Global Compact Ten Principles Applied in Infrastructure Sectors under the Belt and Road Initiative (BRI) — A Practical Guide for Private Sector Players: Anti-corruption Principle
PURPOSE OF THE PUBLICATION AND ACKNOWLEDGEMENTS

This Publication is an output of the UN Peace and Development Trust Funds (UNPDF) supported project (PDF-SDG-2021-8): Implementing 2030 Agenda through UNGC Action Platform on Sustainable Infrastructure for the Belt and Road Initiative to Accelerate the Sustainable Development Goals.

In his remarks at the 2nd Belt and Road Forum for International Cooperation in 2019, the Secretary-General of the United Nations Mr. Antonio Guterres emphasized, “The five pillars of the Belt and Road — policy coordination, facilities connectivity, unimpeded trade, financial integration and people-to-people exchanges — are intrinsically linked to the 17 Sustainable Development Goals.” And “the world will benefit from a Belt and Road Initiative that accelerates efforts to achieve the Sustainable Development Goals (SDGs).”

In the Joint Communique of the Leaders’ Roundtable of the 2nd Belt and Road Forum for International Cooperation, nearly 40 heads of states said: “In the interest of sustainability, we support improving cooperation in project preparation and implementation, to promote projects that are investable, bankable, economically viable and environment-friendly. We call on all market players in the Belt and Road cooperation to fulfill their corporate social responsibility and follow the principles of UN Global Compact.

Supported by the UN Peace and Development Trust Fund (UNPDF), the UN Global Compact has developed its Ten Principles Guide, with the objective of engaging private sector players that participated in infrastructure projects under the Belt and Road Initiative to align their operations with the principles of the Global Compact and ensure that people and the planet prosper as a result of responsible business conduct that realizes the private sector’s greatest potential to accelerate the SDGs.

We would like to thank the following UN agencies, think tanks, organizations and individuals for their invaluable contribution to the development of the Guide:

- The United Nations Development Programme (UNDP)
- The United Nations Children’s Fund (UNICEF)
- UN Women
- International Labour Organization (ILO)
- The United Nations Resident Coordinator’s Office in China

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Sustainable Infrastructure is Key to Sustainable Future

In our interconnected world, where the pace of change is swift and the challenges multifaceted, the infrastructure sector stands as both a reflection of our aspirations and a foundation for our shared future. In particular, the infrastructure sector, when viewed through the lens of sustainable development, reveals a landscape of opportunities and challenges because we have the chance to create projects that respect our planet, uplift communities and operate with unparalleled integrity.

The United Nations Global Compact is the world’s largest corporate sustainability initiative. Our ambition is to accelerate and scale the global collective impact of business by upholding the Ten Principles and delivering the Sustainable Development Goals through accountable companies and ecosystems that enable change. In this regard, the Ten Principles of the UN Global Compact can enrich this landscape by providing actionable insights and best practices that transform infrastructure from mere physical constructs to holistic, sustainable endeavors.

The report, "Global Compact Ten Principles Applied in Infrastructure Sectors under the BRI: A Practical Guide for Private Sector Players", offers a profound exploration into the transformative potential and responsibilities inherent in infrastructure development. As we navigate the complexities of global infrastructure development, this guide serves as a beacon, illuminating the path towards responsible and sustainable practices.

The guide relates the harmonious integration of the Ten Principles of the UN Global Compact to the infrastructure sector. It charts a course for businesses and stakeholders, emphasising the need for infrastructure projects that are not only economically robust but also ethically impeccable, environmentally conscious and socially beneficial, including when it comes to jobs.

As the Belt and Road Initiative (BRI) scales across continents, the importance of embracing these principles cannot be overstated. They can ensure that the BRI’s legacy is sustainable growth, inclusivity and global cooperation.

The depth and breadth of this guide is indicative of the collaborative spirit generated during its compilation. Drawing from diverse case studies, expert insights and practical recommendations, the guide paints a picture of what responsible infrastructure development can and should look like. I am deeply grateful to the authors, contributors and the myriad of stakeholders who have lent their voices and expertise to this endeavor. Their collective wisdom not only enriches this guide but also underscores the pivotal role the infrastructure sector plays in our global sustainability journey.

Furthermore, as we stand at the crossroads of unprecedented technological advancements and pressing global challenges, from climate change to socio-economic disparities, this guide should be seen as a compass, pointing us towards a future where every project is a prime example of sustainability, inclusivity and ethical excellence.

This is also a call to action demanding that private sector players, policymakers and communities embrace a holistic and forward-thinking approach to infrastructure. It calls for an approach that not only seeks to build physical structures but also to foster community growth, protect our planet and uphold the highest standards of governance and transparency.

In closing, this is a vision of a world where every infrastructure project, big or small, is demonstrated proof of our shared values and commitment to a better future. It is also an invitation to all of us to be architects of that future, building not just for today but for the next generations.

With hope and determination,

Sanda Ojiambo
Assistant Secretary-General & CEO
United Nations Global Compact
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UN GLOBAL COMPACT PRINCIPLE TEN: ANTI-CORRUPTION

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Businesses should work against corruption in all its forms, including extortion and bribery.
1 CONCEPT AND KEY REFERENCES

1.1 CORRUPTION’S DEFINITION

During the United Nations Convention against Corruption (UNCAC) negotiations, United Nations Member States carefully considered the opportunity for the global anti-corruption treaty to provide a legal definition of corruption. Concluding that any attempt at a comprehensive definition inevitably would fail to address some relevant forms of corrupt behavior, the international community reached a global consensus on several common manifestations of corruption while leaving each State free to go beyond the minimum standards outlined in the Convention. The Convention calls for ratifying States to outlaw, at a minimum, bribery of public officials; embezzlement, trading in influence, abuse of function, and illicit enrichment by public officials; and bribery and embezzlement in the private sector, as well as money-laundering and obstruction of justice. These corrupt actions are spelled out under the chapter of the Convention devoted to criminalization and law enforcement, denoting that corruption is a notion wider than bribery and extortion—is a crime. Following this approach, the UN Global Compact’s Tenth Principle calls for companies to work against corruption in all forms, including extortion and bribery. On the other hand, according to the World Bank’s definition: “Corruption—the abuse of public office for private gain—covers a wide range of behavior, from bribery to theft of public funds.” Transparency International defines corruption as “the abuse of entrusted power for private gain.”

A corrupt practice is the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.

Example: A company is awarded Bank-financed contracts from governments in exchange for a bribe or kickbacks. Kickbacks generally occur when a company that is awarded a contract “kicks back” money to the ministry official(s) who steered the award of the contract to that company. Typically, the kickback is a percentage of the value of the contract and, in countries with systemic corruption, the percentage is built into the cost that all bidders consider when bidding on contracts. In most cases, the money paid in bribes or kickbacks is extracted from the project financing, decreasing development impact.
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The World Bank’s Anti-Corruption Guidelines and Sanctions Reform: page 6

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1.2 CORRUPTION'S SCOPE

1.2.1 Subject

According to the UN Convention against Corruption, the subjects of corruption include "public officials," "foreign public officials," and "officials of public international organizations."

**UN Convention Against Corruption, Chapter 1, Article 2.**

For the purpose of this Convention:

(a) "Public official" shall mean: (i) any person holding a legislative, executive, administrative or judicial office of a State Party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority; (ii) any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party; (iii) any other person defined as a "public official" in the domestic law of a State Party. However, for the purpose of some specific measures contained in Chapter II of this Convention, "public official" may mean any person who performs a public function or provides a public service as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party;

(b) "Foreign public official" shall mean any person holding a legislative, executive, administrative or judicial office of a foreign country, whether appointed or elected;

(c) "Official of a public international organization" shall mean an international civil servant or any person who is authorized by such an organization to act on behalf of that organization.

Of course, corruption also affects the private sector.

**UN Convention Against Corruption, Chapter 2, Article 12.**

1. Each State Party shall take measures, in accordance with the fundamental principles of its domestic law, to prevent corruption involving the private sector, enhance accounting and auditing standards in the private sector, and, where appropriate, provide effective, proportionate, and dissuasive civil, administrative or criminal penalties for failure to comply with such measures.

1.2.2 Behavior

Corruption takes many different forms, and there is no specific form. The degree of impact varies widely from one type of corruption to another. Corruption generally includes bribery, extortion or solicitation, trading in influence, money laundering, etc.

**ICC Rules on Combating Corruption, Part I**

**Article 1 Prohibited Practices, p5**

Enterprises will prohibit the following practices at all times and in any form, in relation with:

- a public official at the international, national, or local level,
- a political party, party official or candidate to political office, and
- a director, officer, or employee of an Enterprise.

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Whether these practices are engaged in directly or indirectly, including through Third Parties:

**Bribery** is the offering, promising, giving, authorizing, or accepting of any undue pecuniary or other advantages to, by or for any of the persons listed above or for anyone else to obtain or retain a business or other improper advantage, e.g. in connection with public or private procurement contract awards, regulatory permits, taxation, customs, judicial and legislative proceedings.

Bribery often includes (i) kicking back a portion of a contract payment to government or party officials or to employees of the other contracting party, their close relatives, friends, or Business Partners or (ii) using intermediaries such as agents, subcontractors, consultants or other Third Parties, to channel payments to government or party officials, or employees of the other contracting party, their relatives, friends or Business Partners.

**Extortion or Solicitation** is the demanding of a bribe, whether or not coupled with a threat if the demand is refused. Enterprises will oppose any attempt of extortion or solicitation and are encouraged to report such attempts through available formal or informal reporting mechanisms unless such reporting is deemed to be counter-productive under the circumstances.

**Trading in Influence** is the offering or solicitation of an undue advantage to exert an improper, real, or supposed influence, with a view of obtaining from a public official an undue advantage for the original instigator of the act or for any other person.

**Laundering the proceeds** of the corrupt practices mentioned above is the concealing or disguising of the illicit origin, source, location, disposition, movement, or ownership of property, knowing that such property is the proceeds of crime.

"Corruption" or "Corrupt Practice(s)" as used in these Rules shall include Bribery, Extortion or Solicitation, Trading in Influence, and Laundering of the proceeds of these practices.

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**Article 2 Third Parties, p8**

With respect to Third Parties subject to the control or determining influence of the Enterprise, including but not limited to agents, business development consultants, sales representatives, customs agents, general consultants, resellers, subcontractors, franchisees, lawyers, accountants or similar intermediaries, acting on the Enterprise’s behalf in connection with marketing or sales, the negotiation of contracts, the obtaining of licenses, permits or other authorizations, or any actions that benefit the Enterprise or its subcontractors in the supply chain, Enterprises should:

1. instruct them neither to engage nor to tolerate that they engage in any act of corruption.
2. not use them as a conduit for any corrupt practice;
3. hire them only to the extent appropriate for the regular conduct of the Enterprise’s business; and
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In recent years, anti-corruption has been widely valued by governments around the world. Currently, there are many legal regulations and rules dealing with anti-corruption. Some of the most influential anti-corruption documents in the international arena are listed in the table below.

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2.1 KEY NORMS AND STANDARDS

Many international norms contain relevant anti-corruption rules. Some of the key norms are listed in the following tables:

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2 KEY STANDARDS AND IMPLICATIONS FOR BUSINESSES

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2. Each Party shall take any measures necessary to establish that complicity in, including incitement, aiding and abetting, or authorization of an act of bribery of a foreign public official shall be a criminal offense. Attempt and conspiracy to bribe a foreign public official shall be criminal offenses to the same extent as attempt and conspiracy to bribe a public official of that Party. |
| **Article 7**                                                                           | Each Party which has made bribery of its own public official a predicate offense for the purpose of the application of its money laundering legislation shall do so on the same terms for the bribery of a foreign public official without regard to the place where the bribery occurred. |
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2. Each Party shall provide effective, proportionate, and dissuasive civil, administrative, or criminal penalties for such omissions and falsifications in respect of the books, records, accounts, and financial statements of such companies. |

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Enterprises should not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantages. Enterprises should also resist the solicitation of bribes and extortion. In particular, enterprises should:

1. Not offer, promise, or give undue pecuniary or other advantages to public officials or the employees of business partners. Likewise, enterprises should not request, agree to, or accept undue pecuniary or other advantages from public officials or the employees of business partners. Enterprises should not use third parties such as agents and other intermediaries, consultants, representatives, distributors, consortia, contractors and suppliers, and joint venture partners for channeling undue pecuniary or other advantages to public officials, or to employees of their business partners or their relatives or business associates.

2. Develop and adopt adequate internal controls, ethics, and compliance programmes or measures for preventing and detecting bribery, developed on the basis of a risk assessment addressing the individual circumstances of an enterprise, in particular the bribery risks facing the enterprise (such as its geographical and industrial sector of operation). These internal controls, ethics, and compliance programs or measures should include a system of financial and accounting procedures, including a system of internal controls, reasonably designed to ensure the maintenance of fair and accurate books, records, and accounts to ensure that they cannot be used for the purpose of bribing or hiding bribery. Such individual circumstances and bribery risks should be regularly monitored and re-assessed as necessary to ensure the enterprise’s internal controls, ethics, and compliance program or measures are adapted and continue to be effective and to mitigate the risk of enterprises becoming complicit in bribery, bribe solicitation, and extortion.

3. Prohibit or discourage, in internal company controls, ethics, and compliance programs or measures, the use of small facilitation payments, which are generally illegal in the countries where they are made, and, when such payments are made, accurately record these in books and financial records.

4. Ensure, taking into account the particular bribery risks facing the enterprise, properly documented due diligence pertaining to the hiring, as well as the appropriate and regular oversight of agents, and that the remuneration of agents is appropriate and for legitimate services only. Where relevant, a list of agents engaged in connection with transactions with public bodies and State-owned enterprises should be kept and made available to competent authorities, in accordance with applicable public disclosure requirements.

5. Enhance the transparency of their activities in the fight against bribery, bribe solicitation, and extortion. Measures could include making public commitments against bribery, bribe solicitation, and extortion and disclosing the management systems and the internal controls, ethics, and compliance programs or measures adopted by enterprises in order to honor these commitments. Enterprises should also foster openness and dialogue with the public so as to promote its awareness of and cooperation with the fight against bribery, bribe solicitation, and extortion.

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<sup>18</sup> https://www.iso.org/iso-37001-anti-bribery-management.html
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This document is applicable only to bribery. It sets out requirements and provides guidance for a management system designed to help an organization prevent, detect, and respond to bribery and comply with anti-bribery laws and voluntary commitments applicable to its activities.

This document does not specifically address fraud, cartels, and other anti-trust/competition offenses, money laundering, or other activities related to corrupt practices, although an organization can choose to extend the scope of the management system to include such activities.

3 Terms and definitions

3.1 Bribery
Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance (3.16) of that person’s duties.

4.1 Understanding the organization and its context
The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the objectives of its anti-bribery management system. These issues will include, without limitation, the following factors:

a. the size, structure, and delegated decision-making authority of the organization;
b. the locations and sectors in which the organization operates or anticipates operating;
c. the nature, scale, and complexity of the organization’s activities and operations;
d. the organization’s business model;
e. the entities over which the organization has control and entities which exercise control over the organization;
f. the organization’s business associates;
g. the nature and extent of interactions with public officials;
h. applicable statutory, regulatory, contractual, and professional obligations and duties.

4.5 Bribery risk assessment

4.5.1 The organization shall undertake regular bribery risk assessment(s), which shall:

a) identify the bribery risks the organization might reasonably anticipate, given the factors listed in 4.1;
b) analyze, assess, and prioritize the identified bribery risks;
c) evaluate the suitability and effectiveness of the organization’s existing controls to mitigate the assessed bribery risks.

4.5.2 The organization shall establish criteria for evaluating its level of bribery risk, which shall take into account the organization’s policies and objectives.

4.5.3 The bribery risk assessment shall be reviewed:

a) on a regular basis so that changes and new information can be properly assessed based on timing and frequency defined by the organization;
b) in the event of a significant change to the structure or activities of the organization.

4.5.4 The organization shall retain documented information that demonstrates that the bribery risk assessment has been conducted and used to design or improve the anti-bribery management system.
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3 Terms and definitions

3.1 Bribery

Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance (3.16) of that person’s duties.

4 Understanding the organization and its context

The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the objectives of its anti-bribery management system. These issues will include, without limitation, the following factors:

a. the size, structure, and delegated decision-making authority of the organization;
b. the locations and sectors in which the organization operates or anticipates operating;
c. the nature, scale, and complexity of the organization’s activities and operations;
d. the organization’s business model;
e. the entities over which the organization has control and entities which exercise control over the organization;
f. the organization’s business associates;
g. the nature and extent of interactions with public officials;
h. applicable statutory, regulatory, contractual, and professional obligations and duties.

4.5 Bribery risk assessment

4.5.1 The organization shall undertake regular bribery risk assessment(s), which shall:

a) identify the bribery risks the organization might reasonably anticipate, given the factors listed in 4.1;
b) analyze, assess, and prioritize the identified bribery risks;
c) evaluate the suitability and effectiveness of the organization’s existing controls to mitigate the assessed bribery risks.

4.5.2 The organization shall establish criteria for evaluating its level of bribery risk, which shall take into account the organization’s policies and objectives.

4.5.3 The bribery risk assessment shall be reviewed:

a) on a regular basis so that changes and new information can be properly assessed based on timing and frequency defined by the organization;
b) in the event of a significant change to the structure or activities of the organization.

4.5.4 The organization shall retain documented information that demonstrates that the bribery risk assessment has been conducted and used to design or improve the anti-bribery management system.
One of the objectives of this document is to assist organizations in developing and spreading a positive culture of compliance, considering that effective and sound management of compliance-related risks should be regarded as an opportunity to pursue and take due to the several benefits that it provides to the organization such as:
- improving business opportunities and sustainability;
- protecting and enhancing an organization’s reputation and credibility;
- taking into account the expectations of interested parties;
- demonstrating an organization’s commitment to managing its compliance risks effectively and efficiently;
- increasing the confidence of third parties in the organization’s capacity to achieve sustained success;
- minimizing the risk of a contravention occurring with the attendant costs and reputational damage.

This document specifies requirements as well as provides guidance on compliance management systems and recommended practices. The requirements and the guidance in this document are intended to be adaptable. Implementation can differ depending on the size and maturity of an organization’s compliance management system and the context, nature, and complexity of the organization’s activities and objectives. This document is appropriate for enhancing compliance-related requirements in other management systems and assisting an organization in enhancing the management of all its compliance obligations.

4 Context of the organization
4.1 Understanding the organization and its context

The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its compliance management system.
For this purpose, the organization shall consider a broad range of issues, including, but not limited to:
- the business model, including strategy, nature, size and scale complexity, and sustainability of the organization's activities and operations;
- the nature and scope of business relations with third parties;
- the legal and regulatory context;
- the economic situation;
- social, cultural, and environmental contexts;
- internal structures, policies, processes, procedures, and resources, including technology;
- its compliance culture.

5 Leadership
5.3 Roles, responsibilities, and authorities
5.3.3 Management
Management shall be responsible for compliance within its area of responsibility by:
- cooperating with and supporting the compliance function and encouraging personnel to do the same;
- ensuring that all personnel within their control are complying with the organization's compliance obligations, policies, processes, and procedures;
- identifying and communicating compliance risks in their operations;
- integrating compliance obligations into existing business practices and procedures in their areas of responsibility;
- attending and supporting compliance training activities;
- developing personnel awareness of compliance obligations and directing them to meet training and competence requirements;
- encouraging their personnel to raise compliance concerns and supporting them and precluding any form of retaliation;
- actively participating in the management and resolution of compliance-related incidents and issues as required;
- ensuring that, once the need for corrective action is identified, appropriate corrective action is recommended and implemented.

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<th>Standards/Organizations</th>
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2.2 IMPLICATIONS FOR BUSINESSES

Why should companies care?

There are many reasons why eliminating corruption has become a priority within the business community. Recent waves of global business ethics scandals have undermined investor, customer, employee, and public confidence and faith in business. Companies are learning the hard way that they can be held responsible for not paying enough attention to the actions of their employees, associated companies, business partners, and agents. The rapid development of corporate governance rules worldwide also prompts companies to focus on anti-corruption measures as part of their mechanisms to express corporate sustainability and protect their reputations and stakeholders’ interests. Their anti-corruption systems are increasingly being extended to a range of ethics and integrity issues, and a growing number of investment managers are looking to these systems as evidence that the companies undertake good and well-managed business practices. Businesses face high ethical and business risks and potential costs when they fail to combat corruption in all its forms effectively. Large and small companies are vulnerable to corruption, and the potential for damage is considerable. Businesses can face:

- Legal risks: Not only are most forms of corruption illegal where they occur, but it is also increasingly becoming illegal in a company’s home country to engage in corrupt practices in another country;
- Reputational risks: Companies whose policies and practices fail to meet high ethical standards or take a relaxed attitude toward compliance with laws are exposed to serious reputational risks. Often, it is enough to be accused of malpractice for a company’s reputation to be damaged, even if a court subsequently determines the contrary;
- Financial costs: There is clear evidence that many countries lose close to USD 1 trillion due to fraud, corruption, and shady business transactions, and in some instances, corruption can cost a country up to 17 percent of its GDP, according to the UN Development Program in 2014. This undermines business performance and diverts public resources from legitimate, sustainable development;
- Erosion of internal trust and confidence as unethical behavior damages staff loyalty to the company as well as the overall ethical culture of the company.

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3 COMMON CORRUPTION PROBLEMS IN INFRASTRUCTURE BUSINESSES

Engineering projects encompass various stages, including approval, planning, bidding, construction, quality supervision, and acceptance assessment. Due to their extensive transaction chains, significant investments, and high-stakes relationships, corruption issues are prone to emerge. Corruption tends to concentrate in power-intensive positions such as project bidding and approval, encompassing external project undertakings, subcontracting, construction, and procurement.

For instance, some companies employ various overt or covert tactics to engage in public relations activities from the project’s outset, aiming to secure project opportunities. During the bidding process, illegal and irregular practices, such as bid-rigging, collusion, leakage of confidential information, preselection of contractors, and subletting of projects, occur sporadically. Certain companies privately modify engineering designs in the construction phase by lobbying construction unit officials, thereby inflating the scope of additional work to maximize profits. Additionally, some construction firms bribe construction unit officials and project supervisors to falsely claim the use of special materials or the adoption of new technologies to meet elevated environmental and safety standards, leading to higher settlement costs. Certain companies resort to bribery in the quality supervision stage to manipulate construction units, supervision entities, and quality inspection agencies, allowing for shoddy workmanship and substandard materials.

In practical anti-corruption management, expecting enterprises to adopt identical anti-corruption measures is impractical. Instead, enterprises should develop suitable policies, principles, and methods under their specific risks and circumstances. This guide emphasizes the United Nations Global Compact’s anti-corruption management recommendations and provides detailed explanations. Additionally, we present a range of real-life cases from which companies can draw inspiration.
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4 MANAGEMENT PRACTICE RECOMMENDATIONS

In the "Business Against Corruption - A Framework for Action," the UN Global Compact proposed an excellent model for anti-corruption management. The model consists of six specific practical steps: Commit, Assess, Define, Implement, Measure, and Communicate. The core idea of the management model is not linear but circular. Specifically, the model emphasizes that companies should constantly cycle through the six steps in the anti-corruption process and update them. In addition, the UN Global Compact advocates collective action.

Note: This picture is from Business Against Corruption - A Framework for Action, p.9

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4.1 COMMIT

As with most management challenges a company faces, transparent leadership is essential if a company is to ensure that it and its agents are not engaging in corrupt practices. The support and commitment of senior management, or "tone from the top," is an essential determinant of the organizational culture. The "tone from the top" influences the norms and values by which the company operates and to which all employees and relevant business partners are expected to adhere. The "tone from the top" is set by the company’s senior management, such as its owner(s), Chief Executive Officers, the Board of Directors, or an equivalent body.

The "tone from the top" should demonstrate ownership of the anti-corruption program. This implies that senior management regards the prevention of corruption as its own responsibility.

The "tone from the top" should reflect irrevocable support and appraisal of the company’s fundamental values, such as integrity, transparency, and accountability. Senior management must express unequivocally that corruption is not accepted as part of this. Putting this into practice, the commitment of senior management to prevent corruption must include the following two significant elements:

- Public policy on zero-tolerance of corruption.
- Development and implementation of an anti-corruption program.

Senior management must clarify that all forms of corruption are forbidden, regardless of how tiny or huge, direct or indirect, active or passive it may be. A formal statement on zero-tolerance of corruption should publicly document the prohibition. It should be emphasized during internal and external events (e.g., employee training, shareholder meetings, conferences).

An effective anti-corruption program must support the overall statement and be comprised of detailed policies and procedures. Support and commitment from senior management must not be seen as a one-off activity when launching an anti-corruption program. Support and commitment are rather an ongoing demonstration of the company’s norms and values.

It is vital that the top management not send mixed signals: On one hand, to urge company managers and representatives to apply stringent codes and high standards, while on the other, to make it clear that these codes are open for interpretation, often regarding the importance of adapting business practices to the local environment. Thus, the first step any company should take in fighting corruption is to have leadership commitments to zero tolerance of bribery and to mainstream anti-corruption policies into its everyday operations, doing so in a transparent way. Companies should make sure that their internal governance mechanisms are transparent and provide oversight of anti-corruption initiatives.

Moreover, the company needs to integrate compliance content, including anti-corruption measures, into the core of its corporate culture, not only to foster a culture of compliance but also to foster a culture of integrity (going beyond what is "legal" to do what is "right"). This corporate culture is instrumental in instilling values of lawful conduct and integrity among employees, enhancing compliance awareness, and promoting self-

regulation. Ultimately, it cultivates a positive cultural atmosphere of compliance while creating a harmonious and favorable internal and external environment for the enterprise.

An enterprise’s unequivocal and public commitment to zero tolerance for bribery and corruption is the bedrock for all anti-corruption regulations and the foundation upon which anti-corruption activities can be sustained. This commitment sends a strong message that bribery and corruption will not be tolerated within the organization, creating a clear stance against such practices and reinforcing the importance of ethical conduct.

Case 1: Zero Tolerance for Corruption Is the Cornerstone of All Action Against Corruption

The case raw materials are from: The Bamburi Cement Sustainability Report 2021**: Excerpt, p. 105

Companies should publicly proclaim their unwavering commitment to zero tolerance for bribery and corruption. This commitment serves as the foundation for all anti-corruption regulations and forms the cornerstone upon which sustainable anti-corruption activities can be built. Bamburi Cement exemplifies this stance in its sustainability report:

"Bamburi Cement maintains a zero-tolerance stance on bribery and corruption. This includes conflicts of interest, donations, gifts, hospitality, government interactions, and recognizing red flags when dealing with Third Parties. In terms of government engagements, our policy includes best practices, specific guidelines, and tools for managing relationships with government entities and officials. Simultaneously, this zero-tolerance approach should not be limited to addressing bribery and corruption solely within the company. It should also emphasize that all suppliers to the company must comply with relevant anti-corruption laws and regulations. Bamburi Cement highlights this requirement: “All our suppliers are expected to adhere to applicable anti-corruption laws and regulations. In addition, we maintain a zero-tolerance policy towards any form of bribery, extortion, solicitation, and embezzlement. Specifically, suppliers and their extended supply chain are prohibited from offering bribes or engaging in any other form of inducement (such as kickbacks, facilitation payments, excessive gifts, hospitality, grants, or donations) in their business dealings with customers, suppliers, public officials, and any other stakeholders. Suppliers are expected to conduct all business dealings transparently and accurately record them in their business books and records.”

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Broadly defined, anti-corruption risk assessment involves a variety of mechanisms used by companies to estimate the possibility of specific types of corruption within the firm and in external relationships, as well as the impact such corruption may have. Effective risk assessment means understanding the enterprise. It means asking questions broadly, understanding the environments in which it operates, and understanding who the enterprise is dealing with in both the public and private sectors. It also means understanding how various anti-corruption programs and controls are working in the enterprise and their effect on risks. Only then can the enterprise direct compliance resources to their best use.26

However, identifying third-party corruption risks can often be challenging. Here are several recommendations to address these risks:

First, due diligence should encompass detailed and specific criteria. Conducting thorough due diligence on the creditworthiness of Third Parties before entering into cooperative agreements is crucial. Due diligence procedures should be tailored to the industry and specific circumstances of the enterprise to assess and flag the risk level of third parties accurately.

Second, due diligence should be conducted early in the process. Business personnel should initiate contact with potential Third Parties through appropriate and legitimate channels, gathering necessary information during the preliminary stages of business exchanges.

Third, enterprises should enhance the terms and conditions of agreements signed with Third Parties. Include anti-corruption clauses in the contract to ensure Third Parties avoid engaging in commercial bribery during cooperation.

Fourth, establish a proactive risk monitoring and early warning mechanism utilizing advanced compliance management tools or platforms. Compliance managers should continuously monitor and assess changes in Third Parties' risk profiles and reputations.

Fifth, companies should bolster their internal risk control systems. This includes implementing guidelines for conducting due diligence on Third Parties, identifying areas prone to corruption risks, establishing corresponding review processes, ensuring compliance with financial record-keeping requirements, and monitoring fund flows in association with Third Parties throughout the entire process.

Sixth, companies should consider training programs for Third Parties. Companies should regularly monitor and promote adherence to compliance terms and conditions among all Third-Party entities.

4.2 ASSESS

With a firm commitment to fighting corruption in hand, companies should assess the risks and opportunities—in financial and extra-financial terms—found in enforcing strict anti-corruption measures and the impact of their operations on the fight against corruption and vice versa. By understanding the risks and context in which they operate, companies can gain a more comprehensive view of the problem’s scope and the areas of most significant concern and importance, thus setting high but realistic goals achievable over a certain period. Companies should perpetually reassess their activities as circumstances evolve and policies and procedures are proven successful (or unsuccessful). As a company identifies its risks, it may find areas of operation that, if improved, can create shareholder and stakeholder value. When dealing with corruption, this may be readily apparent: Through its elimination, not only does a company avoid legal, reputational, and other risks, but the company also retains morale and capital, increasing the potential for efficient production. Finally, by assessing the impact of its operations and the impact of corruption on its operations, a company can answer questions posed by stakeholders and calculate the areas of high risk that should be addressed first. Companies are encouraged to look at the Communication on Progress and other sustainability reports of competitors to help determine the best ways to benchmark their performance.27


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Case 2: Companies Should Identify Risk Areas for Corrupt Activities
The Case Raw Materials Are from: The Skanska Group Anti-Corruption Policy

Companies should provide comprehensive and detailed information on specific risk areas associated with corruption, enabling precise management and effective prevention of corrupt activities. This approach aligns with various anti-corruption regulations, including those based on the United Nations Convention against Corruption. Skanska Group, for instance, exemplifies this by defining specific risk areas for corrupt activities in its anti-corruption policy. These areas encompass: 1. Conflicts of interest; 2. Suppliers; 3. Intermediaries; 4. Joint venture partners; 5. Sellers of land and buyers of tangible assets; 6. Applying for or taking over permits; 7. Hospitality and gifts; 8. Facilitation payments; 9. Political contributions; 10. Charitable contributions; 11. Community investment and sponsorship; 12. Hiring relatives of public officials and foreign public officials. Elaborating on these risk areas enables company employees and partners to comply with ethical and legal requirements and avoid conflicts of interest, bribery, and other misconduct. It safeguards the company’s reputation and brand image while ensuring the integrity and transparency of business operations.

Case 3: Companies Should Continuously Improve Their Risk Management System
The Case Raw Materials Are from: ENKA Sustainability Report 2022

Companies should establish and continually enhance a risk management system that aligns with their development stage. This system should encompass various company departments, processes, and platforms. The approach taken by ENKA serves as a prime example:

ENKA implements a range of fundamental control mechanisms, including corporate departments, management systems, process control procedures, and dedicated software for process management. Additionally, ENKA conducts regular audits of its projects and subsidiaries, both by its internal audit team and by the internal audit teams within each subsidiary. Comprehensive audits are carried out annually, covering policy and performance-based process control, financial statements and reports, cost control, compliance with local and international laws, anti-bribery and anti-corruption measures, adherence to social and human rights standards, occupational health and safety, environmental management, and quality assurance. These audits are conducted by experienced internal audit teams under International Standards on Auditing, and the findings are reported to senior management. Immediate corrective actions are taken to address any identified non-conformities.

By establishing such an integrated risk management structure and mechanism, companies enhance their ability to identify and control corruption risks and effectively combat corrupt activities. Ultimately, this contributes to the company’s sustainable development and growth.

Case 4: Companies Should Be Good at Using the Power of Technology
The Case Raw Materials Are from: Trafigura Group Sustainability Report 2022

Companies should leverage the power of technology to continuously enhance their risk identification and assessment methods and strengthen their ability to review and monitor risks. An excellent example is Trafigura, which has effectively utilized technology to improve its due diligence processes for counterparties. Trafigura has implemented an automated Know Your Counterparty (KYC) onboarding and monitoring system, which has streamlined the review and identification of high-risk counterparties. Trafigura has achieved end-to-end automation for many new counterparty trading relationships by automating standard due diligence procedures. In 2022, Trafigura conducted 9,229 KYC checks, resulting in the initial decline of 1,733 counterparties (18.6 percent). Further review and communication with the relevant counterparties ultimately led to the refusal of 685 counterparties (7.4 percent), while approving 8,544 counterparties (92.6 percent).

Furthermore, companies can apply technology tools to other business areas in addition to counterparties’ due diligence. For instance, Trafigura has implemented an automated screening system for its vessel monitoring program. Utilizing PurpleTRAC, a specialized and market-leading vessel screening service, Trafigura screened 26,417 vessels in 2022 (compared to 22,382 in 2021). The automated screening system enables prompt and accurate identification of potential issues, reducing the occurrence of human errors in the screening process. Trafigura’s Compliance Department further reviews approximately 10 percent of vessels flagged by the system.

By leveraging new technologies to strengthen compliance management, companies demonstrate their commitment to anti-corruption measures. This approach ensures regulatory compliance and adherence to norms while reducing the company’s risk of corruption.

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Case 3: Companies Should Continuously Improve Their Risk Management System
The Case Raw Materials Are from: ENKA Sustainability Report 2022
Companies should establish and continually enhance a risk management system that aligns with their development stage. This system should encompass various company departments, processes, and platforms. The approach taken by ENKA serves as a prime example:

ENKA implements a range of fundamental control mechanisms, including corporate departments, management systems, process control, procedures, and dedicated software for process management. Additionally, ENKA conducts regular audits of its projects and subsidiaries, both by its internal audit team and by the internal audit teams within each subsidiary. Comprehensive audits are carried out annually, covering policy and performance-based process control, financial statements and reports, cost control, compliance with local and international laws, anti-bribery and anti-corruption measures, adherence to social and human rights standards, occupational health and safety, environmental management, and quality assurance. These audits are conducted by experienced internal audit teams under International Standards on Auditing, and the findings are reported to senior management. Immediate corrective actions are taken to address any identified non-conformities.

By establishing such an integrated risk management structure and mechanism, companies enhance their ability to identify and control corruption risks and effectively combat corrupt activities. Ultimately, this contributes to the company’s sustainable development and growth.

Case 4: Companies Should Be Good at Using the Power of Technology
The Case Raw Materials Are from: Trafigura Group Sustainability Report 2022
Companies should leverage the power of technology to continuously enhance their risk identification and assessment methods and strengthen their ability to review and monitor risks. An excellent example is Trafigura, which has effectively utilized technology to improve its due diligence processes for counterparties.

Trafigura has implemented an automated Know Your Counterparty (KYC) onboarding and monitoring system, which has streamlined the review and identification of high-risk counterparties. Trafigura has achieved end-to-end automation for many new counterparty trading relationships by automating standard due diligence procedures. In 2022, Trafigura conducted 9,229 KYC checks, resulting in the initial decline of 1,733 counterparties (18.6 percent). Further review and communication with the relevant counterparts ultimately led to the refusal of 685 counterparties (7.4 percent), while approving 8,544 counterparties (92.8 percent).

Furthermore, companies can apply technology tools to other business areas in addition to counterparties’ due diligence. For instance, Trafigura has implemented an automated screening system for its vessel monitoring program. Utilizing PurpleTRAC, a specialized and market-leading vessel screening service, Trafigura screened 25,417 vessels in 2022 (compared to 22,382 in 2021). The automated screening system enables prompt and accurate identification of potential issues, reducing the occurrence of human errors in the screening process. Trafigura’s Compliance Department further reviews approximately 10 percent of vessels flagged by the system.

By leveraging new technologies to strengthen compliance management, companies demonstrate their commitment to anti-corruption measures. This approach ensures regulatory compliance and adherence to norms while reducing the company’s risk of corruption.
4.3 DEFINE

Once a company comprehensively understands its context, it should set high but realistic goals to adhere to the Tenth Principle against Corruption, address risks, and pursue opportunities. Once a company has defined its goals, it should construct and adopt strategies and policies to achieve them. Such policies may include an ethics code aimed at capturing the values that underpin an organization, and they should be applied to all relevant business practices. Voluntary compliance with internal regulations of business principles and ethics and with external guidelines such as the Business Principles for Countering Bribery, which were developed by a multi-stakeholder approach led by Transparency International, and the Tenth Principle of the UN Global Compact, has the added effect of strengthening day-to-day compliance with law and regulation. When companies set and reinforce high standards of behavior as the norm, incidents of non-compliance are reduced and are easier to identify and correct.\(^\text{10}\)

Anti-corruption is a crucial objective in establishing a comprehensive compliance framework within a company. Building a robust anti-corruption system entails developing and enhancing the overall compliance management system, which can be divided into three levels:

1. **Policy guidelines for compliance**: The compliance code of conduct is the fundamental and essential compliance system, forming the basis and framework for other compliance systems. It encompasses various aspects such as legal compliance, honesty and integrity, lawful tax payment, fair competition, prevention of bribery and corruption, conflict of interest avoidance, protection of corporate assets, and information security. These guidelines are essential for establishing standardized requirements and control processes from the very beginning.

2. **Systematic compliance management systems**: Specific compliance management systems should be developed to address particular topics or risk areas applicable to all employees, departments, and Third Parties involved in the company’s operations. These systems provide detailed guiding principles and standards for key compliance risk areas in the company’s day-to-day activities. Examples include policies on gifts and invitations, whistleblower management and internal investigations, human resources compliance, and sponsorship and donations. It is also essential for companies to develop industry- or region-specific compliance management systems that address specific compliance requirements. For instance, anti-money laundering policies for the financial industry or data protection policies for the banking, communications, and healthcare sectors. In addition, the company should clarify the anti-corruption responsibilities of each department and establish a compliance governance structure for anti-corruption.

3. **Specific approaches and operational processes to support compliance management systems**: Enterprises should establish corresponding standard operating procedures for implementing compliance policies. Integrating specific standards and requirements into existing relevant business processes is beneficial, ensuring that compliance procedures are clear to employees and that all business practices are carried out legally and compliantly.

By implementing these three levels of compliance management, companies can effectively address anti-corruption objectives and ensure that their operations are conducted ethically and under legal requirements.

### Case 5: Companies Should Clarify the Responsibilities of Each Department

Companies should establish a well-structured and effective compliance management system, clearly assigning responsibilities to each department. This approach aligns with international anti-corruption guidelines, such as the OECD Guidelines for Multinational Enterprises, and standards like ISO 37001. Keppel Corporation’s Sustainability Report highlights its comprehensive compliance governance structure implementation. This structure includes a Board Risk Committee and a Group Regulatory Compliance Management Committee. The Board Risk Committee oversees regulatory compliance and drives the Group’s compliance and governance system implementation. The Group Regulatory Compliance Management Committee, chaired by the Chief Executive Officer, includes the heads of all business units. These bodies ensure robust corporate governance and facilitate the development and implementation of compliance policies and guidelines.

Furthermore, Keppel Corporation has integrated a robust compliance framework and processes throughout the Group and implemented an ISO 37001 anti-bribery management system across its business units. This approach further strengthens corporate governance and ensures effective compliance policies and guidelines are established and implemented. Companies like Keppel Corporation demonstrate their commitment to ethical business practices and anti-corruption efforts by adhering to international standards and implementing comprehensive compliance frameworks.

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\(^{10}\) Page 10, “Business Against Corruption: A Framework for Action”, reported by UNGC. https://unglobalcompact.org/library/162


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4.4 IMPLEMENT

Principles and codes are rarely sufficient in themselves. They must be accompanied by training and follow-up, ensuring that an ethical culture is developed within a company through a consistent strategy. Continuous efforts must ensure principles and codes are integrated into other management systems. Companies should engage with their business partners and empower them to address corruption-related issues and, where appropriate, to meet specific goals set by the company. By ensuring a clean supply chain, companies help themselves avoid potential liability and strengthen anti-corruption efforts beyond themselves.

An enterprise’s anti-corruption management system should be well-suited to its business development, encompassing all domestic and foreign business areas, departments, and employees. It should be seamlessly integrated into decision-making, implementation, supervision, and feedback processes and reflected in decision-making mechanisms, internal controls, and business processes. Regular feedback should be provided for the implementation and execution of anti-corruption measures and regulations, allowing for timely corrections, adjustments, and improvements where necessary. This continuous optimization ensures the effective operation of the anti-corruption management system, regulations, and processes, promoting the establishment of a robust compliance management system within the enterprise.

To address specific areas with a high risk of corruption, companies should take the following measures:

1. Gifts and Hospitality: Companies should clearly define permissible conditions for accepting gifts or hospitality and explicitly prohibit offering or accepting gifts or hospitality in certain circumstances. Specifying essential factors, including form, value, personnel scope, and quantity, is important.
2. Travel and Study Tours: Companies should arrange travel and study tours for legitimate purposes, focusing on proper payment and documentation. Direct payments to service providers such as hotels, flights, and restaurants are encouraged, and expenses for influential outsiders’ or Third Parties’ spouses and family members should not be reimbursed.
3. Donations and Sponsorships: Implement a specific donation and sponsorship management system to regulate the process, including background checks, supervision, and fund management. In addition, companies should have strict policies and procedures to mitigate the risk of misusing political contributions.
4. Bidding Management: Introduce relevant bidding management systems to standardize the process and prevent fraud, collusion, corruption, coercion, and other unethical behaviors.
5. Personnel Recruitment: Establish relevant personnel systems to standardize the process, ensuring merit-based recruitment.
6. Procurement: Implement a transparent procurement management system, regulating procurement behavior and ensuring an open and transparent process.
7. Conflicts of interest: Companies should clearly define a conflict of interest, have a detailed policy, and establish relevant assessment and disclosure procedures to control this risk.

By proactively addressing these specific risk areas, companies demonstrate their commitment to combating corruption, maintaining ethical practices, and fostering a culture of compliance within their organizations.

In addition, enterprises should implement regular anti-corruption training to ensure all employees are educated on anti-corruption laws and regulations, internal anti-corruption rules, management systems, risk prevention, and control requirements. Company leaders at all levels should set an example by participating in anti-corruption training, while employees in high-risk areas and key positions should be provided with targeted training.
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Case 6: A Transparent Reporting Process Is Necessary
The Case Raw Materials Are from: Transpower New Zealand Limited Compliance Policy\textsuperscript{34} Excerpt, p. 3-4

Companies should establish a comprehensive policy and robust implementation process to facilitate the reporting of corrupt activities. These measures should encompass both internal and external reporting processes. Companies must prioritize protecting whistleblowers’ legitimate rights and activate specialized reporting channels when necessary. The approach taken by Transpower serves as an exemplary model:

Normal reporting of policy breaches
From time to time, despite employees’ best efforts, policy breaches may occur. These must be: 1. Reported through line management as part of normal business processes so that remedial action can be taken. 2. Recorded in the appropriate non-compliance register; and 3. Reported to the General Management Team, Chief Executive and Board as part of routine management reporting.

A disclosure of a policy breach through the normal reporting process is managed by line management under that division’s policies or regular working practices.

Special reporting of policy breaches
Special reporting of policy breaches If an Employee feels inhibited from reporting a breach through the standard reporting line, they are entitled to escalate it through the following people: 1. General Manager of their division; 2. General Manager – People; 3. Chief Executive; 4. General Counsel & Company Secretary under his/her responsibility for fraud control and legislative compliance; and 5. Chairperson of the Board Audit & Finance Committee.

A breach may also be reported by an employee, contractor, or consultant by phoning the Transpower anonymous reporting Fair Call hotline at 0800 100 526. Overall, companies should establish transparent reporting channels and well-defined procedures to encourage employees to report instances of corruption. It is equally important to safeguard whistleblowers’ rights throughout the reporting process. By implementing such measures, companies can effectively prevent and combat corruption while ensuring adherence to ethical and legal requirements.

Case 7: Anti-Corruption Risk Assessment Is Also Necessary for the Company’s Processes
The Case Raw Materials Are from Webuild 2022 Consolidated Non-financial Statement\textsuperscript{35}; Excerpt, p. 155

An organization’s compliance processes and implementation mechanisms require continuous improvement, as they are essential to risk assessment and implementation. Webuild provides an excellent example of this approach:

Webuild’s Compliance Unit conducts regular anti-corruption risk assessments to update the 231 model, which is a crucial part of its compliance framework. These assessments encompass the entire Webuild Group, including subsidiaries, consortia, and joint ventures. The scope of the assessment is determined based on the corruption perception index assigned to the country of operation and the maturity of the compliance system. In 2022, all legal entities within the Webuild Group underwent the anti-corruption risk assessment. The findings from this assessment are utilized to develop the Compliance Plan and schedule annual audits and inspections, ensuring the proper application of ethical and anti-corruption procedures and standards across the Group’s operating companies.

Therefore, it is crucial for companies to regularly review and conduct risk assessments on their anti-corruption management efforts, as well as the enforcement of related rules and regulations. This proactive approach enables the timely identification and rectification of deficiencies. Companies may ensure their efficient operation and positively impact sustainable development by consistently optimizing and improving the anti-corruption management system, rules, laws, and management processes.

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Case 8: Implementation Mechanisms Should Be Tailored to Local Conditions
China CNR - Yawan High-Speed Rail Project in Indonesia

A company’s anti-corruption policies and implementation mechanisms should be tailored to local conditions, mainly when conducting business abroad. Companies must adapt their anti-corruption measures to align with local laws, regulations, and international standards. A notable example is the Yawan high-speed railway project China CNR undertook in Indonesia.

During the bidding stage, China CNR established the Yawan high-speed railway project team comprising various technical, commercial, legal, financial, quality, and procurement departments. The company conducted a comprehensive study to ensure compliance with Indonesian laws and regulations, technical standards, certification rules, and industry guidelines. This meticulous approach enabled CNR to participate in the project bidding process in full compliance with Indonesia's legal requirements.

Throughout the project execution phase, China CNR continued to deepen its understanding of Indonesian laws, focusing on crucial areas such as procurement, tax exemptions, labor and employment, and environmental protection. These efforts ensured that every aspect of the project adhered to the law. Moreover, China CNR provided compliance training to employees assigned to work in Indonesia. The training emphasized the importance of complying with local laws and regulations, respecting the local religion and culture, safeguarding business secrets, and requiring employees to sign a Compliance Undertaking. This comprehensive set of measures effectively ensured the compliance of the Yawan high-speed railway project.

By adapting anti-corruption measures to local conditions, companies can mitigate risks, promote ethical business practices, and demonstrate respect for the legal framework and cultural norms of the countries in which they operate.

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Case 9: Enterprises should Introduce a Specific Donation and Sponsorship Management System to Standardize the Donation and Sponsorship Process
China Merchants Shekou - China Merchants C-Star African Youth Innovation and Entrepreneurship Program

The China Merchants C-Star African Youth Innovation and Entrepreneurship Program, known as the C-Star Program, is organized and financially supported by the China Merchants Charity Foundation (CMCF). The program aims to contribute to the "Belt and Road" initiative by empowering African youth, guiding industrial development, and fostering entrepreneurship and employment. CMCF strictly adheres to anti-corruption laws and regulations domestically and internationally to ensure the proper use of funds and prevent corrupt activities. CMCF has developed the Project Management Measures and Fund Management Measures to facilitate effective project management. These measures outline specific operations and processes, including management structure, program declaration and approval, contract management, finance, implementation, archives, and legal responsibilities.

The Djibouti Chinese Chamber of Commerce and China Merchants Shekou are responsible for implementing the program. Firstly, the C-Star program team collaborates with incubators and venture capital institutions in East Africa to ensure fair and transparent recruitment and selection of young entrepreneurs from African countries. Secondly, the Djibouti Chinese Chamber of Commerce and China Merchants Shekou have developed a detailed implementation plan and rules for candidate selection. This includes a three-step process: "Candidate Resume Screening, Interview Scoring by the Professional Evaluation Committee, and Final Approval by the High-level Evaluation Committee." The evaluation focuses on the candidates’ overall personal situations and the maturity and compatibility of their entrepreneurial projects.

Regarding charity funds, the project team strictly adheres to the management methods and requirements of the China Merchants Charity Foundation. Drawing on the compliance management system of the China Merchants Group, the project team establishes corresponding systems for procurement management, change management, contract management, authority, responsibility, and standardized processes to ensure the program’s implementation. These initiatives contribute to the standardization of fund utilization and mitigate the risk of corruption. In case of any corruption incidents, the project team enforces accountability under the integrity management rules and anti-corruption systems of the China Merchants Group.

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Throughout the implementation of the C-Star program, the project team maintains an open attitude, welcoming valuable opinions and suggestions from local government, enterprises, society, partners, and external oversight.

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Case 10: Strengthening Anti-Corruption Training
The case raw materials are from Metinvest Sustainability Report 2020 Excerpt, p. 54-55

Companies should prioritize regular anti-corruption training and activities to raise awareness among employees and ensure their understanding of the company’s anti-corruption policies and systems. These training initiatives can be conducted through online and offline platforms.

For instance, Metinvest has implemented many anti-corruption trainings and activities:

“We consistently organize training and campaigns to enhance employee awareness of all relevant business ethics regulations and standards. We provide an online Code of Ethics course for the Group’s assets. In 2020, we conducted an Ethics Week event, which included interviews with the Executive Team, general directors of assets, the Compliance Officer, and compliance coordinators. We engaged employees in quizzes and contests and published a special issue crossword puzzle in the corporate newspaper. In 2020, approximately 17,000 employees successfully completed the online Code of Ethics test, with around 63% of them attending this training in 2019-2020. Since 2013, Metinvest has utilized the Trust Line maintained by SCM to enhance transparency and accountability. We have witnessed increased inquiries submitted through the Trust Line, indicating growing trust among our personnel in our feedback mechanisms. We thoroughly analyze and investigate all inquiries, provide appropriate feedback, and take necessary actions in response. In 2020, 825 requests were submitted via the Trust Line, out of which 430 were confirmed. The main topics were internal policy infractions, HR lawsuits, and other major issues. “Strengthening anti-corruption training for employees showcases the company’s firm commitment to combat corrupt activities and reinforces the implementation of its anti-corruption policy. By equipping employees with knowledge of relevant anti-corruption laws, regulations, and the company’s policies and systems, they are better equipped to prevent unethical behavior and proactively eliminate corruption at its roots. Moreover, these measures enhance the company’s transparency, instill a sense of employee responsibility, and foster trust in the anti-corruption mechanisms. Ultimately, this promotes overall compliance and ethical behavior within the company.

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4.5 MEASURE

Not all policies will work for all companies. Often, what works in a small company will not work in a large company, and what works in one part of the world may not work in another. Thus, measuring and monitoring impacts and progress are essential for companies to combat corruption effectively. Only then can companies amplify their successes and replace policies that do not work in their context of operation. Companies are encouraged to set key indicators to measure success or failure while defining goals. Companies should use this information to reassess their management systems continually. Most companies will find it helpful to work closely with stakeholders in analyzing the data and determining a company’s successes and failures. As part of this step, companies should decide which indicators to measure their progress and whether a particular policy or program is successful. These measures should be implemented throughout the company’s operations, with real-time monitoring and testing to ensure their effectiveness. Any flaws or room for development should be addressed right away.

Companies should regularly conduct systematic and comprehensive monitoring and evaluation of their compliance management systems.

Regular monitoring, evaluation, and reporting are essential to implement anti-corruption measures efficiently and effectively. Monitoring provides data on the progress over time in achieving its objectives; evaluation uses this data to determine which elements are working, which ones are not, and what changes need to be made. While monitoring consists of the compilation of information and the analysis of single elements of the anti-corruption program, for instance, the monitoring can include assessing a specific process, such as the participatory development of a code of conduct on sponsors. The monitoring is an in-depth study conducted at a discrete point in the life cycle of a program. An evaluation is the analysis of the results of the monitoring.

In contrast to monitoring, evaluations have clear criteria against which the results are evaluated to identify a potential need for modifications and improvements. For instance, an evaluation may lead to the conclusion that the system of internal controls in a company’s subsidiary needs to be improved in terms of its effectiveness. Evaluations also allow for possible opportunities to improve efficiency. The evaluation can be conducted by the company’s internal compliance management departments or outsourced to external professional organizations. Companies should consider their evolving compliance requirements, adjust compliance management objectives, and update compliance risk management measures to meet internal and external compliance demands when assessing effectiveness.

The rationale for conducting periodic monitoring and evaluations is to determine whether anti-corruption policies or procedures require modification. Modification of the anti-corruption program could include the introduction of new measures (e.g., a new policy on prohibiting facilitation payments is required due to the company’s extension of its business operations into a country known for such payments), additional existing measures (e.g., additional training courses), reduction of inefficiencies (e.g., removing redundant controls) or the adaptation of strategies (e.g., anti-corruption news communicated by senior management as podcasts instead of emails).

Companies can enter a continuous improvement stage through periodic monitoring and evaluation, re-identifying compliance risks, and refining their compliance systems. This ensures the sound operation of the entire compliance management system. Companies should actively participate in regulatory supervision and inspections, immediately improving their compliance management systems and raising their compliance management capabilities under regulatory standards. Companies can only grow by taking such proactive actions while maintaining ethical practices and legal compliance.
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Source:

Case 11: Using Digital Technology to Improve Corporate Compliance Management

Kang Yuan Pharmaceutical: Rely on Digital Platform System to Improve Corporate Marketing Compliance Management

Information asymmetry, excessive selling and incentives, and a lack of independent evaluation and supervision plague the traditional pharmaceutical marketing model. These factors create an environment prone to non-compliance and corrupt practices. Kang Yuan Pharmaceuticals has embraced digital technology to address these challenges and established a marketing compliance management system to enhance transparency and compliance in pharmaceutical marketing.

The system incorporates marketing expenses into budget management and control, ensuring a transparent record of expense usage. Through predefined compliance rules, it automatically monitors the application, execution, feedback, and payment process of expenses, ensuring that marketing promotion activities adhere to reasonable, legal, and compliant practices. Additionally, Kang Yuan Pharma has adopted a new academic promotion model that leverages digital technology to strengthen the relationship between pharmaceutical companies and physicians. This model helps physicians become more knowledgeable about drugs, fostering sales enhancement. Calculations, feedback, and moderation are employed to ensure compliance in promotional activities.

Furthermore, Kang Yuan Pharmaceuticals has implemented rigorous speaker management norms. Doctors must meet specific title requirements and undergo approval to enter the speaker pool. They are then paid according to standard labor fees, with labor agreements signed to ensure compliance. The company also takes responsibility for paying personal income tax on behalf of doctors, ensuring they receive legitimate after-tax income. Kang Yuan Pharmaceuticals has established a stringent compliance review system that assesses each meeting and payment and conducts post-mortem audits to reinforce compliance.

Overall, leveraging digital platform systems enables companies to improve compliance management. This approach facilitates real-time monitoring and control of corruption risks, effectively preventing and reducing the occurrence of corrupt practices.

The cases come from interviews with companies.

Case 12: Continuous Improvement of Supply Chain Risk Management

The Case Raw Materials Are From the Mota-Engil Sustainability Report 2021; Excerpt, p. 54

Companies should prioritize continuously improving their internal risk management system and enhance risk management in their supply chain to establish an integrated internal and external risk management system. Mota-Engil’s approach to improving supply chain risk management serves as a good example:

Mota-Engil has strengthened the integration of its Procurement, Compliance, and Internal Audit departments to review fundamental principles of the procurement process and monitor indicators that mitigate risk situations. This integration enables the implementation of preventive and corrective measures. The supplier management model has been enhanced to include stricter requirements and procedures for qualifying and assessing supplier performance. The Third-Party Procedure (KYS-Know Your Supplier) was incorporated into the procurement processes in 2020, with Securimate and Mota-Engil Group’s integrity assessment technology providing support.

By integrating the procurement, compliance, and internal audit departments, Mota-Engil improves its oversight of supply chain compliance, effectively preventing corrupt practices. Furthermore, employing technology to improve supplier integrity assessment is a praiseworthy approach.

In summary, companies should strive to integrate their procurement, compliance, and internal audit functions to strengthen supply chain compliance oversight. Adopting technology-driven solutions for assessing supplier integrity can also help improve risk management efforts in the supply chain.

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Case 13: Companies Should Learn from Corrupt Activities and Improve Their Compliance Management System

*Zoomlion: Overseas Project Corruption Case*

Building an enterprise’s compliance management system is an ongoing continuous improvement process. It requires the enterprise to continuously acknowledge its corruption issues, take prompt action, and learn from past corruption cases to enhance its anti-corruption management system.

For instance, in 2018, when an overseas project corruption case occurred in Zoomlion, the enterprise immediately initiated an internal investigation and actively collaborated with international institutions to conduct a comprehensive probe into the case. In response to the management loopholes revealed by the case, the company organized several specialized meetings, engaged in communication and deliberation with relevant departments, and devised management initiatives to address the identified gaps. These initiatives included implementing electronic contracting for all overseas operations and establishing a streamlined “end-to-end” management model. In addition, the company strengthened communication with overseas customers, reviewed and organized contract transactions, and ensured that customer payments were directly remitted to the company’s official bank account.

This example highlights that constructing a compliance management system cannot be accomplished overnight but requires iterative and continuous improvement through practical experience. Therefore, companies should prioritize the implementation mechanism in their business activities, regularly evaluate it, and draw lessons from past corrupt activities to enhance their compliance management system and promptly elevate their compliance management level.

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4.6 COMMUNICATE

The anti-corruption management department should regularly report to the senior management and decision-making levels on the status of anti-corruption management. The report should include a corruption risk assessment, an assessment of the effectiveness of anti-corruption training, identification, and handling of anti-corruption violations, compliance risks posed by violations, identified system or process loopholes or defects, recommended corrective measures, and an overall evaluation and analysis of anti-corruption management. Good anti-corruption governance requires internal corporate efforts and controls and enhanced communication with stakeholders outside the company. Companies must timely disclose anti-corruption information and report anti-corruption initiatives in the Annual Progress Report.46

As with the other nine principles, businesses are expected to report on progress in implementing the Tenth Principle within the framework of the Communication on Progress of the UN Global Compact by describing47:

- (a) Their public commitment to fighting corruption (including signature to the UN Global Compact and other principles, such as the PACI principles)
- (b) Translation of that commitment into practical policies, programs, and systems (e.g., implementation of anti-corruption policies such as those found in the UN Global Compact Reporting Guidance on the Tenth Principle, the ICC Code of Conduct, and the Business Principles for Countering Bribery)
- (c) Outcomes and impact of the implementation of the Tenth Principle.

The UN Global Compact also recommends the use of the relevant Global Reporting Initiative48 (GRI) indicators for reporting:

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9. Please report the company’s total number and nature of incidents of corruption during the reporting year.
Relevant indicators: GRI Disclosure 205-3 (2016); WEF Common Metrics; ISAR D.2.1

10. Within the reporting period, what measures has the company taken to address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?
Relevant indicators: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016); Reporting Guidance on the 10th Principle Against Anti-corruption – B3

11. Does your company engage in collective action against corruption?
Relevant indicators: GRI Disclosure 3-3-d (2021) for the topic GRI 205 (2016)

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Case 14: Enhancing Communication with Stakeholders
The Case Raw Materials Are from: LUKOIL Group Sustainability Report 2021[50], Excerpt, p. 85

Companies should emphasize strengthening communication with stakeholders and sharing information regarding compliance management through various channels, including websites, annual reports, sustainability reports, and regular meetings. This commitment to transparency and timely information sharing is crucial.

For instance, as stated in its sustainability report, the LUKOIL Group recognizes the importance of engaging with diverse stakeholder groups to achieve a balanced alignment of interests and expectations. The company acknowledges that factors beyond its operations may influence stakeholders’ perspectives on social, environmental, and economic issues. Given the breadth of LUKOIL Group’s activities and the varying positions held by different stakeholders, the company places great value on fostering long-term constructive relationships based on partnership, active participation in addressing long-term development challenges, transparency, and disclosure of relevant information. These principles are outlined in the Sustainability policy of LUKOIL Group and the Code of Business Conduct and Ethics of PJSC LUKOIL. The company’s corporate website, annual report, and sustainability report are the primary channels for updating stakeholders about its activities.

By actively engaging with stakeholders and promptly disclosing information, companies facilitate collaborative strength, ensure compliance, and establish a solid foundation for cooperation between the company and its stakeholders.

Case 15: Strengthening Anti-Corruption Awareness and Fostering Compliance Values
Shenzhen Trading Group: Strengthen Internal and External Communication[51]

Shenzhen Trading Group is committed to promoting compliance and anti-corruption efforts through various initiatives. One notable approach is providing "customized" compliance training to different community sectors to cultivate a solid compliance mindset. Through 89 "Easy Lecture" seminars, the group has successfully trained over 10,000 individuals. These training activities span government, finance, medical, education, and other industries, encompassing diverse subjects such as state-owned enterprises, collective enterprises, private enterprises, administrative institutions, and social organizations. This comprehensive approach highlights the group’s dedication to spreading compliance awareness and providing training to organizations across the spectrum, fostering anti-corruption practices throughout society.

Additionally, Shenzhen Trading Group has implemented measures to enhance the quality of its services by proactively offering assistance. Establishing the "Shenzhen Public Resources Trading Center" WeChat public account and video platform has expanded the reach of compliance-related information and broadened the channels for publicizing compliance efforts. In 2022, the WeChat public account released 238 informative posts, and the video platform published 28 videos, attracting over 50,000 followers and generating nearly 280,000 views. The content covers many subjects, including practical business knowledge, platform operation guidelines, case studies, policy updates, and project promotions. Through these promotional activities, Shenzhen Trading Group has improved communication and information dissemination with stakeholders, enhancing compliance awareness and promoting responsible behavior.

In summary, Shenzhen Trading Group has demonstrated its proactive approach to combatting corruption through customized compliance training and extensive promotional channels and content. By offering training to various industries and organizations, the group fosters a culture rooted in compliance values and actively promotes anti-corruption efforts in society. Moreover, establishing WeChat public and video platforms allows for effective communication and information sharing, enabling stakeholders to stay informed and align with compliance standards. These initiatives raise awareness and emphasize the importance of compliance within the community, ultimately facilitating the establishment of a fair and transparent business environment.

Guidance on the 10th Principle Against Anti-corruption – B3

50  https://www.lukoil.com/Sustainability/SustainabilityReport
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4.7 COLLECTIVE ACTION

Often, a local business leader believes that, although tackling all forms of corruption would be desirable, he or she cannot do it alone. There is, at times, a perception that corruption—from petty bribery and so-called facilitation payments to large-scale corrupt acts—is so much part of local culture that there is no remedy for the individual company. Although business managers may recognize that corruption is a problem, they may not consider it their role to change the business culture. In these circumstances, collective action with other companies provides one of the critical solutions. Collective action is a process of cooperation among various stakeholders to counter corruption jointly. Through such an alliance of like-minded organizations, the problem can be approached and resolved from multiple angles, and the impact of individual action can be increased. These joint efforts aim to create fair and equal market conditions and a level playing field for all market players while eliminating the temptation of corruption. Collective action can be initiated and driven through various channels. The available methods range from integrity pacts for individual procurement transactions to industry-specific codes of conduct and compliance pacts and joint measures implemented as part of a long-term initiative to raise a country’s public awareness and tighten up its regulatory system and procurement guidelines.\(^9\)

When the power of one individual company is not enough to change or influence the status quo, frequently, the only available alternative is to join forces with other companies and start collaborating through the power of collective action. One company alone may be unable to address the quality or integrity of the standards and practices of the business environment in which it operates, such as weak, insufficient, or non-existent institutional and governance frameworks. The collective action approach is a formidable strategy, as it brings together diverse stakeholders to tackle complex challenges that are difficult to overcome individually and collectively. Companies and other stakeholders can effectively address intricate integrity issues by harnessing the collective power of multiple entities. This practical approach often yields the most beneficial outcomes in the face of complexity.\(^9\)

Collective action is a flexible, dynamic, and potentially ever-evolving approach. It can be designed and implemented in many ways according to multiple dimensions. For example:

1. Short- to long-term initiatives.
2. Voluntary to formal, externally monitored initiatives.
3. Issue-driven or conceived as ongoing platforms.
4. Exclusively private sector-based or hybrid models (i.e., participation of other actors from the public sector and civil society).
5. Top-down (i.e., promoted by international organizations) vs. "bottom-up" approaches.
6. Aimed at institutional-level changes (e.g., modifications of laws and norms)
7. Capacity building initiatives (e.g., training activities and developments of specific tools).
8. Global or local—or global.
9. Analogic or digitally oriented.
10. Focused exclusively on tackling anti-corruption issues.
11. Focused on "connecting the dots" between corruption and its adverse impacts on other sustainability-related issues (e.g., human rights, climate change, and access to health and education).

The Playbook on Anti-Corruption Collective Action\(^9\) details the history of collective action, its conceptual framework, its roles (initiator, facilitator, participant, and monitor), and its future perspectives.

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4.7 COLLECTIVE ACTION

Often, a local business leader believes that, although tackling all forms of corruption would be desirable, he or she cannot do it alone. There is, at times, a perception that corruption—from petty bribery and so-called facilitation payments to large-scale corrupt acts—is so much part of local culture that there is no remedy for the individual company. Although business managers may recognize that corruption is a problem, they may not consider it their role to change the business culture. In these circumstances, collective action with other companies provides one of the critical solutions. Collective action is a process of cooperation among various stakeholders to counter corruption jointly. Through such an alliance of like-minded organizations, the problem can be approached and resolved from multiple angles, and the impact of individual action can be increased. These joint efforts aim to create fair and equal market conditions and a level playing field for all market players while eliminating the temptation of corruption. Collective action can be initiated and driven through various channels. The available methods range from integrity pacts for individual procurement transactions to industry-specific codes of conduct and compliance pacts and joint measures implemented as part of a long-term initiative to raise a country’s public awareness and tighten up its regulatory system and procurement guidelines.  

When the power of one individual company is not enough to change or influence the status quo, frequently, the only available alternative is to join forces with other companies and start collaborating through the power of collective action. One company alone may be unable to address the quality or integrity of the standards and practices of the business environment in which it operates, such as weak, insufficient, or non-existent institutional and governance frameworks. The collective action approach is a formidable strategy, as it brings together diverse stakeholders to tackle complex challenges that are difficult to overcome individually and collectively. Companies and other stakeholders can effectively address intricate integrity issues by harnessing the collective power of multiple entities. This practical approach often yields the most beneficial outcomes in the face of complexity.  

Collective action is a flexible, dynamic, and potentially ever-evolving approach. It can be designed and implemented in many ways according to multiple dimensions. For example:
1. Short- to long-term initiatives.
2. Voluntary to formal, externally monitored initiatives.
3. Issue-driven or conceived as ongoing platforms.
4. Exclusively private sector-based or hybrid models (i.e., participation of other actors from the public sector and civil society).
5. Top-down (i.e., promoted by international organizations) vs. “bottom-up” approaches.
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54 “Uniting against Corruption: A Playbook on Anti-Corruption Collective Action”, reported by UNGC, https://unglobalcompact.org/library/5896
Case 16: Hybrid Model of Collective Action

Government, Companies, Universities, and Media Work Together to Promote the Development of Compliance Governance

To promote the compliance development of enterprises and improve the tax compliance governance of key tax source enterprises, the Lianyungang Municipal Taxation Bureau of the State Administration of Taxation of China has taken several measures. Firstly, the tax department cooperated with the State-owned Assets Supervision and Administration Commission (SASAC) and the Justice and Inspection Department to strengthen the study and propaganda about the Compliance Management Guidelines. On the other hand, to equip enterprises with compliance knowledge and foster their adherence to regulations, the tax department has taken the initiative to engage experts in compliance from esteemed institutions such as the Beijing New-Century Academy of Transnational Corporations, Peking University, and Nanjing University. These experts have been invited to conduct specialized counseling reports, providing valuable insights and guidance. At the same time, the tax department actively carries out compliance special lecture meetings and strengthens learning and communication with local universities.

This tax department formed a team of compliance governance experts to strengthen the compliance risk supervision of crucial projects. In addition, the tax department cooperates with local business chambers to carry out actions such as internal control risk tests for large enterprises to make “compliance and honest tax payment” a hard constraint for enterprises. At the same time, the local media actively publicizes the cooperation among the tax office, business chambers, and universities on regional compliance governance, which facilitates the sharing and dissemination of compliance governance experience.

This demonstrates the importance of strengthening compliance regulation, knowledge dissemination, and cooperation in anti-corruption efforts. Enterprises’ compliance and tax integrity can be promoted through these measures, and a good compliance governance atmosphere can be developed locally.

Case 17: Siemens’ Collective Action Against Corruption

The Case Raw Materials Are From Siemens Integrity Initiative Annual Report 2021\textsuperscript{56}; Excerpt, p. 67

Businesses should actively participate in the collective action against corruption. On the one hand, this helps to foster the fight against corruption and create a positive business climate. On the other hand, collective action can successfully lower the cost of anti-corruption for companies, and collective wisdom can improve the effectiveness of the fight against corruption. For example, Siemens’ collective action against corruption:

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

1. Developed, launched, and translated the “Uniting against Corruption: A Playbook on Anti-Corruption Collective Action” in collaboration with Global Compact Local Networks and with support from strategic partners.

2. Participated in the Special Session of the General Assembly against Corruption, co-organized a video conversation between the United Nations Global Compact CEO and Executive Director and the President of the 75th Session of the United Nations General Assembly, and co-organized with the United Nations Office on Drugs and Crime the “In the Margins of UNGASS: High-level Forum for the Private Sector.”

3. Global Compact Local Networks in Brazil, India, Kenya, and Ukraine continued to develop Collective Action initiatives:
   - GCN Brazil: Signed a memorandum of understanding with the Ministry of Agriculture, Livestock and Food Supply, launched podcasts with Grupo Globo, and developed a protocol to initiate additional Collective Action initiatives in their Network.
   - GCN India: Launched an Anti-Corruption Collective Action Working Group in the Healthcare Sector and continued to form strategic collaborations.
   - GCN Kenya: Implemented training for signatories to the Kenyan Code of Ethics, conducted outreach to enlist more companies to sign the code, and held joint events with the public sector in commemorating International Anti-Corruption Day and African Anti-Corruption Day.
   - GCN Ukraine: Organized an Anti-Corruption Week, launched a Memorandum for companies and stakeholders to declare their support for a joint principle-based initiative, and formed a partnership with Ukraine’s National Agency on Corruption Prevention to develop a set of recommendations and an e-learning course for small and medium-sized enterprises based on the new Standard Anti-Corruption Program for Legal Entities.

In this series of collective actions, Siemens has demonstrated its determination to fight against corrupt activities and objectively enhanced its ability to combat corrupt practices and expand in overseas markets. At the same time, it promotes local anti-corruption policies and creates a favorable business environment, ultimately giving Siemens positive feedback. Therefore, the active participation of companies in collective anti-corruption initiatives is a self-benefiting and altruistic initiative.

\textsuperscript{55} The cases are derived from interviews.

To promote the compliance development of enterprises and improve the tax compliance
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About the UN Global Compact

As a special initiative of the UN Secretary-General, the United Nations Global Compact works with companies everywhere to align their operations and strategies with ten universal principles in the areas of human rights, labour, environment and anti-corruption. Launched in 2000, the UN Global Compact guides and supports the global business community in advancing UN goals and values through responsible corporate practices. With more than 24,000 companies signatories based in over 170 countries, and 70 Local Networks, it is the largest corporate sustainability initiative in the world.

The UN Global Compact is unparalleled in its ability to unite companies with every stakeholder group working to advance sustainable development, including the United Nations, Government, civil society, investors and academia. Together, through bold actions and collaboration between all sectors of society, we can end extreme poverty and hunger, fight inequalities and address climate change, ensuring no one is left behind.

Visit unglobalcompact.org to learn more.

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“Sustainable Infrastructure for the Belt and Road Initiative to Accelerate the SDGs” Action Platform

Launched on June 16, 2020 during the UN Global Compact Leaders Summit, the Action Platform is designed to be the main mechanism for engaging companies operating in alignment of the SDGs under the framework of the Belt and Road Initiative. The Action Platform takes a sectoral approach to engage private sector players across major infrastructure sectors to ensure adoption of Global Compact ten principles in corporate strategy and actions to truly accelerate the SDGs.

For more information about the action platform and potential participation, please visit BRI Action Platform, or contact: bri@unglobalcompact.org
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The Ten Principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

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