



INTEGRITY & COMPLIANCE

**POLICY PAPER
2018**

TABLE OF CONTENTS

Foreword by the Task force Chair Jorge Mandelbaum1

Executive Summary – Call to G20 leaders.....2

Key Policy Recommendations and Action Plan.....4

Introduction.....6

Recommendation 1: Enhance Integrity and Transparency in Public Procurement with a focus on Infrastructure Projects.....15

Recommendation 2: Implement High Standards of Ethics and Integrity with a focus on SOEs20

Recommendation 3: Pursue the Implementation of Beneficial Ownership Transparency 23

Annex..... 28



FOREWORD BY THE TASK FORCE CHAIR JORGE MANDELBAUM

One of the most important assets of developed, stable and inclusive countries are those which respect and follow the law. It is for that reason that we have taken the premise of following the rule of law as one of the core premises of the work of the B20 Integrity and Compliance Cross-Thematic Group.

It is crucial that we accept that corruption is a major barrier to prosperity and equality, as it affects economic and financial stability, threatens investment and curtails the basic rights of citizens. But most importantly, corruption breaks the social contract between citizens and states. It affects the overall governance and institutional environment and does not allow for a level playing field in any social or business undertaking.

Governments should therefore lead the way to address corruption and to follow a culture of integrity within societies. Education in ethics and integrity from early childhood is a key element to achieve this, enabling for positive working environment and creating a long-term value. For the public sector, implementing high standards of ethics and integrity is especially crucial in rebuilding trust in public institutions and laying the groundwork for sustainable growth.

In spite that much has been written about anti-corruption strategies, this year our task force builds on the solid German recommendations. We have focused our work on an innovative initiative that is instrumentally oriented towards promoting good behavior in the form of a “Commitment to Integrity and Ethical Standards” (CIES) in both the public and the private sector.

We have focused the CIES on two main objectives. It addresses integrity enhancement in infrastructure projects by enabling access to relevant information, by streamlining procedures, by applying integrity standards requirements to all stakeholders in the procurement cycle and by building reporting mechanisms, among others. Secondly, it looks upon high implementation standards of integrity and compliance for State-Owned Enterprises (SOEs) -establishing programs adopted by the private sector customized to consider specific risks of State enterprises, ensuring accountability through information, transparency and public account reporting, as well as promoting collective action between SOEs and the private sector to develop integrity initiatives.

We are convinced that collective action is the way forward towards building more ethical and fair societies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jorge', written over a horizontal line.

Jorge Mandelbaum

Chair of the B20-Taskforce on Integrity and Compliance
President of CIPPEC - Centro de Implementación de Políticas
Públicas para la Equidad y el Crecimiento

EXECUTIVE SUMMARY – CALL TO G20 LEADERS

Recognizing corruption as one of the G20's top priorities and acknowledging that it undermines good governance, erodes trust in institutions and hinders sustainable development, the Integrity & Compliance Cross Thematic Group (ICCTG) underscores the urgency of effectively advancing the anti-corruption agenda and expresses its readiness to work towards that end with relevant stakeholders.

Cognizant of the benefits of integrity in terms of reputation and long-term value creation, the ICCTG presents a concrete and innovative contribution to the G20 Argentina 2018 Presidency called "Commitment to Integrity and Ethical Standards" (CIES). The CIES consists of a set of common values and standards, which promotes a culture of integrity, transparency, accountability and social responsibility, consistent with existing international instruments. Leveraging on the adherence of G20 Members to several G20 High-Level Principles and international conventions related to integrity and anti-corruption, and on similar commitments by the private sector, the CIES brings together shared values and standards applicable to both sectors. In this manner, the CIES provides a common basis on which to hold the public and private sectors to account, thereby ensuring a level playing field. By committing to the CIES, businesses and governments of G20 Members engage in collective action that sets a strong tone in fostering high standards of integrity. For this reason, the ICCTG seeks the G20's adherence to the CIES and calls for an enabling environment that upholds education, rule of law and digitalization as the foundation of its execution.

Supporting the G20 Anti-Corruption Working Group action plan, building upon the gains of the B20 Germany Responsible Business Conduct and Anti-Corruption Cross-Thematic Group, and promoting the values embodied by the CIES, the ICCTG puts forward the following recommendations:

- **Enhance integrity and transparency in public procurement with a focus on infrastructure projects**

To address the susceptibility to corruption of the public procurement process, this recommendation seeks to establish incentives for companies that adhere to high quality standards of integrity and compliance in the form of an eligibility requirement or affirmative competitive preference, ensure the participation of all stakeholders in the procurement process including maximizing the use of digitalization for this purpose, and promote collective action between the public and private sectors.

- **Implement high standards of ethics and integrity with a focus on State-Owned Enterprises (SOEs)**

To address corruption risks of SOEs, this recommendation calls on the G20 Members to ensure that SOEs adhere to and disclose high quality standards of integrity and compliance in line with international good practice, and facilitate joint action geared towards building trust and exchanging lessons learned.

- **Pursue the implementation of beneficial ownership transparency**

To deter the wrongful use of legal persons and arrangements, this recommendation focuses on the full implementation of beneficial ownership action plans, the mandating of public registers of beneficial ownership information, and the development of rules for its effective and efficient data handling and exchange.

Giving due regard to actions already taken by the G20 Members, and recognizing the need to monitor advances in the implementation of previous and current G20 commitments related to integrity and anti-corruption, the ICCTG calls on the G20 leaders

to entrust the task of developing and applying specific indicators for monitoring progress and measuring impact, as well as publishing results, to multilateral organizations. Notwithstanding the primary role entrusted to multilateral organizations to carry out this critically important work, business and civil society also play an important stewardship role as partners to provide expertise and catalytic funding for such independent initiatives.

KEY POLICY RECOMMENDATIONS AND ACTION PLAN

RECOMMENDATION 1: Enhance integrity and transparency in public procurement with a focus on infrastructure projects – To address the susceptibility to corruption of the public procurement process, this recommendation seeks to establish incentives for companies that adhere to high quality standards of integrity and compliance in the form of an eligibility requirement or affirmative competitive preference, ensure the participation of all stakeholders in the procurement process including maximizing the use of digitalization for this purpose, and promote collective action between the public and private sectors.

Policy Action 1.1: Establish standardized incentives in public infrastructure procurement - G20 Members should establish and enforce incentives, in a way that is consistent with applicable procurement laws, for companies that adhere to high quality standards of integrity and compliance while providing the corresponding guidance and support to small and medium enterprises (SMEs) that would address barriers to their involvement in public procurement.

Policy Action 1.2: Ensure openness, fairness, transparency and accountability in the entire procurement cycle of public infrastructure – G20 Member Governments should ensure that all stakeholders are able to participate in the procurement process by enabling timely access to information that is provided in line with the G20 Anti-Corruption Open Data Principles and across the contracting process and contract cycle, identifying opportunities to employ technology in the procurement process, and streamlining procedures.

Policy Action 1.3: Build cooperation, trust and strategic alignment between the public and private sectors in relation with infrastructure projects – G20 Members should facilitate collective action between the public and private sectors by developing complementary and joint efforts that prevent corruption while preserving their respective independence. Taking into account that the building of trust requires a concerted commitment to implement and enforce transparency, G20 Members must also promote initiatives and reporting mechanisms that promote openness, dialogue and accountability.

RECOMMENDATION 2: Implement high standards of ethics and integrity with a focus on SOEs - To address corruption risks of SOEs, this recommendation calls on the G20 Members to ensure that SOEs adhere to and disclose high quality standards of integrity and compliance in line with international good practice, and facilitate joint action geared towards building trust and exchanging lessons learned.

Policy Action 2.1: Ensure that SOEs commit and adhere to high quality standards of integrity and compliance, and assume accountability to stakeholders including reporting publicly on anti-corruption programs - G20 Members should demonstrate their continuing commitment to upholding integrity by (i) applying high quality standards of integrity and compliance within the public sector itself, and (ii) ensuring that SOEs and other companies—including SMEs—implement the same standards in line with international good practice and SOE anti-corruption guidelines, and publicly disclose such standards, particularly in connection with procurement and

bidding processes.

Policy Action 2.2: Promote collective action among SOEs, the general government and the private sector – G20 Members should facilitate the professional cooperation between the public and private sectors by developing joint initiatives, building trust and exchanging information and lessons learned, among others, that encourage the adoption of robust best practices on integrity and the implementation of effective compliance measures across all sectors. Such facilitation should not come at the expense of maintaining a strict separation of government functions in the exercise of ownership of SOEs.

RECOMMENDATION 3: Pursue the implementation of beneficial ownership transparency - To deter the wrongful use of legal persons and arrangements, the recommendation calls on the G20 Members to pursue the full implementation of beneficial ownership action plans, ensure the availability of information and establish the rules for information exchange.

Policy Action 3.1: Implement previously established beneficial ownership action plans and ensure consistency in beneficial ownership regulation including for Designated Non-Financial Businesses and Professions (DNFBPs) and legal professional privilege – G20 Members should ensure the implementation of beneficial ownership action plans, making sure that regulation of beneficial ownership is consistent, to remove regulatory arbitrage and to aid businesses who need to provide and use this information from having to comply with differences across jurisdictions. This will ensure a level playing field for all and remove prospective barriers to entry.

Policy Action 3.2: Mandate public registers of beneficial ownership that utilize globally consistent data classifications and verification of information – G20 Members should ensure access to beneficial ownership information by mandating public registers of beneficial ownership that utilize globally consistent data classifications and verification of information. This will combat corruption and money laundering at all levels of government and corporate business dealings, as well as ensure transparency in public procurement across the supply chain.

Policy Action 3.3: Develop rules for effective and efficient exchange of information – G20 Members should scale the availability and use of beneficial ownership information by creating rules to ensure its effective and efficient exchange. International standards on data privacy, data handling and data classification must be defined.

INTRODUCTION

The B20 (Business 20) Integrity & Compliance Cross-Thematic Group (ICCTG) is committed to work with relevant stakeholders to advance the anti-corruption agenda, and promote the adherence to high quality standards of integrity and compliance for a sustainable and inclusive economic global development. In this role, the ICCTG will advocate consolidated recommendations at the G20 (Group of Twenty) level, provide business and civil societal stewardship through sharing integrity and compliance best practices, and promote collective action.

In this respect and following prior B20 recommendations, the ICCTG seeks to produce a concrete and innovative contribution to global anti-corruption efforts in the form of a “Commitment to Integrity and Ethical Standards” (CIES) by G20/B20 Members. Given the complexity of the prevailing context and the need to remain consistent with the G20 agenda, the CIES will focus on developing and strengthening joint private and public standards and recommendations to prevent any possible instance of corruption, particularly in infrastructure projects and in state-owned enterprises (SOEs)¹. The ICCTG also considers it fundamental to pursue the full implementation of beneficial ownership transparency. The focus on these recommendations, together with a strong emphasis on education, rule of law and digitalization, is the approach adopted by the ICCTG to foster a culture of integrity.

In so doing, the ICCTG aims to address the urgent need to rethink integrity and compliance strategies, and to enhance their practical implementation to confront the following milestones ahead:

- Create a fair trade environment and determine how to modify the incentive structures that govern forms of public-private relationships, addressing both the supply and demand sides of corruption.
- Implement high standards of ethics and compliance.
- Develop collaborative intelligence and identify methods to share knowledge and experience among sectors.
- Define the role of SOEs and public administration to drive change in how they are treated across sectors.
- Develop uniform criteria to evaluate integrity programs, encourage and acknowledge compliance efforts, and guide the application of sanctions and/or incentives.
- Design and roll-out a capacity building program under the B20 banner in cooperation with leading civil society and private sector champions to second experts in integrity and compliance, and help governments and SOEs accelerate their standards and leadership.

Recognizing the need to monitor advances in the implementation of previous and current G20 commitments related to integrity and anti-corruption, the ICCTG calls on the G20 leaders to entrust the task of developing and applying specific indicators

¹ For the purpose of this Policy Paper, the following SOE definition of the Organisation for Economic Co-operation and Development (OECD) shall apply: “...any corporate entity recognised by national law as an enterprise, and in which the state exercises ownership, should be considered as an SOE. This includes joint stock companies, limited liability companies and partnerships limited by shares. Moreover statutory corporations, with their legal personality established through specific legislation, should be considered as SOEs if their purpose and activities, or parts of their activities, are of a largely economic nature.” OECD, *OECD Guidelines on Corporate Governance of State-Owned Enterprises* (Paris: OECD Publishing, 2015), 14, accessed February 5, 2018, <http://dx.doi.org/10.1787/9789264244160-en>.

for monitoring progress and measuring impact, as well as publishing results, to multilateral organizations. Moreover, aspiring to influence the G20 agenda and to generate greater momentum in advocating ICCTG priorities, two unprecedented joint declarations have been developed with the Civil 20 (C20), another G20 Engagement Group. The B20 and C20 Joint Statements on Increasing Integrity and Transparency in SOEs² and Implementation of National Anti-Corruption Strategies³ embody the two G20 engagement groups' shared messages and commitment to work with governments on the aforementioned areas.

GENERAL CONTEXT

Addressing corruption continues to be a top global priority for the G20. The 2017-2018 G20 Anti-Corruption Action Plan states that corruption “undermines good governance, erodes the trust that people place in public institutions, corrodes decision-making, impedes economic development and facilitates organized crime.”⁴ Despite the growing understanding of these adverse consequences, corruption continues to be a global challenge. The World Bank Enterprise Surveys show that 32.6 percent of firms at the global level identify corruption as a major constraint, reaching up to 49.1 percent in the Middle East and North Africa.⁵ Moreover, a 2015 estimate published in December 2016 by the International Monetary Fund (IMF) listed the annual cost of bribery, one aspect of corruption, at about USD 1.5 to USD 2 trillion—or roughly two percent of the global GDP. The economic and social corruption costs are considered to be even larger.⁶

Adding to the issue's complexity is the global crisis of trust in institutions across sectors evident today. The 2018 Edelman Trust Barometer reveals that 20 out of 28 countries fall under the “distruster” category, with an average global trust index in government, business, NGOs and the media of 48 percent. Furthermore, 69 percent cite that the most important expectation they have for CEOs is that their company is trusted.⁷ This breakdown has placed some additional pressure on governments, companies and SOEs to address corruption risks and restore confidence.

Although there has been an increase in global commitment and international cooperation to combat corruption, Transparency International found in its most recent Corruption Perceptions Index released in February 2018 that the majority of countries have not made significant progress in addressing this persistent trend.⁸ Moreover, progress remains uneven at the regional level in achieving the United Nations (UN) Sustainable Development Goal (SDG) 16 on Peace, Justice and Strong Institutions.⁹ Substantially reducing corruption and bribery in all their forms (SDG 16.5) is a key prerequisite for achieving all other SDGs and thus highlights its importance in the overall achievement of said goals by 2030.

² The B20 and C20 Joint Statement on Increasing Integrity and Transparency in SOEs is available at <https://civil-20.org/c20/wp-content/uploads/2018/06/B20-C20-JOINT-STATEMENT-INCREASING-INTEGRITY-AND-TRANSPARENCY-IN-STATE-OWNED-ENTERPRISES-.pdf>, accessed July 15, 2018.

³ The B20 and C20 Joint Statement on the Implementation of National Anti-Corruption Strategies is available at <https://civil-20.org/c20/wp-content/uploads/2018/06/B20-C20-Joint-Statement-Implementation-of-National-Anti-corruption-Strategies-.pdf>, accessed July 15, 2018.

⁴ G20 2016 China, G20 Anti-Corruption Action Plan 2017-2018, September 27, 2016, accessed April 3, 2018, http://www.g20chn.org/English/Documents/Current/201609/t20160927_3508.html.

⁵ The World Bank, Enterprise Surveys, accessed May 13, 2018, <http://www.enterprisesurveys.org>.

⁶ IMF, Fiscal Affairs and Legal Departments, *Corruption: Costs and Mitigating Strategies* (n.p.: IMF, 2016), 5, accessed April 3, 2018, <http://www.imf.org/external/pubs/ft/sdn/2016/sdn1605.pdf>.

⁷ Edelman, *2018 Edelman Trust Barometer: Global Report* (n.p.: n.p., 2018), 6, 29 and 44, accessed May 12, 2018, <http://cms.edelman.com/sites/default/files/2018-01/2018%20Edelman%20Trust%20Barometer%20Global%20Report.pdf>.

⁸ Transparency International, Corruption Perceptions Index 2017, February 21, 2018, accessed April 3, 2018, https://www.transparency.org/news/feature/corruption_perceptions_index_2017.

⁹ UN Economic and Social Council, *Progress towards the Sustainable Development Goals: Report of the Secretary General* (n.p.: UN, May 11, 2017), 16, accessed May 13, 2018, http://www.un.org/ga/search/view_doc.asp?symbol=E/2017/66&Lang=E.

Given this context and considering the cost involved in bribery, legal sanctions including fines and internal investigation expenses, and the impact of reputational damage, there is a strong business case for fighting corruption. Raising standards of integrity and compliance is as important now as ever. The former focuses on living up to organizational values while the latter on living up to external and internal requirements. Companies that act with integrity and ensure compliance with anti-corruption laws can decrease their exposure to corruption-related risks, prevent or reduce legal sanctions arising from a corruption case, obtain tax credits and derive financial and commercial benefits.¹⁰ While the implementation of integrity and compliance practices does incur costs, the benefits of integrity in terms of reputation and long-term value creation cannot be sufficiently underscored. High levels of trust and reputation make it easier to operate, thereby making a culture of integrity crucial in achieving sustainable growth.

ANTI-CORRUPTION AND INTEGRITY AS A B20 PRIORITY

Anti-corruption has been adopted by the B20 as a thematic priority since 2012.¹¹ Through the years, recommendations to G20 Member Governments have been carried over to further strengthen efforts and additional ones have been introduced to cover new priorities. Now under the leadership of Argentina, the ICCTG follows suit with a view to creating and sustaining a shared culture of integrity within and between the public and private sectors.

One of the most relevant calls from the ICCTG is related to the fulfillment and monitoring of existing and upcoming G20 Anti-Corruption Principles, Action Plan and commitments. In particular, the B20 Germany Responsible Business Conduct and Anti-Corruption Cross-Thematic Group's Policy Paper revolved around three recommendations, namely establishing beneficial ownership transparency, recognizing compliance efforts and enhancing responsible business conduct in infrastructure projects.¹² In order to evaluate the responsiveness of G20 Germany to B20 Germany recommendations, said Policy Paper was compared to official G20 documents. The first two recommendations and their corresponding policy actions were reflected in the 2017 G20 documents, which translates to an overall average score of 42 percent or "sufficient" in terms of G20 responsiveness.¹³ Moreover, the importance of Anti-Corruption and Responsible Business Conduct was demonstrated with the inclusion of this topic in the Leaders' Declaration and the endorsement of four High-Level Principles designed to promote integrity in the public and private sectors.¹⁴

One of these G20 High-Level Principles is on Countering Corruption in Customs, which recognizes that "ineffective and inefficient customs...can negatively impact the benefits of international trade, trust in government, as well as sound economic and public sector reforms."¹⁵ The issue of integrity in customs sits at the nexus of business

¹⁰ Transparency International, "The Business Case for Fighting Corruption," *Anti-Corruption Helpdesk*, 1, accessed May 18, 2018, https://www.transparency.org/files/content/corruptionqas/Business_case_for_fighting_corruption_1.pdf.

¹¹ Jens Martens, *Corporate Influence on the G20: The case of the B20 and transnational business networks* (New York and Berlin: Global Policy Forum and Heinrich-Böll-Stiftung, 2017), 23, accessed April 20, 2018, https://www.boell.de/sites/default/files/corporate_influence_on_the_g20.pdf?dimension1=ds_g20_de.

¹² G20 Germany 2017: B20 Dialogue, *Promoting Integrity by Creating Opportunities for Responsible Businesses: B20 Cross-Thematic Group Responsible Business Conduct and Anti-Corruption Policy Paper 2017* (Berlin: B20 Germany, 2017), 2, accessed January 29, 2018, https://www.b20germany.org/fileadmin/user_upload/documents/B20/b20-ctg-rbac-policy-paper.pdf.

¹³ G20 Germany 2017: B20 Dialogue, *G20 Responsiveness Report: B20 Evaluation of the Hamburg G20 Leaders' Declaration: Shaping an Interconnected World* (Berlin: B20 Germany, 2018), 68, accessed June 22, 2018, https://www.b20germany.org/fileadmin/user_upload/News/G20_Responsiveness_Report.pdf.

¹⁴ *Ibid.*, 60.

¹⁵ G20 High Level Principles on Countering Corruption in Customs, accessed June 25, 2018, <http://www.g20.utoronto.ca/2017/2017-g20-corruption-in-customs-en.pdf>.

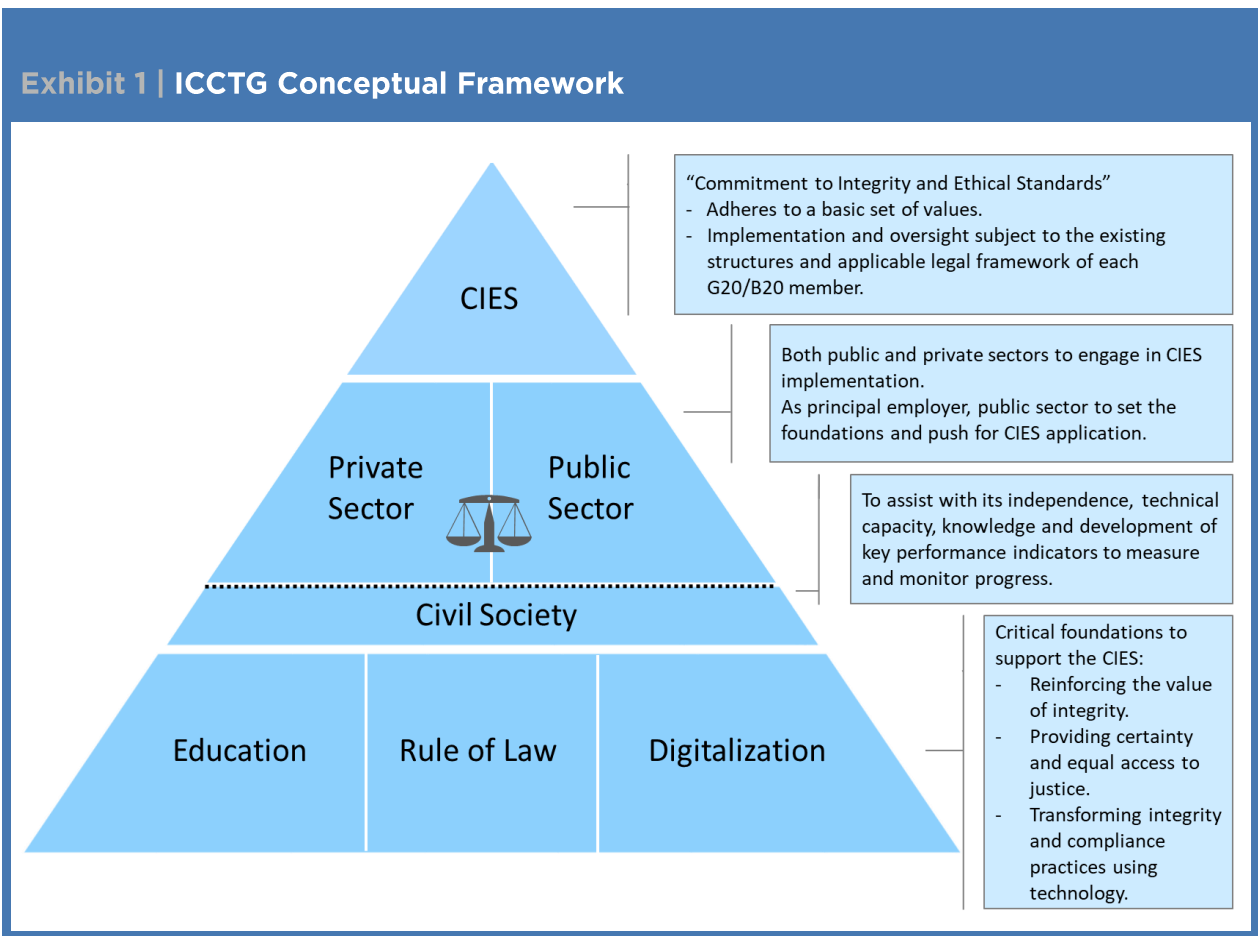
priorities on trade facilitation and combatting corruption, which is why the ICCTG would like to call on the G20 to foster a clean environment for international trade by strengthening integrity in Customs, and to ensure the full implementation of the G20 High-Level Principles on Countering Corruption in Customs and the B20 Turkey Anti-Corruption Task Force's recommendation on moving towards a comprehensive digital environment for customs and border clearance¹⁶. The G20 should support the efforts by the OECD and the World Customs Organization to bring the aforementioned High-Level Principles to life through a targeted program focused on implementation, aimed at raising Customs' awareness on illicit trade and its links to breaches in integrity.

In addition, the ICCTG calls upon the G20 leaders to address not only the supply side but also the demand side of corruption. Governments have the authority over its own officials and can therefore target the demand side by ensuring that those who solicit and accept corrupt payments are prevented, detected and sanctioned accordingly. While companies can focus on the supply side by ensuring the same for those who offer and make corrupt payments, businesses are likewise subject to the conditions set by the states where they operate. Promoting and engaging in existing international instruments such as the OECD Anti-Bribery Convention and the UN Convention Against Corruption (UNCAC) are thus important in this regard, thereby leveling the global playing field.

Alongside the ICCTG's appeals to the G20, this policy paper also affirms its commitment to raise the standards of integrity and compliance as a joint initiative. For this goal to be achieved it is crucial that the private sector and the public sector engage in building guidance and best practices in this field, keeping in mind that knowledge is based on concrete experience, both positive and negative. In that sense, leading private sector representatives could be a sound source of education, bringing to the table their experience of establishing integrity and compliance practice to facilitate the path of capacity building and setting a common ground standard for all companies across the world, including SOEs. Indeed, it is a long road ahead, but as the G20's private sector voice, the ICCTG is confident that this quest for transparency and more fair conditions will be easier by learning and contriving from its common experience.

¹⁶ The B20 Anti-Corruption Task Force Policy Paper is available at http://b20turkey.org/policy-papers/b20turkey_actf.pdf, accessed June 25, 2018.

CONCEPTUAL FRAMEWORK



Towards a concrete and innovative contribution to the global anti-corruption effort, the ICCTG proposes a collaborative output in the form of a CIES by G20/B20 Members. Such commitment is the primary goal of the ICCTG as an essential starting point to promote a virtuous cycle of integrity and as such, reflected in the apex of the Conceptual Framework as shown in Exhibit 1. The CIES requires the adherence of the public and private sectors, including SOEs, to a basic set of values and minimum standards that are consistent with existing international instruments¹⁷, as defined in Exhibit 2. By committing to these common values and standards, businesses and governments of G20 Members engage in a global multi-stakeholder initiative to promote an environment that values integrity and supports ethically sound behavior. With respect to implementation and oversight, the CIES is subject to the existing structures and applicable legal framework of each G20/B20 Member.

¹⁷ See the Ten Principles of the UN Global Compact, available at <https://www.unglobalcompact.org/what-is-gc/mision/principles>, accessed May 13, 2018; the OECD Good Practice Guidance on Internal Controls, Ethics, and Compliance, available at <https://www.oecd.org/daf/anti-bribery/44884389.pdf>, accessed July 7, 2018; the OECD Guidelines for Multinational Enterprises, available at <http://www.oecd.org/daf/inv/mne/48004323.pdf>, accessed July 7, 2018; the OECD, UN Office on Drugs and Crime (UNODC) and the World Bank’s Anti-Corruption Ethics and Compliance Handbook for Business, available at <https://www.oecd.org/corruption/Anti-CorruptionEthicsComplianceHandbook.pdf>, accessed May 13, 2018; the SDG 16.5 “substantially reduce corruption and bribery in all their forms” available at <https://sustainabledevelopment.un.org/sdg16>, accessed August 21, 2018; the UNCAC available at https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf, accessed August 21, 2018; and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, available at https://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf, accessed August 21, 2018.

Exhibit 2 | Commitment to Integrity and Ethical Standards

Culture of Integrity	<ul style="list-style-type: none"> • Set the tone at the top with organization leaders demonstrating high standards of propriety in the discharge of duties. • Adopt high quality standards of integrity and compliance proportionate to the organization's size and economic capacity, and in accordance with its specific risks and legal, regulatory and business requirements. • Establish and implement a code of conduct/ethics that defines clear expectations of personal behavior from the organization's leaders, employees, business associates and third parties with whom they interact.
Transparency	<ul style="list-style-type: none"> • Ensure open, fair and transparent procurement practices. • Establish policies and procedures to identify, monitor and manage conflicts of interest. • Require the disclosure of beneficial ownership information of the entities with which the organization does business.
Accountability	<ul style="list-style-type: none"> • Establish internal controls consistent with applicable laws that prevent misconduct and remediate inadequacies as necessary. • Provide accessible and safe channels to report wrongdoing, and ensure that appropriate and prompt actions are taken in response to such reports.
Social Responsibility	<ul style="list-style-type: none"> • Prevent human rights violations in the organization's operations and provide remedies should they occur. • Eliminate all forms of informal business relationships¹⁸. • Act responsibly in dealing with the local community and environment, and engage with relevant stakeholders as needed.

The middle tier of the framework shows the key role that the public and private sectors play in implementing the CIES and working towards a business environment with a greater level of integrity. The public sector can promote an environment conducive to integrity.¹⁹ As the principal employer in a number of countries, the public sector can set the foundation and push for the application of the CIES within the scope of its authority. The public sector can also address the problems of excessive bureaucracy since it often imposes a disproportionate burden, particularly on small and medium enterprises (SMEs), creating both incentives and opportunities for bribery and corruption. The private sector must make the same commitment, thereby together ensuring a level playing field. It is worth saying that within the private sector, SMEs may need special consideration, including through training, tools and capacity building to comply with international integrity and anti-corruption standards and to be able to access international markets. Civil society also plays a significant and tangible role as it leverages its independence, technical capacity and extensive experience on the ground to monitor and measure progress.

An effective CIES depends on strong foundations rooted in education, rule of law

¹⁸ For the purpose of this paper, the following definition of informal sector of the International Labour Organization shall apply: "The informal sector is broadly characterised as consisting of units engaged in the production of goods or services with the primary objective of generating employment and incomes to the persons concerned. These units typically operate at a low level of organisation, with little or no division between labour and capital as factors of production and on a small scale. Labour relations—where they exist—are based mostly on casual employment, kinship or personal and social relations rather than contractual arrangements with formal guarantees." Resolution concerning statistics of employment in the informal sector, adopted by the Fifteenth International Conference of Labour Statisticians, January 1993, paragraph 5, available at https://www.ilo.org/wcmsp5/groups/public/@dgreports/@stat/documents/normativeinstrument/wcms_087484.pdf, accessed August 8, 2018.

¹⁹ See the OECD Recommendation of the Council on Public Integrity, particularly Section 5 on a whole-of-society approach to integrity, available at <http://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf>, accessed July 7, 2018.

and digitalization, as shown in the base of the Conceptual Framework. Inherent in education is the overarching value of integrity, understood as “the quality of being honest and having strong moral principles” that one refuses to change,²⁰ which is crucial in building or strengthening society’s moral fiber in business and outside of it. The foundation of education can be built at school and within the workforce. Education within the public sector, private sector and in civil society can serve to reinforce the value of integrity in the business environment, and is essential to raising awareness and building the capacity to fight corruption.

Education and ethical norms are undoubtedly the most important pillars for a life-long journey as a responsible leader and decision-maker, whether serving as an elected public official, as a civil servant, as private sector executive or as a member of civil society. UNODC’s Education for Justice initiative seeks to prevent crime and promote a culture of lawfulness through education activities designed for primary, secondary and tertiary levels.²¹ A number of approaches have been recently compiled and reported by the OECD to incorporate education for integrity, namely mainstreaming of public integrity values through the school curriculum, conduct of trainings by public integrity bodies, and development of after-school integrity programs.²²

However, it is crucial to recognize the specific position the private sector has in closing the gaps that the above-mentioned approaches may not fully address at the primary and secondary education levels. The private sector often has not only resources but also the capabilities to work hand-in-hand with the public sector particularly in continued education and certification for integrity and compliance. An illustrative example that had been proposed during the B20 in Cannes to establish a public procurement fellowship and recommended to the G20 was recently announced, despite the number of years necessary to design and ultimately roll it out through the Global Infrastructure Hub, the World Economic Forum (WEF) and Meridiam. Such example demonstrates the potential of mobilizing resources and capabilities to design and roll-out a similar fellowship in the field of integrity and compliance, which could immediately become the minimum common denominator for a new private sector-backed B20 flagship initiative to train government and SOE officials responsible for these critical functions.²³

A strong rule of law is also a critical foundation for achieving a sustainable CIES. It provides an environment where laws and institutions ensure accountability, certainty and equal access to justice.²⁴ To provide such enabling environment, governments should promote laws, institutions and processes consistent with international human rights norms and standards to assure that all actors, private and public, are equally accountable to laws that are enforced and independently adjudicated.²⁵ The rule of

²⁰ *Cambridge Dictionary*, accessed May 14, 2018, <https://dictionary.cambridge.org/es/diccionario/ingles/integrity>.

²¹ For more details, see UNODC’s Education for Justice, available at <https://www.unodc.org/e4j/>, accessed August 8, 2018.

²² OECD, *Education for Integrity: Teaching on Anti-Corruption, Values and the Rule of Law* (n.p.: OECD, 2018), 10-11, accessed May 14, 2018, <https://www.oecd.org/governance/ethics/education-for-integrity-web.pdf>.

²³ See OECD’s Education for Integrity, *op.cit.*; OECD’s Public Governance Reviews, Behavioural Insights for Public Integrity: Harnessing the Human Factor to Counter Corruption, available at https://read.oecd-ilibrary.org/governance/behavioural-insights-for-public-integrity_9789264297067-en#page1; Meridiam’s Launch of the Africa Infrastructure Fellowship Program, available at <http://www.meridiam.com/en/society-investing/blog/launch-of-the-africa-infrastructure-fellowship-program-aifp>; and High-Level Panel on Infrastructure: Recommendations to the G20, Final Report, available at https://us.boell.org/sites/default/files/downloads/HPL_Report_on_Infrastructure_10-26-2011.pdf; all accessed May 14, 2018.

²⁴ UN Global Compact, *Business for the Rule of Law Framework* (n.p.: UN Global Compact, 2015), 3, accessed May 13, 2018, https://www.unglobalcompact.org/docs/issues_doc/rule_of_law/B4ROL_Framework.pdf.

²⁵ UN Security Council, *The rule of law and transitional justice in conflict and post-conflict societies: Report of the Secretary-General* (n.p.: UN, August 23, 2004), 4, accessed May 13, 2018, <http://archive.ipu.org/splz-e/unga07/law.pdf>.

law should also provide appropriate incentives and encouragement for the right behavior,²⁶ and adequate investigation and punishment for the wrong one, as applicable. This ultimately leads to the respect and equal protection of rights, which are indispensable for achieving a sustainable global standard of integrity.

As developed by the UN Global Compact, a strong rule of law includes:

- Clear and accessible laws that protect and assure enforceability of legal rights.
- An independent and impartial justice system that promotes fairness and ensures transparent, timely and predictable resolution of disputes.
- Public institutions that empower business and individuals to make a positive contribution to the economy and society.²⁷

While governments carry the primary duty to establish a strong legal framework and robust institutions, the private sector can play a vital role in advancing good governance and supporting rule of law efforts. This cooperative approach will enhance consistency and certainty with respect to the rule of law, thus strengthening the foundation of the Conceptual Framework.

Digitalization is the third critical foundation on which the CIES stands. Advances in digitalization are transforming the way the world operates, including integrity and compliance practices. For instance, digital technologies cut red tape through the simplification of procedures and integration of workflows, thereby reducing incentives and opportunities for bribery and corruption. Automating services also curtails discretionary powers owing to lesser interactions and involvement in the decision-making process. In addition, the digital revolution is generating data in vast quantities that governments, businesses and civil society can leverage in terms of making informed decisions, enhancing services, and improving transparency and accountability.²⁸ It likewise offers tools to monitor and detect anomalies and underperformance, control high-risk areas, and provide channels for communication, participation and reporting.

Advancing the CIES requires adaptation to digitalization in order to keep up with rapid developments, which likewise needs to be reinforced by the other two elements—education and the rule of law—to ensure that people, institutions and new technologies are all aligned in pursuing integrity and compliance efforts.

Robust policy recommendations must be accompanied by an actionable implementation plan to ensure sustained success. Any approach to effective policy implementation by the G20 must take into consideration the governments' willingness to adopt, replicate and scale up such solutions. Moreover, failure to recognize the importance of new models of public and private cooperation will further hinder the very much needed policy implementation. To be successful in the long term, a series of public and private sector interventions should be mapped out and then assigned to the respective stakeholder groups. For instance, to foster a capacity building program to train public officials and disseminate the use of ethics and integrity standards in government and SOEs. Such exemplary intervention could be delivered as a sponsored G20 fellowship exchange program jointly designed, funded and delivered by

²⁶ For example, an incentive for transparent and complete reporting is a clean/unqualified audit report.

²⁷ UN Global Compact, Promote the rule of law to protect citizens and businesses, accessed May 13, 2018, <https://www.unglobalcompact.org/what-is-gc/our-work/governance/rule-law>.

²⁸ Luis Alberto Moreno, "How tech can fight corruption in Latin America and the Caribbean," WEF, December 14, 2017, accessed July 5, 2018, <https://www.weforum.org/agenda/2017/12/how-technology-is-becoming-a-powerful-ally-in-the-fight-against-corruption-in-latin-america-and-the-caribbean/>.

public and private sector experts collaborating under the B20 umbrella and supported by civil society and multilateral organizations. With the defined output, actors and fundamental elements, this Conceptual Framework shall guide the overall approach of the ICCTG.

RECOMMENDATION 1: ENHANCE INTEGRITY AND TRANSPARENCY IN PUBLIC PROCUREMENT WITH A FOCUS ON INFRASTRUCTURE PROJECTS

Rationale

Public procurement involves a sizable amount of funds and presents vast opportunities for business. It amounted to EUR 4.2 trillion or 12 percent of the Gross Domestic Product (GDP) of the OECD Member Countries in 2013.²⁹ In comparison, the World Bank estimates the average public procurement to be between 15 percent and 30 percent of GDP, and suggests that it could even be higher in other countries.³⁰ Given the amount of tax payer money involved, there is great pressure for governments to protect public interest by ensuring efficient procurement, and obtaining value for money at the same time.

The public procurement of goods, services and infrastructure is a fundamental element in public service delivery. In particular, infrastructure plays an important role in defining economic capacity and has a direct impact on human development, social inclusion and environmental sustainability.³¹ In fact, infrastructure for development is one of the three priorities of G20 Argentina, as it is critical to economic development and boosts both growth and productivity.³²

According to the OECD, the amount of investment in infrastructure must be substantially increased in developing economies to meet social needs and support economic growth. The OECD estimates that global infrastructure investment requirements by 2030 for transport, electricity generation and transmission will total USD 71 trillion—or about 3.5 percent of the annual world GDP from 2007 to 2030.³³ The New Climate Economy cites an even higher amount of USD 90 trillion for investments in infrastructure in cities, land use and energy systems from 2015 to 2030.³⁴ Nevertheless, an IMF study shows that when the value of public capital (input) is compared to the measures of infrastructure coverage and quality (output), average inefficiencies in public investment processes reach roughly 30 percent.³⁵

Public procurement is frequently used by governments as a means of investment in public infrastructure, as sound procurement management can lead to savings, productivity and service improvement,³⁶ as well as build public trust. However, the public procurement process is susceptible to abuse and corruption, specifically the

²⁹ OECD, *Preventing Corruption in Public Procurement* (n.p.: OECD, 2016), 5, accessed February 5, 2018, <http://www.oecd.org/gov/ethics/Corruption-Public-Procurement-Brochure.pdf>.

³⁰ Simon Evenett and Bernard Hoekman, "International Cooperation and the Reform of Public Procurement Policies," *World Bank Policy Research Working Paper 3720* (Washington DC: World Bank, 2005), cited in Transparency International, *Integrity Pacts in Public Procurement: An Implementation Guide* (n.p.: Transparency International, 2013), 16, accessed February 5, 2018, https://www.transparency.org/whatwedo/publication/integrity_pacts_in_public_procurement_an_implementation_guide.

³¹ OECD, *Towards a Framework for the Governance of Infrastructure* (n.p.: OECD, 2015), 1, accessed July 13, 2018, <https://www.oecd.org/gov/budgeting/Towards-a-Framework-for-the-Governance-of-Infrastructure.pdf>.

³² G20 Argentina 2018, Overview of Argentina's G20 Presidency 2018: Building Consensus For Fair and Sustainable Development, December 1, 2017, accessed April 3, 2018, <https://g20.argentina.gob.ar/en/overview-argentinas-g20-presidency-2018>.

³³ OECD, *Fostering Investment in Infrastructure: Lessons Learned From OECD Investment Policy Reviews* (January 2017), 5, accessed April 3, 2018, <https://www.oecd.org/daf/inv/investment-policy/Fostering-Investment-in-Infrastructure.pdf>.

³⁴ The New Climate Economy, *Better Growth, Better Climate: The New Climate Economy Report* (n.p.: The Global Commission on the Economy and Climate, 2014), 1, accessed May 13, 2018, https://newclimateeconomy.report/2016/wp-content/uploads/sites/2/2014/08/New-climate-economy_executive-summary_web.pdf.

³⁵ IMF, *Making Public Investment More Efficient* (Washington D.C.: IMF, 2015), 1, accessed July 13, 2018, <http://www.imf.org/external/np/pp/eng/2015/061115.pdf>.

³⁶ OECD, *Infrastructure & Energy in Public Procurement* (n.p.: OECD, 2018), 1, accessed April 3, 2018, <http://www.oecd.org/gov/public-procurement/infrastructure-energy/>. See also the OECD's Getting Infrastructure Right: A framework for better governance, available at <http://www.oecd.org/gov/getting-infrastructure-right-9789264272453-en.htm>, accessed July 7, 2018.

process to win and to implement contracts. According to an OECD analysis of foreign bribery cases between 1999 and 2014, upwards of 57 percent of bribes worldwide were paid to obtain public procurement contracts.³⁷ The World Bank Enterprise Surveys also show that 29.3 percent of firms at the global level are expected to give gifts averaging 1.8 percent of the contract value to secure government contracts.³⁸ It remains to be the government activity most susceptible to corruption due to the cash flow involved.³⁹ Recent enforcement actions against corporations engaging in bribery during the bidding process of infrastructure projects continue to highlight the susceptibility of the procurement process to corruption. While the OECD's Anti-Bribery Convention currently focuses on the supply side of bribery, the ICCTG calls upon the G20 and the OECD to take note of the demand side and show clear commitment to collectively combat bribe solicitation and explore options for concrete work in this area for a comprehensive fight against corruption.

POLICY ACTIONS

1.1: Establish standardized incentives in public infrastructure procurement

1.2: Ensure openness, fairness, transparency and accountability in the entire procurement cycle of public infrastructure

1.3: Build cooperation, trust and strategic alignment between the public and private sectors in relation with infrastructure projects

POLICY ACTION 1.1: ESTABLISH STANDARDIZED INCENTIVES IN PUBLIC INFRASTRUCTURE PROCUREMENT⁴⁰

G20 Members should establish and enforce incentives⁴¹, in a way that is consistent with applicable procurement laws, for companies that adhere to high quality standards of integrity and compliance⁴² while providing the corresponding guidance and support to SMEs that would address barriers to their involvement in public procurement. Policies suggested include:

- Requiring the existence of, adherence to and public disclosure of a robust, risk-based and effective integrity and compliance program as a condition to access international financing and —with a view to large infrastructure projects— as an incentive to receive higher scoring when participating in public biddings.

³⁷ OECD, *OECD Foreign Bribery Report: An Analysis of the Crime of Bribery of Foreign Public Officials*, (n.p.: OECD Publishing, 2014), 32, accessed April 3, 2018, https://read.oecd-ilibrary.org/governance/oecd-foreign-bribery-report_9789264226616-en.

³⁸ The World Bank, *Enterprise Surveys*, op.cit.

³⁹ OECD, *Public Procurement*, accessed April 3, 2018, <http://www.oecd.org/governance/public-procurement.htm>.

⁴⁰ See WEF's Strategic Infrastructure: Steps to Prepare and Accelerate Public-Private Partnerships, particularly chapters 3 "Structuring a Balanced Risk Allocation" and 4 "Creating a Conducive Enabling Environment," available at http://www3.weforum.org/docs/AF13/WEF_AF13_Strategic_Infrastructure_Initiative.pdf; and WEF's Strategic Infrastructure: Mitigation of Political & Regulatory Risk in Infrastructure Projects, particularly chapters 2 "Public Sector Measures" and 4 "Joint Public-Private Measures," available at http://www3.weforum.org/docs/WEF_Risk_Mitigation_Report_2015.pdf, both accessed May 14, 2018.

⁴¹ For example, in Argentine Law No. 27401, the existence of an Integrity Program is a prerequisite to contract with the national government, and is one of the conditions to reduce and exempt a legal entity from criminal and administrative legal action.

⁴² For examples, refer to the OECD, UNODC, and World Bank's Anti-Corruption Ethics and Compliance Handbook for Business, op.cit.; OECD's Due Diligence Guidance for Responsible Business Conduct, available at <http://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>, accessed May 13, 2018; International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants; and ISO 37001 Anti-Bribery Management Systems.

- Requiring the public disclosure of ownership information for all bidders and subcontractors, and encouraging the disclosure of ownership information of the direct supply chain to identify and address conflicts of interest, and increase the transparency and integrity of the procurement process.
- Evaluating integrity standards using relevant, predictable and objective criteria and scoring methods to avoid unfair treatment and discrimination.⁴³
- Encouraging the continuous improvement and periodic review of the integrity and compliance program throughout the contract life cycle.
- Providing enforcement authorities with the mandate, autonomy and resources to audit compliance with requirements.
- Recognizing companies' compliance and anti-corruption efforts through laws and policies that mitigate liability.
- Promoting and rewarding of voluntary self-disclosure and self-cleaning in case of internally detected misconduct.

POLICY ACTION 1.2: ENSURE OPENNESS, FAIRNESS, TRANSPARENCY AND ACCOUNTABILITY IN THE ENTIRE PROCUREMENT CYCLE OF PUBLIC INFRASTRUCTURE⁴⁴

G20 Member Governments should ensure that all stakeholders are able to participate in and monitor the procurement process by enabling timely access to information that is provided in line with the G20 Anti-Corruption Open Data Principles and across the contracting process and contract cycle, identifying opportunities to employ technology in the procurement process, and streamlining procedures. Policies suggested include:

- Adopting an e-procurement system that is user-friendly, transparent and accessible to all stakeholders.⁴⁵
- Using new digital technologies to streamline the process, generate meaningful data, identify red flags, track and monitor progress, and guide procurement decisions.⁴⁶
- Implementing transparent processes throughout the procurement cycle.
- Establishing accountability and control mechanisms throughout the procurement cycle including the timely and public announcements of projects, as well as of pre-determined and restricted exceptions to competitive procurement.

⁴³ For examples, refer to the procurement policies of Korea and Europe that allow bidders to reapply for public contracts, in the event of previous misconduct, provided that they have since implemented effective measures to manage the risk.

⁴⁴ See WEF's Strategic Infrastructure: Steps to Prepare and Accelerate Public-Private Partnerships, op.cit.; WEF's Strategic Infrastructure: Mitigation of Political & Regulatory Risk in Infrastructure Projects, op.cit.; WEF's Building Foundations for Trust and Integrity, particularly the chapters on "Trust as an Engine for Growth" and "Enablers for Rebuilding Trust and Integrity," available at http://www3.weforum.org/docs/WEF_PACI_IU_Report_2017.pdf; WEF's Learnings from the Field: Cases on Corruption in the Infrastructure and Urban Development Industries, particularly the chapters on "Bribery of Government Officials for Obtaining Business" and "Compliance Programme to Achieve Cultural Change," available at http://www3.weforum.org/docs/WEF_IU_PACI_2014_Learning_from_the_field.pdf, all accessed May 14, 2018; and OECD's Integrity Framework for Public Infrastructure, available at <https://www.oecd.org/corruption/ethics/Integrity-Framework-For-Public-Infrastructure-Brochure.pdf>, accessed July 7, 2018.

⁴⁵ For an example, refer to the Open Contracting Data Standard. In South America, there are some e-procurement projects that are being implemented such as Chile Compra, available at <http://www.chilecompra.cl> and Colombia Compra Eficiente, available at <https://www.colombiacompra.gov.co/>, both accessed June 22, 2018.

⁴⁶ For an example, refer to the Open Contracting Data Standard.

- Promoting a culture of ethics and integrity in all the phases of the procurement cycle.
- Reporting publicly on the public procurement policies and procedures and their implementation.

POLICY ACTION 1.3: BUILD COOPERATION, TRUST AND STRATEGIC ALIGNMENT BETWEEN THE PUBLIC AND PRIVATE SECTORS IN RELATION WITH INFRASTRUCTURE PROJECTS⁴⁷

G20 Members should facilitate collective action⁴⁸ between the public and private sectors by developing complementary and joint efforts that prevent corruption while preserving their respective independence. Taking into account that the building of trust requires a concerted commitment to implement and enforce transparency, G20 Members must also promote initiatives and reporting mechanisms that promote openness, dialogue and accountability⁴⁹. Policies suggested include:

- Promoting international instruments and voluntary integrity mechanisms.⁵⁰
- Encouraging the conduct of trainings and the sharing of best practices to address integrity issues between the public and private sectors.⁵¹
- Ensuring that effective legal remedies are in place for large public contracts above the thresholds of the Government Procurement Agreement of the World Trade Organization, which allows for effective intervention in procurement procedures in cases of infringements of public procurement law.
- Avoiding multiple prosecutions and sanctions for the same offence by establishing an international legal framework for the application of the *non bis in idem* (double jeopardy) principle and/or consultation mechanisms to determine the most appropriate jurisdiction for prosecution, and/or encouraging law enforcement cooperation, joint investigations and coordinated sanctions when more than one G20 Member has jurisdiction over an alleged offense related to public infrastructure procurement.
- Enacting laws that regulate contributions by the private sector to finance political party and electoral campaigns to enable the transparent flow of funds from the private sector (including legal entities) to recipients. These laws should also include preventing SOEs from becoming potential donors, thereby avoiding the dishonest deviation of funds destined to public works towards politics.

⁴⁷ See WEF's Strategic Infrastructure: Steps to Prepare and Accelerate Public-Private Partnerships, op.cit.; WEF's Strategic Infrastructure: Mitigation of Political & Regulatory Risk in Infrastructure Projects, op.cit.; WEF's Building Foundations for Trust and Integrity, op.cit.; WEF's Learnings from the Field: Cases on Corruption in the Infrastructure and Urban Development Industries, op.cit.; and OECD's Recommendation of the Council on Principles for Public Governance of Public-Private Partnerships, available at <https://www.oecd.org/governance/budgeting/PPP-Recommendation.pdf>, accessed July 7, 2018.

⁴⁸ See the B20 Collective Action Hub, available at <https://www.collective-action.com/>, accessed June 22, 2018.

⁴⁹ For examples, refer to the International Public Sector Accounting Standards and integrated reporting, which promotes increased transparency and provides greater confidence to encourage long-term investment in infrastructure projects.

⁵⁰ For examples, refer to High Level Reporting Mechanisms, Integrity Pacts and integrity dialogue for collective action among international contractor associations starting from France and South Korea.

⁵¹ For examples, refer to the International Chamber of Commerce (ICC) Anti-Corruption Clause in public-private contracts, "Resist" type of training workshops, integrated reporting, mandatory training for bidders in Korea and the open contracting approach.

- Demonstrating swift and exemplary enforcement of the rule of law for any violation of the public procurement laws.
- Enacting laws that regulate and facilitate an effective, rapid and transparent recovery of assets derived from corruption in line with Chapter V of the UN-CAC.

RECOMMENDATION 2: IMPLEMENT HIGH STANDARDS OF ETHICS AND INTEGRITY WITH A FOCUS ON SOES

Rationale

Ethics and integrity are important elements for all organizations, not just for fostering a positive working environment but also in terms of improving reputation and creating long-term value. For the public sector, implementing high standards of ethics and integrity is especially crucial in rebuilding trust in public institutions and laying the groundwork for sustainable growth.

It is likewise important for SOEs to implement such standards because, particularly in emerging markets, SOEs can represent a large portion of many countries' GDPs and are often used by governments to provide critical services to citizens, such as water and energy. SOEs continue to increase as major players in the international market, competing directly with some of the largest private corporations. According to the UN Conference on Trade and Development, roughly 1,500 state-owned multinational enterprises have more than half of their headquarters in developing countries and nearly a third in the European Union (EU). These SOEs own almost ten percent of all foreign affiliates.⁵² Moreover, Transparency International states that approximately one quarter of Fortune 500 companies are state owned and are often the largest employers in certain countries.⁵³

Evidence suggests that SOEs are particularly susceptible to bribery and corruption. An OECD analysis of the proportions of bribes paid to public officials found that the vast majority of bribes promised, offered or given were to SOE officials, with 80 percent of total bribes (measured by the amounts involved) being paid to SOE officials.⁵⁴ The most serious recent cases of bribery have reached a scale where the consequences of the dishonesty had significant consequence for government finances. Moreover, SOEs operating at the national and municipal levels are often concentrated in sectors concerned with the delivery of public services, and when they face severe corruption risks the negative consequences are felt directly by citizens and private businesses. Finally, a number of recent corruption scandals have furthermore highlighted additional issues that may arise from large SOEs competing in the global marketplace.

In the private sector, like multinational corporations, SMEs too are exposed to corruption risks but often lack sufficient resources to implement a proportionate response. Training and capacity building tools enable SMEs to respond effectively to corruption challenges and can thus further spread responsible business practices throughout the supply and distribution chains, leading to growth and investment. The G20 has recognized the need for anti-corruption education for SMEs in G20 Member Countries. SMEs would benefit from additional support on how to address corruption risks.⁵⁵

⁵² UN Conference on Trade and Development, *World Investment Report 2017: Investment and the Digital Economy* (Geneva: UN, 2017), xi, accessed May 13, 2018, http://unctad.org/en/PublicationsLibrary/wir2017_en.pdf.

⁵³ Transparency International, *Transparency International Launches 10 Anti-Corruption Principles for State-Owned Enterprises*, November 28, 2017, accessed April 3, 2018, https://www.transparency.org/news/pressrelease/transparency_international_launches_10_anti_corruption_principles_for_soes.

⁵⁴ OECD, *OECD Foreign Bribery Report: An Analysis of the Crime of Bribery of Foreign Public Officials*, 25.

⁵⁵ These tools could include the G20/B20 Turkey 2015's Anti-Corruption Toolkit for Small and Medium Sized Companies, available at <https://irp-cdn.multiscreensite.com/e0b6c17a/files/uploaded/B20-G20%20Anti-corruption-Toolkit%20for%20SMEs%202015.1.pdf>; and ICC's Anti-Corruption Third Party Due Diligence: A Guide for Small and Medium Size Enterprises, available at <https://cdn.iccwbo.org/content/uploads/sites/3/2015/07/ICC-Anti-corruption-Third-Party-Due-Diligence-A-Guide-for-Small-and-Medium-sized-Enterprises.pdf>, both accessed May 14, 2018.

POLICY ACTIONS

2.1: Ensure that SOEs commit and adhere to high quality standards of integrity and compliance, and assume accountability to stakeholders including reporting publicly on anti-corruption programs

2.2: Promote collective action among SOEs, the general government and the private sector

POLICY ACTION 2.1: ENSURE THAT SOEs COMMIT AND ADHERE TO HIGH QUALITY STANDARDS OF INTEGRITY AND COMPLIANCE, AND ASSUME ACCOUNTABILITY TO STAKEHOLDERS INCLUDING REPORTING PUBLICLY ON ANTI-CORRUPTION PROGRAMS

G20 Members should demonstrate their continuing commitment to upholding integrity by (i) applying high quality standards of integrity and compliance within the public sector itself, and (ii) ensuring that SOEs and other companies—including SMEs—implement the same standards in line with international good practice⁵⁶ and SOE anti-corruption guidelines⁵⁷, and publicly disclose such standards, particularly in connection with procurement and bidding processes. Policies suggested include:

- Ensuring the adoption of programs or measures to combat corruption and to promote integrity, and encouraging similar mechanisms to set the tone at the top.
- Requiring the disclosure of beneficial ownership information.
- Ensuring the establishment of controls to prevent, detect and manage conflicts of interest in an ongoing manner.
- Ensuring that SOEs apply good governance with balanced board of directors, representation of independent directors, and a rigorous and transparent process for the appointment of board directors.
- Ensuring the adoption and implementation of high-quality reporting, governance and financial management practices across all sectors.⁵⁸
- Ensuring that SOEs report publicly on their commitments to ethics and integrity, on their beneficial ownership and on the design and implementation of their anti-corruption programs.
- Ensuring the enhancement of the skills, capacities and expertise of SOE boards of directors, managers and employees.
- Preventing the channeling of procurement activities through SOEs for the purpose of circumventing public procurement.

⁵⁶ For examples, refer to the OECD, UNODC, and World Bank's Anti-Corruption Ethics and Compliance Handbook for Business, op.cit. and the OECD Guidelines on Corporate Governance of State-Owned Enterprises, op.cit.

⁵⁷ For an example, refer to Transparency International's 10 Anti-Corruption Principles for SOEs, available at https://www.transparency.org/whatwedo/publication/10_anti_corruption_principles_for_state_owned_enterprises, accessed May 13, 2018.

⁵⁸ For examples, refer to the OECD Guidelines on Corporate Governance of State-Owned Enterprises, op.cit. and the International Financial Reporting Standard.

- Supporting international efforts to develop anti-corruption and integrity guidance for the state as SOE owners.

POLICY ACTION 2.2: PROMOTE COLLECTIVE ACTION AMONG SOEs, THE GENERAL GOVERNMENT AND THE PRIVATE SECTOR

G20 Members should facilitate the professional cooperation between the public and private sectors by developing joint initiatives, building trust and exchanging information and lessons learned, among others, that encourage the adoption of robust best practices on integrity and the implementation of effective compliance measures across all sectors. Such facilitation should not come at the expense of maintaining a strict separation of government functions in the exercise of ownership of SOEs. Policies suggested include:

- Encouraging the public and private sectors to consider anti-corruption collective action based on their risk assessments and as part of a risk-based approach.
- Encouraging SOEs to adopt integrity mechanisms and guidelines that require a multi-stakeholder approach.⁵⁹
- Promoting the transfer of knowledge and good practice on integrity among the public sector, private sector and SOEs.⁶⁰
- Fostering dialogue, cooperation and collaboration between the public and private sectors to strengthen their respective compliance capacities and supply chains.

⁵⁹ For examples, refer to Integrity Pacts, High Level Reporting Mechanisms and neutral facilitators. See also the OECD's Getting Infrastructure Right: A framework for better governance, op.cit.

⁶⁰ For examples, refer to the ICC Anti-Corruption Clause in public-private contracts, "Resist" type of training workshops, integrity and compliance roundtable with private sector and SOE leaders, integrity fellowship program and integrated reporting.

RECOMMENDATION 3: PURSUE THE IMPLEMENTATION OF BENEFICIAL OWNERSHIP TRANSPARENCY

Rationale

In the past five years, a global norm has emerged around beneficial ownership transparency. As a result, beneficial ownership information has become important for curbing money laundering and terrorist financing, promoting markets that are fair and free from conflict of interest, reducing the costs and enhancing the effectiveness of due diligence for business and government. In the longer term, beneficial ownership transparency can contribute to enhanced public accountability and trust across societies.

The G20, supported by the B20, was at the forefront of this effort to drive beneficial ownership transparency, with the introduction of the High-Level Principles on Beneficial Ownership Transparency⁶¹ in 2014. G20 Governments should continue to play a leadership role in promoting transparency around ultimate beneficial owners of companies. By pursuing beneficial ownership transparency, and ending the anonymous companies it enables, the G20 takes a positive step for all stakeholders engaged in integrity and compliance.

The G20 is not alone in moving ahead. Recent advances in the EU and the Extractive Industries Transparency Initiative (EITI), for instance, demonstrate that consensus has been built about the importance of beneficial ownership transparency and the availability of public registers to document them. Within the EU, the Fourth Anti-Money Laundering Directive already required Member States to establish registers for beneficial ownership until mid-2017. With the Fifth Directive, the amendment requires the registers to be public and interconnected, and a verification mechanism for the accuracy of data to be established. EU Member States must implement the new rules into their national legislation by January 2020.⁶² In 2016, the EITI set out a new standard⁶³ that also requires more than 50 EITI compliant countries to implement public reporting of beneficial ownership by extractive companies by 2020.

Several countries, starting with a group that made commitments to beneficial ownership transparency at the UK Anti-corruption Summit in 2016, have begun to set the standard by passing legislation and setting up public registers of beneficial ownership. A global public register has also been set up, to which the United Kingdom and other governments are already providing information, as a joint initiative guided by leading transparency organizations and allied businesses.⁶⁴ This will enable cross-jurisdictional and cross-business ownership to be ascertained.

While legal persons and arrangements have a valid function in the global economy, they have also been used to facilitate crimes such as tax evasion, fraud, money laundering, counterfeiting, bribery and corruption, and terrorist financing. Ensuring that authorities have access to information regarding the ultimate beneficial owner, source of assets and business objectives could considerably deter and/or enable the redress of the wrongful use of legal persons and arrangements.⁶⁵ This would be an

⁶¹ The G20 High-Level Principles on Beneficial Ownership Transparency is available at https://star.worldbank.org/sites/star/files/g20_high-level_principles_beneficial_ownership_transparency.pdf, accessed June 22, 2018.

⁶² The details of the Fifth Anti-Money Laundering Directive are available at http://ec.europa.eu/newsroom/just/document.cfm?action=display&doc_id=48935, accessed July 13, 2018.

⁶³ The details of the EITI standard is available at https://eiti.org/sites/default/files/documents/the_eiti_standard_2016_-_english.pdf, accessed June 22, 2018.

⁶⁴ See Open Ownership, available at <https://openownership.org/>, accessed July 13, 2018.

⁶⁵ Financial Action Task Force (FATF), *The Misuse of Corporate Vehicles, including Trust and Company Service Pro-*

enormous boost to law enforcement efforts, which can be frustrated by lack of transparency in company ownership, hindering their ability to follow the money in cases of money laundering, for instance.⁶⁶

The private sector, too, has a strong interest in the public availability of accurate and standardized beneficial ownership data.⁶⁷ The EY Global Fraud Survey in 2016 found that 91 percent of senior executives believe it is important to know the ultimate beneficial ownership of the entities with which they do business.⁶⁸ SMEs, too, have an interest in beneficial ownership transparency. In the United States, Small Business Majority recently ran a poll that found that:

- 84 percent of small business owners say the use of shell companies to secure contracts or obtain government set-asides reserved for small businesses is a problem.
- 77 percent of small business owners agree that Congress should pass legislation that would mandate businesses to disclose the true identity of their owners.⁶⁹

In addition, many companies have been increasingly active in their support of government providing public beneficial ownership information, citing the role of such information in fraud and loss prevention, the reduction of investment risk, assistance with integrity and compliance requirements, and generating a positive impact on competition.⁷⁰ The G20 has been promoting the implementation of its High-Level Principles on Beneficial Ownership Transparency since they were adopted nearly five years ago in Brisbane, Australia. The G20 Anti-Corruption Working Group, with its multiyear action plans, including the G20 Anti-Corruption Action Plan 2017-2018, has consistently pointed to the need to expose corruption and illicit finance, and to implement beneficial ownership action plans as a remedy to this.⁷¹

The FATF developed the first international standards on beneficial ownership in 2003 and later strengthened them in 2012.⁷² Of the five G20 countries that have been assessed against these FATF standards, compliance has been modest.⁷³ A 2018 report by Transparency International on the level of implementation of the G20 Bene-

viders (Paris: FATF/OECD, 2006), 17, accessed February 13, 2018, <http://www.fatf-gafi.org/media/fatf/documents/reports/Misuse%20of%20Corporate%20Vehicles%20including%20Trusts%20and%20Company%20Services%20Providers.pdf>.

⁶⁶ A good example of the link between police investigation and the prevalence of anonymous companies is found in the London property market. See Transparency International's *Corruption on Your Doorstep: How Corrupt Capital is Used to Buy Property in the UK*, available at <http://www.transparency.org.uk/publications/corruption-on-your-doorstep/#.WxjSVFOFNTY>, accessed June 22, 2018.

⁶⁷ See The B Team's *Developing the Business Case for Beneficial Ownership Transparency*, available at <http://www.bteam.org/announcements/the-business-case-for-beneficial-ownership-transparency/>, accessed June 22, 2018.

⁶⁸ EY, *Global Fraud Survey 2016*, Key Findings, accessed June 22, 2018, <https://www.ey.com/gl/en/services/assurance/fraud-investigation---dispute-services/ey-global-fraud-survey-2016>.

⁶⁹ Small Business Majority, *Small Business Owners Support Legislation Requiring Transparency in Business Formation*, April 4, 2018, accessed July 13, 2018, <http://www.smallbusinessmajority.org/our-research/entrepreneurship-freelance-economy/small-business-owners-support-legislation-requiring-transparency-business-formation>.

⁷⁰ See The B Team's *Ownership is Everyone's Business*, available at <http://www.bteam.org/announcements/ownership-is-everyones-business/>, accessed June 22, 2018.

⁷¹ See G20 2016 China's G20 Anti-Corruption Action Plan 2017-2018, *op.cit.*

⁷² In response to a G20 mandate in 2014, the OECD's Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) has drawn on the work of the FATF in incorporating a beneficial ownership criterion into its standards on tax transparency. In 2016 the G20 Finance Ministers and Central Bank Governors mandated the Global Forum and the FATF to work together to study ways to improve the implementation of the international standards on transparency, including on the availability of beneficial ownership information and its international exchange. This mandate was strengthened in 2017 with the recognition by G7 Finance Ministers and Central Bank Governors of the work by the FATF and the Global Forum on reinforcing inter-agency and international cooperation, in particular on beneficial ownership information, and work by the OECD in complementary tax areas relating to beneficial ownership.

⁷³ FATF, *Consolidated assessment ratings*, updated January 30, 2018, accessed February 13, 2018, <http://www.fatf-gafi.org/media/fatf/documents/4th-Round-Ratings.pdf>.

ficial Ownership Principles shows that eleven G20 countries still have weak or average beneficial ownership legal frameworks. This is an improvement from the 15 countries reported in 2015. Still, progress has been slow.⁷⁴

First and foremost, G20 countries need to improve their implementation of beneficial ownership transparency, as they have committed to doing for the past five years. Implementation of beneficial ownership transparency is also linked to the success of other G20 priorities. Global growth, trade and investment, domestic resource mobilization, development assistance, and free and fair markets all require an open and transparent environment free of corruption. Public procurement, too, would be cleaner if beneficial owners of all bidders had to be known. Likewise, safeguarding the global financial system from bad actors would re-instill public trust and eliminate the means for illegal activity to appear legitimate. Regulatory consistency across nations is imperative and would aid corporations of all sizes to compete on a global scale.

In addition, the G20 must keep pace with its commitment to be a global leader on the issue of beneficial ownership transparency. To reflect global movement on this issue, including considerable progress on this area of reform, the G20 should emphasize the need for public and free access to beneficial ownership information, and the publication of information using best-in-class open data standards, for ease of sharing and use.⁷⁵

In sum, the ICCTG underscores the need for the concrete implementation of beneficial ownership transparency and the continuity of efforts in this area across G20 Presidencies. It reiterates the call made by the B20 Germany Responsible Business Conduct and Anti-Corruption Task Force for the G20 to lead the world in realizing beneficial ownership transparency and to support the joint efforts to strengthen the implementation of beneficial ownership transparency standards undertaken by the FATF and the OECD.

POLICY ACTIONS

3.1: Implement previously established beneficial ownership action plans and ensure consistency in beneficial ownership regulation including for Designated Non-Financial Businesses and Professions (DNFBPs) and legal professional privilege

3.2: Mandate public registers of beneficial ownership that utilize globally consistent data classifications and verification of information

3.3: Develop rules for effective and efficient exchange of information

⁷⁴ Transparency International, *G20 Leaders or Laggards? Reviewing G20 Promises on Ending Anonymous Companies* (Berlin: Transparency International, 2018), 10, accessed May 20, 2018, https://www.transparency.org/whatwedo/publication/g20_leaders_or_laggards.

⁷⁵ The United Kingdom implemented a public register of beneficial ownership, the People with Significant Control Register, in 2016. The register currently lists beneficial owners for more than three million companies. While there is always room for improvement, the register is the first of its kind in the G20 and its availability for public use ensures that its data can be verified against other sources of information. It is important to note that concerns about privacy of beneficial owners—one key argument put forth against public registers—have not proven significant in the United Kingdom. After the initial filings, only approximately 30 requests were granted to keep ownership anonymous. The United Kingdom continues to lead in this area and in May 2018 the UK government passed legislation requiring public registers of beneficial ownership in its overseas territories, many of which have long been associated with illicit financial flows and the use of anonymous company structures.

POLICY ACTION 3.1: IMPLEMENT PREVIOUSLY ESTABLISHED BENEFICIAL OWNERSHIP ACTION PLANS AND ENSURE CONSISTENCY IN BENEFICIAL OWNERSHIP REGULATION INCLUDING FOR DNFBPs AND LEGAL PROFESSIONAL PRIVILEGE

G20 Members should ensure the implementation of previously created beneficial ownership action plans, making sure that regulation of beneficial ownership is consistent, to remove regulatory arbitrage and to aid businesses who need to provide and use this information from having to comply with differences across jurisdictions. This will ensure a level playing field for all and remove prospective barriers to entry. Policies suggested include:

- Aligning beneficial ownership action plans with FATF Recommendations and subsequent FATF proposals to the G20, taking account of the growing body of knowledge around best practice in this field.
- Ensuring proper enforcement of beneficial ownership transparency legal regimes, creating more uniform laws and penalties for those who are found complicit in illegal activity, to address those (including non-financial service providers [DNFBPs]) engaged in leveraging current legal frameworks to conceal ownership information, considering legal professional privilege.
- Monitoring implementation and reporting on progress.

POLICY ACTION 3.2: MANDATE PUBLIC REGISTERS OF BENEFICIAL OWNERSHIP THAT UTILIZE GLOBALLY CONSISTENT DATA CLASSIFICATIONS AND VERIFICATION OF INFORMATION

G20 Members should ensure access to beneficial ownership information by mandating public registers of beneficial ownership that utilize globally consistent data classifications and verification of information. This will combat corruption and money laundering at all levels of government and corporate business dealings, as well as ensure transparency in public procurement across the supply chain. Policies suggested include:

- Providing high quality, reliable beneficial ownership data.
- Making national registers publicly available and free of charge or considering the use of a global public register.
- Adopting best-in-class open data standards to create ease of use for all stakeholders.⁷⁶

POLICY ACTION 3.3: DEVELOP RULES FOR EFFECTIVE AND EFFICIENT EXCHANGE OF INFORMATION

G20 Members should scale the availability and use of beneficial ownership information by creating rules to ensure its effective and efficient exchange. International standards on data privacy, data handling and data classification must be defined. Policies suggested include:

⁷⁶ This includes developing measures and guidance to facilitate access for users and enhancing inter-agency cooperation through improved information sharing.

- Establishing guidelines on the process for accessing beneficial ownership information, including how the responsible authorities should handle these requests.
- Providing guidance on country-specific legal arrangements that will ensure authorities are able to efficiently share both non-confidential and confidential information with other counterparts.
- Expanding access and exchange with non-G20 countries, especially with regard to the development and use of public registers.

ANNEX**LIST OF ACRONYMS AND ABBREVIATIONS**

B20	Business 20 (G20 Engagement Group)
C20	Civil 20 (G20 Engagement Group)
CIES	Commitment to Integrity and Ethical Standards
DNFBPs	Designated Non-Financial Businesses and Professions
EITI	Extractive Industries Transparency Initiative
EU	European Union
FATF	Financial Action Task Force
G20	Group of Twenty
GDP	Gross Domestic Product
Global Forum	Global Forum on Transparency and Exchange of Information for Tax Purposes
ICC	International Chamber of Commerce
ICCTG	Integrity & Compliance Cross-Thematic Group
IMF	International Monetary Fund
OECD	Organisation for Economic Co-operation and Development
SDGs	Sustainable Development Goals
SMEs	Small and Medium Enterprises
SOEs	State-Owned Enterprises
UN	United Nations
UNCAC	United Nations Convention Against Corruption
UNODC	United Nations Office on Drugs and Crime
WEF	World Economic Forum

SCHEDULE OF TASK FORCE EXCHANGES

#	Date	Location	Theme
1	March 23 rd , 2018	Teleconference	Task Force Kick-Off: topic selection based on survey results
2	April 20 th , 2018	Washington D.C., United States	1 st in person meeting: discuss first draft
3	May 28 th , 2018	Paris, France	Joint Task Force Meeting: discuss 2 nd draft
4	July 2 nd , 2018	Teleconference	2 nd call: review 2 nd iteration cycle and 3 rd draft
5	July 20 th , 2018	Buenos Aires, Argentina	3 rd in person meeting & Buenos Aires Anti-Corruption Compact side event: 1 st advocacy meeting
6	August 27 th , 2018	Teleconference	3 rd call: close final draft
8	October 5 th , 2018	Buenos Aires, Argentina	B20 Summit: 2 nd advocacy meeting

TASK FORCE MEMBERSHIP LIST

Name	Company/Organization	Country	Deputy
------	----------------------	---------	--------

COORDINATION GROUP

Chair			
Jorge Mandelbaum	CIPPEC	Argentina	
Co-Chairs			
Maria Elena Casasnovas	ASOCIACION CRISTIANA DE DIRIGENTES DE EMPRESA (ACDE)	ARGENTINA	
Sujata Dajal	JOHNSON & JOHNSON	UNITED STATES	José Priegue
Jacqueline Donaldson	NESTLE	LATAM	
Marc Firestone	PHILIP MORRIS INTERNATIONAL	SWITZERLAND	Livio Vanghetti
Corinne Lagash	SAFRAN	FRANCE	
Klaus Moosmayer	SIEMENS AG	GERMANY	Dalma Parisi
Paula Morrone	UNILEVER DE ARGENTINA S.A.	LATAM	Rocio Leguizamo
B20 Sherpa			
Fernando Landa	BUSINESS 20	INTERNATIONAL	Fernando Landa
Knowledge Partner			
Andrea Rey	Ernst & Young	ARGENTINA	
Sergio Medina	Ernst & Young	ARGENTINA	
Mary Rose Guzman	Ernst & Young	ARGENTINA	
Concept Partners			
Patricia Moreira	TRANSPARENCY INTERNATIONAL	INTERNATIONAL	Katja Bechtel
Network Partners			
Hanni Rosenbaum	BUSINESS AT THE OECD	INTERNATIONAL	
Viviane Schiavi	INTERNATIONAL CHAMBER OF COMMERCE	FRANCE	Laura Chan Aramendi
Rachel Grimes	INTERNATIONAL FEDERATION OF ACCOUNTANTS	INTERNATIONAL	Amir Ghandar

Carol Bellringer	INTERNATIONAL FEDERATION OF ACCOUNTANTS	INTERNATIONAL	Gary Pflugrath
Ramya Krishnaswamy	WORLD ECONOMIC FORUM	INTERNATIONAL	Isabel Cane
Members			
Sebastian Parigi	JOHNSON&JOHNSON	INTERNATIONAL	
Guinand Grégoire	MOUVEMENT DES ENTREPRISES DE FRANCE (MEDEF)	INTERNATIONAL	
Pedro Rodrigues de Almeida	PHILIP MORRIS INTERNATIONAL	ARGENTINA	

Name	Company/Organization	Country	Deputy
-------------	-----------------------------	----------------	---------------

TASK FORCE MEMBERS

Isobel Wu	360	CHINA	
Guillermo Gonzalez Prieto	ABBVIE S.A.	ARGENTINA	
Nicolas Messina	ABECEB	ARGENTINA	
Alejandro Almarza	ADEBA	ARGENTINA	
Gustavo Nigohosian	CORPORACIÓN AMÉRICA AIR-PORTS	ARGENTINA	
Mariana Regueira Corti	AHK ARGENTINA	GERMANY	Sofia Lirussi
Sylvie Kandé De Beaupuy	AIRBUS	FRANCE	
Alain Viallix	ALCATEL-LUCENT	FRANCE	
Naqschbandi Noor	ALLIANCE FOR INTEGRITY	GERMANY	Carolina Echevarria
Robert Sutini	AMERICAN CLUB	UNITED STATES	
Nicolas Noro Villagra	ANHEUSER-BUSCH INBBEV (QUILMES)	ARGENTINA	
Yilmaz Arguden	ARGE CONSULTING	TURKEY	Erkin Erimez
Enrique Prini Estebecorena	ASOCIACIÓN ARGENTINA DE ETICA Y COMPLIANCE	ARGENTINA	Enrique Prini Estebecorena
Demetrio Bravo Aguilar	ASOCIACIÓN DE BANCOS PÚBLICOS Y PRIVADOS DE LA R.A. (ABAPPRA)	ARGENTINA	

Dominique Hogan-Doran SC	AUSTRALIAN BAR	AUSTRALIA	
Ramiro Cabrero	BAKER HUGHES, A GE COMPANY	ARGENTINA	
Maria Marta Talice Laboratto	BANCO PROVINCIA DE LA BUENOS AIRES	ARGENTINA	
Lida Preyma	BANK OF MONTREAL	CANADA	
Gretta Fenner	BASEL INSTITUTE ON GOVERNANCE	SWITZERLAND	Gemma Aiolfi
Andrea Rodriguez	BAYER	GERMANY	
Maximiliano D'Auro	BECCAR VARELA	ARGENTINA	
Marco Fernandes	BERKELEY RESEARCH GROUP	BRAZIL	Denise Debiassi
Susana Sierra	BH COMPLIANCE	CHILE	
Geoff Healy	BHP	AUSTRALIA	Martin Commons
Ricardo Corona Castellanos	BOCAR GROUP	MEXICO	
Augusto Muench	BOEHRINGER INGELHEIM	ARGENTINA	
Maryse Tremblay	BOMBARDIER INC.	CANADA	
Vincenzo Dell'Osso	BONELLIEREDE	ITALY	
Nicola Giovinazzi	BRISTOL-MYERS SQUIBB SRL - ITALY	ITALY	José Alberto Cerutti
Ronald Ridderbeekx	BRITISH AMERICAN TOBACCO PLC	UNITED KINGDOM	John Flint
Lorena Bartomioli	BRONS & SALAS	ARGENTINA	
H. Daniel Alvarez	BUREAU VERITAS	ARGENTINA	Patricia Bucet
François Vincke	CABINET WILLKIE FARR & GALLAGHER LLP	BELGIUM	
Tamara Geraldine Quiroga	CÁMARA ARGENTINA COMERCIO Y SERVICIOS	ARGENTINA	Esteban Mancuso
Cristian Vial	CAMARA CHILENA DE LA CONSTRUCCION	CHILE	
Isaías Drajer	CÁMARA INDUSTRIAL DE LABORATORIOS FARMACÉUTICOS ARGENTINOS	ARGENTINA	Mariano Genovesi
Huasheng Chen	CHINA COUNCIL FOR THE PROMOTION OF INTERNATIONAL TRADE	CHINA	

Ignacio Salguero Salguero	CHUBB	UNITED KINGDOM	
Jose María Campos Gorriño	CONFEDERATION OF EMPLOYERS AND INDUSTRIES OF SPAIN (CEOE)	SPAIN	
Maria Jose Alzari	ARGENTINEAN BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT (CEADS)	ARGENTINA	
Teresa Padó	COPAL	ARGENTINA	
Rafaela Fontenelli	CSN	BRAZIL	
Alfredo Domínguez Ruiz-Huerta	CUATRECASAS	SPAIN	Paloma Blázquez Rodríguez
Davinder Singh	DREW & NAPIER LLC	SINGAPORE	
Allan McCrea Steele	EDELMAN	UNITED STATES	Gonzalo Plecity
Gönenç Gürkaynak	ELIG, ATTORNEYS-AT-LAW	TURKEY	Ceren Yıldız
Esteban Pilatti	EMPRESA CONSTRUCTORA PILATTI S.A.	ARGENTINA	
José Luis Arnoletto	FED ARG DE CONSEJOS PROFESIONALES DE CIENCIAS ECONÓMICAS	ARGENTINA	Ana María Daqua
Sergio Torretti	FEDERACIÓN INTERAMERICANA DE LA INDUSTRIA DE LA CONSTRUCCIÓN	CHILE	
Stormy-Annika Mildner	FEDERATION OF GERMAN INDUSTRIES (BDI)	GERMANY	Lea Spörcke
Lee Tashjian	FLUOR	UNITED STATES	
Gonzalo Guzman	GLAXOSMITHKLINE (GSK)	UNITED KINGDOM	Maria Arbona
Angela Joo-Hyun Kang	GLOBAL COMPETITIVENESS EMPOWERMENT FORUM (GCEF)	INTERNATIONAL	
Maria Eugenia Sampalione	GOLDCORP	CANADA	
Therese Lee	GOOGLE	UNITED STATES	
Laurence Loyer	GRUPO SUPERVIELLE	FRANCE	
Elisa Sardi	GRUPO TECHINT	ARGENTINA	Agustina Tognola
Anna Carolina Miranda Bastos do Valle	HERMANO ADVOGADOS	BRAZIL	

Adrián Eduardo Finochiaro	HIPÓDROMO ARGENTINO DE PALERMO SA	ARGENTINA	
Ojea Quintana Santiago	HOLCIM ARGENTINA	ARGENTINA	
Ferdinand Porak	HOSPITAL ALEMAN EN BUENOS AIRES	ARGENTINA	
Ben Trim	HSBC PLC	UNITED KINGDOM	Will Morgan
Michael Silverman	HUGHES HUBBARD & REED LLP	UNITED STATES	Kevin Abikoff
Jan Dauman	IBLF GLOBAL	UNITED KINGDOM	
Germán Zarama	INSTITUTE FOR HUMAN RIGHTS AND BUSINESS IHRB	INTERNATIONAL	
Pablo Abiad	INTEGRA CAPITAL	ARGENTINA	
Tayfun Zaman	INTEGRITY PARTNERS COMPLIANCE CONSULTANCY	TURKEY	
Brook Horowitz	INTERNATIONAL BUSINESS LEADERS FORUM IBLF GLOBAL	INTERNATIONAL	
Gemma Aiolfi	INTL CTRE FOR COLLECTIVE ACTION, BASEL INSTITUTE ON GOVERNANCE	INTERNATIONAL	Mirna Adjami
Charles Gould	INTERNATIONAL CO-OPERATIVE ALLIANCE	INTERNATIONAL	Bruno Roelants
Richard Howitt	INTERNATIONAL INTEGRATED REPORTING COUNCIL	INTERNATIONAL	Jonathan Labrey
Geoff Cook	JERSEY FINANCE	UNITED STATES	
Koh Nakajima	KEIDANREN (JAPAN BUSINESS FEDERATION)	JAPAN	
Ana Beatriz López Espinar	KPMG	NETHERLANDS	Diego Bleger
Cosimo Pacciolla	KUWAIT PETROLEUM ITALIA S.P.A.	ITALY	Martina Nicole Pontara
Adrian Sanchez	LEXIS NEXIS RISK SOLUTION	MEXICO	
César Roberto Litvin	LISICKI LITVIN & ASOC.	ARGENTINA	
Luisa Garcia	LLORENTE & CUENCA	SPAIN	Mariano Vila
Simonneau Denis	L'OREAL	FRANCE	
Domenica Parada	MICROSOFT	UNITED STATES	Clara Maria Bozzo

Fabiana Dircie	NOVARTIS	ARGENTINA	
Patrick Moulette	OECD	INTERNATIONAL	Nejla Saula
Silvina Coria	OLX NASPERS	ARGENTINA	
Gavin Hayman	OPEN CONTRACTING PARTNER-SHIP	UNITED STATES	Hera Hussain
Edgardo Gabriel Vazquez	PFIZER	ARGENTINA	Ignacio Romano
Iohann Le Frapper	PIERRE FABRE	FRANCE	
Andrey Bugrov	PJSC «MMC «NORILSK NICKEL»	RUSSIAN FEDERATION	Elena Shtykanova
David Rodin	PRINCIPIA ADVISORY SARL	SWITZERLAND	
Chaitanya Suri	PWC PRIVATE LIMITED	INDIA	
Carolina Lessa Giuga	RELX GROUP	UNITED STATES	
Alexander Shokhin	RUSSIAN UNION OF INDUSTRIALISTS AND ENTREPRENEURS	RUSSIAN FEDERATION	Marina Larionova
Debora Dansker	SANDOZ	ARGENTINA	
Danielle Cannata	SAUDI BASIC INDUSTRIES CORPORATION	SAUDI ARABIA	
Michel Demarre	SEFI - CICA	FRANCE	
Maria Silvina Moschini	SHEWORKS!	UNITED STATES	
Germán Gonzalez	SIEMENS GAMESA RENEWABLE ENERGY	SPAIN	Gustavo Fleury
Marco Reggiani	SNAM S.P.A.	ITALY	
Manuel Etchevehere	SOCIEDAD RURAL ARGENTINA	ARGENTINA	
Rocio Soriano	TECMA S.A.	ARGENTINA	
Maria Virginia Linaza	TELECOM ARGENTINA S.A.	ARGENTINA	
Sergio Comin	TELEFÓNICA	SPAIN	
Alejandro Solito	TFP CONSTRUCCIONES SRL	ARGENTINA	
Dominique Lamoureux	THALES	FRANCE	
Annabel Hogg	THE B TEAM	UNITED KINGDOM	Madeleine McCarroll
Federico Liutvinas	THOMSON REUTERS	CHILE	
Sebastian Lochen	THYSSENKRUPP AG	GERMANY	

Paolo Tosca	TIM	ITALY	Caterina Bartolini
Alexandra Wrage	TRACE INTERNATIONAL	UNITED STATES	
Firas Aramouni	TRANS CAPITAL FINANCE	UNITED KING- DOM	
Jeffrey Hardy	TRANSNATIONAL ALLIANCE TO COMBAT ILLICIT TRADE	INTERNATIONAL	
Maria Soledad Urri	TRENES ARGENTINOS IN- FRAESTRUCTURA	ARGENTINA	
Ramon Masllorens	UNION INDUSTRIAL ARGENTINA (UIA)	ARGENTINA	Laura Ruth Gimenez
Michl Ebner	UNIONCAMERE - TRENINO ALTO ADIGE	ITALY	Vito Giannella
Dimitri Vlassis	UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC)	INTERNATIONAL	Candice Welsch
Manuel Facundo Tessio	UNIVERSIDAD AUSTRAL	ARGENTINA	
Lorenzo Berho	VESTA	MEXICO	