COLLECTIVE ACTION
Against Corruption
Plenary Activity 1

Let’s do a round of introductions!
INTRODUCTION TO THE WORKSHOP ON COLLECTIVE ACTION AGAINST CORRUPTION

“If corruption were an industry, it would be the world’s third largest, worth more than $3 trillion and 5% of global GDP.”*  
* The Pearl Initiative

Workshop objectives:
By the end of this workshop, participants should understand:
- That the private sector has a significant role in anti-corruption efforts
- The concept of Collective Action Against Corruption and its added value, AND
- The practical issues pertinent to the implementation of Collective Action Against Corruption.
TRAINING WORKSHOP OVERVIEW

• Module 1: What is Corruption?
• Module 2: What Role for the Private Sector?
• Module 3: Practical Implementation of Collective Action Against Corruption
• Module 4: Collective Action Against Corruption in Practice
Module 1-A

What is Corruption?
Plenary Activity 1

What Is your understanding of the term “Corruption”?
CORRUPTION: Three Key Criteria

(1) Abuse of (2) entrusted authority for (3) private gain.

- **Entrusted**: appointed, elected, inherited, OR granted through a contract (as in a trust, a service or agent contract).
- A position of **authority**: public sector, private sector, OR civil society; local, national OR international.
- A **private gain**:
  - benefit to the person abusing the entrusted authority, OR benefit to a third party, e.g. a friend, a member of the family, the community, the confession, the tribe, the town, or the political party;
  - financial, political, OR social
  - immediate OR deferred
  - at the expense of the **public interest** (breaches the law, undermines equality before the law, and undermines the proper management of public resources and public affairs)
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CORRUPTION under the UNCAC

➢ UNCAC: no definition; a list of corruption offences
  ➢ Corruption offences
    ➢ Bribery
    ➢ Embezzlement, misappropriation or other diversion of property
    ➢ Trading in Influence
    ➢ Abuse of Function
    ➢ Illicit enrichment

➢ Related offences
  ➢ Laundering the proceeds of crime
  ➢ Concealment
  ➢ Obstruction of Justice
Bribery

• **Is when any person exchanges (actively or passively) anything (money, service, etc.) with a person who enjoys an entrusted authority (public/private; local/national/international) in return for an undue advantage.**

  • Active bribery: promised, offered, given
  • Passive bribery: solicited, accepted
  • Public (national, foreign, and international) and private

• **EXTORTION** is a form of soliciting a bribe, albeit through force or the threat thereof.
Embezzlement

• Is when a person who has control over money by virtue of his/her entrusted authority uses it for personal benefit.
• Other similar term, misappropriation
Trade in influence

• Is when a person (instigator) gets another person with influence (influencer) over a public official to use that influence so that the public official gives an undue advantage to the instigator.
Abuse of function / position

• Is when a public official abuses his/her entrusted authority to breach the law for his/her benefit or that of any other person.

Illicit Enrichment

• When a public official significantly (standards vary depending on law) enriches without a reasonable explanation given his/her income or declared wealth.
Individual / Group Exercise

With your team members, develop a short story describing a corruption situation / scenario relevant to your industry / sector and or country. Be ready to present the scenario to the plenary for discussion.

Module 1 – A What is Corruption?
Module 1-B

What is Corruption?
MODULE 1B
DEFINING CORRUPTION

Corruption:

➢ No global consensus on an exact definition;
➢ Transparency International: Abuse of entrusted authority for private gain.
➢ UNCAC: no definition; a list of corruption offences
  ➢ Corruption offences
    ➢ Bribery
    ➢ Embezzlement, misappropriation or other diversion of property
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Module 1-C
What is Corruption?
Plenary Activity 1

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Individual / Group Exercise 1

Develop a short story describing a corruption situation / scenario relevant to your industry / sector and or country. Be ready to present the scenario to the plenary for discussion.
Module 2

What Role for the Private Sector?
## Module 2
### The Pressure for Anti-Corruption Efforts

#### Increasingly Globalized Economy
- Flow of funds / foreign aid
- Foreign Direct Investment
- Multi-national business operations

#### Foreign Laws w/Extra-territorial Reach
- FCPA
- UKBA
- CFPOA

#### Emergence of Sanctions & Penalties
- UNCAC
- Arab Convention Against Corruption
- OECD Anti-Bribery Convention

#### Social Pressure
- Increasing awareness
- Growing frustration (economic, social & political conditions)
- Social Media / Neighboring Examples

---

Module 2 What Role for the Private Sector?
Who are supposed to be the actors tackling corruption and what actions should they be taking?
Individual / Group Exercise 2 (continued)

<table>
<thead>
<tr>
<th>Who Are the Stakeholders?</th>
<th>What Actions Do You Expect from Them?</th>
<th>Are These Expected Actions Being Carried Out</th>
<th>Why or Why Not?</th>
</tr>
</thead>
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MODULE 2
ZOOM IN: THE PRIVATE SECTOR

No Sanctions and / or Weak Enforcement
Receipt of undue advantage
Acceptance as the norm: lack of alternatives
Perception as business necessity: to avoid short-run disadvantage
Prisoner’s Dilemma: lack of trust

MOST COMMON DRIVERS

Module 2 What Role for the Private Sector?
MODULE 2
ZOOM IN: THE PRIVATE SECTOR

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<td>Creates unequal opportunities</td>
</tr>
<tr>
<td>Creates undeserved opportunities</td>
</tr>
<tr>
<td>Results in suboptimal allocation of economic resources &amp; price-quality alternatives</td>
</tr>
</tbody>
</table>

<table>
<thead>
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<th>The Counterargument</th>
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<tr>
<td>“Exactly! It’s every man [business] for himself [itself]– this is the game, we have to play it, otherwise we are out. No other choice. Ethics is secondary to our survival.”</td>
</tr>
<tr>
<td>“These are just statistics. What do they mean to us? Let others worry about the world, we need to think of our business.”</td>
</tr>
<tr>
<td>“It’s just another cost of business (contract, license, procedures) necessary to earn profits. The alternative is to lose business and profits.”</td>
</tr>
<tr>
<td>“Growth is a long-term concept. We have to make it through the short-run first.”</td>
</tr>
<tr>
<td>“Laws are not applicable in practice. Even if they are, we can just bribe our way out of them – it’s just a matter of more cost.”</td>
</tr>
<tr>
<td>“It’s just another risk we have to take. No other choice. It applies to all. We’ll cross that bridge when we get to it.”</td>
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<th>The Gaps</th>
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<td>➢ Individual perspective is lacking.</td>
</tr>
<tr>
<td>➢ Short-term perspective is lacking.</td>
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<tr>
<td>➢ Profitable alternatives are missing.</td>
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NO REAL BUSINESS CASE!!

Module 2 What Role for the Private Sector?
Module 2 What Role for the Private Sector?

**PROBLEM**

- Given the status quo, they receive an undue advantage.
- They accept corruption as the norm &/ or see it as necessity: Doubt effectiveness of individual efforts & distrust competitors and the overall environment.
- Given the status quo, they are disadvantaged and may eventually be squeezed out of the market.
- Isolated efforts by individual business are likely to be insufficient and diluted.

**SOLUTION**

- Proactively Engaged in Anti-Corruption
  - Make clean business a competitive advantage & corruption a disadvantage
- Engaged in Corruption
  - Act collectively, create trust, pushing to change the overall environment
- Out of Business Necessity
  - Change the status quo
- Disengaged
  - Magnify impact: coordinate efforts, consolidate information

- Honest / Disengagement is the best option
MODULE 2
ROLE OF THE PRIVATE SECTOR

To Do What?

By Whom?

How?

AGREE TO UPHOLD HIGH ETHICAL STANDARDS & GOOD / CLEAN BUSINESS PRACTICES

Losers of the Status Quo, Together

Align Interests

Build Trust

COLLECTIVE ACTION FOR INTEGRITY

Module 2 What Role for the Private Sector?
MODULE 2
TRANSFORMING CLEAN BUSINESS INTO COMPETITIVE ADVANTAGE

Less Cost: actual (illicit payments) and potential (penalties, legal costs, ...)

Positive reputation: Attracts ethically oriented customers, investors, employees, suppliers, partners,...

Increased Revenues

A FAIR market driven by INNOVATION, QUALITY & EFFICIENCY

Enhanced growth potential

Protection from legal liability

Module 2 What Role for the Private Sector?

Enhanced Firm Value
MODULE 2
TRANSFORMING CLEAN BUSINESS INTO COMPETITIVE ADVANTAGE

Change the Corruption Equation

CREATE THE **BUSINESS** CASE FOR INTEGRITY

Module 2 What Role for the Private Sector?
MODULE 3

PRACTICAL IMPLEMENTATION OF
Collective Action Against Corruption
MODULE 3
WHAT CAN THE PRIVATE SECTOR OFFER?

✓ Refrain from corruption
✓ Adopt/implement effective compliance programs to prevent / detect corruption
✓ Self-reporting of violations
✓ Cooperation in case of investigation of corrupt activity
✓ Remedial action in case of corrupt activity to sanction culprits, compensate victims, and improve compliance program
✓ Share information
✓ Encourage other private sector actors to counter corruption

INCENTIVES

• Preferred standing: procurement transactions
• Fast tracked procedures
• Reduced costs/ interest rates
• Access to finance / Enhanced credit facilities
• Partnership and revenue opportunities
• Access to international markets
• Expanded network / distribution channels
• Positive publicity
• Capacity-building assistance

DISINCENTIVES

• Suspension of business operations
• Contractual penalties / compensatory damages due in case of anti-corruption clause violations
• Increased cost of capital
• Difficulties to penetrate the market (anywhere across the supply chain)
• Negative publicity

LEGAL, COMMERCIAL, and REPUTATIONAL
MODULE 3
What Can The Public Sector Offer?

AS A LEGISLATOR, A LAW ENFORCER, and A MAJOR BUYER GOODS & SERVICES

**INCENTIVES**
- Preferred standing: procurement transactions
- Fast tracked procedures
- Reduced sanctions / fines
- Lower tariffs / duties
- Tax credits / exemptions
- Positive publicity
- Access to subsidies
- Faster payment

**DISINCENTIVES**
- Disqualification
- Confiscation of goods
- Suspension of business operations
- Heavy fines
- Imprisonment
- Negative publicity
- Loss of subsidies

LEGAL, COMMERCIAL, and REPUTATIONAL
## MODULE 3
### WHY ANTI-CORRUPTION AGENCIES?

**ZOOM IN: ANTI-CORRUPTION AGENCIES**

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<thead>
<tr>
<th>CHARACTERISTICS</th>
<th>IMPLICATIONS</th>
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<td>A stand-alone institution</td>
<td>✓ Greater autonomy</td>
</tr>
<tr>
<td></td>
<td>✓ Better insulation from undue influence</td>
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<tr>
<td></td>
<td>✓ <strong>Enhanced credibility</strong></td>
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<tr>
<td>An anti-corruption mandate</td>
<td>✓ Specialization and expertise in anti-corruption</td>
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<td>✓ Value added to the CA initiative</td>
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<td>✓ Enhanced effectiveness of the ACA</td>
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MODULE 3
WHY ANTI-CORRUPTION AGENCIES? *

✓ Corruption prevention

• Policy / strategy: implementation, development, advice to other institutions
• Institutional reviews and inspections
• Codes of conduct and ethics
• Asset disclosure and conflict-of-interest systems
• Access to information
• Legislative drafting
• Regulatory quality
• Receipt and processing of complaints and reports on corruption cases
• Promotion of societal participation in anti-corruption efforts
• Research and information gathering
• Assessments and diagnostics
• Skill development and training

✓ Corruption awareness

• Awareness-raising on corruption issues and anti-corruption efforts
• Advice to public and private entities on development and implementation of awareness material and activities

✓ Anti-corruption law enforcement

• Investigation
• Prosecution
• Asset recovery
• Protection of witnesses, victims, experts, collaborators-of-justice, whistle-blowers and reporting persons, as well as related persons.

✓ Cross-cutting coordination

• National and international coordination and cooperation on anti-corruption policy / strategy:
  • development
  • implementation
• National and international coordination and cooperation on issues of:
  • Prevention
  • Awareness
  • Law enforcement
• Coordination of sector-specific policies and programs
• Dissemination of consolidated information on progress of anti-corruption efforts

*Adapted from: “Anti-Corruption Agencies: Reflections on International Standards & Experiences and Considerations for Arab Countries” (2012), UNDP
MODULE 3
What Can Civil Society Offer?

CHARACTERISTICS

Credibility

Neutrality

Expertise

Network

IMPLICATIONS FOR POTENTIAL ROLE

✓ Convene stakeholders that otherwise do not know and / or trust each other
✓ Carry out or assist in monitoring and assessment activities
  ▪ Participate in public tenders
  ▪ Monitor and assess compliance with CA provisions
  ▪ Monitor and assess implementation of sanctions
✓ Advocate for anti-corruption efforts by public and private sector stakeholders:
  ▪ Regulatory changes
  ▪ Compliance programs
✓ Communicate information
✓ Contribute resources and expertise to the CA initiative: information, staff, compliance training, etc...
✓ Carry out awareness-raising and capacity-building activities
✓ Enhance reputational incentives and disincentives:
  ▪ Publicize ethical behavior (reinforce peer pressure)
  ▪ Publicize corrupt activity
MODULE 3:
MODELLING THE CA INITIATIVE

STAKEHOLDERS

One stakeholder group
Sector-specific
Local

All stakeholder groups
Cross-sectoral
International

STAKEHOLDERS’ ROLES

INITIATOR

• Identify the main issue(s)
• Draft the course of the CA initiative
• Identify and convene other actors
• Manage the initiative

FACILITATOR

• Convene other actors in a neutral context
• Assist other actors in the application of measures: Simplify, expedite, support, empower, etc...
• Mediate between different actors & / or competitors, as a neutral 3rd party
• Manage the process

PARTICIPANT

• Commit to and abide by the provisions of the CA initiative

MONITOR

• Assess, as a neutral 3rd party, compliance with provisions
• Assess progress
• Identify areas of improvement

Module 3 Practical Implementation of Collective action Against Corruption
Module 3 Practical Implementation of Collective action Against Corruption
MODULE 3
IMPORTANT CONSIDERATIONS

Initiating Factor

Company Composition
- Size, ownership
- Homogeneity vs. heterogeneity
- Level of understanding, ability /willingness to learn
- Approach to the problem
- Power Balance

Governance & Project Management
- Planning (clearly defined objectives)
- Organization
- Implementation
- Monitoring and Evaluation
- Communication

Trust & Enforcement

SUSTAINABILITY and REPUTATION
MODULE 4
Collective Action Against Corruption
IN PRACTICE
# MODULE 4
The Case of **THE NIGERIAN PORT SECTOR**

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<td>Country</td>
<td>Nigeria</td>
</tr>
<tr>
<td>Industry</td>
<td>Maritime</td>
</tr>
<tr>
<td><strong>Participants</strong></td>
<td>Private Sector: MACN; Multi-lateral Organization: UNDP; Anti-Corruption Agencies: Independent Corrupt Practices Commission (ICPC), the Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), the Bureau for Public Procurement (BPP); the Economic and Financial Crimes Commission; Public Sector: the Nigerian Port Sector; Civil Society</td>
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<tr>
<td><strong>Type of CA Initiative</strong></td>
<td>Commitment and joint activities toward the vision of a maritime industry free of corruption</td>
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<td><strong>Initiation/Motivation</strong></td>
<td>MACN initiated collaboration with UNDP and UNODC for a pilot project to address corruption at ports. Selection of Nigeria as the pilot project based on: (1) survey of the MACN membership to identify particular challenging ports, (2) Nigerian government’s and local authorities’ willingness to engage/conducive policy environment: [port sector reform in 2004 + newly adopted national development strategy focused on improving the competitiveness of the port sector], (3) the availability of local resources and capacity to participate, (4) capacity of the local UNDP office: UNDP secured official government commitment.</td>
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<td><strong>Members' Commitment</strong></td>
<td>Risk assessment across six Nigerian ports + recommendations for the short and long terms.</td>
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<td><strong>Activities</strong></td>
<td>● Training and certifying 70 local corruption risk assessors drawn from the public sector (federal and state), anti-corruption agencies, and civil society to conduct on-site assessments in private sector entities, government agencies, and other public sector organizations. ● Corruption risk mapping and identification of significant governance issues (by aforementioned risk assessors). ● Multi-stakeholder engagement to recommend risk mitigation and prevention measures. TUGAR and the national authorities developed a “risk reduction plan.” MACN developed an action plan to promote the implementation of these measures.</td>
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<td><strong>Outcomes</strong></td>
<td>● Improvement of members’ internal anti-corruption management programs and practices and aligned operational procedures to support more consistent practices when calling at ports in Nigeria. ● Reduced corruption; enhanced public-private dialogue; enhanced trust in / legitimacy of local government</td>
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<td><strong>Initiator/Facilitator</strong></td>
<td>MACN and UNDP</td>
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<td><strong>External Monitoring</strong></td>
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**MODULE 4**

The Case of **THE BERLIN-BRANDENBURG INTERNATIONAL AIRPORT**

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<td>Germany</td>
</tr>
<tr>
<td>Industry / Project</td>
<td>Construction / public works</td>
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<tr>
<td>Participants</td>
<td><strong>Private Sector:</strong> Bidding companies and FBS (Flughafen Berlin-Schönefeld GmbH (FBS)) – a limited company owned by the <strong>Public Sector</strong> [Federal Republic of Germany, the State of Berlin, and the State of Brandenburg]; Industrial Chamber of Commerce; <strong>Civil Society:</strong> TI-Germany (TI-D);</td>
</tr>
<tr>
<td>Type of CA Initiative</td>
<td><strong>Integrity Pact</strong></td>
</tr>
<tr>
<td>Initiation/Motivation</td>
<td>Initial approach by TI-D; Allegations of corruption surrounding the project; Instructions from the Mayor of Berlin to address corruption risks.</td>
</tr>
<tr>
<td>Members' Commitment</td>
<td>Mandatory signed contracts: between FBS and the bidder who wishes to participate and its subcontractors</td>
</tr>
<tr>
<td>Activities</td>
<td>● TI-D and FBS: Developed the Integrity Pact (tailored to German laws); designing bidding processes, service packages such that the procurement plan involves a larger number of smaller tendering packages [allowing medium-sized firms to bid] ● The Industrial Chamber of Commerce: capacity-building and assistance to medium-sized participants in the tender process. ● Parties to contract accept and abide by mutual obligations throughout all phases of the project and accept the role of the monitor.</td>
</tr>
<tr>
<td>Outcomes</td>
<td>Over 1000 bidders; Only 7 complaints; 4 won by FBS; 1 lost; 1 withdrawn; 1 settled out of court.</td>
</tr>
<tr>
<td>Initiator /Facilitator</td>
<td>FBS and TI-D</td>
</tr>
<tr>
<td>External Monitoring</td>
<td>Independent experts. Team leader: a retired procurement official (City State of Berlin); spotless track record; became a member of TI-D prior to taking on the task.</td>
</tr>
<tr>
<td>Sanctions</td>
<td>Monetary damages: 3% of contract value + exclusion from the bidding process</td>
</tr>
</tbody>
</table>
## MODULE 4

### The Case of CoST HONDURAS

<table>
<thead>
<tr>
<th>Date</th>
<th>2014 and ongoing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Honduras</td>
</tr>
<tr>
<td>Industry</td>
<td>National public infrastructure</td>
</tr>
</tbody>
</table>

**Participants**
- **Civil Society**: Association for a More Just Society (ASJ), Regional Area of the West (EROC) and Democracy without Borders Foundation (FDsF), TI-Honduras; **Private Sector**: Honduran Chamber of the Construction Industry (CHICO), College of Civil Engineers of Honduras (CHIC) and Honduran Association of Coffee Producers (AHPROCAFE); **Public Sector**: Sectorial Cabinet of Productive Infrastructure (GSIP), Presidential Office of Transaction and Modernization of the State (DPTME) and Institute of Access to Public Information (IAIP); **International MSG**: CoST National Secretariat supported by International Secretariat

**Type of CA Initiative**
- **Integrity Pacts**

**Initiation/Motivation**
- Supported by the Government’s Presidential Director of Transparency and led by the Minister of Infrastructure and Public Utilities.

**Members’ Commitment**
- Disclosure of information pertaining to all phases of public infrastructure as per legislation
- Assurance: evaluating disclosed information
- Social accountability: Giving citizens, the media and academia access to the results to inform their actions

**Activities**
- CoST Honduras: Improving and enhancing the user-friendliness of the online platform where procurement information is posted + support the design of a new website / platform for public–private partnership (PPP) projects in accordance with the CoST Infrastructure Data Standard, the World Bank PPP Framework and the Open Contracting Data Standard.
- Building capacities of MSGs (citizens, the media and academia) and supporting them in validating and interpreting information and demanding accountability.

**Outcomes**
- Compliance with disclosure requirements increased from 27% to 84% (2015) and 97% (2016).
- Development (by 2015 and with support from the World Bank) of a national e-procurement portal (SISOCS) for online disclosure of project information (> 450 projects to date).
- Issuance of CoST Honduras Assurance Reports for 2015 (13 projects) and 2016 (19 projects).
- CoST Honduras received 3rd prize by the Open Government Partnership in 2016 for its efforts to include civil society actors in its initiative.

**Initiator/Facilitator**
- CoST Honduras

**External Monitoring**
- CoST Honduras + Civil Society
### MODULE 4
**The Case of THE INTEGRITY NETWORK INITIATIVE**

<table>
<thead>
<tr>
<th>Date</th>
<th>Founded 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Egypt</td>
</tr>
<tr>
<td>Industry</td>
<td>Multi-sector</td>
</tr>
</tbody>
</table>

**Participants**

- **Multi-lateral organization**: United Nations Global Compact; **Private sector**: Egyptian Junior Business Association (EJB); Corporates/MNEs; SMEs; **Civil Society**

**Type of CA Initiative**

*Education, training, and establishing a multi-stakeholder business-led integrity network* towards the vision of a corporate anti-corruption ecosystem in Egypt.

**Initiation/Motivation**

EJB’s CSR efforts [alignment with EJB mission] + Availability of UNGC funding for such an Initiative. SMEs: receive tangible business advantages; Corporates/MNEs: reduced risk of operations in the Egyptian market.

**Members' Commitment**

- SMEs commit to (1) their senior managers attending a 3-hour, in-person anti-corruption training, (2) appointing an Ethics & Compliance Manager, (3) developing a detailed AC policy, and (4) finally signing an Integrity Pledge in front of representatives from the private and public sectors, civil society, academia and the media in a public ceremony.
- Corporates / multinationals (1) provide support to SMEs: platform, network, knowledge-sharing, tangible business advantages and incentives [access to business opportunities, preferred commercial conditions, access to finance, publicity, etc.] (2) demonstrate ethical leadership.

**Activities**

- Establish a tailored anti-corruption standard / integrity pledge and capacity building program for SMEs.
- Build a surrounding network of partners that provides a joint platform and support to SMEs and motivates them to join the fight against corruption by: (a) providing them with tangible business advantages and incentives (b) demonstrating ethical leadership.
- Engage in collective action efforts to raise awareness, engage in policy dialogues with public sector entities, and advocate for policy recommendations / anti-corruption efforts.

**Outcomes**

- Over 100 members; around 65 SMEs who have adopted the Integrity Pledge.
- Improved awareness with the importance of AC and ways to fight it; behavioral changes.
- Development of Guidance Materials based on multi-stakeholder discussions and inputs: (1) Guidance Manual for SMEs in Egypt: Implementing the EJB Integrity Pledge”. (2)”Commercial Incentives: What large companies can do to motivate SMEs to commit to an anti-corruption standards
- A training course for senior management was developed; a series of workshops was carried out.

**Initiator/Facilitator**

Egyptian Junior Business Association (EJB): NGO / premium business association w/over 400 prominent business persons

**External Monitoring**

An independent assessment process will also be developed for participating SMEs - that volunteer to undergo the evaluation - to assess their performance in connection w/ AC programs.
<table>
<thead>
<tr>
<th>Date</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Mozambique</td>
</tr>
<tr>
<td>Industry</td>
<td>Multi-sector</td>
</tr>
<tr>
<td>Participants</td>
<td><strong>Civil Society</strong>: the Centro de Integridade Poeblica (CIP) (TI Mozambique); <strong>Public Sector</strong>: Ministry of Industry and Commerce; <strong>Private Sector</strong>: business associations, and legal, tax and auditing institutions, as well as three European donors.</td>
</tr>
<tr>
<td>Type of CA Initiative</td>
<td>Research and information gathering</td>
</tr>
<tr>
<td>Initiation/Motivation</td>
<td>TI Mozambique set up the National Group for the Promotion of Business Integrity (GRUPBI) of representatives from the public and private sectors.</td>
</tr>
<tr>
<td>Members' Commitment</td>
<td>Integrity reforms over 2 stages: Assessment and Collective Action</td>
</tr>
<tr>
<td>Activities</td>
<td>(1) Carry out research to generate evidence on the state of business integrity based on which a reform agenda is developed. (2) Implement the recommendations through Collective Action [which the CSO may initiate or monitor].</td>
</tr>
<tr>
<td>Outcomes</td>
<td>● dissemination of findings through a series of workshops. ● The planning of the CA phase is underway by TI-Mozambique including an oil sector-specific initiative involving local and multinational companies.</td>
</tr>
<tr>
<td>Initiator/Facilitator</td>
<td>TI-Mozambique</td>
</tr>
</tbody>
</table>
Identify a potential collective action initiative against corruption (needs, constraints, resources, parties) for your country? Consider potential elements of such an initiative. How do you see your role in this initiative?