and reporting lines are presented in chart 1 below.

Chart 1
Governance structure



8. Part B of this section examines in detail the flow of financial information within IFAD, the internal actors involved in the process of investment decision-making, and the specific roles and responsibilities, as well as the flow of financial information as per chart 2.

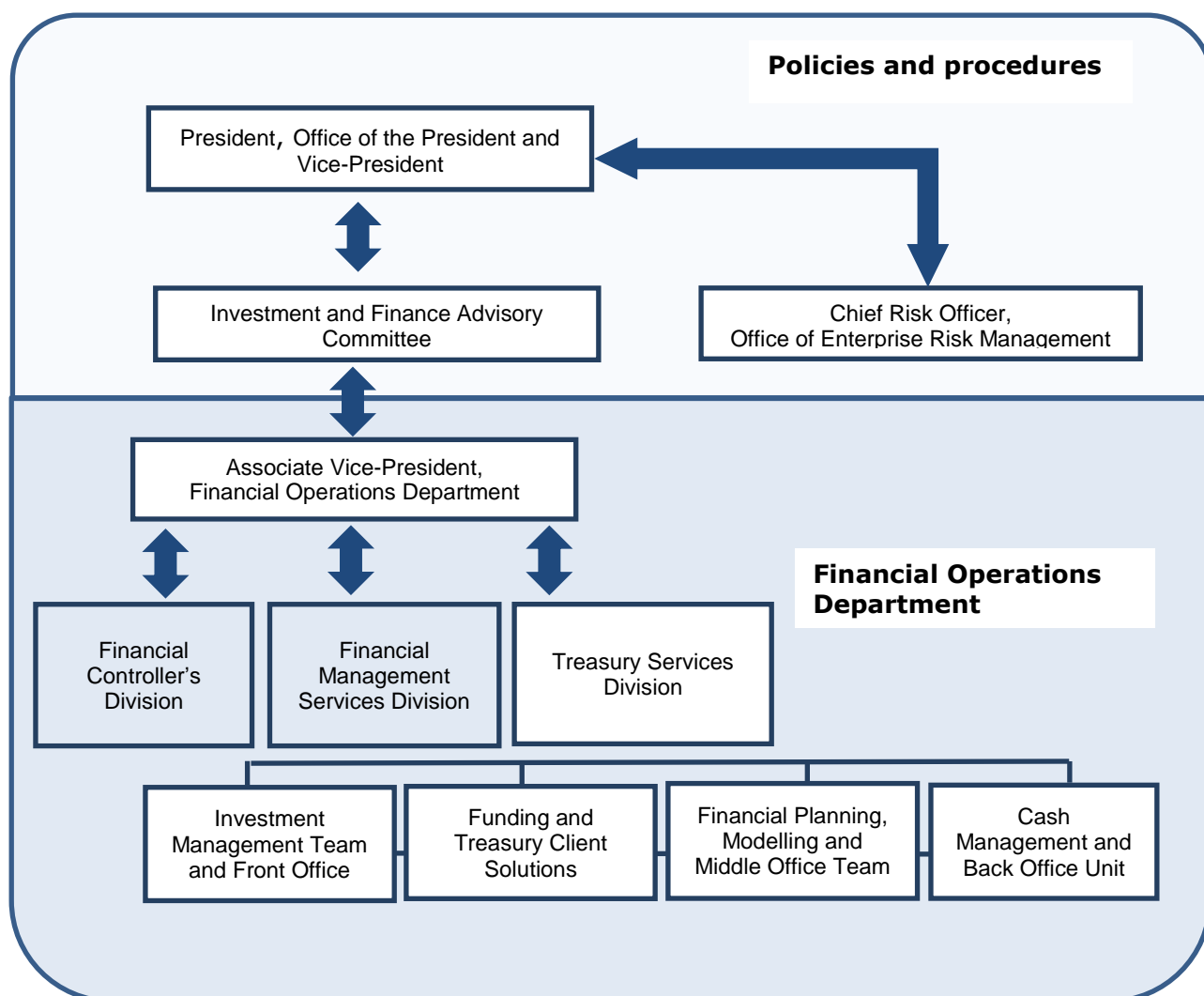
² See PB 2008/06.

³ See IFAD's Human Resources Implementing Procedures – Chapter 1: Duties, obligations and privileges 1.7.9(vi).

B. Investment-related roles and responsibilities in IFAD

9. IFAD's internal flow of financial information in terms of investments is presented in chart 2.

Chart 2
IFAD's internal flow of financial information



10. **The President** has oversight and decision-making responsibility for the investment of the assets based on the approved Investment Policy Statement (IPS). He or she may delegate authority for specific investment-related activities.
11. **The Chief Risk Officer (CRO)** reports directly to Vice-President, Office of the President and Vice-President. This direct reporting line ensures segregation of investment risk management duties from the investment function performed in THE Treasury Services Division (TRE).
12. **The Investment and Finance Advisory Committee (FISCO)** is charged with the supervision and oversight of the various financial matters of the organization. The rules of procedure and terms of reference of FISCO are presented in annex I.
13. **Associate Vice-President, Chief Financial Officer and Chief Controller (AVP)**. As head of the Financial Operations Department (FOD), the AVP/FOD is responsible for IFAD's financial resource management. Through the Financial Controller's Division (FCD), the Financial Management Services Division (FMD) and TRE, the AVP/FOD:

- (i) Manages and reports on IFAD's financial resources in a framework of cost efficiency, risk containment, transparency and accountability;
 - (ii) Invests and manages financial assets not immediately needed, in line with operational requirements;
 - (iii) Safeguards and maximizes the resources available for operations through prudent financial management and investment of financial resources, and through appropriate accounting, reporting and projections on IFAD's use of these resources;
 - (iv) Works with internal and external partners in sharing knowledge, harmonizing financial management systems and procedures, and/or enabling their collaboration; and
 - (v) Performs functions delegated by the President, including updating the investment guidelines.
14. The **Financial Controller's Division** is responsible for the accounting and reporting of the Fund. It must ensure integrity, transparency and control of the management of IFAD's resources, including trust funds, supplementary funds, funds of hosted entities and funds raised through innovative financing-related activities. The division provides leadership and interpretation on all major issues related to the formulation and implementation of accounting policies and procedures, such as the adoption of new International Financial Reporting Standards (IFRS). The main specialized services provided by FCD are the following:
- (i) Maintaining adequate control systems to ensure that all IFAD's financial transactions are properly, completely and accurately recorded and reported, are consistent with IFAD's Framework for Delegation of Authority, and policies and procedures, and are in accordance with IFRS;
 - (ii) Compiling accurate and timely internal and external financial reports that reflect and capture all the Fund's financial transactions and results, and the overall financial position;
 - (iii) Originating governing body and other official documents on financial matters, for example, financial statements and drawdown requirements;
 - (iv) Monitoring credit risk on the loan portfolio and determining impairment allowances in accordance with IFRS requirements, liaising with the Office of Enterprise Risk Management (RMO);
 - (v) Monitoring and strengthening financial management and fiduciary responsibilities for IFAD's fund flows, supplementary funds administration, audit and reporting;
 - (vi) Ensuring financial and budgetary management of extrabudgetary funds and hosted entities;
 - (vii) Liaising with the external auditors and the Audit Committee;
 - (viii) Strengthening the Fund's anti-money laundering, counter-terrorism financing (AML/CFT) and sanctions screening programme through the enhancement of related policies and procedures, performing of sanctions screening checks and conducting integrity due diligence assessments for AML/CFT; and
 - (ix) Ensuring operational risk management/controllership.⁴
15. The **Financial Management Services Division** is a specialized technical division responsible for promoting and directly supporting the strengthening of financial management practices in IFAD-financed operations, including financial reporting,

⁴ Operational risk function is currently under review within the newly created RMO.

project audits, project liquidity management and fiduciary compliance throughout the project lifecycle. It also leads on development finance policies and initiatives, supporting the corporate roll-out of IFAD's financial architecture with relevant financial instruments and client solutions, including debt management and loan pricing. The division is structured to:

- (i) Mainstream financial management procedures to form an integral part of the development process in all IFAD-financed and -managed operations to ensure that funds are used for the intended purpose. FMD achieves this through the provision of risk-based financial direction and oversight during the preparation and implementation of country strategic opportunities programmes and during the design, supervision and implementation support of IFAD projects, programmes and grant activities;
- (ii) Lead corporate advisory and financial services for the area of development finance and IFAD's developing financial architecture and enhanced business model, including but not limited to IFAD financing terms and criteria, debt issues, modernizing and diversifying IFAD's financial products and instruments, and increasing the flexibility of IFAD's financial offerings;
- (iii) Engage IFAD's external stakeholders, including governments, projects, project staff and auditors, as well as IFAD's workforce (including accredited consultants) to promote financial management knowledge-sharing and capacity-building;
- (iv) Act as a second line of defence for financial management in operations, ensuring consistency of financial management practices across regions through a quality assurance unit. Lead financial management policies and procedures including the risk-based assurance framework and related system and tool development, including direct engagement with borrowers/recipients to facilitate the roll-out of IFAD's e-disbursement system, the IFAD Client Portal; and
- (v) Maintain strategic partnerships with other international financial institutions (IFIs) and multilateral platforms to promote sharing of best practices and to harmonize IFAD's financial management policies and operational practices where applicable and desirable.

16. The **Treasury Services Division** has a key fiduciary role in managing IFAD's liquidity and the cash flows of both replenishment-based and borrowed resources. This includes strategic portfolio and liquidity planning and long-term financial projections of cash flows and resources. The specialized services provided by TRE are designed to:

- (i) Formulate and implement financial policies and procedures, including the investment policy;
- (ii) Manage IFAD's operational cash and liquidity requirements for all funding sources;
- (iii) Actively manage IFAD's liquidity portfolio;
- (iv) Coordinate strategic portfolio and liquidity planning by defining funding plans, quantify and set liquidity requirements and targets, and determine the resources available for commitment;
- (v) Develop partnerships with the treasuries of other IFIs regarding the cash flow processes of disbursements and receipts through operational bank accounts; and
- (vi) Act as focal point for IFAD's borrowing activity.

17. TRE relies on four operating units to deliver these services:

- (a) The **Cash Management and Back Office Unit (CM)** provides both cash management and post-trading services on investments. High-level responsibilities are to:
- (i) Manage and report on all cash inflows and outflows for all IFAD and non-IFAD operational accounts and across funding sources with due regard to short-term liquidity and availability of funds;
 - (ii) Ensure accurate processing for all financial and cash flow transactions in operational bank accounts (including administrative payments, loan/grant disbursements, payroll, liquidity transfers, settlement of investment-related transactions) in both regular and business continuity working environments;
 - (iii) Ensure compliance with IFAD procedures and adherence to relevant international payment regulations and post-trading industry standards;
 - (iv) Manage and execute treasury reconciliation and first-level accounting across IFAD and non-IFAD operational accounts;
 - (v) Monitor and manage the liquidity of IFAD and non-IFAD operational accounts to ensure adequate funds for financial, investment and payment/disbursement transactions;
 - (vi) Be responsible for post-trade processing and investment settlement activities for financial transactions traded for internally managed portfolios across funding sources;
 - (vii) Develop, manage and maintain relationships with central and commercial banks and IFAD's global custodian, regarding cash flow operations for IFAD accounts;
 - (viii) Manage, administer and upgrade cash management systems, including but not limited to IFAD's SWIFT platform. Ensure that systems are in line with required industry standards and applicable international regulations;
 - (ix) Manage operational risk at the unit level through internal processes and production of reports on cash management and back office activities, with relevant key performance indicators;
 - (x) Manage TRE's activities in support of IFAD's decentralization, including negotiating legal, financial and administrative arrangements with the relevant commercial banks. Provide support to IFAD Country Office local bank accounts and to channelling of funds in local currency;
 - (xi) Participate in accreditation process for cooperation initiatives (like Green Climate Fund) and their operational implementation; and
 - (xii) Participate in the review of IFAD's financial policies and in their operational implementation.
- (b) The **Investment Management and Front Office (IM)** monitors and manages IFAD's internally and externally managed portfolios. Responsibilities are to:
- (i) Directly manage the internal portion of the liquidity portfolio. This involves market research, credit analysis of issuers, trade execution and optimal portfolio construction;
 - (ii) Periodically review IFAD's investment policy and guidelines to ensure alignment with investment strategies, in light of changing financial and market conditions;

- (iii) Oversee and analyse the externally managed portion of the liquidity portfolio;
 - (iv) Implement currency and asset allocation of the overall liquidity portfolio;
 - (v) Implement foreign exchange and interest rate risk hedges;
 - (vi) Manage IFAD's relationships with trading counterparties, external fund managers and, jointly with the CM, the global custodian; and
 - (vii) Ensure the availability of funds for IFAD and non-IFAD operations through prudent liquidity management in collaboration with the CM.
- (c) The **Financial Planning, Modelling and Middle Office** coordinates strategic portfolio and liquidity planning. Responsibilities are to:
- (i) Formulate strategies and policies to optimize the use of internal and external resources to finance IFAD's operations, including the planning, structuring and ongoing management of the optimal capital structure in compliance with asset and liability management (ALM) principles in liaison with the RMO;
 - (ii) Design, enhance and maintain IFAD's financial models;
 - (iii) Produce short-term and long-term financial projections to test the financial sustainability of the programme of loans and grants under specific scenarios;
 - (iv) Define IFAD's investment policy and investment guidelines to ensure alignment and compliance with IFAD's investment goals and adequacy in light of changing financial and market conditions, in liaison with the IM;
 - (v) Administer the Treasury Management System (currently "Treasury's database") and other Treasury systems (e.g. Bloomberg);
 - (vi) Provide portfolio analytics including performance on the internally managed business units and portfolios, including operational bank accounts managed by TRE/CM, and externally managed portfolios;
 - (vii) Provide data to IFAD's global custodian to enable portfolio analytics and reporting functions including on operational bank accounts;
 - (viii) Analyse, implement and review IFAD's Liquidity Policy;
 - (ix) Monitor overall assets against the currency composition of IFAD's commitments to minimize exposure to currency risk, in liaison with the RMO;
 - (x) Recommend benchmark concepts to be used and update benchmarks as required, reporting performance against the benchmark on a monthly basis;
 - (xi) Manage and administer the pre-trade compliance system and intradivisional workflow automation;
 - (xii) Design and maintain ALM techniques and implement ALM scenario analysis and related reporting through dedicated systems and models; and
 - (xiii) Produce reporting on all output of the functions above for TRE and FOD, RMO, FISCO and governing body committees (e.g. Audit Committee, Executive Board, Replenishment Consultation).

- (d) The **Funding and Treasury Client Solutions Unit** is the focal point for IFAD's borrowing activity. Responsibilities are to:
- (i) Formulate strategies and policies for the optimization of IFAD's funding structure, with a focus on borrowed funds and in line with the organization's need;
 - (ii) Identify and explore new funding sources, in an effort to have a diversified funding base and minimize funding cost;
 - (iii) Formulate policies related to IFAD's loan pricing reflecting cost of IFAD's funding;
 - (iv) Analyse and propose funding plans to ensure alignment with IFAD's disbursement plans and Liquidity Policy in coordination with the Financial Planning Modelling and Middle Office, RMO and the relevant divisions, by drawing on data from IFAD's financial models;
 - (v) Lead TRE's efforts in resource mobilization by liaising with existing and prospective lenders including Member States, development banks and private sector investors. These efforts will be undertaken in collaboration with internal divisions for the production of related documentation;
 - (vi) Lead and coordinate the production and update of financial information material for potential investors/Member States as well as for financial media and other external parties (investor presentation, reports, data visualization, benchmarking, slides, scripts, Q&A, press releases) to support communications efforts for investor outreach; and
 - (vii) Produce reporting on all output of the functions above for TRE and FOD, RMO, FISCO and governing body committees (e.g. Audit Committee, Executive Board, Replenishment Consultation).
18. **The Office of Enterprise Risk Management** has the following responsibilities related to the liquidity portfolio and financial risk:
- (i) Actively monitor, analyse and periodically report on IFAD's investment risk budget;
 - (ii) Liaise with TRE and FCD to provide credit risk analysis on existing and proposed investments;
 - (iii) Contribute to setting and managing the Fund's risk budget on an ongoing basis by monitoring, analysing and reporting on financial risk exposure and by identifying potential new risk factors in IFAD's investments;
 - (iv) Perform stress tests and scenarios and propose mitigation strategies;
 - (v) Oversee the global custodian compliance monitoring system to ensure correct alignment with all investment guidelines;
 - (vi) Provide advice on potential risks to IFAD's financial soundness based on extended knowledge of IFI best practice and, inter alia, capital adequacy, credit and liquidity ratios;
 - (vii) Monitor adherence to the established capital adequacy ratios;
 - (viii) Formulate and propagate the Fund's ALM Framework;
 - (ix) Provide periodic investment risk and compliance reports to the CRO, Senior Management and FISCO; and
 - (x) Review the investment guidelines proposed by the IM.

C. Investment policies and procedures

19. The overall framework for IFAD's investment processes and controls is governed by the following policies and procedures (as may be amended or updated from time to time):
- Financial Regulations of IFAD;
 - IFAD Policy on Enterprise Risk Management;⁵
 - IFAD's Investment Policy Statement;
 - IFAD's Liquidity Policy;⁶
 - IFAD's investment guidelines;
 - Control Framework for IFAD Investments;⁷
 - IFRS;
 - Investment management and master custody agreements;
 - Treasury Manual; and
 - Rules of procedure and terms of reference of FISCO, referred to in annex I;
20. **Financial Regulations of IFAD.** The Financial Regulations of IFAD govern the financial administration of the Fund and are interpreted in accordance with the Agreement Establishing IFAD.
21. **IFAD Policy on Enterprise Risk Management (ERM).** The ERM policy⁸ establishes a formal, systematic and integrated approach to identifying, managing and monitoring operational, financial and compliance risks in IFAD and defines key roles and responsibilities for all stakeholders in ERM activities. Certain activities performed under IFAD's ERM relevant to investments include:
- (a) **Annual certification of compliance with the Code of Conduct and declaration of non-IFAD income, goods, services or assets.** Pursuant to IFAD's Code of Conduct,⁹ all staff members are required to submit an annual certification form declaring: (i) compliance with the Code of Conduct; (ii) conflicts of interest; and (iii) all sources of non-IFAD income, goods, services or assets.
 - (b) **Management assertion and external audit attestation¹⁰ of internal controls over financial reporting (ICFRs).** Since 2011, IFAD has issued an annual Management assertion on the effectiveness of ICFRs. The first independent attestation by external auditors was issued for the financial year 2012, and such attestations are now included yearly in the audited consolidated financial statements.
 - (c) **Financial disclosure statement for selected staff members.** Since 2012, selected staff members, based on their role and responsibilities, are also required to submit a detailed financial disclosure statement.¹¹
22. **IFAD's Investment Policy Statement.** The IPS is updated annually by TRE and approved by the AVP/FOD. It is then submitted to the Executive Board for final approval at its December session. The document provides the overarching

⁵ See EB 2008/94/R.4.

⁶ See EB 2006/89/R.40

⁷ Formerly titled "Internal Control Framework for IFAD's Investments".

⁸ IFAD is in the process of updating its ERM policy.

⁹ IFAD's Human Resources Implementing Procedures – Chapter 1: Duties, obligations and privileges 1.7.9(vi).

¹⁰ EB 2010/99/R.30.

¹¹ IFAD Information Circular IC/ETH/01/2012 paragraph 3(b).

principles regulating IFAD's key investment responsibilities, investment universe and acceptable risk parameters.

23. Specifically, the IPS aims to:
 - (i) Define the duties, responsibilities and governance over IFAD's investments;
 - (ii) Set out IFAD's investment objectives for risk and return, and define the eligible asset classes, credit rating requirements and tranching of the liquidity portfolio;
 - (iii) Define key components of investment guidelines;
 - (iv) Determine the risk budget for IFAD's overall liquidity portfolio; and
 - (v) Establish formalized criteria to measure, monitor and evaluate performance and risk.
24. **IFAD's Liquidity Policy.**¹² This policy (as amended or updated from time to time) provides a "means of monitoring and ensuring that the Fund has adequate liquidity available at all times".
25. **IFAD investment guidelines.** For each individual portfolio, IFAD's investment guidelines define the principles by which a fund is managed and monitored. The RMO, through daily oversight and monitoring, ensures strict compliance with investment guidelines through the compliance monitoring system provided by IFAD's global custodian.
26. These investment guidelines include at least the following components for each portfolio:
 - (i) Investment objectives: defining expected return and risk;
 - (ii) Risk budget (tracking error, etc.);
 - (iii) Base currency;
 - (iv) Eligible currencies;
 - (v) Eligible instruments;
 - (vi) Minimum and maximum portfolio duration;
 - (vii) Minimum credit quality;
 - (viii) Diversification requirements;
 - (ix) Procedures for futures and options; and
 - (x) Comparative performance benchmark.
27. The benchmarks identified in the investment guidelines must be: (i) unambiguous, transparent and simple; (ii) investable and replicable; (iii) measurable and stable; (iv) appropriate to the investment purpose; (v) reflective of current investment opinions; and (vi) specified in advance.
28. **Investment management and master custody agreements.** The agreements with external parties ensure that the relationship falls within a verified and constantly updated legal framework.
29. **Treasury Manual.** This manual provides a detailed description of the specialized services provided by TRE, and defines how the division's workload is divided among its various functions.
30. The manual is divided into two main sections: (i) the executive manual, providing a broad overview of the organization and its major processes; and (ii) the

¹² See EB 2006/89/R.40

operational manuals (Cash Management, Investment Management and Financial Planning Modelling and Middle Office), which constitute a working document that provides the user with specific details, descriptions and examples of processes and procedures. Table 1 gives an overview of the Treasury Manual.

Table 1
Overview of the Treasury Manual

	<i>Executive manual</i>	<i>Operational manuals</i>
What is it?	An overview document that provides a concise description of TRE's functions and procedures in a summary format.	A detailed description of the functions, tasks and processes that make up the responsibilities of TRE staff.
How is it used?	Contains embedded navigation links that take the user directly to relevant sections within the operating manual for additional information.	Contains specific listings of duties, activities, detailed process flows, and other "how-to" material. Can be used as a step-by-step instruction guide for most procedures.
Who are the prospective users?	Intended for use as a quick reference for those interested in how TRE operates and what its major functional responsibilities are.	Intended for use as a detailed reference for those tasked with carrying out TRE's day-to-day functions.

31. To maintain flexibility, accessibility and adaptability, the Treasury Manual is published on IFAD's local area network in portable document format (PDF). The electronic file is controlled by the TRE front office. In view of the constant revision of processes and the restricted nature of parts of the Treasury Manual, no hard copies are distributed.
32. **Confidentiality.** Due to the confidential nature of the information presented, parts of the Treasury Manual are restricted and can be viewed by authorized users only. Approved users may not divulge its contents to third parties without specific written permission by authorized senior staff. The public sections of the manual, i.e. the IFAD Treasury Executive Manual, are available to be viewed by all staff on the TRE intranet site.
33. **Investment committees.** IFAD has two investment committees – FISCO and the FOD Management Team – as elaborated upon in annex I.

III. Risk assessment, control, information and communication, and monitoring activities pertaining to the investment portfolio

A. Risk identification

34. IFAD's investments are exposed to a variety of financial risks. Marked-to-market investments are affected by market risks, as well as liquidity, credit, counterparty and operational risks. A detailed definition of these risks and a summary of the key measures used to measure such risks in IFAD's liquidity portfolio are given below.
35. **Market risk** is defined as the risk of losses arising from exposure to changes in financial market variables (prices and rates). IFAD is exposed to changes in interest and exchange rates.
36. **Interest rate risk** is defined as the potential risk that the value of a fixed rate security will decline as a result of an upward movement in the absolute level of interest rates, based on the spread between the two rates, and the overall shape of the yield curve. Interest rate risk is monitored on the overall portfolio and on the individual portfolios. Risk measurements include duration, standard deviation, ex ante tracking error (active risk), value at risk (VaR) and conditional value at risk (CVaR).
37. **Currency risk** arises from the change in price of one currency against another. IFAD faces currency risk as its future commitments may be in different currency to that of its assets. Currency risk is monitored, and reported on, on a monthly basis.

Liquidity risk

38. Liquidity risk is defined as the risk stemming from the lack of marketability of an investment that cannot be readily sold in the secondary markets to generate the necessary liquidity to meet contractual obligations. At any point in time, IFAD must be able to meet its disbursement obligations for loans and grants.
39. Liquidity risk is addressed through the minimum liquidity requirement (MLR).¹³ This amount must be available at any point in time to ensure IFAD's ability to meet its disbursement obligation promptly and without additional costs.

Credit risk

40. Credit risk is defined as the risk of loss of the loan principal or loss of a financial reward stemming from a borrower's failure to repay a loan or otherwise meet a contractual obligation.
41. Credit risk is actively managed by RMO in coordination with TRE (for the investment portfolio) and FCD (for the loan portfolio). The minimum rating floors in the respective investment guidelines are an indicator of risk and used as a tool in managing credit risk. The eligibility of individual securities and issuers is determined on the basis of ratings given by the three major credit rating agencies: Fitch, Moody's, and Standard & Poor's. For investment management purposes, credit analyses by security and by issuer will be performed – for all internally managed investments and, on a selective basis, for externally managed assets, and for commercial and central banks – using financial information systems, credit analysis provider(s) and other sources. All other credit analysis will be performed and reported as an integral part of risk management. Moreover with the adoption of the impairment requirement of IFRS 9, an impairment allowance has been set up to reflect the expected credit loss of financial instruments designated at amortized costs. Monitoring activities of this credit risk are performed by FCD in conjunction with TRE and RMO.

Counterparty risk/trading counterparties

42. Counterparty risk is defined as the risk to each party of a contract that the counterparty will fail to perform its contractual obligations.
43. Counterparty risk is managed for all investments through the establishment of a minimum rating for eligible counterparties, including banks for operational cash and for short-term investments and trading counterparties.
44. Counterparty risk is also managed by capping exposure to each issuer/bank. Counterparty risk analyses are performed for the purpose of investment management using financial information systems, credit analysis providers and other sources. All other counterparty risk analyses will be performed and reported as an integral part of risk management.

Country risk

45. Country risk is a collection of risks associated with investing in a country. These risks include political risk, exchange rate risk, economic risk, sovereign risk and transfer risk.
46. Country risk is managed for all investments through the establishment of maximum country exposure concentrations within the guidelines of every individual portfolio. Country exposures are monitored on a daily basis through the internal compliance system.
47. **Operational risk** is defined by the Basel Committee on Banking Supervision as "the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events." Operational risk is the risk that is not inherent in

¹³ See EB 2006/89/R.40 and EB 2013/110/R.15.

financial, systematic or market-wide risk. This includes certain elements of legal risk.

48. Operational risk is addressed by defining a sound framework of responsibility and accountability within IFAD's financial structure, by establishing back-up procedures and by performing legal reviews of all official policies.
49. On a broader organizational level, the Revised IFAD Policy on Preventing Fraud and Corruption in its Activities and Operations¹⁴ aims to: "reaffirm the Fund's and its Member States' continued commitment to the prevention and mitigation of fraud and corruption in IFAD-financed and/or IFAD-managed operations and activities and to ensure that the Fund has adequate safeguards and measures in place to this end".
50. IFAD's Anti-Money Laundering and Countering the Financing of Terrorism Policy¹⁵ seeks to ensure that integrity risks are identified, assessed and adequately mitigated by taking the nature, scale and complexity of the Fund's activities into account. The intent of the policy is to prevent the Fund's exposure to serious reputational risk, financial loss or legal liability.
51. In addition, IFAD's Human Resources Implementing Procedures specify that "Screening will be conducted with professional rigour ... and selection processes ensuring that candidates are assessed on the basis of the highest standards of competence, integrity, and appropriate experience to carry out IFAD's objectives and avoid potential conflicts of interest".¹⁶

B. Risk measurement and management

Risk budgeting and risk tolerance

52. The aforementioned points are addressed through a risk-budgeting framework which represents the overall risk appetite and tolerance of the organization. This translates into risk metrics as defined in the IPS, investment guidelines, the Liquidity Policy as well as other policies and internal procedures (as may be amended or updated from time to time).
53. Specifically, risk budgeting is the procedure of allocating risk within and between funds. It entails setting predetermined limits for the liquidity portfolio – on an aggregate level and at the level of individual managers – monitoring these measures and adjusting the portfolio whenever they exceed the tolerance level. In more detail, risk budgeting is the process of:
 - (i) Measuring and decomposing the aggregate risk of a portfolio into its constituents on a quantitative basis;
 - (ii) Setting risk limits (risk budgets) for the overall liquidity portfolio and individual portfolios, ex ante through the definition of ranges of selected risk metrics in line with the organization's risk appetite and tolerance level;
 - (iii) Allocating risks across the assets in compliance with risk budgets;
 - (iv) Monitoring the use or misuse of risk budgets on an ongoing basis;
 - (v) Expanding ALM;
 - (vi) Analysing the results (ex post); and
 - (vii) Changing investments when necessary to align the portfolio with the desired risk level.

¹⁴ See EB 2018/125/R.6.

¹⁵ See EB 2019/128/R.41/Rev.1

¹⁶ IFAD's Human Resources Implementing Procedures, chapter 2: Staff recruitment and appointment 2.3.1 (ii).

54. IFAD's IPS sets the risk budget for IFAD's overall liquidity portfolio. The risk budget for individual portfolios is set in IFAD's investment guidelines and approved by the President of IFAD, unless otherwise delegated. Additional limits are set in the MLR, investment policies and other internal procedures. Table 2 details the risk measures selected for the risk management framework and their tolerance level as defined in these IFAD policies and guidelines.

Table 2
IFAD's investment risks, established limits and Control Framework*

<i>Risk type</i>	<i>Risk measure and source</i>	<i>Established limit</i>	<i>Monitoring frequency/tool</i>	<i>Reporting frequency</i>	<i>Alert level/action taken</i>
Interest rate risk	Manager's duration (determined in IFAD's investment guidelines)	Duration must be no lower than zero (i.e. divesting into cash, lower limit) and no higher than two years above the benchmark duration (upper limit).	Daily through compliance system.	Monthly in the risk report to the Treasurer and the AVP/FOD. Quarterly in the report on IFAD's liquidity portfolio to the Executive Board.	Should the duration upper or lower limit be breached, the issue will be reported by the RMO to the IM the Treasurer. The IM will immediately liaise with the investment manager to: <ul style="list-style-type: none"> • Verify the reason for the duration position/strategy. • Agree on a reasonable time frame for the manager to restore duration within allowable limits. • Upon execution of required trades, request written confirmation by the manager of the new duration level. The RMO will then re-evaluate the duration level and report to the Treasurer.

* Table 2 presents the internal procedures established under the risk management framework to monitor and manage risks within the corresponding risk-budgeting framework. The established limits are detailed only for reference purposes, however the limits might change when the corresponding policy or guideline is updated.

It should be noted that a high tracking error does not necessarily indicate a higher risk, but only a higher degree of difference when compared with the benchmark. For example, should a benchmark contain sub-prime mortgage-backed securities, a portfolio indexed against this benchmark and not containing such securities may show a high tracking error but a lower risk level in absolute terms.

<i>Risk type</i>	<i>Risk measure and source</i>	<i>Established limit</i>	<i>Monitoring frequency/tool</i>	<i>Reporting frequency</i>	<i>Alert level/action taken</i>
Interest rate risk (continued)	One-year CVaR at 95 per cent confidence level (stated in IFAD's IPS and, for individual portfolios, in IFAD's investment guidelines)	Overall portfolio: as determined in the IPS. Individual portfolios: according to the specific investment guidelines.	Monthly through risk management system.	At least monthly in the risk report to the Treasurer and the AVP/FOD. More frequently if alert level for measure is reached. Quarterly in the report on IFAD's liquidity portfolio to the Executive Board.	Should the CVaR on the overall portfolio or on any single manager exceed its threshold the issue will be reported by the RMO to the IM, the Treasurer and the AVP/FOD The following actions will be taken: <ul style="list-style-type: none"> • The RMO will perform a breakdown analysis to identify the sources of increased CVaR. • Depending on the result of the breakdown analysis, the RMO will recommend to the AVP/FOD and to the Treasurer corrective measures on the overall portfolio or for a single manager. These measures may include, but are not limited to, increasing the cash exposure, decreasing duration and divesting from a certain sector. • The measures will be discussed within TRE and RMO and an action plan will be presented to the AVP/FOD and to the Treasurer. • Upon approval, the recommendations will be implemented with the concerned counterparty.

<i>Risk type</i>	<i>Risk measure and source</i>	<i>Established limit</i>	<i>Monitoring frequency/tool</i>	<i>Reporting frequency</i>	<i>Alert level/action taken</i>
Currency risk	Percentage deviation from target currency ratios	While the aim of the framework is to minimize any variance (i.e. zero variance), any deviation of more than 10 per cent per currency is considered above the absolute limit.	Monthly through internal analysis.	At least monthly to the Treasurer and the AVP/FOD. More frequently if the variance is close to the established limit. Quarterly in the report on IFAD's liquidity portfolio to the Executive Board.	Should the percentage deviation in any single currency exceed the absolute limit, the following actions will be taken: <ul style="list-style-type: none"> • The RMO will recommend a realignment strategy by one of the following tools: foreign exchange transactions on internally managed cash or change in currency composition of one or more of the externally managed individual portfolios. • An execution time frame for the realignment will be communicated by the RMO to the Treasurer and the AVP/FOD and to the concerned teams (the IM and/or the CM). • The concerned party will be instructed to execute the trades. • Upon execution, a new analysis will be performed to verify the realignment of the assets.
Liquidity risk	Percentage of gross disbursement (determined in IFAD's MLR). <i>(Currently under review)</i>	MLR (composed of IFAD's investment portfolio) set at 60 per cent of the total of annual gross disbursements (cash outflows) and potential additional requirements due to liquidity shocks. <i>(Currently under review)</i>	Quarterly through internal analysis.	Quarterly in the report on IFAD's liquidity portfolio to the Executive Board.	Should IFAD's investment portfolio decrease to reach the level of 70 per cent of gross disbursements, the issue will be reported by the RMO to the AVP/FOD and the Treasurer and immediately communicated to the Programme Management Department in order to revise the plan for future disbursements.
Credit risk	Credit rating (determined in IFAD's investment guidelines) and fundamental analysis carried out in-house.	Minimum credit floor determined in the IPS and in IFAD's investment guidelines.	Daily through compliance monitoring system.	At least monthly in the risk report to the Treasurer and the AVP/FOD. On a quarterly basis a credit rating analysis by portfolio will be presented in the report on IFAD's liquidity portfolio to the Executive Board.	Should a security be downgraded below IFAD's minimum credit floor, the manager has 30 days to propose a strategy to the RMO to address the breach. Credit risk is reported and analysed by the RMO. TRE also analyses the credit risk for internally managed investments, and, on a selective basis, for externally managed assets. Credit risk analyses for commercial and central banks are performed by using financial information systems, credit analysis providers and other market sources. Credit risk for securities designated at amortized cost is also monitored by the impairment allowance created to reflect the expected credit loss. Activities are carried out by FCD, TRE and RMO.

<i>Risk type</i>	<i>Risk measure and source</i>	<i>Established limit</i>	<i>Monitoring frequency/tool</i>	<i>Reporting frequency</i>	<i>Alert level/action taken</i>
Counterparty risk	Credit rating for counterparties	Minimum credit rating for eligible counterparties determined in IFAD's IPS.	Monthly through internal analyses.	Ad hoc basis, but if there is a credit event (e.g. downgrade) then a report will be written.	Should counterparty be downgraded below IFAD's minimum credit floor, the issue will be reported by the RMO to the Treasurer, the AVP/FOD, the IM and the CM. Immediate action will, as appropriate, be taken with the investment manager. TRE performs analysis of counterparties for all investment activities, including trading, derivatives and banks eligible for investments. Monitoring is also performed on commercial and central banks' credit ratings and financial soundness.
Country risk	Maximum country risk exposure and concentration limits (determined in IFAD's investment guidelines).	Depending on liquidity portfolio guidelines.	Daily through compliance monitoring system.	Monthly in liquidity portfolio reports to FISCO and quarterly to the Executive Board.	Should a country concentration be exceeded, the issue will be reported by the RMO to the Treasurer, the AVP/FOD, the IM and the CM. Immediate action will be taken, as appropriate, with the investment manager.
Operational risk	Segregation of duties within TRE, back-up procedures, legal control (determined in the Treasury Manual and Operational Risk Management for Treasury, and Cash and Investment). Segregation of duties of TRE and the RMO reported in this Control Framework document and various investment guidelines.	Not applicable.	Continuous.	Annually, through the revision of the Treasury Manual and the Operational Risk report (from 2012) Annually through the revision of the ICFRs. From time to time through the update of the Treasury Manual in order to reflect changes in the structure and or/duties	With regard to payments, segregation of duties for core financial procedures within FOD exists between FCD, the Administrative Services Division (ADM) travel unit and TRE. FCD and ADM have the authority to instruct movements of IFAD funds to external parties. The TRE cash management unit reviews the transactions received and, with due regard to internal checks and liquidity availability, prepares and authorizes the execution of all financial and payment transactions through operational bank accounts. FCD and TRE independently post accounting entries in the Fund's general ledgers, which are reconciled on, at least, a monthly basis. With regard to internally managed investments, within TRE segregation of duties exists between the IM, which recommends (for the Treasurer's approval) and executes trades, and CM unit which performs trade settlement and post-trading activities. RMO independently reports on the investment activities. Additionally, with regard to the liquidity portfolio, the first level of sign-off is performed between the external portfolio managers and IFAD's global custodian, thereby ensuring accountability and segregation of duties. Procedures are reported in the Treasury Manual and in the ICFR process flows. Audits are performed annually on processes and procedures.

C. Control, information and communication, and monitoring activities

55. TRE reports externally certain risk measurement metrics and analyses to the Executive Board and the Audit Committee through the quarterly and annual liquidity portfolio report. Comprehensive monthly risk reports are also produced by the Unit and shared internally with the Treasurer and AVP/FOD and, if deemed relevant, with FISCO.
56. These comprehensive monthly risk reports inform, communicate and monitor activities that cover the following areas of risk monitoring:
 - (i) Currency risk;
 - (ii) Market and credit monitoring, and risk levels compared to predetermined risk budget levels;
 - (iii) Compliance monitoring versus investment guidelines and subsequent actions, if any; and
 - (iv) Portfolio and benchmark performance.
57. Whenever a risk measure reaches the "alert level", as defined in table 2, the RMO will inform the IM, the Treasurer and the CRO. Appropriate risk-mitigating strategies will be recommended and actions will be taken, as described in table 2. Upon completion of the actions, the RMO will verify the risk level and report the new level to the concerned parties.
58. In addition to the risk measures established in IFAD's IPS for risk-budgeting purposes, a comprehensive set of risk measures is analysed through the risk management system. Whenever one of the risk measures, either on the overall portfolio or on a single manager, is deemed to be excessive or shows a significant change from the previous period, the RMO will bring the issue to the attention of the CRO, the Treasurer and the IM.
59. The additional measures (whose definitions are given in annex III) include:
 - (i) Annualized standard deviation or returns by manager, individual portfolio, benchmark and for the overall portfolio and benchmark;
 - (ii) CVaR with a one-year forward-looking horizon and a 95 per cent confidence level, by manager, by individual portfolio benchmark, and for the overall portfolio and the overall benchmark;
 - (iii) Historical monthly CVaR for the historical period of the past two years;
 - (iv) Overall risk decomposition, by risk type; and
 - (v) Risk-adjusted return indicators (Sharpe ratio, tracking error, information ratio, beta and alpha).
60. FCD executes full data control and reconciliation of financial records against the custodian and/or third parties.
61. The risks in IFAD's investments are currently monitored with a variety of tools:
 - (i) **Enhanced risk management system.** IFAD is constantly strengthening its analytical resources to monitor risk in the liquidity portfolio, and enable TRE and the RMO to perform ex ante analyses as well as stress tests on assets, on the individual portfolios and on individual managers;
 - (ii) **Compliance monitoring system.** This web-based application supplied by the global custodian enables the RMO to verify on a daily basis the compliance of external portfolio managers with the respective investment guidelines. The majority of guidelines are currently coded in the system, and the application flags breaches or alert levels on a daily basis. Guidelines that

cannot be coded in the system are monitored through internal analyses and manual procedures;

- (iii) Compliance checks on the internally managed portfolios are, for reasons of segregation of duty, performed by the global custodian who alerts the RMO Unit as soon as a breach occurs and produces a monthly report;
- (iv) In addition to the above, the IM performs qualitative analyses on selected issuers and counterparties; and
- (v) Performance reporting by the global custodian.

Rules of procedure and terms of reference of the Investment and Finance Advisory Committee (FISCO) (high-level committee)

1. Purpose

- 1.1. To assist and advise the President in deciding on strategic financial matters and in determining the overall investment strategy and policy.
- 1.2. The scope of FISCO's review for information and/or for final decision by the President includes:
 - 1.2.1. Financing and resource requirements;
 - 1.2.2. Financing mechanisms;
 - 1.2.3. Investment policy and MLR;
 - 1.2.4. Financial risk management;
 - 1.2.5. Direct charges against investment income;
 - 1.2.6. Appointment of investment managers and global custodian;
 - 1.2.7. Financial market developments;
 - 1.2.8. Any other financial matters deemed strategically important.

2. Membership

- 2.1 The membership of the Committee shall be determined by the President and shall include:
 - The President (Chairperson)
 - Vice-President, Office of the President and the Vice-President
 - Associate Vice-President, Programme Management Department
 - Associate Vice-President Financial Operations Department, Chief Financial Officer and Chief Controller
 - Associate Vice-President, Strategy and Knowledge Department
 - Associate Vice-President, Corporate Services Department
 - Associate Vice-President, External Relations and Governance Department
 - Director and Chief of Staff, Office of the President and Vice-President
 - Director and Treasurer, Treasury Services Division (Secretary)
 - Director, Financial Management Services Division
 - Director, Financial Controller's Division
 - General Counsel, Office of the General Counsel
 - Director, Global Engagement, Partnership and Resource Mobilization Division
 - Director and Chief Risk Officer, RMO
 - Director, Office of Audit and Oversight (observer)
 - Other members at the discretion of the Chairperson

3. Meetings

- 3.1 Members and observers will attend all meetings. In the event they are unable to attend, qualified representatives shall be designated and communicated in writing to the Secretary.
- 3.2 Other IFAD staff directly concerned with the matters to be discussed may be asked by the Secretary to attend as observers, subject to the approval of the Chairperson.
- 3.3 A quorum shall consist of the President as Chairperson or, in the event of the President's inability to attend, his/her representative (under a specific delegation of authority from the President); the Director and Treasurer, TRE, as Secretary or his/her representative, the AVP/FOD or his/her representative and four other members of the Committee.
- 3.4 Meetings will be held every eight weeks in conjunction with the regular meetings of the Executive Management Committee, and more often if the business of the Fund so requires.

4. Agenda, documentation and minutes

- 4.1 The Director and Treasurer, TRE, will act as Secretary of the Committee and shall be responsible for the following:
 - 4.1.1 Scheduling meetings;
 - 4.1.2 Drafting the agenda in consultation with the AVP/FOD;
 - 4.1.3 Coordinating and distributing documentation to the Committee at least four working days prior to the meeting date;
 - 4.1.4 Providing information on the strategic financial or operational matters indicated in 1.2, as deemed necessary by the Chairperson or FISCO members;
 - 4.1.5 Preparing minutes of the meeting for the Chairperson's approval – which shall include decisions taken by the Chairperson, substantive observations by members, actions to be undertaken by responsible officers – and distributing signed minutes to all participants;
 - 4.1.6 Preparing an updated tracker of actions for the Committee.

Reference to the principles outlined in the COSO Internal Control–Integrated Framework in the context of IFAD’s investment-related activities

I. Control environment

1. **The organization demonstrates a commitment to integrity and ethical values:** Specific policies and procedures that fall under the IFAD Policy on Enterprise Risk Management require: (a) annual certification of compliance with the IFAD Code of Conduct and declaration of non-IFAD income, goods, services or assets; (b) Management assertion and external audit attestation of ICFRs; and (c) financial disclosure statements for selected staff members. These points – referred to in section II.C of the Control Framework – demonstrate **a commitment to integrity and ethical values.**
2. **The board of directors demonstrates independence from Management and exercises oversight of the development and performance of internal control:** IFAD’s Governing Council, Executive Board and Audit Committee are independent from Management and exercise oversight as referred to in section II.A.
3. **Management establishes, with Board oversight, structures, reporting lines, and appropriate authority and responsibilities in the pursuit of objectives:** Section II.B describes the investment-related roles and responsibilities of key parties responsible for oversight and decision-making of investment-related activities. Chart 1 illustrates IFAD’s governance structure and chart 2 shows the internal flow of financial information in terms of investments.
4. **The organization demonstrates a commitment to attract, develop and retain competent individuals in alignment with objectives:** IFAD’s Human Resources Implementing Procedures state that “Screening will be conducted with professional rigour ... and selection processes ensuring that candidates are assessed on the basis of the highest standards of competence, integrity, and appropriate experience to carry out IFAD’s objectives and avoid potential conflicts of interest.”¹⁷
5. **The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives:** Section 3.1 of IFAD’s Human Resources Policy¹⁸ states that IFAD staff pledge themselves to “discharge their functions and regulate their conduct solely with the interest and objectives of the Fund in view.”

II. Risk assessment

6. **The organization specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives:** The Governing Council adopted the Financial Regulations of IFAD. Regulation VIII, paragraph 2 states that “in investing the resources of the Fund the President shall be guided by the paramount considerations of the security and liquidity. Within these constraints ... the President shall seek the highest possible return in a non-speculative manner”.

¹⁷ IFAD’s Human Resources Implementing Procedures – Chapter 2: Staff recruitment and appointment 2.3.1(ii).

¹⁸ See EB 2004/82/R.28/Rev.1.

7. **The organization identifies risks to the achievement of its objectives across the entity and analyses risks as a basis for determining how the risks should be managed:** Through the IPS the organization identifies an investment universe to achieve the above-mentioned objective as detailed in section III.A, whereby it stipulates asset classes, credit rating floors, durations and corresponding benchmarks. Section III.A identifies various risks (i.e. market risk, currency risk, liquidity risk, credit risk, counterparty risk and operational risk) associated with IFAD's liquidity portfolio and describes how these risks are mitigated and managed by IFAD. Table 2 summarizes established limits, monitoring/reporting frequencies and what alert actions are to be taken.
8. **The organization considers the potential for fraud in assessing risks to the achievement of objectives:** IFAD addresses this through its Policy on Preventing Fraud and Corruption in its Activities and Operations,¹⁹ which aims to: "reaffirm the Fund's and its Member States' continued commitment to the prevention and mitigation of fraud and corruption in IFAD-financed and/or IFAD-managed operations and activities and to ensure that the Fund has adequate safeguards and measures in place to this end".
9. **The organization identifies and assesses changes that could significantly impact the system of internal control:** The annual review of the IPS and Control Framework provides a framework to identify the adequacy of IFAD's internal controls, which is then reported to the Executive Board and Audit Committee. IFAD's investment committee, FISCO, meets regularly to review emerging challenges and risks and to discuss and endorse mitigation strategies.

III. Control activities

10. **The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels:** Sections III.B and III.C stipulate IFAD's risk assessment, controls and monitoring activities to mitigate risks. These are further summarized in table 2.
11. **The organization selects and develops general control activities over technology to support the achievement of objectives:** Section III.C highlights the control and monitoring activities, specifically in relation to IFAD's risk management and compliance monitoring systems (a web-based application supplied by IFAD's global custodian). Furthermore, IFAD is continuing to develop and improve the internal information technology systems pertaining to financial risks and controls.
12. **The organization deploys control activities through policies that establish what is expected and procedures that put policies into action:** Section II.C outlines the IFAD investment-related policies and procedures that govern IFAD's investment processes and controls. It makes reference to IFAD's Financial Regulations, the ERM policy, the IPS, the Liquidity Policy, investment guidelines, the Control Framework, investment management and master custody agreements, the Treasury Manual and FISCO. Table 2 summarizes established risk limits, monitoring/reporting frequencies and procedures/actions to be taken in the event risk levels are breached.

¹⁹ See EB 2018/125/R.6.

IV. Information and communication

13. **The organization obtains or generates and uses relevant, quality information to support the functioning of internal control:** As summarized in table 2, specifically under the column "monitoring frequency/tool", quality information is regularly collated by IFAD to generate compliance and risk reports to support the functioning of internal control.
14. **The organization internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control:** Section II.B of the Control Framework, illustrates and details how financial information (in terms of investments) is communicated within the organization. This includes objectives and responsibilities for internal control. Risk levels are also reported to the FOD Management Team.
15. **The organization communicates with external parties regarding matters affecting the functioning of internal control:** The IPS and Control Framework, together with the annual revisions, provide a channel for the organization to communicate matters affecting the internal control over investment-related activities to external parties.

V. Monitoring activities

16. **The organization selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning:** The effective functioning of internal controls over investments are subject to separate independent reviews by IFAD's Office of Audit and Oversight, together with periodic reviews by the external auditors.
17. **The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including Senior Management and the board of directors, as appropriate:** On an annual basis the IPS and Control Framework is reviewed to identify any potential deficiencies with IFAD's internal controls in relation to its investment activities, with proposed improvements and changes reported to the Audit Committee and Executive Board. Furthermore table 2 summarizes the frequency and timeliness of communicating any investment-related internal control breach to relevant parties, including the Treasurer, AVP/FOD, IFAD's investment committees as well as the Executive Board and Audit Committee.

Glossary of risk measures and related terms

Active risk: The risk a portfolio or fund acquires when it is actively managed, especially when its managers attempt to outperform some benchmark. More specifically, the more a fund or portfolio differs from the benchmark upon which it is based, the more likely it is to underperform or outperform that same benchmark. This extra risk is active risk. For example, a one-year forward-looking active risk of 0.2 per cent means that, over the coming year, the portfolio excess return over the benchmark is expected to be in the range of +/- 0.2 per cent of its mean value.

The active risk can be predictive (or ex ante), based on expected return, or ex post, derived from the actual returns of the portfolio.

Alpha: Alpha is a risk-adjusted measure of the so-called "excess return" on an investment. It is a common measure of assessing an active manager's performance as it is the return in excess of a benchmark index or "risk-free" investment.

Benchmark: A benchmark is a standard against which the performance of a security or manager can be measured. The benchmark should be an investment instrument that has certain characteristics of transparency and replicability so as to best represent the performance of a certain investment universe. In financial markets, the most popular indices are used as benchmarks. For example, the Standard & Poor's 500 is a widely used benchmark for United States "large-cap" equities markets.

Beta: Beta is a measure of the volatility, or systematic risk, of a security or a portfolio in comparison with the financial market as a whole.

Conditional value at risk: CVaR is a measure of the average expected loss of a portfolio assuming that the VaR has been reached. When it is assumed that the portfolio loss has exceeded the VaR, the CVaR gives an indication of the magnitude of the losses in "the tails" of the distribution, i.e. in extreme loss cases. The higher the CVaR, the more a portfolio is expected to lose in extreme scenarios and, hence, the riskier it is.

Confidence level: This is the range (with a specified value of uncertainty, usually expressed in percentage terms) within which the true value of a measured quantity exists. It is also the level of certainty with which an estimate can be trusted.

Duration: This is a measure of the sensitivity of a bond's price to changes in the level of market yields. For bonds, prices and yields have an inverse relationship. If the yields increase, the bonds' prices decrease. A bond with longer duration is more sensitive to changes in market yields meaning that, all else equal, its price will decline more for a given increase in yields than the price of a bond with shorter duration.

Information ratio: This is a measure of risk-adjusted performance. The information ratio measures the relation between the portfolio's average excess return (in excess of the benchmark return) and its tracking error. A higher information ratio indicates a better reward for the portfolio's tracking error, thereby also indicating more successful investment management skills.

Risk-adjusted return: This is a measure of how much an investment returned in relation to the amount of risk it took on. It is often used to compare a high-risk, potentially high-return investment with a low-risk, lower-return investment. A simple risk-adjusted return measure is derived from dividing the portfolio's annual return by its annual standard deviation. This ratio gives an indication of the amount of return generated by each risk unit. The higher the ratio, the better the risk-adjusted return.

Risk-free rate: This is the theoretical rate of return of an investment with no risk of financial loss. The risk-free rate represents the interest that an investor would expect from an absolutely risk-free investment over a given period of time. Risk-free assets usually refer to short-dated government bonds. For United States dollar investments,

usually United States Treasury bills are used, while a common choice for euro investments are German Government bills or the Euro Interbank Offered Rate (Euribor).

Sharpe ratio: This is a measure of risk-adjusted performance. It measures the relation between the portfolio's average excess return (in excess of risk-free return) and its standard deviation. The higher the Sharpe ratio is, the better the reward for market risk.

Standard deviation: This is a measure of the volatility of a certain value around its average. The higher the standard deviation, the more the value is dispersed around its average. In the case of portfolio returns, the higher the standard deviation of returns the more returns are expected to vary around the average expected return. Therefore, a portfolio with a high standard deviation is considered more risky than one with a lower one, all else being equal.

Value at risk: This is the maximum potential loss an investment can incur over a defined time horizon within a specified confidence level. If an liquidity portfolio of US\$100 million has a three-month VaR of 1.5 per cent with a confidence level of 95 per cent, the maximum amount that could be lost over the next three-month period is US\$1.5 million; and this estimate can be trusted with 95 per cent certainty, meaning that it is expected that the estimate is correct 19 times out of 20 (95 per cent of the times).

Volatility: This is a measure of the fluctuation in the market price of the underlying security. Mathematically, volatility is the annualized standard deviation of returns.