A Word from the Siemens Integrity Initiative Steering Committee
A Word from the Siemens Integrity Initiative Project Office

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Project management and reporting
Project organization

Siemens Integrity Initiative
Status of the first funding round
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Project profiles and highlights of activities in 2012

Annex

Please refer to the following website for a general overview of the Siemens Integrity Initiative, the selection process for the first funding round and highlights of activities: www.siemens.com/integrity-initiative.

The Siemens Integrity Initiative Annual Report 2011 can be found here www.siemens.com/integrity-initiative/Report2011
Welcome to the Siemens Integrity Initiative Annual Report 2012! This is our second Annual Report and, as before, we will be updating you on last year’s Collective Action activities as well as reporting on the current status of the Siemens Integrity Initiative and our projects. We are delighted at the significant progress with implementation that we have made in many of these activities, now in their second year, and of the tangible results that are now evident across all countries. These are described in detail in Section C of this report, based on the information supplied and coordinated by our partners as of February 28, 2013.

This report follows on consistently from our first detailed Annual Report* for 2011, in which we informed you about our general Collective Action activities in Section A and set out the background to the Siemens Integrity Initiative in Section B. We explained the general idea behind the initiative as it was conceived in 2009, and illustrated how the first funding round for approximately 40 million US dollars progressed from the planning stage through the selection and awarding of funds to the first projects in December 2010.

Working in conjunction with its locally based Siemens Project Relationship Managers, the Project Office informed itself regularly of the project progress made by means of a biannual reporting process, providing an overview of the implementation and milestones of the contractually agreed activities as well as a target/actual analysis of the associated budgets. Based on this the Project Office held regular face-to-face meetings with the Steering Committee of the Siemens Integrity Initiative and the dedicated working group at the World Bank in Washington to keep them informed about the results achieved so far. Under the terms of the “Settlement Agreement” of July 2, 2009, the World Bank Group has audit rights over the

use of funds and veto rights over the selection of anti-corruption groups or programs receiving funds.

In addition, most of the information presented here is transparently available to the general public on a specially created web page at www.siemens.com/integrity-initiative.

This applies in particular to the application and selection process for projects, the brief project profiles, the individual funds allocated and the Siemens Integrity Initiative Annual Report 2011.

A detailed newsletter portraying the “Highlights of project implementation” and encouraging partners around the world to share their knowledge and collaborate across international boundaries was sent out to our external and internal partners worldwide in January 2013, and is included in Section D.

This report was presented to the World Bank in March 2013, accompanied by an in-depth presentation in Washington.

We would like to offer our heartfelt thanks to Mr. Josef Winter, who left the Steering Committee on December 31, 2012 to take over the country management of Siemens Indonesia.

We remain firmly on track. Our 31 projects in 22 countries are making excellent progress and we are convinced that, with the Siemens Integrity Initiative and our Collective Action activities worldwide, we can help to create a level playing field for the benefit of all and thus support fair growth. With this in mind, we plan to announce the framework conditions for the second funding round in June 2013, further expanding our portfolio in the fight to eliminate corruption and promote integrity in business.

Steering Committee of Siemens Integrity Initiative:
Dr. Hans-Jörg Grundmann, Chief Compliance Officer, Siemens AG (Chair of the Steering Committee)
Peter Solmssen, Member of the Managing Board and General Counsel, Siemens AG
Burkhard Ischler, Senior Vice President, Government Affairs, Siemens AG
This last year, 2012, has been both a challenging one and one that provides us with hope. On the one hand, the political and economic climate has focused the attention of companies and governments alike. On the other hand, the issue of corruption has remained at the top of the agenda and legal frameworks are continuing to converge. The G20 leaders as well as the business community (B20) that provides recommendations to the G20 have continued their work on anti-corruption throughout the presidency of the Government of Mexico and the Government of the Russian Federation. Transparency in public procurement, cooperation between the public and the private sector, support for small and medium-sized enterprises as well as training and education are important topics to be discussed. The concept of cooperation or “Collective Action” as we call it has also entered fora such as the World Economic Forum in Davos, where leaders are calling for greater transparency, and the OECD, where a special workshop on Collective Action was hosted by the OECD Working Group on Bribery.

So we can say with confidence that 2012 was the year in which “Collective Action” became established on the global agenda. And this is also thanks to you, the Integrity Partners of the Siemens Integrity Initiative, who work all around the world to promote transparency and the fight against corruption, make the voices of civil society and business heard and provide a format for constructive interaction and dialog with all stakeholders, including governments.

In the first year of implementation, our projects focused mainly on getting started, setting up appropriate project management structures, and gathering groups of relevant stakeholders to implement the planned activities. Even then, we already saw some remarkable outputs.
In this second year of implementation, we have seen an enormous boost in activities and outputs. Projects are running at full steam, having successfully navigated through some difficult political circumstances and changes.

During this second year of implementation, we have learned that the demand from the private sector for information and training on compliance and anti-corruption measures is very high. Companies increasingly need and want to find new approaches to fighting corruption – a challenge that many of them have faced during their operations. Many projects have addressed this need successfully and have provided more than 170 training courses, workshops and conferences to over 5,000 participants. As a consequence, many new background publications, compliance-related websites, training materials and curricula have also been released.

But this flurry of activities was not confined to corporate compliance. The projects have also responded to the increased interest of the public and the private sectors in interacting with each other, learning from each other, identifying joint solutions to improve the transparency of processes where corruption could occur, and providing incentives to companies that take up the cause of clean business.

In the coming year, we expect most projects to reach their peak. Some projects will come to an end and will start the scheduled process of winding down their activities and assessing their impact. So the new funding round to be announced at the end of June will provide the opportunity for a new wave of projects to pick up the lessons learned from this first round and come up with new ideas for fighting corruption.

We would like to thank all of the Integrity Partners and Project Partners for their contribution and incredible dedication. We look forward to continuing our cooperation in the year to come and will keep you informed about new developments.

The Collective Action & External Affairs Team is headquartered in Munich, Germany:

Sabine Zindera heads the department and is supported by Birgit Forstnig-Errath (Head of the Siemens Integrity Initiative) and Sabrina Vetter (Collective Action Manager responsible for driving the Collective Action Stakeholder Mapping Process), as well as the network of Siemens Business Leaders, Compliance Officers, and legal and tax experts all around the world.
Introduction

The main objective of the Siemens Integrity Initiative is to create fair market conditions for all market participants by fighting corruption and fraud through Collective Action as well as education and training.

The Initiative focuses on supporting projects that have a clear impact on the business environment, can demonstrate objective and measurable results, and have the potential to be scaled up and replicated.
The Siemens Integrity Initiative aims to:

- Raise standards and create awareness of compliance and business integrity
- Create a common platform for dialog with the private and public sectors
- Strengthen the rule of law

Under the umbrella of the Siemens Integrity Initiative, Siemens will disburse funds to support non-profit organizations worldwide that promote business integrity and fight corruption.
Project management and reporting

• Responsibility for managing the projects funded under the Siemens Integrity Initiative lies with the respective Integrity Partner; Siemens supports projects financially, monitors the use of funds in a biannual reporting process, and participates in activities where appropriate and requested by the Integrity Partner.

• The main points relating to the management of projects are regulated in a funding agreement between Siemens and the Integrity Partners and its Project Partners.

• Funds are paid out subject to the achievement of milestones and on a biannual basis (reimbursement of actual costs only; no pre-payments apart from an initial payment).

• Integrity Partners report annually on progress, funds used and work plans for the next year. All Annual Reports must be accompanied by a financial report that has been audited by an external audit company. Regular interim reports help to review progress throughout the year. All Annual Reports must be reviewed and approved by the local Siemens Project Relationship Manager, the Siemens Integrity Initiative Project Office and Corporate Finance.

• Siemens has set up an internal project structure for selecting projects and for supporting and monitoring projects during the implementation phase.

• Siemens supports all projects with a designated Project Relationship Manager and a mentor from senior management.

• Country-specific projects, for example, can draw on the CEO of the local Siemens company as their mentor. All Project Relationship Managers (PRMs) are coordinated by the Siemens Integrity Initiative Project Office (see also Project Organization).
Roles and responsibilities of Project Relationship Managers and Mentors:

**Project Relationship Manager**

- **Monitoring role**
  - Approval of progress of project (according to World Bank requirements)
  - Approval of external communication with Corporate Communications

- **Support role**
  - First contact point for Integrity Partner
  - Create success stories
  - Knowledge sharing
  - Participation in project activities

- **Link to Project Office**
  - Reporting on successes or issues on regular basis

**Mentor for local projects**

- **Support from local Management (CEO)**
  - Representation at local high-level events / Project Steering Committee Meetings
  - High-level communication activities (use success stories)

- **Link to Project Office**
  - Provide high-level support in resolving of issues / challenges
  - Represent project at global high-level events

**Siemens Integrity Initiative Project Office**

- PRM reports to Project Office on regular basis
- Project Office / PRM calls on mentor when needed
A. Introduction

Project organization

• The internal Siemens project management structure of the Initiative consists of several dedicated teams that provide overall supervision and guidance (such as the Steering Committee) and deal with daily operations of the Initiative (Project Office and Project Team).

• To make this Initiative a company-wide effort and ensure engagement and representation, all relevant business units of Siemens have been integrated into the structure of the Initiative.

• The main operational contact for this Initiative is the Project Office, which comprises four people and is supported by an extended Project Team from various departments (Compliance Legal, Corporate Finance, Compliance Business Excellence, Corporate Communications and Compliance colleagues in all relevant countries).

• The Project Office is the main link to the World Bank with regard to the audit and veto rights as well as reporting obligations.

• The work of the Project Office and Project Team is overseen by the Siemens Integrity Initiative Steering Committee, which consists of Peter Solmsen, Member of the Managing Board and General Counsel; Dr. Hans-Jörg Grundmann, Chief Compliance Officer and current chair of the Steering Committee; and Burkhard Ischler, Senior Vice President Government Affairs.

• As the World Bank has veto and audit rights, it has set up a team of experts to liaise with Siemens regarding the Siemens Integrity Initiative, as shown in the chart.
Project Organisation

World Bank

World Bank Working Group Siemens Integrity Initiative

- Governance and Public Sector
- Institutional Integrity (INT)
- Legal Department
- Financial Management
- External Relations (EXT)
- IFC Investment and Credit Risk Department
- World Bank Institute
- Governance Partnership Facility

✓ Veto-rights over the selection of projects
✓ Audit right over the use of funds
✓ Annual reporting on progress and work plans

Siemens

Siemens Integrity Initiative Steering Committee*

- Dr. Hans-Jörg Grundmann, Chief Compliance Officer (chair)
- Peter Solmssen, Member Managing Board and General Counsel
- Burkhard Ischler, Government Affairs

Siemens Integrity Initiative Project Office

Siemens Integrity Initiative Project Team

Compliance
- Business Excellence
- Legal
- Regions and Sectors

Corporate Communications

Corporate Finance

* Mr. Josef Winter, former Chief Compliance Officer, resigned from the Steering Committee on December 31, 2012 and took over the role of CEO of Siemens Indonesia.
Siemens Integrity Initiative

On July 2, 2009, the World Bank Group announced a comprehensive settlement with Siemens. As part of the settlement, Siemens agreed to cooperate to change industry practices, clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption. Siemens subsequently set up the Siemens Integrity Initiative to support projects and organizations fighting corruption and fraud with funding worth USD 100 million over the next 15 years.
In the first funding round, thirty-one projects from over twenty countries were selected to receive total funding of up to USD 40 million.

For information on Collective Action, the Siemens Integrity Initiative, the selection process and criteria, and funded projects, please visit www.siemens.com/collective-action.

A detailed description of activities implemented during the first year (2011) was provided in the Siemens Integrity Initiative Annual Report 2011 www.siemens.com/integrity-initiative/Report2011

**Key data**

<table>
<thead>
<tr>
<th></th>
<th>USD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total funding volume</td>
<td>100.0 M</td>
</tr>
<tr>
<td>Funds committed in the first funding round</td>
<td>37.7 M</td>
</tr>
<tr>
<td>Disbursements in year 1 + year 2* (release of provision)</td>
<td>16.3 M</td>
</tr>
<tr>
<td>Expected disbursements year 3*</td>
<td>14.0 M</td>
</tr>
<tr>
<td>Number of projects 2012</td>
<td>31</td>
</tr>
<tr>
<td>Countries covered 2012</td>
<td>22</td>
</tr>
</tbody>
</table>

* Siemens fiscal year (October – September)
Outlook for the next funding round

The next funding round will be announced in June 2013 with a deadline for submission of proposals in August 2013. The final announcement of projects to be funded is not expected before summer 2014.

The announcement, application process and selection criteria will be made available transparently on our website.

The second funding round will apply the same selection criteria and focus area as the first round. The World Bank non-veto process and audit right will apply accordingly.

The selection will be made on a competitive basis in two stages (Expression of Interest and Full Proposal) with a focus on projects that can demonstrate a clear business impact and results in sectors and countries of relevance to Siemens.

The second funding round will fund up to 25 projects for up to USD 30 million.

Note: Projects that already submitted an Expression of Interest for the first funding round as well as projects that have already been funded are eligible to submit another proposal in the second funding round.
### List of projects funded in the first funding round:

<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Country of implementation</th>
<th>Total Funding volume in USD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basel Institute on Governance, Switzerland</td>
<td>Global</td>
<td>1.86 M</td>
</tr>
<tr>
<td>Beijing New Century Academy on Transnational Corporations, China</td>
<td>China</td>
<td>0.89 M</td>
</tr>
<tr>
<td>Central European University, Hungary in cooperation with Integrity Action*, United Kingdom</td>
<td>Central and Eastern Europe</td>
<td>3.09 M</td>
</tr>
<tr>
<td>COCIR (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry), Belgium</td>
<td>Europe, Asia, Russia, South America</td>
<td>0.96 M</td>
</tr>
<tr>
<td>Commonwealth Business Council, United Kingdom in cooperation with The Convention on Business Integrity, Nigeria</td>
<td>Nigeria</td>
<td>1.1 M</td>
</tr>
<tr>
<td>Ethics Institute of South Africa (EthicsSA)</td>
<td>Angola, South Africa</td>
<td>1.5 M</td>
</tr>
<tr>
<td>Federation of Korean Industries-International Management Institute in cooperation with Global Competitiveness Empowerment Forum</td>
<td>South Korea</td>
<td>0.81 M</td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA in cooperation with the UN Global Compact and PRME (Principles for Responsible Management Education), USA</td>
<td>Global</td>
<td>1.48 M</td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA in cooperation with the UN Global Compact and its local networks</td>
<td>Brazil, Egypt, India, Nigeria, South Africa</td>
<td>2.87 M</td>
</tr>
<tr>
<td>Fundación Universidad de San Andrés (FUnDeSA), Argentina</td>
<td>Argentina</td>
<td>0.73 M</td>
</tr>
<tr>
<td>Humboldt Viadrina School of Governance, Germany</td>
<td>Global</td>
<td>1.3 M</td>
</tr>
<tr>
<td>International Anti-Corruption Academy (IACA), Austria</td>
<td>Global</td>
<td>2.02 M</td>
</tr>
<tr>
<td>International Business Leaders Forum (IBLF), United Kingdom in cooperation with the School of Public Administration of Renmin University, China</td>
<td>China, Russia</td>
<td>1.5 M</td>
</tr>
</tbody>
</table>

* CEU’s project partner Tiri was renamed Integrity Action (www.integrityaction.org).

** SDforB/VCCI scheduled to end the project officially by end of December 2012 according to the approval of the Government. Accordingly, Siemens agreed with SDforB/VCCI to end also the part of the project that is funded by Siemens. Given the Siemens AG financial year and the scope and timing of the approved budgets and approved work plans, Siemens AG and SDforB/VCCI have mutually discussed and agreed to cease actual project activities as of 30 June 2012, and to cease funding by 30 September 2012 in order to allow for the preparation of final reports.
<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Country of implementation</th>
<th>Total Funding volume in USD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil</td>
<td>Brazil</td>
<td>3.11 M</td>
</tr>
<tr>
<td>Maala Business for Social Responsibility, Israel</td>
<td>Israel</td>
<td>0.48 M</td>
</tr>
<tr>
<td>Makati Business Club, Philippines in cooperation with the European Chamber of Commerce Philippines</td>
<td>Philippines</td>
<td>1.04 M</td>
</tr>
<tr>
<td>Organisation for Economic Co-operation and Development (OECD), MENA-OECD Investment Programme</td>
<td>Middle East and North Africa</td>
<td>0.75 M</td>
</tr>
<tr>
<td>Oživení, Czech Republic in cooperation with Transparency International Slovakia and the Economics Institute of the Academy of Sciences of the Czech Republic</td>
<td>Czech Republic, Slovakia</td>
<td>0.6 M</td>
</tr>
<tr>
<td>Partnership for Governance Reform – Kemitraan, Indonesia</td>
<td>Indonesia</td>
<td>1.5 M</td>
</tr>
<tr>
<td>POLMED (The Polish Chamber of Commerce of Medical Devices), Poland</td>
<td>Poland</td>
<td>0.46 M</td>
</tr>
<tr>
<td>Sequa gGmbH, Germany in cooperation with German Agency for International Cooperation (GIZ), Chengdu General Chamber of Commerce (Province of Sichuan), China, and Hunan Provincial Chamber, China</td>
<td>China</td>
<td>1.49 M</td>
</tr>
<tr>
<td>Transparency International Bulgaria</td>
<td>Bulgaria</td>
<td>0.45 M</td>
</tr>
<tr>
<td>Transparency International Italy</td>
<td>Italy</td>
<td>0.6 M</td>
</tr>
<tr>
<td>Transparency International Mexico</td>
<td>Mexico</td>
<td>0.23 M</td>
</tr>
<tr>
<td>Transparency International USA in cooperation with Social Accountability International, USA</td>
<td>USA, Global</td>
<td>0.66 M</td>
</tr>
<tr>
<td>United Nations Development Programme Regional Bureau for Arab States, USA</td>
<td>Arab States Region</td>
<td>1.78 M</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – Incentives to Corporate Integrity</td>
<td>India, Mexico</td>
<td>1.12 M</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria – UNCAC Outreach and Communication</td>
<td>Global</td>
<td>0.75 M</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria, Austria – The 6P’s</td>
<td>India, Mexico</td>
<td>1.22 M</td>
</tr>
<tr>
<td>University of Cairo, Center for Economic and Financial Research and Studies (CEFRS), Egypt</td>
<td>Egypt</td>
<td>0.85 M</td>
</tr>
<tr>
<td>Vietnam Chamber of Commerce and Industry (VCCI) in cooperation with the International Business Leaders Forum (IBLF), United Kingdom**</td>
<td>Vietnam</td>
<td>0.5 M</td>
</tr>
</tbody>
</table>

**Total funding volume in USD**

| 37.7 M |
The chart illustrates the regional spread and balance of the first funding portfolio.

### Shortlist of projects covering all major growth regions and high-risk countries (31 projects, USD 37.7 million)

<table>
<thead>
<tr>
<th>Region/Country of implementation (number of project proposals)</th>
<th>% of Collective Action</th>
<th>% of Education &amp; Training</th>
<th>Bubble size = Approximate value of funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global Projects (6 Projects, USD 8.4M)</td>
<td>42 %</td>
<td>58 %</td>
<td></td>
</tr>
<tr>
<td>North America (1 sub-project, USD 0.7M)</td>
<td>100 %</td>
<td></td>
<td></td>
</tr>
<tr>
<td>South America (4 sub-projects, USD 2.2M)</td>
<td>100 %</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:** Due to importance of BRIC they are shown separately and are not included in clusters; schematic illustration only – subject to change.

The number of project proposals per region is indicated in brackets; one third of Collective Action projects include education & training elements.
Project profiles and highlights of activities in 2012

The following pages contain project objectives and funding volumes as agreed with Integrity Partners in the respective funding agreements. The descriptions of activities undertaken in year 2 (2012) were provided by the Integrity Partners in their respective Annual Progress Report 2012 and approved by the relevant Integrity Partners for external use.
Integrity Partners submitted the following documentation, which was the basis for the review of progress:

- Annual Progress Report, which provided an overview of activities undertaken and an assessment of progress made
- Financial Report, which showed the utilization of funds per activity and in comparison to the original budget set in the funding agreement
- Audit Statement by an external audit company, which verified the financial report and provided an unqualified audit opinion on the use of funds
- Updated Work Plan and Updated Budget for year 3
The Basel Institute has been instrumental in the design and implementation process of several joint multi-stakeholder efforts to set industry standards in a number of sectors of the economy through Collective Action across the globe, among them, the "Wolfsberg Anti-Money Laundering Principles". On the basis of its know-how, the Basel Institute is best placed to continue this work further and bring it to new sectors and to a new level. This project will formalize the existence of the Centre for Global Industry Standards, located at the Basel Institute.

The Centre for Global Industry Standards will promote, facilitate and create Collective Action initiatives by bringing together stakeholders involved in specific economic sectors for a dialogue to agree on governance and anti-corruption standards and their implementation. The Centre will also contribute to the coordination and integration of standards at the global level. The role of the Centre is mainly that of independent expert and facilitator; in our experience, the success of Collective Action is based on being driven by its participants.
The Basel Institute acting as the Centre for Global Industry Standards will develop and coordinate Collective Action initiatives. It will bring together stakeholders to agree on and implement sector-specific anti-corruption standards.

KEY ACTIVITIES YEAR 2:

- International Center for Collective Action (ICCA)
  - Establishment of the International Center for Collective Action (ICCA);
    http://www.collective-action.com
  - Conclusion of institutional partnerships for the ICCA with leading organizations in the area of anti-corruption including the International Anti-Corruption Academy (IACA), the Organisation for Economic Cooperation and Development (OECD), TRACE, Transparency International and Universidad de San Andrés Argentina
  - Presentation of the ICCA and its concept for Collective Action at various international forums (e.g. OECD anti-bribery working group in Paris, PACI Task Force meeting in Geneva, two workshops at the 15th International Anti-Corruption Conference in Brasilia, Brazil)

- Publications
  - Pieth, Mark; 2012; “Collective action and corruption”; Basel Institute on Governance; Working Paper Series 13/2012

- Initiatives
  - The High Level Reporting Mechanism (HLRM) became part of the B20/G20 process and of the final recommendations of the Cannes Summit in November 2011. Columbia which has volunteered as pilot country will be launching the HLRM in April 2013 at a conference hosted by the President of Colombia
  - Working level meeting of leading companies from the energy and transport sectors agreeing on their mutual interest in developing a working group on energy and transport under the ICCA
The initiative will work to improve legal compliance within Chinese companies, make recommendations to improve compliance policy issued by governmental departments, and bring leaders from these groups into closer communication with one another.

To support a long-term dialogue on ethical compliance in China, NATC will establish a ‘Compliance Executive Club’ whose members will range from government officials to business executives. To address some of the issues that come up in pursuing organizational compliance, NATC will publish a guide for organizational compliance and hold tailored training workshops to improve compliance results. For daily support and information, a compliance website will be established and maintained. The website will contain a thorough database of compliance information.

To improve compliance policy, NATC will develop and present research-based policy recommendations to the departments responsible for such policy.

NATC’s Collective Action Initiative – Fostering a Better Business Environment in China

COUNTRY OF IMPLEMENTATION: China
DURATION: 3 years
USD (MILLION): 0.89 M
REGISTERED IN: China
NATC will provide practical training to Chinese companies on compliance issues and develop and present recommendations on compliance law to Chinese policymakers.

**KEY ACTIVITIES YEAR 2:**

- Three policy recommendations were submitted to ministries and the central government; one of them was commented on by the Vice Premier of China.

- Input was provided to “Several Opinions on Constructing Corporate Culture of China’s Overseas Companies”, which was jointly issued by seven Ministries in April 2012.

- A platform was established in order to keep stakeholders informed on related issues and help them to exchange ideas and to work jointly on improving the business environment in China.

- NATC’s Collective Action Initiative was included in the “Best Case Collection of UN Global Compact Principle 10” and issued at the Rio+20 conference.

- First book titled “Compliance – The New Development Trend of the Global Companies” was published.

- Two research reports titled “The Status Quo of Compliance Report of Chinese Mainland 69 Largest Companies” and “Framework of Compliance Report for Chinese Companies” were issued.

- A series of trainings on compliance for staff of different companies as well as government officials were held and training material was developed.

- First Annual Forum took place in March 2012 with about 200 participants, including high-ranking government officials, compliance officers of companies, representatives of international organizations and experts; http://ent.chinanews.com/cj/z/kuaguogongsi2012/index.shtml (Chinese).

C.

Project profiles and highlights of activities in 2012

Name of Integrity Partner:

Central European University in cooperation with Integrity Action, United Kingdom

DESCRIPTION OF INTEGRITY PARTNER (www.ceu.hu)

Central European University, Hungary, is a unique graduate institution accredited in both the United States and Hungary. It is dedicated to building open societies through serious and morally responsible intellectual engagement inspired by, and in the service of, pressing social needs. Students are drawn from more than 100 countries for Master’s, doctoral, and executive education programs in the fields of business, social sciences, humanities, law, management, environmental studies, government and public policy. The CEU Business School was the first educational institution in the region to train managers by offering a western graduate business program leading to an American MBA.

CENTRAL EUROPEAN UNIVERSITY (CEU) aims to level the playing field by shaping and influencing the behaviors of approximately 16,000 undergraduate and graduate students and 3,500 executives in Central and Eastern Europe and the former Soviet Union over the next five years. Through integrity education, the project will equip participants with the practical insights, skills and tools required to operate with integrity in weak governance environments. The project will develop the Center for Integrity in Business and Government at the CEU Business School, which will provide an institutional framework for cross-disciplinary teaching and research on issues of integrity and anti-corruption, and will deliver integrity curricula in graduate and executive education programs at CEU. The Center will serve as a regional resource of excellence in integrity education, and together with the project partner, Integrity Action, will help build the capacity of targeted institutions of higher learning across the region through facilitating local curriculum development.
KEY ACTIVITIES YEAR 2:

CEU:
• Two pilot courses on micro- and macro-level factors influencing business integrity were launched as part of the MBA course; Two anti-corruption and ethics courses were taught to public policy graduate students; http://business.ceu.hu/mba-core#ethical-leaders
• Global executive survey on integrity education was distributed to over 4,000 executives and compliance officers to provide new data and input to curriculum development
• An innovative ethnographic study of compliance in business was launched
• First integrity training for political leaders from Tunisia was held at CEU Business School
• Two educators workshops bringing top international scholars from six disciplines together was organized
• “Business Leaders on Integrity in Practice” – a networking workshop for Central Asian business executives from four countries was organized in Bishkek, Kyrgyzstan
• Business networking meeting was organized during CEU Summer University in Budapest to offer an opportunity for business people, interested in green and ethical business, to exchange views and ideas

Integrity Action*:
• Established one formal Business Advisory Council in Armenia and met with other businesses in Russia and Kyrgyzstan to encourage collaboration with universities
• 83 academics from 73 partner universities were trained in four curriculum development workshops in Georgia, Kyrgyzstan, Russia and Armenia; Over 400 others attended presentations on integrity in public administration and business; Global online classroom; http://classroom.integrityaction.org/
• Local capacity was built by training trainers from training institutes and dozens of additional academics at conferences in Armenia, Bulgaria, Kazakhstan, Kyrgyzstan, and Russia
• Annual Integrity Summer School was held in Budapest with 52 participants from 25 countries; http://www.summer.ceu.hu/leadership-2012

* CEU’s project partner Tiri was renamed in Integrity Action (www.integrityaction.org)

Through integrity education the project will shape the behavior of current and future business practitioners and public administrators in the region.
COCIR’s new code of conduct provides an effective and efficient process to further align the healthcare and IT industry involved in healthcare on compliant business ethical rules. The COCIR code of conduct is now substantiated by the establishment of a committee composed of all legal counsels of COCIR corporate company members. COCIR and its members are gradually getting requests from other countries, such as China, Russia, India and Brazil showing interest in adopting the Code. The main project objectives are to build up resources in the COCIR office to support the following activities:

1. Enlargement of the Code in content matters
2. Enlargement of the Code in geographical spread
3. Deployment of the Code through training and enhanced communication/cooperation with other stakeholders

C. Project profiles and highlights of activities in 2012

Name of Integrity Partner:

**COCIR (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry)**

<table>
<thead>
<tr>
<th>PROJECT:</th>
<th>Expansion of COCIR Code of Conduct</th>
</tr>
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<tbody>
<tr>
<td>COUNTRY OF IMPLEMENTATION:</td>
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</tr>
<tr>
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COCIR’s key objectives include promoting free worldwide trade of medical devices and maintaining the competitiveness of the European health sector.
**KEY ACTIVITIES YEAR 2:**

- A Code of Conduct brochure was developed; Copies were printed and distributed to COCIR Corporate Members (1,550) and at the AdvaMed International Medical Device Compliance Conference in May 2012; [http://cocir.trynisis.com/site/fileadmin/Publications_2012/IMAY_2012_-_COCIR_Code_of_Conduct.pdf](http://cocir.trynisis.com/site/fileadmin/Publications_2012/IMAY_2012_-_COCIR_Code_of_Conduct.pdf)
- The COCIR Code of Conduct, Q&As and Dos and Don’ts were translated into Dutch, French, German, Italian and Spanish and are available on the COCIR website
- Training material including Power Point slides for in-person-training and an online e-learning tool were developed. The e-learning tool will also be made available on the COCIR website; [http://www.cocir.org/site/index.php?id=60&tx_ttnews%5Btt_news%5D=516&cHash=84e394fcbf7336ad9ceabe4f7a7c07c6](http://www.cocir.org/site/index.php?id=60&tx_ttnews%5Btt_news%5D=516&cHash=84e394fcbf7336ad9ceabe4f7a7c07c6)
- New texts for the COCIR Q&As covering research, independent third parties and charitable donations were formally approved and a press release was issued;
- A survey was distributed to COCIR’s Code of Conduct Committee to determine areas for future code expansion; A working group was established which is currently exploring new topics for the next edition of the COCIR Code, expected in Q4 2013
- The COCIR report entitled “Expansion of Code Content” was finalised in order to facilitate the preparation of a new edition of the COCIR Code in 2013; promotion of COCIR and the COCIR Code is continuing through meetings with European medical and scientific organizations; Local contacts in BRIC countries have been identified and COCIR is currently liaising with corporate members in Argentina to determine an effective strategy for promoting COCIR and the COCIR Code in Latin America
- Networking with various associations (including EUCOMED and EDMA) and scientific community, European Association of Radiologists (ESR) was intensified; In April 2012, COCIR hosted a meeting with EUCOMED and EDMA to exchange opinions on industry trends; In June 2012 COCIR presented its Code of Conduct to ESR. In September 2012, COCIR participated in EUCOMED’s Compliance Network Meeting; COCIR is also involved in discussion with the European Commission’s Ethics and Transparency Platform
The project will do this by strengthening self-regulation of business, its compliance with government regulations, stakeholder activism and public vigilance over the arrangement. It will also build on existing relationships with the two principal regulators, the Central Bank of Nigeria (CBN) and the Nigerian Securities Exchange Commission (SEC) to build a partnership to strengthen corporate leadership practices by raising standards of board leadership across the economy.

It will seek to reach out to directors of listed companies in Nigeria to review their fiduciary responsibilities, and define stakeholder expectations. The aim is to define a set of business principles, reporting guidelines and a system of compliance incentives jointly with directors of listed companies in Nigeria. As an additional step, stakeholders will work on an independent public feedback mechanism for compliance monitoring, inclusive of whistleblower and complaints-handling mechanisms. It will also establish an interactive social networking website to promote peer learning and issue-based training for coalition partners.
The aim of the project is to use Collective Action to improve corporate governance and reduce corruption in the Nigerian business environment.

KEY ACTIVITIES YEAR 2:

• Relationships with the Securities and Exchange Commission (SEC) and the Nigeria Stock Exchange (NSE) have been established in order to sensitize directors to their fiduciary responsibilities
• CBI partnered with The Premium Times and signed a Memorandum of Understanding in Abuja on October 23, 2012
• CBI is working on a Memorandum of Understanding with the Institute of Directors in order to jointly carry out training workshops in the geo-political zones of Nigeria; The objective of the training workshops is to strengthen stakeholder engagement and to build capacity in order to improve the corporate governance of Nigerian companies
• CBI’s Integrity Rating system has been peer-reviewed by the Humboldt – Viadrina School of Governance, Berlin; The next step is to get this adopted as well as recognized by the Corporate Affairs Commission and to get listed on the Corporate Governance Index
• A Stakeholder Enrollment and Public Feedback Mechanism, www.egunje.info – a bribe payer’s reporting platform seeking to create a platform to collate, amplify and apply the voice of ordinary citizens to reduce levels of impunity in the Nigerian society has been set up and the platform was launched in November 2012; Its widespread adoption and use is now being promoted
• A workshop was held in Lagos on May 3, 2012 focusing on “Development of a National Anti-Corruption Strategy: Business Sector Perspectives”
• In collaboration with the DFID programme ENABLE, Workshops for Business Membership Organizations (BMOs) on Stakeholders Engagement were carried out in Lagos, Kaduna and Calabar between December 2011 and February 2012
• In collaboration with Heinrich Boile Foundation (HBF) on the “Essence of Oil” project, a functional website with a registered domain name was hosted and a website was developed – www.integritynigeria.org; The website was launched at a media event with the participation of about 30 people drawn from the public/private sectors in Abuja on July 23, 2012
• A Facebook page was created and Twitter followership has reached over 3,800 followers in July 2012. So far three sessions of twitter seminars on “#essenceofoil” were held
Project profiles and highlights of activities in 2012

Name of Integrity Partner:
Ethics Institute of South Africa (EthicsSA)

**PROJECT:**
Capacitating African business networks to implement global anti-corruption initiatives and good practices

**COUNTRY OF IMPLEMENTATION:** Angola, South Africa
**DURATION:** 5 years
**USD (MILLION):** 1.5 M
**REGISTERED IN:** South Africa

Business networks and individual businesses seldom have the appropriate expertise to implement internationally developed anti-corruption and good governance guidelines, standards and initiatives, and are often unaware of their existence. Other challenges in the anti-corruption field relate to making impacts felt at the ground level, and creating platforms for the private and public sectors to engage on corruption challenges and Collective Action solutions.

This project will attempt to address these challenges and to build local capacity in two countries. In Angola the focus will be on Collective Action initiatives in the private sector with the aim of enhancing ethical business practices and good governance standards. This should improve the investment climate and enhance the ease of doing business in Angola.

In South Africa the project will aim to reduce corruption on the ground level, by engaging with municipalities and businesses at the local level to implement collective projects that will impact positively on the ethical business climate and municipal service delivery.
The project aims to capacitate African business networks with the implementation of anti-corruption initiatives and good governance practices. The project will be implemented in Angola and in South Africa (at the municipal level).

KEY ACTIVITIES YEAR 2:

Angola

- The very first Business Ethics Seminar for companies took place in May 2012; The development of Principles for Responsible Business for Angola and the establishment of an Ethics Institute for Angola was endorsed.

- A working group was formed to develop Principles for Responsible Business for Angola (equivalent to a code of ethics for business in Angola) under the leadership of the Chamber of Commerce and Industry of Angola; A first workshop to design the Principles was held in August 2012.

- A concept document was developed for the establishment of an Ethics Institute for Angola.

- Two of the Angolan partners were certified as the first two Angolan Ethics Officers by the Ethics Institute of South Africa.

- Four trainings for companies on business ethics, facilitated by the Angolan partners, took place in four different provinces; The trainings focused on creating awareness for business ethics and building capacity to manage ethics in companies; [http://www.portalangop.co.ao/motix/pt_pt/noticias/economia/2012/11/51/Decorre-seminario-sobre-etica-empresarial,c273ccc5-e5f6-8a1b-17e9a5ba326f.html](http://www.portalangop.co.ao/motix/pt_pt/noticias/economia/2012/11/51/Decorre-seminario-sobre-etica-empresarial,c273ccc5-e5f6-8a1b-17e9a5ba326f.html)

- A newsletter has been launched on business ethics, corruption and fraud issues which is distributed on a monthly basis to 172 company representatives.

South Africa

- Memorandums of Understanding or verbal agreements are in place in five municipalities; One of them is a metropolitan municipality (City of Cape Town); Negotiations with other municipalities are ongoing.

- Ethics awareness and ethics capacity workshops for councilors and managers were held in three municipalities.

- Collective Action workshops between business and the municipality with a focus on the procurement process of the municipality were conducted in Mogalakwena and Overstrand.

- An Ethics Officer Certification Programme with 15 delegates from the municipalities Mogalakwena and Overstrand took place.
**Name of Integrity Partner:**

Federation of Korean Industries – International Management Institute (FKI-IMI) in cooperation with Global Competitiveness Empowerment Forum, South Korea

**PROJECT:**

NABIS (Northeast Asia Business Integrity School)

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<tr>
<th>COUNTRY OF IMPLEMENTATION</th>
<th>DURATION</th>
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<tr>
<td>South Korea</td>
<td>3 years</td>
<td>0.81 M</td>
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NABIS aims to educate university students by nurturing leadership with integrity. Current business leaders and good practices in business ethics will be identified in order to promote fair market conditions in the Republic of Korea. NABIS trainers from Korean companies and Korean subsidiaries of Western and Northeast Asian companies operating in the Republic of Korea will teach NABIS students by using the NABIS curriculum, which includes case studies from their own companies.

NABIS aims to influence behavioral changes by teaching the importance of business integrity in the free market and in trade systems and by building a community based on learning and support for NABIS students, candidate students and NABIS trainers.

NABIS activities also include train-the-trainer modules, workshops, scholarship and graduation ceremonies, CEO forums, as well as outreach activities to promote the inclusion of NABIS modules into business schools and universities.

**DESCRIPTION OF INTEGRITY PARTNER**

(www.imi.or.kr, in Korean language)

Federation of Korean Industries – International Management Institute (FKI-IMI) is an affiliated non-for-profit organization of FKI, a non-for-profit organization representing the Korean business community (more than 420 members including Korean conglomerates). FKI-IMI nurtures current and future business leaders with diverse education and training programs: CEO programs include a Global Advanced Management Program with over 3,000 alumni, intensive education courses for CMO, CFO, CSO, HR, PR and Sales etc. FKI-IMI offers a platform for business leaders to foster their strategic management competence and leadership for the 21st century knowledge economy era through morning, monthly, yearly and seasonal forums.

The Project Partner Global Competitiveness Empowerment Forum is a non-profit organization that provides professional and catalyst services in the areas of corporate social responsibility, sustainability and business integrity. (www.g-cef.org)
The project aims to establish the Northeast Asia Business Integrity School (NABIS), an educational project for university students, in order to foster a clean and transparent business environment.

**KEY ACTIVITIES YEAR 2:**

- Application announcement for the first NABIS Cycle reached 1,600 students from 235 universities through, among other outlets, 49 online student club bulletins
- 32 students were chosen from the Young Leaders Club and the Elite Integrated Club
- NABIS recruited renowned companies in various industries since different sectors have diverse dilemmas in compliance and different risks of corruption; Among them are GS Engineering and Construction, Kyobo Life Insurance, KT-Information communication technology, POSCO Steel and KEPCO-Utilities, SK C&C and State Owned Enterprise
- NABIS curriculum and training materials for trainers and students were developed
- Two train-the-trainer workshops were held with representatives of the eight participating companies to enhance the quality of classes; As a result, the NABIS company and corporate trainer community was established
- A trainer workshop for facilitating communication and knowledge sharing among trainers of the different cycles was conducted
- During NABIS student classes eight teams were set up to prepare and propose innovative solutions for anti-corruption dilemmas of the participating NABIS Cycle 1 companies
- The first NABIS Cycle ended with a Graduation Ceremony and the first CEO Forum with up to 70 participants, including students, trainers and others in February 2012; Two teams and two students were awarded for their work
- Eight companies were selected for the second NABIS Cycle; Among them are Incheon Airport Corporation, Samsung C&T, Korea Hydro and Nuclear Power and Doosan Heavy Industries
- Outreach was done through media and the introduction of NABIS at Corporate Social Responsibility forums and networks
The UN Global Compact and Principles for Responsible Management Education (PRME) will develop anti-corruption guidelines for management schools. The Guidelines will offer business schools academic modules to address transparency, ethics and anti-corruption. The Guidelines will address key topics, including corporate governance; business ethics; the business case for anti-corruption; corporate compliance; Collective Action; UN Convention against Corruption; Global Compact 10th Principle; public contracting/procurement; and, supply chain management. The Guidelines will build upon existing resources and will incorporate input from the web-based and face-to-face meetings and seminars. After the Guidelines are developed, they will be disseminated to PRME-affiliated universities. A pilot phase will provide for follow up with participating institutions to evaluate the value and effectiveness of the Guidelines. Project success will be demonstrated in part by the business school graduates who can demonstrate better understanding of various anti-corruption and ethical decision-making strategies.
KEY ACTIVITIES YEAR 2:

- Comprehensive anti-corruption guidelines for curriculum change for business schools and management related academic institutions around the world were launched; The guidelines were presented at the 3rd Global PRME Forum as well as the Rio+20 Corporate Sustainability Forum in June 2012 and can be downloaded at: http://www.unprme.org/resource-docs/ComprehensiveAntiCorruptionGuidelinesforCurriculumChange.pdf

- The guidelines, which are integrated into a single “toolkit”, provide instruments to address the ethical, moral, and practical challenges that students will face in the marketplace.

- The toolkit provides a menu-style list of various topics from which instructors can select and organize stand-alone courses or individual course modules; This “toolkit” contains a total of eleven modules on diverse topics such as international standards, legislation and behavior science.

- Sixteen schools in thirteen countries are currently taking part in the curriculum’s pilot phase, which will end with an evaluation in May 2013.

- The following schools are participating in the PRME Anti-Corruption toolkit pilot phase: IAE Business School (Argentina), Universidad de San Andres (Argentina), Fundación Universitaria de los Andes (Colombia), Audencia Nantes School of Management (France), HSBA Hamburg School of Business Administration (Germany), Bangalore University (India), Lagos Business School (Nigeria), Silesian University of Technology (Poland), AESE Business School (Portugal), The Financial University (Russia), The Lomonosov State University Business (Russia), Moscow International Higher Business School MIRBIS (Russia), University of Stellenbosch (South Africa), University of Applied Sciences HTW Chur (Switzerland), Mzumbe University (Tanzania), Kyiv Mohyla Business School (Ukraine).

- Development of an online platform and marketing campaign of the toolkit for business schools will follow in mid 2013.
This project aims to establish a high-impact anti-corruption Collective Action platform in five countries – Brazil, Egypt, India, Nigeria, and South Africa. By facilitating ongoing dialogue between the private and public sector, this project will provide a wide variety of stakeholders in these five countries with an opportunity to explore how specific Collective Action initiatives can create incentives for ethical business performance, and to discuss areas for further improvement. In so doing, the project aims to scale up existing anti-corruption efforts in the target countries, and provide participants with knowledge, skills, strategies and resources to promote ethical practices and transparency in business operations, within each country, and in international cross-sectoral relations. The project will emphasize the role of local actors in each of the target countries, engaging and building the capacity of local stakeholders who are faced with corruption in their routine transactions and business relationships.
**KEY ACTIVITIES YEAR 2:**

**Global**

- The second year continued to build on good progress made during the first year of the project. The Global Compact (GCO) Foundation continues to enjoy great working relationships with project partners. Despite, the project required continuous learning in terms of streamlining all the reporting obligations processes and clarifying complex financial reporting requirements of this project to all project partners.

- The GCO continued to strive to raise the profile of the UN Global Compact’s Collective Action projects, and its partnerships with SIIs through various outreach opportunities that the UN Global Compact engaged. The topic of anti-corruption and Collective Action has been prominently featured during most of our regional Network Meetings. A major effort has been made to frame anti-corruption Collective Action driven by our project partners as innovative contributions of business community in support of sustainable, transparent development.

- The Publication “Sustainability with Integrity: From Individual to Collective Action” was published. The publication illustrated the range of examples on corporate anti-corruption efforts. The publication features a number of Collective Action examples to raise the awareness of the Collective Action concept; [http://www.unglobalcompact.org/docs/Issues_Anti-Corruption/GC_for_the_10th_Principle.pdf](http://www.unglobalcompact.org/docs/Issues_Anti-Corruption/GC_for_the_10th_Principle.pdf)

- The Global Compact Anti-Corruption Collective Action has also been communicated to the UN Global Compact’s global stakeholders including government officials, UN offices, and other global stakeholders. The project partners’ efforts and the profile of their progress have inspired other GC Local Networks to consider Collective Action as a mechanism to address anti-corruption issues affecting the business community.
**C. Project profiles and highlights of activities in 2012**

**Name of Integrity Partner:**

**Foundation for the Global Compact in cooperation with the UN Global Compact and its local networks**

**Brazil** (in cooperation with UN Global Compact and Instituto Ethos)

- The Instituto Ethos and the Global Compact developed a list of clean (ethical) companies with a strong emphasis on compliance and ethics to create an incentive structure for ethical performance; The “Pro-Ethics Company list” was published as a case study in the UN Global Compact publication: “Corporate Sustainability with Integrity: Organizational Change to Collective Action”; [http://www.unglobalcompact.org/docs/issues_doc/Anti-Corruption/GC_for_the_10th_Principle.pdf](http://www.unglobalcompact.org/docs/issues_doc/Anti-Corruption/GC_for_the_10th_Principle.pdf)

- The publication titled “Commitments, Demands and Priority Proposals” developed by the Instituto Ethos and presented at the Rio+20 Corporate Sustainability Forum was translated into English

- Partnership with the UN Global Compact’s Sub-Working Group on Sport Sponsoring and Sport Related Hospitality and the National Committee on Business and Investors was established

- Participation in UNODC Expert Group Meeting on Major Events and presentation at the UNGC Sub-Working Group on Sport Sponsoring and Sport Related Hospitality

- The Seminar “Social Control on Fighting Corruption” was held on December 7, 2011

- Rio+20 Corporate Sustainability Forum activities included:
  - Corporate Sustainability Forum – Sustainability with Integrity Session
  - Local Networks Annual Meeting
  - Clean Games Side Event at Barra Arena

**Egypt** (in cooperation with UN Global Compact and Egyptian Junior Business Association)

- The Second Anti-Corruption Conference in Egypt, “Private Sector’s Role in Fighting Corruption”, was held under the auspices of the Minister of Trade and Industry Eng. Hatem Saleh on October 7, 2012. The high-level conference featured over 300 top level executives, business owners, and professionals of various industries in Egypt
A special committee was established under the auspices of the Minister of Industry and Foreign Trade to focus on a strategy for fighting corruption. The committee is headed by the assistant to the Minister of Industry and Foreign Trade for Legal and Legislative affairs, and including EJB members, government officials, and members of civil society.

Thirteen roundtable workshops with members of the business community were held. The roundtables, each representing a specific sector, featured over 80 members. The roundtables focused on areas of corruption highly relevant to the private and public sectors.

A meeting with members of civil society and other organizations was held to discuss anti-corruption clauses for the new Egyptian constitution.

EJB is planning to collaborate with the Ministry of Industry and Foreign Trade, Egyptian Banking Institute, and HUMBOLDT-VIADRINA School of Governance on creating an incentive program for businesses that comply with anti-corruption measures (several meetings were held with their anti-corruption department and an agreement for cooperation is underway).

EJB is currently discussing potential cooperation with more than four different entities that are interested to assist in the fight against corruption.

Four booklets were translated into Arabic: “Fighting Corruption in the Supply Chain”, “Collective Action in the Fight Against Corruption”, “Clean Business is Good Business”, and “Fighting Corruption Through Collective Action: A Guide For Business”. The booklets are still being reviewed and will be printed within the next period.

India (in cooperation with UN Global Compact and Global Compact Society – India)

A National Consultation on Transparency and Anti-Corruption measures in Procurement in India was organized in partnership with the United Nations Office on Drugs and Crime (UNODC) at Claridges, New Delhi on April 18 and 19, 2012. The Consultation made recommendations on behalf of businesses on the Public Procurement Bill 2012.

Three seminars on “Transparency in Ethical Business for Profitability” were organized in (1) Mumbai (in October 2011, 50 participants), (2) Chennai (in December 2011, 60 participants) and (3) Kolkata (in May 2012, 40 participants).

Presentation of the Collective Action project at the 9th Meeting of the UNGC Anti-Corruption Working Group which took place from October 23 – 25, 2011 in Marrakesh, Morocco and at the 10th Meeting of UNGC Anti-Corruption Working Group in June 2012, Rio de Janeiro, Brazil.
C. Project profiles and highlights of activities in 2012

Name of Integrity Partner:

Foundation for the Global Compact in cooperation with the UN Global Compact and its local networks

- First publication: “Raising the Bar through Collective Action: Anti-Corruption Efforts In Action in India” a compendium of nine case studies representing business from the public and private sectors, highlights internal anti-corruption company policies, practices, and their implementation. The publication plays a key role in raising awareness of notable efforts made by Indian businesses.

- Three papers were launched: (1) Policy Paper “Collective Action Project Business Case for Public-Private Dialogue on Anti-Corruption and Green Economy”, which was presented during the 7th National Convention of Global Compact Network India in New Delhi in March 2012; (2) “Green Paper on Procurement”, which brings together existing procurement policies, guidelines and related arguments and which was disseminated as a precursor to the National Consultation; (3) “White Paper on Transparency and Anti-Corruption Measures in Procurement”, which included succinct deliberations and focused recommendations and was circulated among relevant stakeholders.

Nigeria (in cooperation with UN Global Compact and Nigerian Economic Summit Group)

- A national Public-Private Anti-corruption workshop on “Openness and Transparency as Stakeholder Commitment against Corruption”, where top business and government executives and officials (156 participants) attended, was held in Abuja from March 22 – 23, 2012.

- Private sector and non-state anti-corruption activists were invited to a seminar: “Changing International Landscape in the Fight against Corruption” in December 2011 to inform them of current and emerging trends in anti-corruption campaigns worldwide; it was attended by businesses, UNGC Local Network participants and the media.

- The project received good media coverage, advertisements and reviews of its activities in both print and electronic media. A Collective Action roundtable/seminar with the media was held in September 2012 to discuss the critical elements of the corruption debacle in Nigeria and to share the achievements of the project. Representatives from six of the top Nigerian newspaper media outlets attended; http://www.businessday
• Reports on (1) the Consultative meeting with Stakeholders and (2) the Policy Dialogue on “Eliminating Corruption in the Business Processes of Government” were published while those on (3) the Anti-Corruption Seminar in December 2011 and (4) the National Workshop on Anti-Corruption have gone to press

• Representatives from the Nigerian project participated in the meeting with other project partners at the sidelines of the Rio+20 Forum in Brazil in June

South Africa (in cooperation with UN Global Compact and National Business Initiative (NBI), South Africa)

• Discussions with the National Treasury on implementation of Integrity Pacts and alignment of the procurement regulations; Top members of government including the President and Minister of Economic Development made a public announcement on the use of Integrity Pacts in government procurement

• Through the project’s successful promotion of Integrity Pacts in large projects, an increasing number of sectors are doing assessments to decide whether to include the Integrity Pact model in their procedures; The Construction Industry Development Board (CIDB), a regulatory body, supported by Consulting Engineers South Africa (CESA), is considering the implementation of CoST (Construction Sector Transparency Initiative) – CoST is similar to an Integrity Pact and is specifically tailored for the sector

• South Africa’s infrastructure/construction sector was successfully involved; A task team for the infrastructure/construction sector was established to steer a focused and impactful intervention on corruption in June 2012; In its first meeting the task team prioritized the topics education, awareness and training for the sector; The project targeted the infrastructure and construction sector because the construction sector is exposed to great risks through anti-competitive practices such as collusion and price-fixing

• Transnet, a corporation of South Africa’s national transport businesses and the recipient of a large part of the South African government’s infrastructure budget, is considering integrating Integrity Pacts into its large procurement projects

• An analysis with recommendations on how Integrity Pacts can strengthen South Africa’s procurement was undertaken and the respective report was finalized in September 2012

• The Annual Business Learning Forum on anti-corruption with a range of expert speakers and case studies from various companies and sector representatives took place on September 25, 2012; Workshop report and case studies are available under: http://www.nbi.org.za/pages/publication-details.aspx?nbiweb=e586ac5b-bcad-49be-ba41-81b0f1fa2ba3&nbilist=baaa9251-7130-4824-a0e9-0991a4bd678f&nbiitem=267
The first objective aims at generating knowledge on institutional, political and business incentives that shape corruption in Argentina, the interaction between formal and informal institutions in specific markets and areas, the cost of corruption to such markets and the mechanisms that may help to prompt actors into action for reform. The project will focus on the following issues: political financing, public procurement, responsibility of legal persons and the role of the legal profession in facilitating corrupt transactions.

Such knowledge will be the basis for shaping consensus-based reform proposals, aimed at shifting the incentives that facilitate corruption. The creation of a multi-stakeholder platform will guide discussions and build consensus for such proposals. This will constitute the centerpiece of a "principle-based initiative", aiming at improving the legal framework and advancing policy reforms.

Name of Integrity Partner: Fundación Universidad de San Andrés (FUdeSA) in cooperation with the Asociación Civil por la Igualdad y la Justicia (ACIJ) and the Centro de Implementación de Políticas Públicas para la Equidad y el Crecimiento (CIPPEC), Argentina

**PROJECT:**

Towards a culture of anti-corruption compliance in Argentina: reorientation of incentives through Collective Action

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<th>COUNTRY OF IMPLEMENTATION</th>
<th>DURATION</th>
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<td>Argentina</td>
<td>3 years</td>
<td>0.73 M</td>
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KEY ACTIVITIES YEAR 2:

- Four diagnosis studies, for example on procurement in the healthcare sector and on the role of law professionals, were concluded, presented, discussed and disseminated; http://www.udesa.edu.ar/accionescolectivas/
- Joined the policy community on healthcare and established a policy community on the legal profession
- A Collective Action draft agreement for the legal profession is circulating for discussion and a Code of Ethics for in-house lawyers is being drafted
- Ways for engagement with the Pacto Argentino por la Inclusion en Salud (Collective Action initiative for improving the health sector) have been explored
- Seminar on corporate compliance and Collective Action in the Master Program on Corporate Law was launched
- A two-month seminar on legal ethics for law students and a workshop with an in-house lawyers’ network was held
- Collective Action as a tool to fight corruption was presented at the third National Forum on Business Social Responsibility and Sustainability (around 500 attendees, more information at http://www.foronacionalrse.org/)
- First Latin American Congress on Ethics, Transparency & Anti-corruption Compliance took place in May 2012
- 280 attendees; 32 speakers; 11 foreign experts attended
- Five core team members discussed results of the four diagnosis studies
- Two plenary sessions, devoted to Collective Action, were held
- Web-platform was launched at an international conference; http://www.udesa.edu.ar/accionescolectivas/
- Paper on corporate compliance and Collective Action in Argentina was accepted for publication at the Law Review of Universidad de San Andrés
- Paper for Crime Law and Social Change has been sent out for peer review
- Agreement to join the International Center for Collective Action (ICCA) launched by the Basel Institute on Governance was signed; www.collective-action.com
The project aims at providing interested parties from government, business, and civil society with an overview of existing and potential mechanisms for incentives and sanctions to encourage companies to engage against corruption. Further to a multi-stakeholder selection process of priorities, comprehensive research will be conducted to prepare a catalog of qualitative assessments of the effectiveness or reasons for failures of each identified anti-corruption incentive and sanction. This will include explanatory comments to facilitate their increased or improved use in enforcement practice and as voluntary measures.

The applicability of selected key incentives and sanctions will be tested with local multistakeholder pilot groups in selected countries by identifying key agents and moderating dialogs to advance the effective change process. Outcomes of these activities will be used to develop 1. a practitioner handbook that comprises experiences, lessons learned and best practices, and 2. learning modules to support online as well as in-person training. Both outcomes provide a sustainable framework for further education and motivation in implementing such mechanisms.
The project analyzes and tests in real world situations existing and potential anti-corruption incentives and sanctions to achieve a sustainable impact on the behavior of business by providing successful models for practical implementation.

KEY ACTIVITIES YEAR 2:

- Global Expert Survey was conducted and published. The survey provides information on the assessment of anti-corruption incentives and sanctions in motivating businesses to counter corruption, the importance of different stakeholders in setting anti-corruption incentives and sanctions for businesses and the impact of different commercial and operational, legal and reputational incentives and sanctions; http://www.humboldt-viadrina.org/eng/research/current-research-areas/anti-corruption/

- Survey was sent to more than 1,000 experts from the public sector, business sector, and civil society; Results were widely disseminated and discussed in various articles and at events such as UN Global Compact Rio+20 Corporate Sustainability Forum (Brazil, June 2012), the UNDP ACINET Regional Workshop (Tunisia, June 2012), the International Anti-Corruption Summer Academy (Austria, July 2012) and the UNODC/IACA “Expert Group Meeting on Legal Incentives for Corporate Integrity and Cooperation” (Austria, September 2012)

- First draft of the Guide “Motivating Business to Counter Corruption – Using sanctions and incentives to change business behavior” was established (a consultation round with international experts is scheduled for the first half of 2013)

- Complementary paper on the motivational factors of business representatives influencing their corruption-related decisions has been written and is now in preparation for publication

- A collaboration agreement was established with the Nigerian based NGO “The Convention on Business Integrity” to advance anti-corruption incentives in Nigeria

- Collaboration agreement was established with the Egyptian-based business association “Egyptian Junior Business Association” on anti-corruption standards and incentives for small and medium enterprises in Egypt

- Collaboration discussions with the UNDP Programme on Governance in the Arab Region (PROGAR) regarding enhancing transparency in the private sector and the role of different stakeholders in Arab countries intensified

- Knowledge exchange workshop with other Siemens Integrity Initiative project partners, Maala-Business for Social Responsibility (Israel) and Transparency International-USA (USA), was conducted in Berlin in September 2012
The International Anti-Corruption Academy (IACA) – a joint initiative by the United Nations Office on Drugs and Crime (UNODC), the Republic of Austria, the European Anti-Fraud Office (OLAF) and other stakeholders – is a pioneering institution that aims to overcome current shortcomings in knowledge and practice in the field of anti-corruption. In pursuing this aim, the Academy will function as an independent centre of excellence in the field of anti-corruption education, training, networking and cooperation, as well as academic research. It will take a holistic and inter-disciplinary, inter-regional, inter-cultural and inter-sectoral approach.

The curricula, which will embrace diverse cultural traditions and focus on country-specific or client-specific requirements, will be flexible enough for participants and students to balance their careers and studies. The Academy will cover a vast spectrum of lectures, seminars, specific events, conferences and other training activities, including (academic) degree programs, and will offer a broad range of tailor-made courses. In doing so, the academy will also provide distance-learning and web-based tools.

International Anti-Corruption Summer School (IACSS): Within the overall project of IACA the project activity of IACSS aims to ensure the continuation of a well-established process which, inter alia, contributes to the fourth pillar of the Academy’s programs and activities: acting as a platform for direct dialogue and networking. Further developing the “Practice meets Science” approach, it will again bring together national and international practitioners of various backgrounds from the private and public sectors, students, media and NGO representatives, and internationally distinguished professors and academics from different disciplines and institutions.

Grants for students and participants from least developed countries (LDCs)/emerging markets (EMs): In congruence with the inter-regional approach of IACA, students and participants from all parts of the world should have the possibility to study and work at the Academy. In order to keep tuition fees affordable and to be able to provide training grants to students and participants who would otherwise not be able to attend, grants to students and participants will be provided.
KEY ACTIVITIES YEAR 2:

The International Anti-Corruption Academy (IACA) is an international centre of excellence for a new and holistic approach to fighting corruption.

International Anti-Corruption Summer Academy (IACSA) – July 5-14, 2012, Laxenburg; http://www.iaca.int/index.php?option=com_content&view=article&id=133&Itemid=115

- Participation of 72 anti-corruption practitioners representing over 60 countries from all sectors of society
- 15 scholarships were granted to participants from Least Developed Countries
- 15 international renowned academics and executive practitioners lectured and trained
- A ten-day training consisting of 54 lecture hours and including two roundtable discussions on contemporary aspects of anti-corruption was conducted
- Lectures on psychology, political science, best practices (Asia, Africa, and the Americas), private sector compliance, asset recovery, public sector anti-corruption, ethics, sociology and law were held
- Innovative insight into anti-corruption through a holistic approach designed to bridge the gap between theory and practice was offered

PROJECT AT A GLANCE:

Master in Anti-Corruption Studies (MACS); http://www.iaca.int/index.php?option=com_content&view=article&id=144&Itemid=1

- Presentation of the 24-month Master program to the public, opening of the application period and promotion of the program
- Elaboration of the curriculum, presentation of the curriculum to the international anti-corruption community including two information events organized at the Academy and incorporation of the community’s feedback
- Reaching out to lectures for the first and second module of the Master program
During the three-year project, IBLF will seek to bring to Russia and China the best international practices in corporate approaches to compliance, raise knowledge and consciousness of the costs of corruption and the benefits of combating it, and bring innovative management tools and techniques to multinational and local companies.

The project, which will be managed in Russia by IBLF’s branch office in Moscow, and by partners at Renmin University in Beijing, will include a range of activities including workshops and round-tables allowing corporate executives to exchange experience and best practices, meetings for the countries’ top business leaders, and the development of collective approaches by companies to combat corruption in specific industries. In China, surveys and studies into the business case for integrity will be conducted, while in Russia, leading business and law schools will be provided with educational material.
“Transforming Principles into Practice in Emerging Markets” brings to Russia and China the best international corporate approaches to compliance.

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

**China** (in cooperation with the School of Public Administration of the Renmin University, China)
- Double survey to investigate perception on corruption as well as companies’ compliance practices was conducted and a Business Integrity Handbook published; [http://www.cblf.org.cn/Uploads/7BC89F58DE-939C4208-AF3D-5680AF200DDD%7D_BUSINESS%20INTEGRITY%20HANDBOOK.pdf](http://www.cblf.org.cn/Uploads/7BC89F58DE-939C4208-AF3D-5680AF200DDD%7D_BUSINESS%20INTEGRITY%20HANDBOOK.pdf)
- Leaders Forum (February 2012) convened 50 representatives of firms, government and business associations
- Two roundtables were organized where 80 company representatives learned about the latest global trends in legislation, its impact on businesses and anti-corruption efforts in China
- Two Business Standard Advisory Council dinners, one training for state-owned enterprises and 30 meetings with various stakeholders were held to identify challenges and drive stakeholders to improve the business environment
- Launch of a new website – [http://www.cblf.org.cn/index_EN.asp](http://www.cblf.org.cn/index_EN.asp) – including a resources download center to share best practices as well as useful tools; Release of the first newsletter via the newly established website

**Russia**
- Collective Action “Industrial Companies Working Group” was established and prepared two publications that analyze procurement processes of the city and suggest recommendations for improvement in cooperation with the procurement department of the City of Moscow:
- Educational course “Business Ethics” for MBA-students was launched in leading Russian business schools
- Nine round-tables for different key audiences were organized (compliance managers, CEOs and professors)
- Four student practitioner meetings were conducted at leading Russian business schools
- Launch of the first anti-corruption and business standards website in Russian; [www.business-standards.ru](http://www.business-standards.ru)
The 2014 World Cup and the 2016 Olympic Games provide an opportunity to set an example in the fight against corruption and to ensure that resources invested in infrastructure are spent in a transparent and efficient way.

The project’s specific objectives are to raise the:

- Level of transparency in public procurement and expenditure;
- Integrity level of public-private sector relations and agreements;
- Level of social control over public budget and expenditure.

**Name of Integrity Partner:**

Instituto Ethos – Ethos Institute for Business and Social Responsibility

**Clean games inside and outside of the stadium (World Cup 2014, Olympics 2016)**

<table>
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<tr>
<th>COUNTRY OF IMPLEMENTATION</th>
<th>DURATION</th>
<th>USD (MILLION)</th>
<th>REGISTERED IN</th>
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<tbody>
<tr>
<td>Brazil</td>
<td>5 years</td>
<td>3.11 M</td>
<td>Brazil</td>
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The main activities are the development of corporate self-regulation mechanisms through the establishment of Sector Agreements, a set of Local Administration Transparency Indicators applicable to the host cities of the events; a Local Administration Transparency Pact; social control mechanisms and instruments providing the society with tools to understand and follow public expenditure and contracts and to engage business; and social mobilization for the approval of a set of regulation bills fostering integrity and combating corruption.
Promoting transparency and integrity for the 2014 World Cup and the 2016 Olympic Games through Collective Action, social monitoring and control mechanisms.

KEY ACTIVITIES YEAR 2:

- Participation and engagement in the first National Conference for Transparency and Social Control in May 2012, which resulted in the approval of 80 proposals for new public policies in the area of transparency and social control
- The National Committee on Companies and Investors began a partnership with UNGC Working Group for the 10th Principle in the development of a publication: “Fighting corruption in sport sponsoring and sport-related hospitality: A practical guide for businesses”
- Important partnerships were established with ABRADEE – the Brazilian National Association of Electricity Distributors and ABIMED – Brazilian Association of High Technology Equipment, Products and Supplies Medical Hospital, inviting all companies associated to join a sectorial agreement for the energy sector
- Participation in the UN Global Compact Rio+20 Corporate Sustainability Forum (Brazil, June 2012) and organization of a side event to discuss the project’s issues
- Participation in the UNODC Expert Group Meeting (Austria, September 2012) on major events and presentation of the Sub Working Group on Sport Sponsoring and Sport Related Hospitality
- A seminar about Social Control against corruption was held in Brasilia in December, with the virtual participation of Georg Kell and speeches from UNESCO, CGU (Comptroller General of the Union), universities and civil society organizations’ representatives and companies’ participation.
- English version of the website was launched; http://www.jogoslimpos.org.br/english/meet-the-project/
- Publications:
  - 203 news published on project’s website; http://www.jogoslimpos.org.br/
  - Public consultation of “Jogo Limpox Jogo Sujo”
Project profiles and highlights of activities in 2012

Name of Integrity Partner:

Maala – Business for Social Responsibility

DESCRIPTION OF INTEGRITY PARTNER
(www.maala.org.il)

Maala – Business for Social Responsibility is Israel’s leading advocate on corporate values and citizenship. Founded in 1998, Maala is a non-profit membership organization that serves to advocate, consult, educate and facilitate and encourage corporations to identify opportunities to promote CSR. Today their membership exceeds 130 of Israel’s leading companies, and the 2010 Index ranked 75 companies with a turnover of over $79 billion and a workforce of over 173,000 employees.

Main activities:

- Expansion of the section on assessment of ethical and governance standards of the Maala Index
- Increase the number of companies in the Maala Index and educate investors about the benefits of the index
- Development and publication of a working tool-kit that helps to understand, implement and practice anti-corruption/bribery and ethical governance standards
- Conduct a media campaign, which creates awareness of the business sector’s obligation to abide by ethical management, corporate governance and anti-corruption standards
- Conduct 11 learning sessions
- Conduct an annual conference to serve as a forum for public dialogue and to raise awareness

PROJECT:

Maala’s Corporate Social Responsibility Collective Voluntary Anti-Corruption Standard Program

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<th>COUNTRY OF IMPLEMENTATION</th>
<th>DURATION</th>
<th>USD (MILLION)</th>
<th>REGISTERED IN</th>
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<tbody>
<tr>
<td>Israel</td>
<td>5 years</td>
<td>0.48 M</td>
<td>Israel</td>
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The aim of the project is to encourage companies to voluntarily adopt and strengthen standards of transparency, ethics, corporate governance and prevention of corruption.

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

- 91 companies were ranked on their CSR performance, including ethics and anti-corruption parameters; Maala CSR Index 2012 ranking results were published at a dedicated mini-site in June 2012; All 91 participating companies received detailed feedback on their performance (45 feedback sessions were held); http://www.maala.org.il/ranking2012/, http://www.maala.org.il/en/company/ranking/2012/

- Interactive index questionnaire was completed and made available to all participating companies; Calculation model software was completed and used to rank participating companies

- Two tool kits for managers were developed and published:
  - Tool kit for corruption and bribery risk assessment including a suggested risk assessment process with relevant information resources and practical assessment tools
  - Tool kit for establishing and maintaining a responsible supply chain containing a check list for suppliers based on ethics and integrity; http://www.maala.org.il/warehouse/userUploadFiles/File/infoport/social/chainr.pdf

- Two learning sessions for Maala members were held:
  - Learning session on the Israeli law against bribery of foreign public workers, the OECD Guidelines for Multinational Companies and on the Good Practice Guide was held on March 25, 2012; Some 25 people attended the session and its proceedings were published on Maala website
  - Meeting on May 21, 2012 on ethical management and the ways to establish and promote a culture of integrity and ethics in the day to day work and management based on a case study by LRN Consultancy

- Two half day work and discussion panels were held:
  - First held on November 21, 2011 on the topic of ethics and business integrity in HR services contracts; Some 50 people attended the session
  - Second held on July 2, 2012 on integrity as a business philosophy and integrity in service and customer relations; Some 80 people attended the session
The specific objectives are to:

- Identify key concerns of the private sector that affect integrity and transparency in business transactions;
- Develop a unified “Business Code of Conduct” as a standard for local and foreign business entities;
- Create an “Industry Integrity Pact” that provides control measures to ensure transparency and integrity in business transactions;
- Develop products to set up integrity practices as basis for an audit and certification program for participating companies; and
- Institutionalize the whole process to promote sustainability of the Integrity Initiative.

COUNTRY OF IMPLEMENTATION: Philippines
DURATION: 4 years
USD (MILLION): 1.04 M
REGISTERED IN: Philippines

Name of Integrity Partner:
Makati Business Club (MBC)
in cooperation with the European Chamber of Commerce in the Philippines
The project aims at initiating Collective Action between foreign and local businesses in order to support fair market conditions. The Integrity Initiative will encourage companies to commit to having no tolerance for corruption, and to sustainable development.

**KEY ACTIVITIES YEAR 2:**

- The 2nd Integrity Summit was held on September 14, 2012 attended by over 500 signatories to the Integrity Pledge from the private and public sectors. Keynote Speaker was Filipino President Benigno Aquino who lauded the efforts of Integrity Initiative. During the summit, the following were presented: An integrity benchmark system was set up and a benchmark report on integrity practices and the Social Weather Stations (SWS) Enterprise Survey on Corruption was published during the Second Integrity Summit. The results of the pilot assessment of 28 companies that underwent the online integrity self-assessment tool are also included in the report. The SHINE project also supported the 2012 SWS Enterprise Survey on Corruption, which shows Filipino businessmen’s perception of government agencies’ sincerity in fighting corruption and the private sector’s level of ethical business practices. A number of companies with good practices were featured in the benchmark study report and they were encouraged to share their practices during the regular integrity fora; the Integrity Initiative is now developing an acceptable system for rewarding integrity compliant companies.

- A series of consultations were conducted to develop and validate acceptable standards of ethical behavior within organizations regardless of size. Anchored on the UCCB principles, the standards were crafted with specific control measures and activities. A consultation of experts was held to design integrity learning interventions and to engage institutions in order to develop a pool of compliance experts.

- About 30 professional and industry associations signed the Integrity Consortium Cooperation Agreement to enable long-term development of ethical practices in the private sector. Through Collective Action among the participating associations there is now a common platform to enforce ethical behavior. The Integrity Initiative promoted integrity standards to several organizations across the country. To some extent the Integrity Initiative was shared with interested groups outside the Philippines.
Governments, international organizations and the business community have adopted legally binding and non-binding anti-corruption and integrity instruments at the regional and global levels. A majority of Arab countries have ratified, and are consequently bound to implement, the United Nations Convention against Corruption (UNCAC). The Arab Anti-Corruption and Integrity Network (ACINET), established with UNDP support and OECD assistance, is an inclusive regional platform for knowledge-sharing, networking, capacity development and policy dialogue that demonstrates the commitment of Arab countries to the fight against corruption.

To ensure an attractive business environment for investment and trade, corruption issues need to be addressed as part of a private sector development strategy. Given the growth of the private sector and associated competition challenges, promoting anti-corruption awareness is essential. Through regular public-private conferences and training sessions, the project will raise awareness of existing international principles and best practices in the area of anti-corruption and build regional capacity to comply with international anti-corruption and integrity standards.
Enhancing Business Integrity in the MENA Region seeks to raise awareness of international principles and best practices in combating corruption in the Middle East and North Africa (MENA).

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

- National Roundtable and training session on "Private Sector Integrity Initiatives in Egypt", March 25, 2012; [http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49739321_1_1_1_1,00.html](http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49739321_1_1_1_1,00.html)
- Multi-stakeholder consultation on Promoting Public-Private Dialogue on Integrity in Cairo, Egypt, March 26, 2012; [http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49739321_1_1_1_1,00.html](http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49739321_1_1_1_1,00.html)
- Multi-stakeholder Dialogue and training session on the Integrity Frameworks in Egypt, Iraq and Jordan on February 12-13, 2012, in Amman, Jordan; [http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49700952_1_1_1_1,00.html](http://www.oecd.org/document/57/0,3746,en_34645207_34645590_49700952_1_1_1_1,00.html)
- Multi-stakeholder Dialogue and training session on "How to Fight Corruption in MENA Countries: Deauville Partnership Coordination and Lessons Learned from Other Regions" in Marrakesh, Morocco, November 13, 2011
- Roundtable on "The Private Sector’s Role in Fighting Corruption" in Cairo, Egypt, November 21, 2011; [http://www.oecd.org/document/55/0,3746,en_34645207_34645466_49381047_1_1_1,00.html](http://www.oecd.org/document/55/0,3746,en_34645207_34645466_49381047_1_1_1,00.html)
- Production of training material:
  - Elements of Voluntary Corporate Integrity Measures and Tools
  - Elements for Governments to Strengthen Public-Private Dialogue on Integrity
  - Strengthening Private Sector Integrity Initiatives in Egypt
  - Establishment of an online library and training materials on “Strengthening Business Integrity – Compliance in the OECD Region” – a source of inspiration for the MENA economies
  - The Role of Public-Private Dialogue in the Fight Against Corruption
- Awareness raising:
  - OECD Working Group on Bribery, October 2011
  - “Pour la bonne Gouvernance et la lutte contre la corruption” in the Journée des Entrepreneurs
Procurement is one of the areas most vulnerable to corruption in the Czech and Slovak Republics. The main root causes for transparent procurement are weak laws and lack of oversight. The project’s objectives are to prepare a set of law amendments based on economic research and legal analyses of current weaknesses of the legal system. Furthermore, the project will aim at identifying potential loopholes, and analyze current practices of state oversight over procurement.

Economic research will support the general recommendations that an anti-corruption approach, including open tenders, electronic auctions, or restrictions for evaluation criteria, could increase efficiency of public budget spending. Together with the support of an anti-corruption business platform, the amendment will be presented to the Parliaments.

To raise awareness with media and the general public, this project will develop an ideal model for an official electronic tender bulletin, enhancing the possibilities of public control by publishing information on tenders.

DESCRIPTION OF INTEGRITY PARTNER
(www.oziveni.cz)

Oživení, meaning "Renewal", was established in 1997 in Prague, Czech Rep., as a non-governmental not-for-profit organization primarily devoted to promoting sustainable mobility, cycling, and reducing car traffic in cities. Since 2000, the amount of public advocacy and watchdog activities has risen, and the main organization’s goals are currently promoting public scrutiny, transparency, public awareness, and free access to information.

Its anti-corruption activities include legislative work at the national level, development and enforcing of municipal anti-corruption policies and tools, systematic monitoring and analysis in the area of conflict of interests, monitoring and public exposure of specific cases of conflict of interests and corruption – watchdog activities, anti-corruption audits and consultancy, free legal aid, and networking services for CSOs involved in anti-corruption work.

COUNTRY OF IMPLEMENTATION: Czech Republic, Slovakia
DURATION: 3 years
USD (MILLION): 0.6 M
REGISTERED IN: Czech Republic

PROJECT:
Improvement of Public Procurement Systems in the Czech and Slovak Republics
The project aims at improving public procurement practices through amendments to the anti-corruption law which are supported by a business platform.

**KEY ACTIVITIES YEAR 2:**

- The Amendment of the Czech Public Procurement Act increasing transparency in public procurement was adopted in January 2012 and became effective on April 1, 2012; The campaign for the adoption of the Amendment included video spots, press releases as well as monitoring of the legislative process in the House of Representatives
- New alternative Open Public Procurement portals were launched in both countries in order to present official data in a user friendly manner and to enable a better public oversight of contracting authorities and their suppliers; www.vsechnyzakazky.cz, http://tender.sme.sk/en/report/all?cut=date:2012
- New methodology on reduction of corruption risks in public procurement for municipalities was published
- Two analyses were carried out to present current experiences and form a basis for further reforms of the public procurement system in both countries: Analyses of the public institutional framework for more economical public procurement (Oživení) and Quality of Public Procurement in 2009-2011 (Transparency International Slovakia)
- Webpage of the Coalition for Transparent Business the Czech Republic was launched; http://www.transparentnipodnikani.cz
- Going forward, the Coalition will focus on the promotion of ethical principles in transactions with the public sector
- Two workshops (February 23 and May 23, 2012) and a legislative conference (September 24, 2012) on "How to improve Public Procurement" were organized by Transparency International Slovakia with the attendance of politicians, public officials and representatives of US Chamber of Commerce in Slovakia; The key topic at these events was the drafting of a new public procurement act in Slovakia and the reform of public procurement
- Six workshops for public officials from municipalities on the reduction of corruption risks in public procurement were organized (109 participants)
The main objectives are:

- To adapt and mainstream anti-corruption principles, values and standards as guided by the UN Convention against Corruption (UNCAC) and other international legal instruments at national and local levels;
- To develop capacities in corruption prevention and prosecution within agencies dealing with e-procurement;
- To develop reliable feedback and improvement mechanisms through monitoring and evaluation.

To achieve these objectives, several key activities will be undertaken: analyzing gaps between international legal instruments and national law, adapting international procurement standards into national law through drafting of new laws and standards, and assisting private sectors and small and medium vendors to comply with the adopted national legal frameworks. The project will also enhance the capacity of vendors and the government’s E-Procurement Agencies; train their staff; educate e-procurement watch organizations; and assist local government in implementing anti-corruption and integrity systems for procurement.
Key Activities Year 2:

- The CLEANING project developed effective collaboration action with several public procurement key stakeholders such as the Public Procurement Policy Council (LKPP), Indonesia Entrepreneur Association (APIINDO), Local E-procurement Service (LPSE), Procurement Service Unit (ULP) and Government Inspectorate.

- In June 2012, a multi-stakeholder meeting was held with several Civil Society Organizations that are concerned about the public procurement implementation in Indonesia; A significant outcome of this meeting was a draft public procurement law.

- Principles and an Ethical Code of Conduct in Procurement and E-procurement were developed as the basis for the formulation of the draft law.

- The project has delivered ten capacity building trainings for government agencies, four workshops and seminars, and eight capacity building trainings for business associations in five provinces (North Sumatera, West Java, Yogyakarta, East Java, and South Sulawesi).

- The series of capacity building activities for public procurement stakeholders trained 310 members of governmental public procurement agencies and 639 members of vendors and associations.

- Direct impact of this series of trainings is the availability of 40 local/provincial level trainers from government agencies and private sectors who are expected to have the capability to deliver the internalization of integrity systems, anti-corruption values and international procurement conventions to their own institutions.

- A report on public procurement in criminal law and criminology was finalized.

- A needs assessment report was finalized and disseminated to Local E-Procurement Agency, Inspectorate and Government Procurement Committee in Yogyakarta.

- Training material was developed (among other things three films).

- A website titled “PANTAU PENGGADAAN” was developed.
The MedKompas project will achieve its aim by organizing trainings on ethical business practices, and through a general promotion campaign on ethical cooperation between medical devices market participants and healthcare professionals.

This promotion of ethical business conduct will spread knowledge on threats resulting from corrupt behavior and the advantages of ethical business practices.

- Trainings are planned in the country over a four year period with the target group identified as representatives of medical devices companies and healthcare professionals.

- Polmed intends to promote and shape ethical patterns of behavior by means of a general promotional campaign.

The campaign will address representatives of both healthcare facilities and medical devices companies in order to highlight relevant and ethical rules for the cooperation between these two groups.
The project aims at initiating a network of compliance managers and promoting ethical cooperation among participants in the medical devices market.

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

- Organization of 18 trainings with 840 participants (400 individuals were initially foreseen); the obligatory test was passed by all participants
- POLMED received official support and a declaration of cooperation for the MedKompas activities from 12 local divisions of the Polish Chamber of Physicians and Dentists (PCPD)
- MedKompas trainings obtained the official certification of PCPD for the next two years (healthcare professionals attending the training gain educational points required by legal regulations)
- Cooperation with CBA (Central Anti-Corruption Bureau), which plans to issue a special edition of the anti-corruption bulletin that is going to be devoted to the medical sector
- Special edition of MedKompas trainings organized for the Polish Medical Association (Tarnow division)
- Update of Q&A guideline document, which is published on www.medkompas.pl
- Update of MedKompas project webpage which allows registered participants to write about and discuss trainings and compliance aspects, ask questions and exchange views; 70 individuals are registered so far
- The cooperation with BROG Marketing, which is the owner of a popular internet portal (www.medicalnet.pl), allowed the publication of promotional materials and information about trainings
- Promotion of ethical business practices in the healthcare sector through the organization / co-organization / participation in seven events (conferences, medical exhibitions, etc.) and panel sessions on ethics as well as the distribution of promotional materials
- Organization of a press conference on September 26, 2012, which summarized the MedKompas project activities that had been undertaken so far; The overall objective was to promote the project to the public
- Publication of 30 promotional materials on the project and information on trainings (press and internet) released
- Distribution of 2,000 brochures promoting the MedKompas project; Preparation and distribution of 2,000 leaflets promoting ethical business practice
Business Membership Organizations (BMOs) have become important players in the process of promoting transparency and fair markets. To strengthen anti-corruption initiatives in China, the project will make available the expertise of German BMOs (German chambers and sectoral associations and their umbrella associations such as DIHK, BDI, etc.) and their members, in combination with the expert network of GIZ GmbH and sequa gGmbH. GIZ GmbH and sequa gGmbH will support the Chinese project partners to develop anti-corruption approaches and improve organizational strengths and management capacities, e.g. qualification of staff and the development of training material.

Key activities are:
- Establishment and support of public-private dialogue platforms,
- Development and implementation of industry-specific standards,
- Knowledge management and exchange of best practices and
- Capacity building within Chinese BMOs.

At the final stage of the project all Chinese partner BMOs should be able to provide professional support mechanisms or business development services incorporating anti-corruption topics to their member enterprises on a self-sustainable basis.
The project aims to strengthen Chinese Business Membership Organizations (BMOs) in fighting corruption in China through regular public-private dialogue, industry specific standards and capacity building of BMOs.

KEY ACTIVITIES YEAR 2:

- Chengdu General Chamber submitted a proposal to the Committee of Economy and Information promoting fair competition, market transparency and SME access to public procurement and supported the Furniture Industry Chamber to establish a first Collective Call for Integrity
- Chengdu Sector Chamber for Food Industry held a Public-Private Conference with 300 companies and representatives from different ministries to revise public procurement and establish Collective Call for Integrity
- Hunan Chamber held a Public Private Dialogue with the provincial governor and party secretary on transparent market access of SMEs in the Hunan economy and the role of the chambers
- Hunan Chamber submitted a study report to the government on the development of the private sector in Hunan with a list of recommendations including integrity relevant issues
- Sector Chambers of Automotive Suppliers Industry and Metal Industry compiled a draft Code of Conduct
- Seven meetings of sector chambers covering discussions on various topics of corruption and ways to prevent corruption took place; Three trainings on management tools to prevent corruption were carried out
- Almost 100 companies were trained in integrity/compliance, which was organized by Chambers
- Over 20 Business Membership Organizations (BMO) representatives trained in seven different training sessions; Networking with other Chambers led to the discussion of a potential roll-out of the project
- Two studies on corruption in private sector were carried out among companies in Hunan/Chengdu
- A guiding Project Road Map was developed
- Website development is ongoing: the UNODC tool “The fight against Corruption” is now available in Chinese language at the Hunan Chamber website – http://thefightagainstcorruption.unodc.org/certificate/; New project flyers were developed, printed and almost 1,000 were distributed so far
- A Help Desk, which has the character of an information desk and Hotline are active now
C.

Project profiles and highlights of activities in 2012

Name of Integrity Partner:
Transparency International – Bulgaria

DESCRIPTION OF INTEGRITY PARTNER
(www.transparency.bg/en)

During its twelve years of existence, Transparency International – Bulgaria has gained substantial visibility in Bulgaria, and has established the necessary links with the general public and gained its reputation as an organization of integrity and stability.

TI-Bulgaria has assumed a substantial presence in the country’s public space. It has created a network of experts and volunteers and has implemented several successful monitoring initiatives, which has given it a place among the 10 most active and viable civil society organizations.

- Analysis of the legal framework and adaptation of the concept of Integrity Pacts (IP) in Bulgaria
- Promotion of the IP concept, organization of working meetings and public discussions with both private sector and public administration representatives; publication of articles and expert positions in the media; advocacy to civil society and private sector; set-up of a monitoring coalition
- Pilot implementation of the IP tool: training of civil servants in the implementation of IPs’ in public contracting; testing of the IP tool in selected tenders; monitoring and assessment of impact of IPs’ on the contracting process; recommendations for improvements
- Create a Public Contracting Transparency and Integrity Indicators (PCTII) tool that builds upon the outcomes of the implementation of the pilot IP’s and publication of a PCTII manual
- Promotion of PCTII tool and use for training representatives of the private sector, civil society and media
The key objective is to enhance integrity standards and transparency in awarding of contracts with significant public interest through policy change in Bulgaria.

KEY ACTIVITIES YEAR 2:

- The focus of the initiative was directed towards the three key actors in the process of public procurement planning, implementation and execution: public institutions of the central administration – the contracting authorities, business organizations and associations, and government institutions with control functions
- Expert analyses and assessments of international and Bulgarian legislation and practices were carried out to enable the effective implementation of an Integrity Pact in public procurement procedures
- Integrity Pact model was developed in accordance to the Bulgarian legislature as well as promotional and informational materials
- Series of working sessions were held with three participating ministries (Ministry of Health, Ministry of Labor and Social Policy, Ministry of Regional Development and Public Works)
- Cooperation agreements and Integrity Pacts with the participating ministries were drafted and signed as a legal basis of Integrity Pact implementation
- Pilot implementation and testing the Integrity Pact model: identification of five public procurement procedures, (within the mandate of the participating ministries) representing significant public interest and therefore suitable for the pilot implementation of the Integrity Pact; monitoring is currently ongoing and the five procurement procedures are at different stages of progress. Current information and monitoring reports are available on the website of the initiative: http://integrity.transparency.bg/en
- Successful advocacy campaign on local and national levels: policy papers on the subject of Integrity Pact implementation were prepared and three policy forums were held with the active participation from both the private sector and public administration representatives (the Commission on Protection of Competition, Public Procurement Agency, Public Financial Inspection Agency; the Bulgarian Chamber of Commerce, the Bulgarian Industrial Association, the German-Bulgarian Chamber of Industry and Commerce and American Chamber of Commerce in Bulgaria, among others)
- Establishment of an advocacy and monitoring coalition: more than 20 NGOs were identified as potential partners in public procurement monitoring and Integrity Pact implementation
- Development of White List in public procurement as a tool for promotion of tenderers who accede to the Integrity Pact and adhere to the principles of transparency and accountability
Protecting the green sector market from corruption and fraud aims at designing a sound framework to avoid misuses and illegal practices, enhancing awareness in the business environment and among public institutions, promoting fair market conditions through clear and transparent procedures, and disseminating results to raise awareness on the issue.

The project will gain knowledge on criminal patterns, market and corporate vulnerabilities, organize laboratories to enhance the capacity to prevent risks and reduce losses, and set up a dialogue platform between the public and private sectors to promote the design and adoption of ad hoc standards.

The focus will be placed on three specific sectors: renewable energies, logistics/mobility of persons and goods, and innovation technologies.

To carry out this project a multi-disciplinary partnership has been established by TI-It (Integrity Partner), National Anti-Corruption Authority, and RiSSC – Research Centre on Security and Crime.

Name of Integrity Partner:
Transparency International – Italia (TI-It)

PROJECT:
Sustainable Procurement
Protecting the Green Sector Market from Corruption and Fraud

COUNTRY OF IMPLEMENTATION: Italy
DURATION: 3 years
USD (MILLION): 0.6 M
REGISTERED IN: Italy
"Protecting the green sector market from corruption and fraud" is a civic, institutional and scientific project for protecting the green economy from threats of fraud and corruption, thus promoting relevant sustainable and ethical standards.

**KEY ACTIVITIES YEAR 2:**

- Activity of analysis and documentation of the criminal risks of corruption and fraud in the renewable energies sector was completed
- Private and public-private success stories (best practices) were selected and collected in a video. Trailer available at: http://www.rissc.it/content/corruzione-e-frode-nella-green-economy-trailer
- A Public-Private Working Table was implemented in four macro-regional areas (Turin, Florence, Padua and Salerno) enhancing the connection and engagement of local institutions and enterprises. Business intermediary organizations, trade associations and civil society are involved in the elaboration of Policy Statements; http://www.greencleanmarket.org/en/category/tavolo-pubblico-privato/
- A Private Platform including the main Business Intermediary Organizations of the renewable energy sectors was implemented in order to promote anti-corruption business instruments
- Five Thematic Tables (Scientific Communication, Energy Systems, Procurement, Finance and Natural Resources) were implemented to identify the main risks of distortion and best practices within Italy’s renewable energy sector; http://www.greencleanmarket.org/en/category/tavoli-tematici/
- A one-day brainstorming session of the Advisory Board and leaders of the Thematic Tables was organized to discuss the results of the work in progress as well as its perspectives
- Advocacy activities on the opportunities and risks of the green energy sector were carried out at a Secondary School in Vimercate (1,500 students) and at the University of Catania
- A project website was launched and is continuously updated; www.greencleanmarket.org
- The project was promoted and results were disseminated at national and international events and in the press
Since 2000, TM has implemented Integrity Pacts/Social Witness (IP/SW) tools in around 100 public procurement processes and has developed a methodology applied to the Mexican context that can be useful to government and private actors in other contexts. This methodology combines a mini-contractual form in a bidding process (IP) with intensive monitoring during the bidding process (SW). The result is a light legal structure with a real-time monitoring process which provides an external, technical and independent view without reducing efficiency, partially restores public distrust in procurement, creates an environment for open discussions of technical decisions, promotes government innovation, and contributes to competition, efficiency and savings. To date, much of the research related to the IP/SW has combined national experiences and practice, without determining the systemic impact for a branch of government, sector or type of company in a cross-time analysis. This project will have this systemic approach, in order to be useful to procurement sectors in any context. The objective is to conduct an analytical review, and to promote the Mexican experience with a particular focus on its economic impact, social results and a new framework for Collective Action among participants in procurement processes. Activities include an analytical review, the production of independent chapters under an editorial plan, and the communication/promotion of the Analytical Review Report with relevant stakeholders.
The project aims to produce an Analytical Review Report of the Integrity Pacts/Social Witness tools that Transparencia Mexicana has applied in around 100 public procurement processes.

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

- The first book “A new role for Citizens in Public Procurement” was published online and distributed to more than 400 members of the Citizens and Markets Knowledge Network; http://corruptionresearchnetwork.org/resources/articles/a-new-role-for-citizens-in-public-procurement-first-publication-of-the-citizens-markets-initiative
- 1,000 copies of the book’s first edition were printed
- Potential topics for the second publication in the series on Citizens and Markets were analyzed and evaluated
- A second call for papers for the publication “A new Generation of Public Control” was launched in April 2012 and a draft index was elaborated
- Several article abstracts were examined to be included in the second book
- The authors’ first version of the articles was submitted in early September 2012 and the editorial committee started the first revision round
- A concept note for the third book on “The Social Witness” was drafted
- A concept note on the paradigm of Citizens and Markets was elaborated
- A communication strategy was planned to widen the dissemination of the paradigm and the knowledge produced so far
The overarching, long-term goal of this project is to improve credibility of corporate compliance programs. Achieving this will help increase public confidence and enhance credibility with investors, rating agencies, financial institutions, export credit agencies and government procurement agencies, which increasingly expect corporations to demonstrate effective compliance programs. This project will assess the strengths and weaknesses of the most commonly used methods of compliance verification and will develop recommendations for companies when considering anti-corruption compliance verification.

The project aims at achieving the long-term goal by:

- Reviewing, assessing and reporting on the efficacy of current approaches to compliance verification;
- Creating awareness and better understanding of the verification methods; and
- Promoting broad acceptance of the relative merits of the methods and findings.

This project will be supported by Michael Herschman, Mark Mendelsohn and Fritz Heimann.
The project will look at the key role that compliance verification methods play in assessing companies’ adherence to their anti-corruption programs.

KEY ACTIVITIES YEAR 2:

- Five Activity Reports analyzing current efforts to verify corporate compliance programs were completed:
  1) corporate self-disclosure, 2) accounting firms, 3) law firms, consulting firms and outside certification bodies, 4) U.S. government-appointed monitors and 5) social and environmental certification bodies; The reports are based on research, interviews with accounting and legal practitioners, consulting firms, companies providing certifications, government monitors and compliance officers

- Six government-appointed monitors, ten companies providing social standards certifications, four companies providing certifications, practitioners at five accounting firms, six law firms and three consulting firms compliance officers at 17 companies and two investment firms were consulted so far; More interviews are planned

- Highlights of the five Activity Reports:
  
  › Report 1) on verification by corporate self-disclosure describes the methodology and parameters for corporate disclosure of anticorruption programs and analyzes reasons for public reporting and the views of compliance officers on the various reporting initiatives
  
  › Reports 2) accounting firms, 3) law firms, consulting firms and certification bodies and 4) government monitors describe the methodology of verifying/assessing compliance with anti-corruption programs used by each and address points such advantages and disadvantages, credibility, issue of cost privilege and potential for providing certification
  
  › Report 5) on social standards certification describes the structure of the various bodies which certify adherence to internationally recognized social and environmental standards and methods

- TI-USA created an Advisory Board to assist in the development of TI-USA’s Guidance Report for companies on compliance verification methods

- TI-USA prepared a comparative analysis of the various verification methods and a proposed outline of the Guidance Report, which formed the basis for the discussion with the Advisory Board

- TI-USA participated in a workshop with two other Siemens Integrity Initiative project partners, the Humboldt-Viadrina School of Governance and Maala-Business for Social Responsibility (Israel); The workshop provided useful insights on public credibility and incentives for anti-corruption compliance
The project is a major component in a broader regional anti-corruption initiative that will generate knowledge and support inclusive anti-corruption policy reform. It will develop the capacities of representatives from at least 40 civil society organizations (CSOs) and businesses across the region, focusing on the implementation of articles 12 and 13 of the UNCAC, and on mainstreaming transparency and integrity standards and practices in various business sectors, with a view to enabling concrete participation in national anti-corruption strategies in at least 4 countries.

Key activities include:

- Training leading non-governmental practitioners (NGPs), using specially developed material,
- Supporting CSOs and businesses to formulate joint policy positions on various anti-corruption themes and engage governments in direct dialogue thereon, and
- Developing a service oriented Portal for the Arab Anti-Corruption and Integrity Network (ACINET) to promote knowledge sharing between various stakeholders.

### Anti-Corruption and Integrity in the Arab Countries (ACIAC)

<table>
<thead>
<tr>
<th>COUNTRY OF IMPLEMENTATION:</th>
<th>DURATION:</th>
<th>USD (MILLION):</th>
<th>REGISTERED IN:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arab States Region</td>
<td>3 years</td>
<td>1.78 M</td>
<td>International Organization, USA</td>
</tr>
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</table>
The project will enable non-governmental actors to help in developing, implementing and monitoring national anti-corruption strategies in Arab countries.

**KEY ACTIVITIES YEAR 2:**

- **Expert Group Meeting on “Training Materials for Promoting Business Integrity and the Implementation of the UN Convention against Corruption in the Arab Region”** was held in Doha in March 2012; Participants agreed on establishing the Doha Working Group, which brings together leading regional and international experts on business integrity and anti-corruption as well as representatives of businesses, civil society, anti-corruption agencies, universities, and training institutes; [http://www.pogar.org/resources/ac/details.aspx?aid=330](http://www.pogar.org/resources/ac/details.aspx?aid=330)

- **The Working Group started to develop two region-specific training/educational courses on anti-corruption in business transactions**

- **A first regional workshop “Enhancing Transparency in the Private Sector and the Roles of Different Stakeholders in Arab Countries”** was held in June 2012, which fostered inclusive dialogue and knowledge sharing on business integrity in Arab region among governments, businesses, and civil society organizations from 14 countries and helped to enhance the capacities of more than 30 non-governmental practitioners to contribute to related reform efforts; [http://www.pogar.org/resources/ac/details.aspx?aid=333](http://www.pogar.org/resources/ac/details.aspx?aid=333)

- **Research and consultation of 80 governmental and non-governmental stakeholders was conducted to assist Anti-Corruption and Integrity Network ACINET’s Non-Governmental Group in identifying four thematic anti-corruption priorities**

- **Process of developing four related position papers was launched:** Papers will be used by leading reform drivers, especially within civil society, as tools for advocating, monitoring, and formulating policy reforms at the country level; [http://www.undp-pogar.org/resources/ac/](http://www.undp-pogar.org/resources/ac/)

- **Enabled 57 civil society leaders and business community representatives to actively engage in and contribute to anti-corruption policy dialogue on UNCAC implementation in 12 Arab countries with particular success in promoting participatory policy reforms in:**
  - Morocco on anti-corruption institutional reforms and business integrity reforms
  - Palestine on national anti-corruption strategy and UNCAC reviews
  - Tunisia on illicit enrichment, UNCAC reviews, and national anti-corruption strategy
This project aims to promote States’ implementation of articles 26 (Liability of legal persons), 32 (Protection of witnesses, experts and victims), 37 (Cooperation with law enforcement authorities) and 39 (Cooperation between national authorities and the private sector) of the United Nations Convention against Corruption and to facilitate private actors’ compliance with the Tenth Principle of the UN Global Compact by:

1. Reviewing, in the framework of high-level committees of public officials and private sector representatives, legislation on corporate liability and legal incentives for companies to voluntarily report on internal incidents of corruption and cooperate with public authorities, and recommending amendments to ensure full compliance with the Convention;

2. Designing and delivering joint training workshops for law enforcement, judicial authorities and companies’ representatives on existing domestic laws governing corporate liability;

3. Organizing meetings of international experts to share existing knowledge and generate innovative approaches on how governments should best encourage and reward companies which report instances of corruption.

**Name of Integrity Partner:** United Nations Office on Drugs and Crime (UNODC) in cooperation with the International Anti-Corruption Academy (IACA), Austria

**Description of Integrity Partner:**
UNODC is mandated to assist Member States in their efforts to fight illicit drugs, crime and terrorism through: 1. field-based technical cooperation projects to enhance the capacity of Member States; 2. research and analytical work to increase knowledge and understanding of drugs and crime issues and expand the evidence base for policy and operational decisions; and 3. normative work to assist States in the ratification and implementation of the relevant international treaties, the development of domestic legislation on drugs, crime and terrorism, and the provision of secretariat and substantive services to the treaty-based and governing bodies.

In its resolution 58/4 of 31 October 2003, the UN General Assembly adopted the UN Convention against Corruption. The Convention entered into force on 14 December, 2005 and to date has been ratified by 150 Member States and the European Union. A Conference of the States Parties has been established by the Convention to promote and review its implementation. UNODC is the guardian of the Convention and the Secretariat of the Conference of the States Parties. The Convention is the legal instrument underlying the UN Global Compact’s 10th Principle against Corruption.

**Project Profiles and Highlights of Activities in 2012**

<table>
<thead>
<tr>
<th>Name of Integrity Partner</th>
<th>UNODC in cooperation with the International Anti-Corruption Academy (IACA), Austria</th>
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</tr>
<tr>
<td><strong>Incentives to Corporate Integrity and Cooperation in accordance with the UN Convention Against Corruption</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Country of Implementation:</strong></td>
<td>India, Mexico</td>
</tr>
<tr>
<td><strong>Duration:</strong></td>
<td>3 years</td>
</tr>
<tr>
<td><strong>USD (Million):</strong></td>
<td>1.12 M</td>
</tr>
<tr>
<td><strong>Registered In:</strong></td>
<td>International Organization, Austria</td>
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The project aims to create systems of legal incentives for companies’ integrity efforts, hence encouraging business to come forward and report internal incidents of corruption.

KEY ACTIVITIES YEAR 2:

Global Coordination

- An Expert Group Meeting on Legal Incentives for Corporate Integrity and Cooperation was held on September 27-28, 2012 at the International Anti-Corruption Academy (IACA) in Laxenburg, Austria.

India

- Technical Working Groups at state and at national levels were formed; Three working group meetings were held at the national level and three at the state level to make recommendations to the proposed and existing legislations.
- A review study was completed to assess conformity of legislation, policy and practice with the UNCAC; Assessment revealed that India is not fully compliant to the UNCAC legislation, practice and/or policy. The report of the review study makes recommendations to address these gaps and also incorporates views of the Working Group members.
- A national base line survey is underway to be completed by end of 2012, which shall provide a more detailed analysis of deviation and challenges to strengthening incentives to corporate integrity.

Mexico

- A Technical Working Group comprising representatives of the federal government and state governments of Mexico City and Puebla was formed.
- Diagnosis on the Mexican legal system and operational implementation of policies on incentives for promoting corporate integrity and reporting of corruption was conducted.
- An online survey was designed and completed by 37 actors from the private sector and 19 from the public sector (federal and state level), collecting information on perceptions of legal incentives and whistle blowing mechanisms in Mexico’s legal framework.
- Permanent working tables with government and private sector actors such as chambers and business associations were established; Bilateral meetings were held to gain trust and provide a forum to share experiences.
- In September 2012, seminars were held to bring the public and private sectors together (14 participants).
The project seeks to enhance companies’ knowledge of how UNCAC can make a difference in their daily work both internally and in their interaction with public counterparts, and to encourage the business community to turn their anti-corruption commitments into action by bringing their integrity programs in line with the universal principles of UNCAC. The project also seeks to support learning institutions which have come to realize that they do have a role to play in preparing the next generation of public and business leaders to the challenge of making right and ethical decisions.

This will be achieved by:

1. Creating and disseminating a structured outreach and communication program that combines a global perspective with local contexts, reaching out to private companies, particularly the UN Global Compact business participants;

2. Developing a comprehensive academic learning course on UNCAC and its implication for public administrators and private operators to be embedded in curricula of business, law and public administration schools.
This project aims to support private actors’ integrity efforts by educating present and future generations of business and public leaders and better informing the corporate community of the UN Convention against Corruption (UNCAC).

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

- APCO Worldwide Inc. was selected in accordance with UN rules and regulations in April 2012 to develop a structured and tailored outreach and communications program on the UNCAC targeted at the private sector; The program consists of an UNCAC communications strategy and an UNCAC toolkit
- The UNCAC communications strategy is in the process of being finalized. The development of the UNCAC toolkit has commenced including a micro-site, and UNCAC-related materials were tailored towards the private sector
- The academic learning course on UNCAC, developed by a consultant together with UNODC, will be finalized by November 2012; An initial draft of the module was presented to an academic group in June 2012 that included the International Anti-Corruption Academy and representatives from the UN Global Compact/Principles for Responsible Management Education Initiative
- The American University/Washington College of Law (AU/WCL) tentatively agreed to offer the UNCAC academic learning course as part of its academic curricula next semester in 2013
- Further academic material is available at: [http://www.track.unodc.org/Pages/home.aspx](http://www.track.unodc.org/Pages/home.aspx)
The project will promote States’ implementation of article 9 of the UN Convention against Corruption (UNCAC) and support private actors’ efforts to comply with the Tenth Principle of the UN Global Compact, by:

1. Reviewing, in the framework of high-level committees of public officials and representatives of the private sector, systems of public procurement, and assessing their compliance with UNCAC, with recommendations feeding into possible legislative amendments;

2. Designing and delivering a joint training program for public procurement personnel and private counterparts on the system of public procurement in force in both countries, giving participants opportunity for mutual learning;

3. Organizing meetings of international experts to share lessons learned and good practices in aligning national public procurement systems with the requirements of UNCAC, and to formulate model practices. Subject to the need for further training activities, a training module on integrity in public procurement will be developed.
The project aims to reduce vulnerabilities to corruption in public procurement systems and to bridge knowledge and communication gaps between public procurement administrations and the private sector.

**PROJECT AT A GLANCE:**

**KEY ACTIVITIES YEAR 2:**

**Global Coordination**

- First Expert Group Meeting on Transparency, Competition and Objectivity in Public Procurement was held in September 2012, co-chaired by UNCITRAL; Participation of international experts from OECD and World Bank as well as diverse public and private sector experts from the Technical Working Groups in India and Mexico
- A review study was completed to assess conformity of legislation, policy and practice with the UNCAC article 9 on public procurement and management of public finances
- A national base line survey is currently underway which shall provide a more detailed analysis of deviations and challenges in procurement practice
- In order to create awareness of corruption, UNODC is developing a comic booklet and two Public Service Advertisements on UNCAC and its significance to the private sector

**India**

- Technical Working Groups at the national and state levels were formed; Three working group meetings were held at the national level and three at the state level to make recommendations to the proposed and existing legislation
- A review study was completed to assess conformity of legislation, policy and practice with the UNCAC article 9 on public procurement and management of public finances
- A national base line survey is currently underway which shall provide a more detailed analysis of deviations and challenges in procurement practice

**Mexico**

- A Technical Working Group consisting of representatives of the federal and state governments of Mexico City and Puebla was formed
- A diagnosis on the Mexican legal system and operational implementation of public procurement policies was conducted
- The federal state level work plan and coordination mechanism was approved
- An online survey was designed and completed by a total of 113 persons from the private and public sectors
- Permanent Working Tables were established with various government and private sector actors such as chambers and business associations
- A seminar, bringing the public and private sectors together, was held in September 2012
Main activities:

- Raise public awareness of indicators for measuring transparency, and the importance and means of combating corruption (target audience is the general public with a special focus on faculty students and the youth)

- Educate faculty students on the benefits of disclosing and sharing information, and the best means of doing this, in light of international best practices; conduct student research competitions (target audience are faculty and students but may expand to include junior candidates in relevant governmental entities and major economic sectors such as the financial sector, small and medium enterprises, and the corporate sector)

- Integrate knowledge about corruption and transparency in academic curricula; train academic professionals on how to teach these new concepts (target audience are academic professors who are in charge of disseminating acquired knowledge to future generations of students)
The aim of this project is to raise awareness, organize extracurricular activities and create curricula for enhancing the knowledge on transparency and combating corruption among faculty students.

**PROJECT AT A GLANCE:**

The internal audit function at the Central Bank of Egypt (March 2012)

The UN Anti-Corruption Convention (March 2012),

Impact of UN Anti-Corruption Convention on Egypt (April 2012)

Extra curricular activities were offered to students:

A simulation model: Students Against Corruption, its first conference is Establishing an Anti-Corruption Unified Authority versus Reforming Existing Authorities: The Egyptian Case (27 March 2012)

A student competition: Means of Collecting, Analyzing and Presenting Economic Data

Four discussion forums on transparency issues and corruption indicators on the local level:

Corruption Indicators on the Local Level (6 March 2012)

Transparency in Subsidizing Bread in Egypt (14 March 2012)

Transparency of State Budget (10 April 2012)

Transparency of Public Debt Management (15 May 2012)

CEFRS reached out to various professors in order to introduce transparency and anti-corruption related sections to their curricula especially in the following courses: Economics of Financing, Advanced Economic Theory: Level 2 and Management of NGOs

CEFRS is leveraging on its Facebook page (realizing the arising importance of social media and a communication channel to reach out to the youth) and historical reputation all over Cairo University (among faculty members), to reach out to the maximum number targeted audience, and enable them to benefit from the initiative activities

It is planned to prepare some publications to spread awareness about the initiative and its objectives, and disseminate the findings of previous activities
The initiative aims at bringing companies operating in Vietnam together to work towards improving integrity and transparency in the way business is conducted. It is expected that the key objective will be achieved by focusing on three main activities. Initially, the project puts emphasis on implementation of research and the development of technical and communication tools to raise awareness and understanding of transparency concepts and the need for improved business practices. In parallel with awareness raising, it encourages enforcement of reforms through promoting multistakeholder consultation and dialogue and policy advice on transparency and integrity. Finally, it promotes positive change in business practices through development and implementation of training programs. It is believed that the achievements from implementing these activities will be scaled up, to have greater impact on the sustainable improvement of transparency and integrity in doing business in Vietnam.
The initiative’s aim is to mobilize the business community in Vietnam around the challenges of integrity, transparency and corruption.

KEY ACTIVITIES YEAR 2:
- First Guidebook “Anti-corruption in business operations in Vietnam” was published in English and Vietnamese in March 2012; The book aims to provide enterprises with a general concept of corruption in Vietnam and all relevant laws, policies and frameworks against corruption in the country
- Collection and publication of existing good practices regarding the implementation of a Code of Conduct in businesses in Vietnam as well as theoretical case studies on how to implement a Code of Conduct
- Second Guidebook “Lexicon – Anti-corruption in supply chain – Guideline on Setting Code of Conduct in Business” is scheduled for publication in September 2012
- Quarterly newsletter was regularly distributed
- Project website was updated with a new version – www.itbi.vn; The website is used to upload training documents, pictures and videos as well as to distribute news and activities
- Multi-stakeholder consultations and dialogues were promoted
- Training programs were developed and implemented; Training materials were created and workshops were organized; Training was focused on providing an update on the Laws on Appeals and Denunciations and represented in the Code of Conducts in business; http://itbi.vn/detail.asp?id=337, http://itbi.vn/album.asp?id=4, http://itbi.vn/detail.asp?id=336
- Training on “Integrity Program – Adding Sustainability to Business” was successfully carried out in July 2012; http://itbi.vn/detail.asp?id=360
Annex

Siemens Integrity Initiative – Newsletter

Project highlights at a glance (2011/2012)

Siemens Integrity Initiative - Newsletter

January 2013

Dear Integrity Partners and colleagues,

Welcome to the Siemens Integrity Initiative Newsletter!

We are now in the second year of implementation of the 31 projects funded under the Siemens Integrity initiative. We have seen so many interesting outcomes and ideas that we wanted to provide you with a preview of selected highlights and project results. We hope that we can encourage you to get in contact with the respective project partners to learn more about the background of their activities.

A more detailed description of each project will be provided in our upcoming Siemens Integrity Initiative Annual Report 2012 which will be released in April 2013. The Siemens Integrity Initiative Annual Report 2011 can be downloaded here: > Link

If you have specific reports or announcements that you wish to share with other Integrity Partners, please contact us.

Thank you for your cooperation!

Salvador Zivkovic, Ethis Forsthoj - Senior Writer
The Project Office of the Siemens Integrity Initiative

Project highlights (2011 - 2012)

> Basel Institute on Governance, Switzerland
> Beijing New Century Academy on Transnational Corporations (NACTC), China
> Central European University, Hungary in cooperation with Integrity Action - Making Integrity Work, United Kingdom
> COEIR (European Coordination Committee of the Radiological, Electro-medical and Healthcare IT Industry), Belgium
> Commonwealth Business Council in cooperation with the Convention on Business Integrity (CBI), Nigeria
> Ethics Institute of South Africa (EthicsSA), South Africa/Angola
> Federation of Korean Industries - International Management Institute (FK-IIMI) in cooperation with Global Competitiveness Empowerment Forum, South Korea
> Foundation for the Global Compact in cooperation with the UN Global Compact and PRME (Principles for Responsible Management Education), USA
> Foundation for the Global Compact in cooperation with the UN Global Compact and its local networks - Project for the UN Global Compact Promoting Collective Action through UN Global Compact Local Networks
> Fundación Universal de Salud (FusSalú) in cooperation with Asociación Civil por la Equidad y Justicia (AEG) and the Centro de Implementación de Políticas Públicas para la Equidad y el Desarrollo (CIPPEC), Argentina
> Humboldt-Bochum School of Governance, Germany
> International Anti-Corruption Academy (IACA), Austria
> International Business Leaders Forum (IBLF), Russia
> Instituto Ethis - Ethis Institute for Business and Social Responsibility, Brazil
> Masa - Business for Social Responsibility, Israel
> Made International Business Club (MCIC) in cooperation with the European Chamber of Commerce in the Philippines
> Organization for Economic Co-operation and Development (OECD), MENA Initiative on Governance and Investment for Development

In 2009, Siemens launched a global US$100 million Siemens Integrity Initiative which supports organizations and projects that fight corruption and fraud through Collective Action, education and training. The initiative focuses on projects that have a clear impact on the business environment and can demonstrate objective and measurable results. The Siemens Integrity Initiative is part of the World Bank-Siemens AG comprehensive settlement that was agreed on July 2, 2009.

> Link to Siemens Integrity Initiative
> Link to Collective Action

For more information please contact the Siemens Integrity Initiative Project Office:

Email > office.integrityinitiative@siemens.com
Project highlights (2011 - 2012)

Basel Institute on Governance, Switzerland
International Centre for Collective Action (ICCA) was launched » Link
High Level Reporting Mechanism was piloted in Colombia » Link

Book on „Collective Action: Innovative Strategies to Prevent Corruption“ was introduced at the International Anti-Corruption Conference in Brasilia / Brazil
» Link to publication » Link to project website Basel Institute on Governance

Beijing New Century Academy on Transnational Corporations (NACTC), China
First book titled „Compliance - The New Development Trend of the Global Companies“ was published
Free Chinese Compliance Information Website was launched » Link
Two Annual Forums (March and September 2012) with about 200 participants were held
» Link to news article on Annual Forums (Chinese)
» Link to NACTC China (Chinese)

Central European University, Hungary in cooperation with Integrity Action - Making Integrity Work, United Kingdom
Two pilot courses on micro- and macro-level factors influencing business integrity were launched as part of the MBA curriculum » Link
Annual Integrity Summer School was held in Budapest with 52 participants from 25 countries » Link

83 academics from 73 partner universities were trained in 4 curriculum development workshops in Georgia, Kyrgyzstan, Russia and Armenia by Integrity Action
» Link to CEU Hungary
» Link to Global Classroom online library

CARECO (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry), Belgium
A Code of Conduct brochure was developed in five languages. Copies were printed and distributed at the ADVANCED conference and to CARECO Corporate Members (1,050 copies). Expanded Q&As were published » Link to Code of Conduct brochure » Link to Q&As
Training material and an online training tool were developed » Link

In addition to this report, Siemens published information on its activities in this field in its comprehensive Annual Report ([www.siemens.com/financialreports](http://www.siemens.com/financialreports)) at the end of the fiscal year as well as in its Sustainability Report ([www.siemens.com/sustainability-report](http://www.siemens.com/sustainability-report)).

This report has been compiled to the best of our knowledge and includes information which has been submitted to the Siemens Integrity Initiative Project Office till March 4, 2013.

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