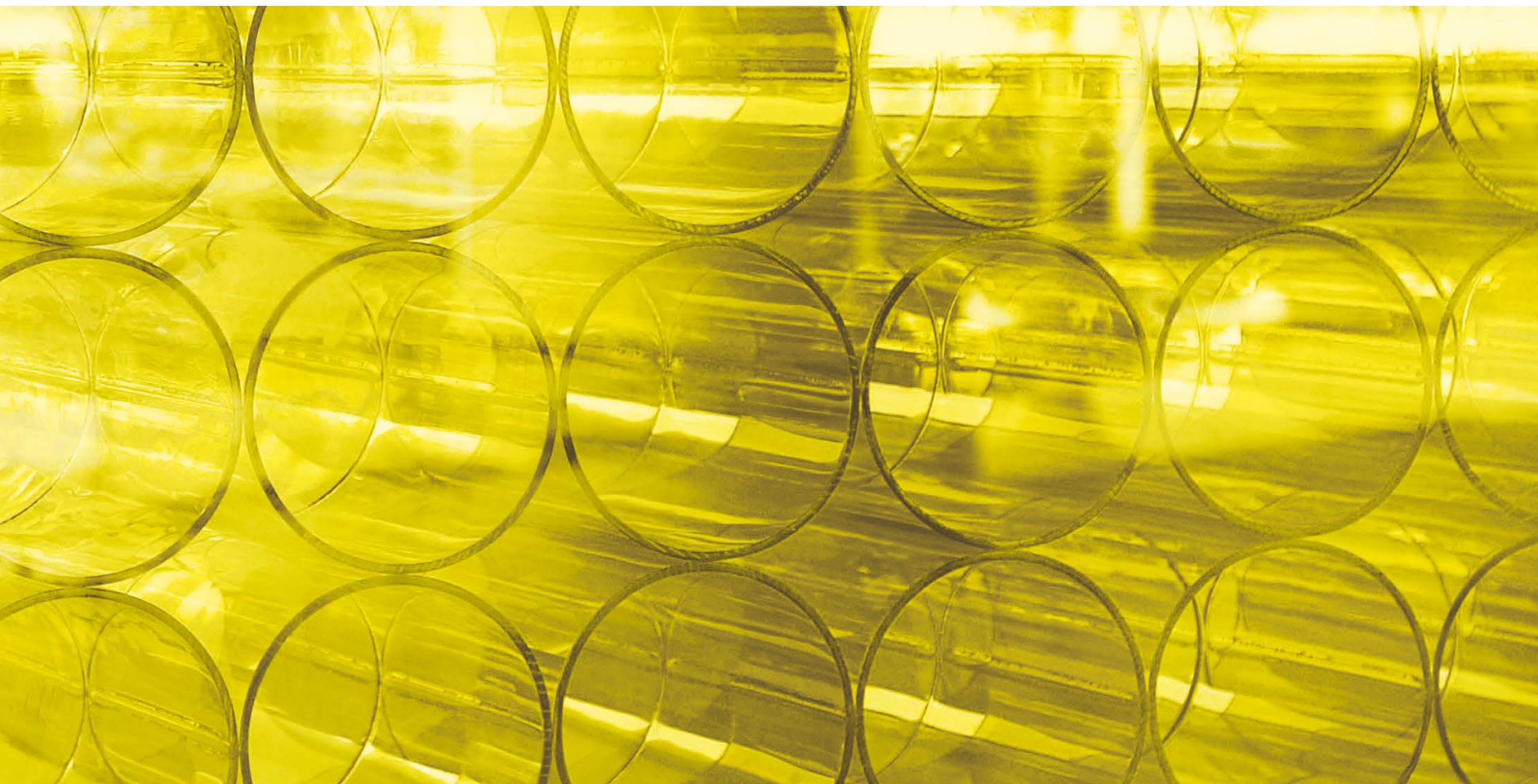


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Siemens
Integrity Initiative
Annual Report 2021

[siemens.com/integrity-initiative](https://www.siemens.com/integrity-initiative)



Content

Foreword

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE STEERING COMMITTEE	4
A WORD FROM THE SIEMENS INTEGRITY INITIATIVE PROJECT OFFICE	8

A.

INTRODUCTION	16
Project management and reporting	18
Project organization	20

B.

SIEMENS INTEGRITY INITIATIVE	22
Status of the First Funding Round	24
Status of the Second Funding Round	25
Status of the Third Funding Round	26
Status of the Golden Stretch Funding Round	28

C.

PROJECT PROFILES AND HIGHLIGHTS OF ACTIVITIES IN 2021	46
C1. First Funding Round Projects	48
C2. Second Funding Round Projects	50
C3. Third Funding Round Projects	52
C4. Golden Stretch Round Projects	98

D.

ANNEX	116
D1. Siemens Golden Stretch Press Release	116
D2. Additional Siemens Reports	118

Note:

Please refer to the following website for a general overview of the Siemens Integrity Initiative, the selection process for the First, Second and Third Funding Rounds and highlights of activities: www.siemens.com/integrity-initiative.

The Siemens Integrity Initiative Annual Report 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020 and 2021 can be found here:

www.siemens.com/integrity-initiative/Report2011	www.siemens.com/integrity-initiative/Report2015	www.siemens.com/integrity-initiative/Report2019
www.siemens.com/integrity-initiative/Report2012	www.siemens.com/integrity-initiative/Report2016	www.siemens.com/integrity-initiative/Report2020
www.siemens.com/integrity-initiative/Report2013	www.siemens.com/integrity-initiative/Report2017	www.siemens.com/integrity-initiative/Report2021
www.siemens.com/integrity-initiative/Report2014	www.siemens.com/integrity-initiative/Report2018	

Kindly note that the online version of this Annual Report 2021, available at www.siemens.com/integrity-initiative/Report2021, is complemented by numerous hyperlinks which provide a wealth of additional external information on the projects funded under the Siemens Integrity Initiative.

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

Steering Committee

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

Dear Reader,

March 2022

It is our pleasure to again present our Annual Report to you. As we all look back on a very eventful year 2021 with all its opportunities and challenges on a local and international level, we hope that you, our partners and stakeholders, could navigate well through this special time.

Our Collective Action and Siemens Integrity Initiative activities in 2021 coincide with the launch of Siemens AG's new growth strategy as part of its virtual Capital Market Day titled "Accelerating High Value Growth" on June 24, 2021.

This strategy includes a comprehensive sustainability agenda with a clear commitment to our new framework called [DEGREE](#), which stands for **D**ecarbonization, **E**thics, **G**overnance, **R**esource efficiency, **E**quity and

Employability and will apply to all activities across the company's businesses worldwide.

Siemens has been operating worldwide for almost 175 years, even in difficult markets.

The global strength of our Siemens brand and our associated values – responsible, innovative and excellent – are of utmost importance to us always and serve as the basis for our responsible actions as stipulated in our [Business Conduct Guidelines](#).

It is precisely here that Collective Action and the Siemens Integrity Initiative come into play, transforming the everyday from Collective Action to Collective Impact, giving something back to society on a broader level and contributing to fairer and more transparent markets for all stakeholders.



Through the projects of the Siemens Integrity Initiative, we continue to make a positive and sustainable overall contribution to the DEGREE Framework, which includes fostering a culture of trust and adhering to ethical standards, which is very much needed for sustainable growth.

In the twelfth year of implementation of the Siemens Integrity Initiative, which we designed and subsequently launched in 2009, we are delighted to report that as of March 2, 2022, around USD 120 million has been committed to 85 projects in more than 50 countries. We continue as one of the largest private sector initiatives aimed at fighting corruption and promoting fair markets.

We are therefore particularly pleased to inform that building on the Third Funding Round, we invited selected short-listed candidates in December 2020 to submit applications for

additional funding, the so-called “Golden Stretch Funding Round”. The initial start-up activities are reported in more detail in this Annual Report.

All eight new “Golden Stretch Rounders” which are described in Section C4. of this Annual Report will receive between USD 1 million and USD 4 million each over a period of three years and were publicly announced in a [Siemens corporate press release on July 7, 2021](#), which you can find in Section D of this Annual Report.

A team of experts from different specialist areas and regions subjected the project proposals to careful cross-functional due diligence before presenting them to us, the Siemens Steering Committee, for approval, and then to the World Bank as part of the non-veto process and to the European Investment Bank for informational purposes.

As the Steering Committee, we have received regular updates on the progress of activities from the Project Office and their cross-functional team and are convinced that the active portfolio of the Third Funding Round and our latest so called “Golden Stretch Funding Round” is ideally placed to further drive Collective Action forward. Collective Action is our shared fight against corruption, and the promotion of responsible business conduct and integrity in defined thematic areas, which include for example creating alliances, strengthening the rule of law, strengthening voluntary standards, creating incentives for good performers, curricula development, capacity building, platforms for dialog and knowledge sharing.

12 years since the start of these activities is a long time and endurance is called for, but it has been and is still worth every single step. So many committed stakeholders have been mobilized at all levels during this time –

● A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

whether globally or in individual countries and business sectors, and we are of course happy that we could keep the very good dialogue despite the challenges of the pandemic.

At this point we would like to thank our committed Integrity Partners throughout the world. Through their project work together with our stakeholders, they have driven forward the key

Key figures¹



303,000
Employees



€ 62.3 billion
Revenue



15.0 %
Adjusted EBITA margin for
the Industrial Businesses



€ 6.7 billion
Net income

Source: [Siemens Sustainability Report 2021](#), Page 2

¹Including Varian.



anti-corruption topics both at the highest levels of engagement and on the ground at institutional level. It is their commitment that has made real the project implementation where details and fulfillment of set goals and milestone matter.

You will find an overview of the most recent accomplishments of the Integrity Initiative in this Annual Report 2021, with an exciting and impressive summary of project activities and outcomes in Section C based on information provided by our Integrity Partners as of key date March 2, 2022.

It is with highest appreciation that we would like to thank Sabine Zindera and her team, who designed the Collective Action program and the Siemens Integrity Initiative at the outset and have worked consistently ever since at the international level to drive the projects forward with long-term strategic perspective and in-depth project management and we optimistically look forward to the benefit in years to come.

**Steering Committee
of the Siemens Integrity Initiative:**

Dr. Andreas Christian Hoffmann
General Counsel, Siemens AG

Annette Kraus
Chief Compliance Officer, Siemens AG

Dr. Horst J. Kayser
Corporate Vice President and Chairman of
the Siemens Portfolio Companies (POC),
Siemens AG

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

Project Office

Dear Reader,

March 2022

“Sustainability is the heart of our business and the engine that drives it. Which is why we’ve developed an ambitious new sustainability framework: DEGREE. With our new ambitious DEGREE framework, which embraces Decarbonization, Ethics, Governance, Resource Efficiency, Equity, and Employability, we are taking yet another step forward. It represents a whole new level in our commitment to sustainable development, good governance, social responsibility, and protecting the environment.”

This strong commitment from our President and Chief Executive Officer of Siemens AG Dr. Roland Busch and our Chief People and Sustainability Officer (CPSO) Judith Wiese in the [Siemens Sustainability Report 2021](#) supports our long-standing work in Collective Action against corruption which ensures practical implementation of the Sustainable Development Goal 16 “Peace, Justice and Strong Institutions”.

And it continues: “For us, responsibility includes conscientiousness, integrity, and adherence to our values. We support that with a strong across-the-board compliance system and clear guidelines for how we do business. In society as well, we’re working for greater integrity and a fair market environment. With the Siemens Integrity Initiative, we’re supporting organizations around the world to combat corruption.”

As we look back on 12 years of implementation of the Siemens Integrity Initiative – established in 2009 on the basis of the settlements reached with the World Bank in 2009 and the European Investment Bank in 2013 and backed with funding of around USD 120 million – we at the Project Office are convinced that we have been able to make a significant private sector contribution – as assessed by the independent Mid-term Review of the Initiative [published in our 2017 Annual Report](#) - to achieving the goals outlined above and will continue to do so in the future.



Our global Collective Action Network is despite the many Corona pandemic challenges and burdens running at full steam.

It should be emphasized with highest appreciation that in this difficult phase, our Project Partners have responded quickly with innovative solutions to keep activities moving through virtual collaboration, online training and conference options and prioritization of research and desk-based activities where necessary and possible.

And, let us be open, the limitations imposed on all of us by the global pandemic will take their toll. Our Partners and we in the Project Office alike have accepted the additional challenges pragmatically and bravely. While all parties involved are working toward the set goals, the full extent of restrictions, delays, or set-backs due to turbulence in the external or internal business environment remains to be seen.

However, our expectations are clear, and that is to do our very best every day in making sure that implementation of the agreed targets progresses well and that we will be able to see each other in real face-to-face meetings again!

The good news is that we were able to start funding for more new activities in 2021 under the banner of our so-called “Golden Stretch Funding Round”.

In alignment with our Siemens Steering Committee, the World Bank and the European Investment Bank, we in December 2020 invited selected short-listed candidates of the Third Funding Round to submit applications for additional funding that largely build upon the eligibility and selection criteria published at www.siemens.com/integrity-initiative and the current activities of the Third Round.

In addition, it was our requirement that applications for the “Golden Stretch Funding Round”

demonstrate in particular how the sustainability of project activities and results into the future will be ensured.

By the submission due date of February 15, 2021, we received interesting and multi-faceted proposals, which were subject to a cross-functional due diligence process in collaboration with the relevant in-country compliance experts, Finance and Tax experts, and Siemens’ Legal department. In this joint process we once again built upon and considered various aspects of our published eligibility and selection criteria, in support of the regional, global and thematic mix, which strongly complements our balanced portfolio and its local activities.

In spring 2021 we presented the result to the Siemens Steering Committee for approval and then to the World Bank as part of the non-veto process and to the European Investment Bank for informational purposes and received a

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

green light to close the individual Funding Agreements with our Golden Stretch Rounders.

We publicly announced the result in our [Siemens corporate press release on July 7, 2021](#), which you can find in Section D of this Annual Report. A total of eight additional impressive projects, which are described in Section C4. of this Annual Report will receive between USD 1 million and USD 4 million each over a period of three years starting from July 2021.

As we prepared and inked our Golden Stretch Round funding agreements, we at the same time continued to foster, coach, and monitor our 22 Third Funding Round projects with activities in full swing since their implementation in 2019, and that despite the many Corona pandemic challenges and burdens.

You can find further information about the status of the Third Funding Round and its projects in Section C3. of this Annual Report 2021.

With this, and in a nutshell, we are delighted to report that as of March 2, 2022, around USD 120 million is committed to 85 projects in more than 50 countries over all Funding Rounds.

Over the last decade, the Collective Action method has met with international recognition among international and regional organizations as well as government and private sector representatives. We are proud to say that to date, with 85 projects worldwide, we have been able to make a valuable, demonstrable contribution to practical implementation and inspire many stakeholders to support our cause.



This practical and real implementation reflects our ambition to deliver “more than just paper”. This is also acknowledged in the Business 20, an official Engagement Group of the political G20. In 2021 we were again accredited as a member of the B20 Task Force on Integrity & Compliance in Italy and promoted Collective Action activities and the Siemens Integrity Initiative as a source of practical implementation.

We are delighted to be able to continue our work and lend our professional support to the strategic principles of the Indonesian B20 Presidency in 2022 under the banner of “Advancing Innovative Inclusive and Collaborative Growth” through our work in conjunction with our projects.

It is exactly here that we can continue to contribute “more than just paper”, because the many examples in this report of practical implementation by our Project Partners should and can inspire others to either support these projects or to set up similar good new projects which fit to the respective business environment.

Another highlight and event that stood out in 2021 was that we were honored to co-organize upon invitation and in collaboration with The United Nations Office on Drugs and Crime (UNODC), a special event on the topic “Stepping up Global Action for Business Integrity” at the ninth session of the Conference of the States Parties to the United Nations Convention against Corruption (CoSP), in Sharm El-Sheikh, Egypt, on December 14, 2021.

Siemens AG and the United Nations Office on Drugs and Crime (UNODC) look back on more than a decade of partnership to strengthen business integrity. Under our Integrity Initiative, we have contributed over USD 13,6 million to UNODC’s efforts to prevent and counter corruption in and with the private sector, enabling the UNODC to deliver nine projects in 17 countries around the globe.

The objectives of this special event were to discuss the latest trends in the area of business integrity, illustrate the impact of the private sector-funded work of UNODC over the past ten years and to call on private sector leaders and champions of integrity to step up their engagement.

More information is on page 15.

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

A very special word of gratitude and appreciation goes to our Steering Committee, which has received regular, detailed updates about the Integrity Initiative throughout 2021 and has continued to support us with valuable advice and supervision, helping us to think ahead with optimism, to close the “Golden Stretch Funding Round” and to provide clear direction in aligning our actions and activities especially in these turbulent times.

Finally, and very importantly, we would like to express our wholehearted gratitude to our Integrity Partners, without whose tireless commitment and multifaceted work on the ground

it would not have been possible to put the agreed upon activities into practice. We would also like to thank our Project Relationship Managers for their dedicated, meticulous support at the local level, and naturally our high-level Mentors for their local insight and guidance and our expert functions that have supported us in a very meaningful and professional way.

Sabine Zindera and Shawn Teixeira

For the Project Office of the Siemens Integrity Initiative

This Annual Report was approved by the Siemens Steering Committee on April 29, 2022 and submitted together with a comprehensive presentation to

the World Bank Group in Washington on May 3, 2022 and to

the European Investment Bank in Luxembourg on May 4, 2022

The Collective Action and External Affairs team is headquartered in Munich, Germany:

Sabine Zindera, Vice President, heads the Collective Action and External Affairs department in the Siemens Legal and Compliance Organization and is supported by Shawn Teixeira and Monika Besel, as well as the network of Siemens Business Leaders, Siemens Country CEOs, Compliance Officers, Controlling and Finance, Legal and Tax experts all around the world.



Under the terms of the agreement between Siemens and the World Bank, the World Bank has audit rights over the use of funds (USD 100 million dollars over 15 years beginning in 2009) and veto rights over Siemens' selection of projects and organizations to be supported. Furthermore, the agreement between Siemens and the European Investment Bank (EUR 13,64 million over 5 years) gives the EIB the right to reject proposed projects.

The projects were chosen according to defined selection criteria and focus areas and underwent a detailed cross-functional due diligence. More information is available on our dedicated web site www.siemens.com/integrity-initiative.

The Siemens Integrity Initiative is managed by a global project organization with in-country presence and support where relevant and is subject to project management rules as detailed in Section A of this report.

The Project Office regularly updates the Siemens Steering Committee, the World Bank Group and the European Investment Bank on the status and progress of the Siemens Integrity Initiative.

Much of the information available to us is transparently accessible to the public and can be viewed on our dedicated web site www.siemens.com/integrity-initiative.

The information provided relates in particular to the framework conditions for the First, Second, Third and Golden Stretch Funding Rounds, the application and selection process for the projects, brief profiles and the funds earmarked for the individual projects, and unabridged versions of the Siemens Integrity Initiative Annual Reports for 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020 and 2021.

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

Two editions stand out and merit further mention:

Our very first 2011 edition introduced to you the Siemens Collective Action program, and in Sections A and B of the report provided insight into the conceptualization, planning, project selection, award of funds and project implementation relating to the First Funding Round tranche of USD 37,7 million.

Our seventh 2017 edition signaled the halfway mark of the 15-year World Bank settlement period and featured a Summary Report of the external Mid-term Review of the Integrity Initiative in Section D. The Mid-term Review was independently conducted by the Canadian Universal Management Group who found there to be “strong evidence” that projects have “achieved their intended short-term results” and have made “significant contributions to change within their respective contexts”.

We hope that this will encourage additional allies to sign up to Collective Action and join us in our fight against corruption. The positive external and internal feedback received in response to our reports, and especially to our externally conducted Mid-term Review has strengthened our resolve to extend our program even further, enabling us to highlight more and more anti-corruption success stories across all countries and, in so doing, integrate additional stakeholders and activities.

As reported, all 31 projects from our First Funding Round have been completed as planned. The Final Report on these activities over the entire project period has already been presented in earlier editions of the Annual Report.

The Final Report of activities over the entire project period for all 24 Second Funding Round projects were presented in previous Annual Report editions. Two Final Reports were presented in our Annual Report 2017, ten Final Reports in Annual Report 2018, ten Final Reports in Annual Report 2019 and two Final Reports in Annual Report 2020.



Additional information to page 11

This year, we have therefore focused on our projects from the Third and Golden Stretch Funding Rounds.

All 22 Third Funding Round projects which started the implementation phase in 2019 are up and running and driving their respective activities as described in this Annual Report.

All 8 Projects of the Golden Stretch Funding Round started their implementation phase in July 2021 and implementation of activities are in progress as described in this report.

The Conference of the States Parties to the United Nations Convention against Corruption is the world's largest anti-corruption policy-making body. The sessions of the Conference, held every two years, are attended by hundreds of high-level lawmakers, policymakers and practitioners from 189 parties that have ratified the United Nations Convention against Corruption and are committed to its implementation.

At each session, the Conference reviews States' efforts to implement the United Nations Convention against Corruption and adopts resolutions which steer global anti-corruption policy and efforts. Besides an official programme of work for governments, the sessions of the Conference offer a rich programme of special events with high impact and visibility.

(Source: UNODC Website)

Link to the Special Session of the ninth session of the Conference of the States Parties to the United Nations Convention against Corruption (CoSP), in Sharm El-Sheikh, Egypt, on December 14, 2021: <https://www.unodc.org/unodc/en/corruption/COSP/session9--special-events/14-Dec-2021.html>

Recording of the event: <https://youtu.be/G5wDCn11YEK> which includes a 7 minute Siemens Video with our Steering Committee Members Dr. Andreas Hoffmann and Annette Kraus, and Sabine Zindera <https://www.siemens.com/collective-action-partnership-unodc>





I Introduction

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

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



The Siemens Integrity Initiative aims to:

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

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

Moving beyond the boundaries of our company, Collective Action continues as a priority in Siemens Legal and Compliance. This is evidenced by our long-standing involvement in the ICC Commission on Corporate Responsibility and Anti-corruption, the Pact Against Corrup-

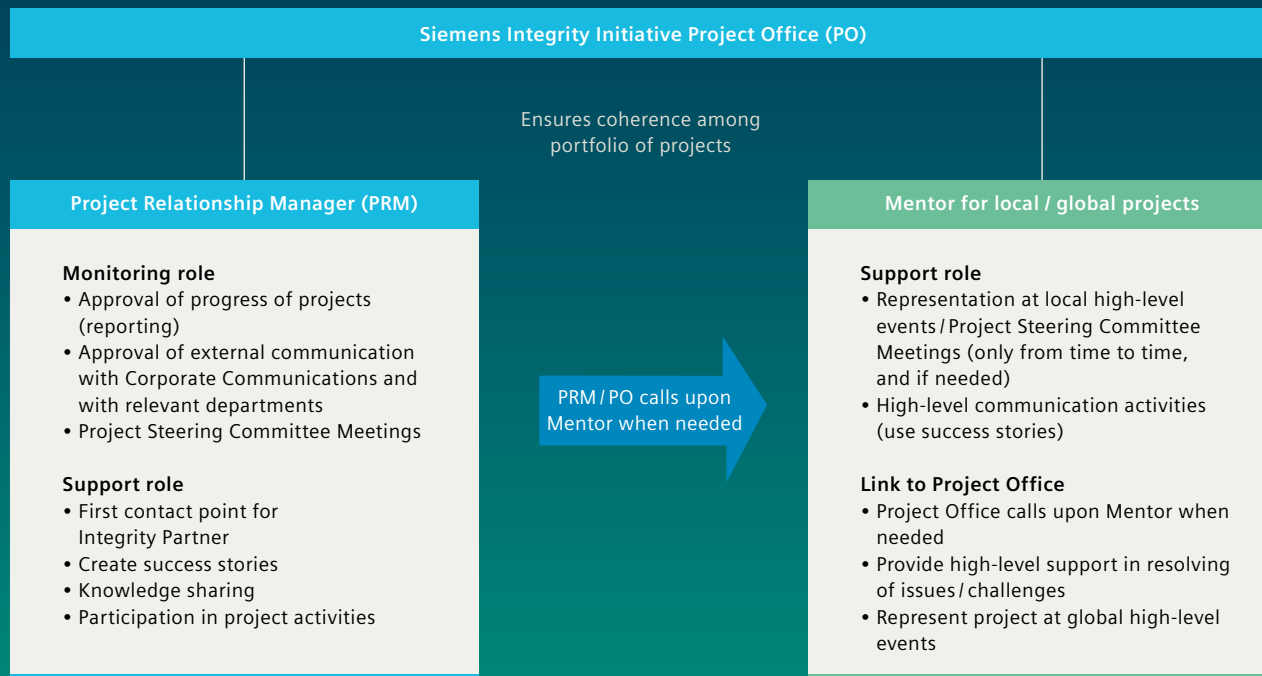
tion Initiative (PACI) of the World Economic Forum and, since 2011, our active involvement in the G20/B20 Task Force on Anti-corruption and the drafting and implementation support of B20 Recommendations drawn up in France, Mexico, Russia, Australia, Turkey, China, Germany, Argentina, Japan, Saudi Arabia, Italy and now in 2022, Indonesia.

We remain committed to the 10 principles of the United Nations Global Compact, and support the implementation of the United Nations Convention against Corruption, as well as the OECD Anti-Bribery Convention. These principles and conventions guided our thematic considerations in project designs which were taken up by our Integrity Partners for implementation through certain modules in our Siemens Integrity Initiative projects.

Project management and reporting

- Responsibility for managing the projects funded under the Siemens Integrity Initiative lies with the respective Integrity Partner. Siemens supports projects financially, monitors the use of funds in a biannual reporting process, and participates in activities where appropriate and requested by the Integrity Partner
- The main points relating to the management of projects are regulated in a Funding Agreement between Siemens and the Integrity Partners and its Project Partners
- Funds are paid out subject to the achievement of milestones and on a biannual basis
- Integrity Partners report annually on progress, funds used and work plans for the next year. All Annual Reports must be accompanied by a financial report that has been audited by an external audit company. Regular Interim Reports help to review progress throughout the year. All Annual Reports must be reviewed and approved by the local Siemens Project Relationship Manager, the Siemens Finance Department, and the Siemens Integrity Initiative Project Office
- Siemens has set up an internal project structure for selecting projects and for supporting and monitoring projects during the implementation phase, as well as a system for capturing and evaluating impact
- Siemens supports all projects with a designated Project Relationship Manager and a Mentor from senior management
- Country-specific projects, for example, can draw on the CEO of the local Siemens company as their Mentor. All Project Relationship Managers (PRMs) are coordinated by the Siemens Integrity Initiative Project Office (see also Project Organization)
- A project completion process is in place which includes the submission of a Final Report, consisting of a Final Progress Report and an Audit Report with project financials prepared by an independent Auditor, as well as the submission of an End of Project Evaluation and a Final Payment Request

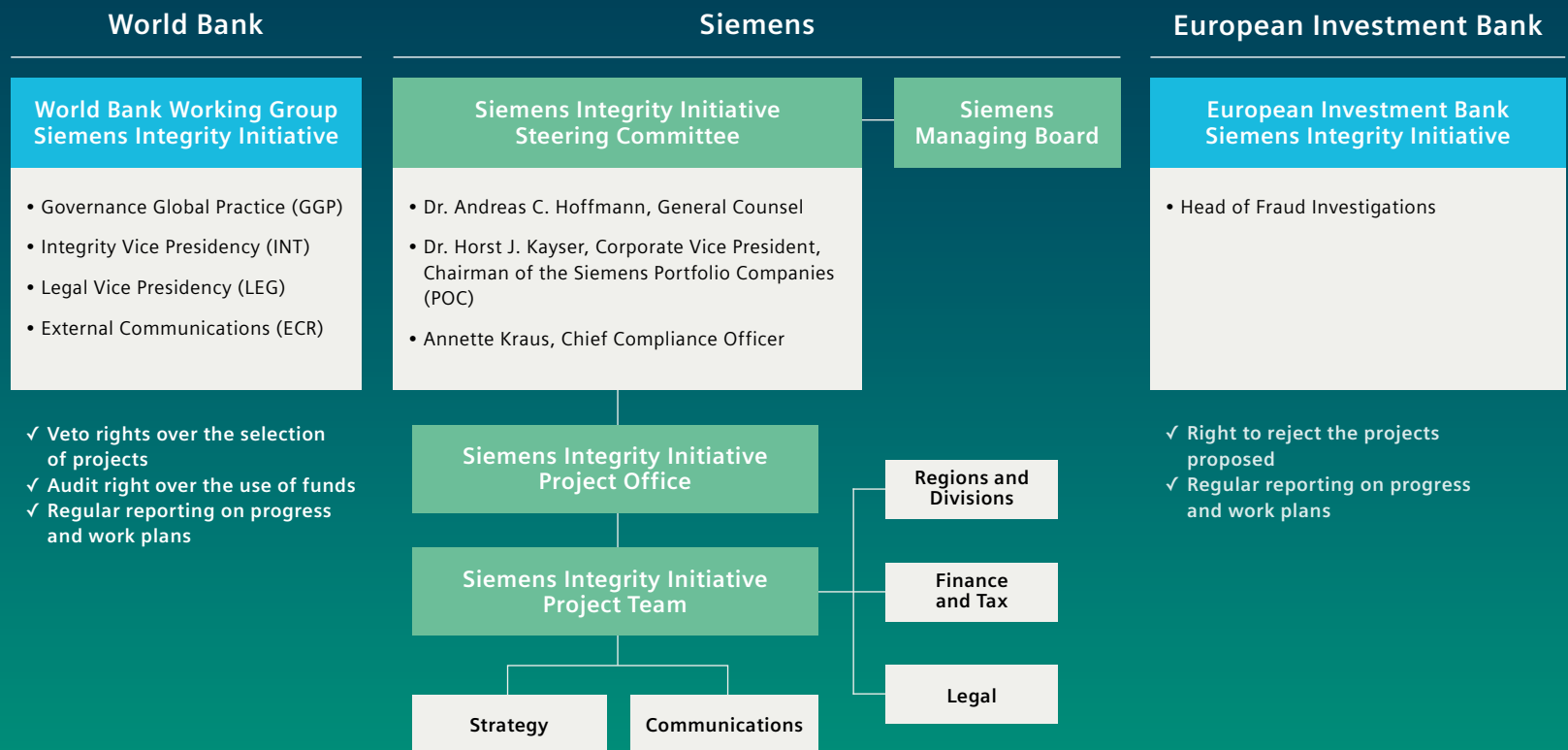
Roles and responsibilities of Project Relationship Managers and Mentors:



Project organization

- The internal Siemens project management structure of the Initiative consists of several dedicated teams that provide overall supervision and guidance (such as the Steering Committee) and deal with daily operations of the Initiative (Siemens Project Office, Project Team and Project Relationship Managers)
- To make this Initiative a company-wide effort and ensure engagement and representation, all relevant business fields of Siemens have been integrated into the structure of the Initiative
- The main operational contact for this Initiative is the Siemens Project Office in Munich and operates with four people globally, and is in addition supported by an extended Project Team from various Siemens departments (Legal and Compliance, Finance, Tax, Strategy, Communications and Compliance colleagues in all relevant countries)
- The Project Office is the main link to the World Bank Group with regard to the audit and veto rights as well as reporting obligations. It is also the main link to the European Investment Bank (EIB) with regard to their rights to reject projects proposed as well as reporting obligations
- The work of the Project Office and Project Team is overseen by the Siemens Integrity Initiative Steering Committee, which consists of Dr. Andreas Christian Hoffmann, General Counsel, Siemens AG; Ms. Annette Kraus, Chief Compliance Officer, Siemens AG; and Dr. Horst J. Kayser, Corporate Vice President, Chairman of the Siemens Portfolio Companies (POC), Siemens AG
- As the World Bank Group has veto and audit rights, and the European Investment Bank has the right to reject proposed projects, they have set up a team of experts to liaise with Siemens regarding the Siemens Integrity Initiative, as shown in the chart

Siemens Integrity Initiative project structure with settlement parties:



B.

• Siemens Integrity Initiative

Siemens Integrity Initiative

On July 2, 2009, the World Bank Group announced a comprehensive settlement with Siemens. As part of the settlement, Siemens agreed to cooperate to change industry practices, clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption.

Siemens subsequently set up the Siemens Integrity Initiative to support projects and organizations fighting corruption and fraud with funding worth USD 100 million over the next 15 years.

This funding was complemented on March 15, 2013 by a separate settlement with the European Investment Bank (EIB), worth EUR 13,64 million over five years.



Status of the First Funding Round

In the First Funding Round, thirty-one projects from over twenty countries were selected to receive a total funding of up to USD 40 million.

As reported in our Annual Report 2016, as at **March 3, 2017**, all 31 projects had completed their scheduled activities.

The final overviews of activities for the entire project period were reported on in various Siemens Integrity Initiative Annual Reports from 2011 to 2017.

These projects are marked in the table on page 30 and further information on the projects is available on www.siemens.com/integrity-initiative.

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

A detailed description of activities implemented during the first to the seventh year (2011 to 2017) was provided in the Siemens Integrity Initiative Annual Report 2011, 2012, 2013, 2014, 2015, 2016 and 2017.

Key data First Funding Round

Funds committed in the First Funding Round	USD 37,7 M
Disbursements in year 1 to year 8 (2010 – June 30, 2018) (release of provision)	USD 34,8 M ¹⁾
Disbursement for Mid-term Review of the Siemens Integrity Initiative performed by Universal Management Group finalized and presented to the World Bank on December 6, 2017 covering the First and Second Funding Rounds	USD 0,18 M
Funds unspent	USD ~2,7 M
No further planned disbursements	USD 0,0 M
Number of projects First Funding Round	31
Thereof projects that have completed their activities	31
Thereof ongoing	0
Countries covered in the First Funding Round	22

Note: Siemens fiscal year (October 1 – September 30) Due to rounding, numbers presented may not add up precisely to the totals provided.

¹⁾ The information provided in this table is based on all approved First Funding Round Final Reports

www.siemens.com/integrity-initiative/Report2011

www.siemens.com/integrity-initiative/Report2012

www.siemens.com/integrity-initiative/Report2013

www.siemens.com/integrity-initiative/Report2014

www.siemens.com/integrity-initiative/Report2015

www.siemens.com/integrity-initiative/Report2016

www.siemens.com/integrity-initiative/Report2017

Status of the Second Funding Round

The Second Funding Round applies the same selection criteria and focus areas as the First Round. As the Second Round is based on the settlement agreements with the World Bank Group and the European Investment Bank, the World Bank Group has audit rights over the use of funds (USD 100 million over a period of 15 years beginning in 2009) and veto rights over the selection of projects by Siemens. The agreement between Siemens and the European Investment Bank (EUR 13,64 million over five years) gives the EIB the right to reject the projects proposed.

The Second Funding Round, with a funding volume of approximately USD 30 million for up to 25 projects plus additional projects funded on the basis of the settlement with the European Investment Bank, was launched on June 27, 2013 with a deadline for submission of proposals in August 2013.

The gradual announcement of the selected projects from the Second Funding Round started in fall 2014 and stretched until spring 2015. **24 projects** were selected for funding in the Second Funding Round with a total committed capital of **USD 35,554 million**.

The selection was made on a competitive basis in two stages (initial Expression of Interest phase and the later Full Proposal phase) with a

focus on project applications that demonstrate a clear impact on the business environment and results in sectors and countries of where Siemens is present. Projects that already submitted an Expression of Interest for the First Funding Round as well as projects that have already been funded were eligible to submit another proposal in the Second Funding Round.

The announcement, application process and selection criteria were made available transparently on the Siemens Integrity Initiative website. The initial first projects were announced in a joint press release published by Siemens, the World Bank Group and the European Investment Bank on December 10, 2014 (see www.siemens.com/integrity-initiative or Section D of the Annual Report 2014).

All 24 Siemens Integrity Initiative Second Funding Round projects have completed their activities by March 2, 2021. The final overviews of activities for the entire project period were reported for all 24 projects in our Annual Report 2017 (2 projects), Annual Report 2018 (10 projects), Annual Report 2019 (10 Projects) and Annual Report 2020 (2 Projects) respectively. These projects are marked in the table on page 34 and further information on the projects is available on www.siemens.com/integrity-initiative.

Key data Second Funding Round

Funds committed in the Second Funding Round	USD 35,554 M
Disbursements in year 1 to year 8 (2015 to March 02, 2022) (release of provision)	USD 34,03 M ¹⁾
Funds currently unspent	USD ~ 1,5 M
Further planned disbursement in year 8 (2022)	USD - 0,1 M
Number of projects	24
Thereof projects that have completed their activities	24
Thereof ongoing	0
Countries covered in the Second Funding Round	More than 20

Note: Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

¹⁾ The information provided in this table is based on approved Annual and Final Reports as at March 02, 2022

More information on the settlements between Siemens and the World Bank Group and Siemens and the European Investment Bank (EIB) is available online as well as on the Siemens Integrity Initiative website: www.siemens.com/integrity-initiative.

Status of the Third Funding Round

The Siemens Integrity Initiative announced the launch of the **Third Funding Round** in its Press Release on **March 13, 2018** as part of the July 2009 settlement between Siemens and the World Bank and the March 2013 settlement between Siemens and the European Investment Bank (EIB).

Open to applications from legal entities such as non-governmental organizations, international organizations, business associations, and academic institutions, the Siemens Integrity Initiative selection process is made on a competitive basis in two stages (initial Expression of Interest phase and the final Full Proposal phase), and favors project proposals that have a direct impact on the private sector and strengthen compliance standards and legal systems.

Entities that submitted Expressions of Interest for the first two funding rounds as well as entities that received funding in the first two funding rounds were also eligible to submit proposals for funding in the Third Funding Round.

The Project Office was truly encouraged by around 140 Expressions of Interest received by the May 8, 2018 deadline. These Expressions of Interest were submitted by local and global organizations dedicated to the fight against corruption and covered a wide range of Collective Action and Education and Training initiatives with very interesting and relevant activities proposed in over 50 countries. The total funding of more than USD 280 million applied for exceeded available funds by a factor of 9.

Siemens conducted a cross functional review and due diligence of all Expressions of Interest with reference to the stated Eligibility and Selection Criteria available at www.siemens.com/integrity-initiative.

After receiving **approval from the Siemens Steering Committee** as well as **the World Bank non-veto** and the **European Investment Bank no objection** decisions for short-listed projects under consideration, around 30 applicant organizations were invited in November 2018 to submit Full Proposals by January 31, 2019.

Following a second detailed cross functional review and due diligence of all submitted Full Proposals, Siemens announced the first group of projects selected under the Third Funding Round in its Press Release on **December 16, 2019**.

All Third Funding Round funding agreements were signed as of March 2, 2020, ultimately adding to the Siemens Integrity Initiative portfolio 22 new projects from more than 40 countries with committed funding of up to USD 25,2 million.

More information on the **eligibility and selection criteria** as well as the **application and selection process** is available on our web site at www.siemens.com/integrity-initiative.

Projects selected for funding under the Third Funding Round are listed in the table on page 38, and further information on the projects is available on www.siemens.com/integrity-initiative and in Section C of this report.

Key data Third Funding Round	
Funds committed in the Third Funding Round	USD 25,2 M
Disbursements in year 1 to year 3 (2019 to March 02, 2022) (release of provision)	USD 14,7 M ¹⁾
Funds currently unspent	USD ~ 10,5 M
Further planned disbursement in year 3 (2022)	USD ~ 5,5 M
Number of projects	22
Thereof projects that have completed their activities	0
Thereof ongoing	22
Countries covered in the Third Funding Round	More than 40

Note: Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

¹⁾ The information provided in this table is based on approved Annual Reports as at March 02, 2022

Status of the Golden Stretch Funding Round

In alignment with the Siemens Steering Committee and the World Bank, the Siemens Integrity Initiative Project Office in **December 2020** invited selected short-listed candidates from the Third Funding Round to submit Full Proposal applications for additional funding.

The Golden Stretch Funding Round builds on the well-established eligibility and selection criteria from previous funding rounds published at www.siemens.com/integrity-initiative, as well as the current implementation activities of selected Third Funding Round projects.

Golden Stretch applicants were required to in particular demonstrate how the sustainability of project activities and results into the future will be ensured and were further challenged to include concepts on how the projects will inspire, support and engage local based Non-Governmental Organizations as well as the Public and the Private Sector.

On the due date of February **15, 2021**, the project office received impressive multi-faceted proposals, and in spring 2021, a team of experts from different specialist areas and regions subjected the projects to careful due diligence before presenting them to the **Siemens Steering Committee for approval** and then **to the World Bank as part of the non-veto process** and to the European Investment Bank for informational purposes.

The public announcement of results was made in the [Siemens corporate press release on July 7, 2021](#), which is available in Section D of this Annual Report.

A total of eight additional projects with a total committed funding of **USD 20,5 million** will receive between USD 1 million and USD 4 million each over a period of three years starting from July 2021.

These eight Golden Stretch projects enhance the overall Siemens Integrity Initiative portfolio to **85 projects** in over **50 countries** with total committed funding of **around USD 120 million**.

Projects selected for funding under the Golden Stretch Funding Round are listed in the table on page 42, and further information on the projects is available in Section C4. of this Annual Report and on www.siemens.com/integrity-initiative.

Key data Golden Stretch Funding Round	
Funds committed in the Golden Stretch Funding Round	USD 20,5 M
Disbursements in year 1 to year 2 (July 1, 2021 to March 02, 2022) (release of provision)	USD 5,9 M ¹⁾
Funds currently unspent	USD ~ 14,6 M
Further planned disbursement in year 2 (2022)	USD ~ 3,7 M
Number of projects	8
Thereof projects that have completed their activities	0
Thereof ongoing	8
Countries covered in all Funding Rounds	More than 50

Note: Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

¹⁾ The information provided in this table is based on approved Annual Reports as at March 02, 2022

List of projects funded under the First Funding Round:

Integrity Partner
Basel Institute on Governance, Switzerland
Beijing New Century Academy on Transnational Corporations, China
Central European University, Hungary in cooperation with Integrity Action, United Kingdom
COCIR (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry), Belgium
The Convention on Business Integrity, Nigeria
The Ethics Institute, South Africa
Federation of Korean Industries-International Management Institute in cooperation with Global Competitiveness Empowerment Forum, South Korea
Foundation for the Global Compact, USA in cooperation with the UN Global Compact and PRME (Principles for Responsible Management Education), USA
Foundation for the Global Compact, USA in cooperation with the UN Global Compact and its local networks
Fundación Universidad de San Andrés (FUdeSA), Argentina
Humboldt Viadrina School of Governance, Germany
International Anti-Corruption Academy (IACA), Austria
International Business Leaders Forum (IBLF), United Kingdom in cooperation with the School of Public Administration of Renmin University, China
Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil
Maala Business for Social Responsibility, Israel
Makati Business Club, Philippines in cooperation with the European Chamber of Commerce Philippines
Organisation for Economic Co-operation and Development (OECD), MENA-OECD Investment Programme, France

¹⁾ Summary of Project Activities was reported in Annual Report 2017 (1) = University of Cairo

²⁾ Summary of Project Activities was reported in Annual Report 2016 (4) = Ethics Angola, IACA, Ethos, Maala

³⁾ Summary of Project Activities was reported in Annual Report 2015 (9) = Basel, CEU, COCIR, CBI, PRME, UNGC, San Andres, Makati, UNDP

⁴⁾ Summary of Project Activities was reported in Annual Report 2014 (14)

⁵⁾ Summary of Project Activities was reported in Annual Report 2013 (2)

⁶⁾ Summary of Project Activities was reported in Annual Report 2012 (1)

= Total number of all summaries 31

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	1,86 M	-	completed as of September 2015 ³⁾
	China	0,89 M	-	completed as of March 2014 ⁴⁾
	Central and Eastern Europe	3,09 M	-	completed as of December 2015 ³⁾
	Europe, Asia, Russia, South America	0,96 M	-	completed as of September 2014 ³⁾
	Nigeria	1,1 M	-	completed as of December 2014 ³⁾
	Angola, South Africa	1,5 M	-	completed as of September 2016 (Angola) ²⁾ ; completed as of September 2015 (South Africa)
	South Korea	0,81 M	-	completed as of March 2014 ⁴⁾
	Global	1,48 M	-	completed as of January 2015 ³⁾
	Brazil, Egypt, India, Nigeria, South Africa	2,87 M	-	completed as of January 2015 ³⁾
	Argentina	0,73 M	-	completed as of September 2014 ³⁾
	Global	1,3 M	-	completed as of May 2014 ⁴⁾
	Global	2,02 M	-	completed as of December 2015 ²⁾
	China, Russia	1,5 M	-	completed as of December 2013 ⁵⁾
	Brazil	3,11 M	-	completed as of June 2016 ²⁾
	Israel	0,48 M	-	completed as of September 2015 ²⁾
	Philippines	1,04 M	-	completed as of March 2015 ³⁾
	Middle East and North Africa	0,75 M	-	completed as of September 2013 ⁵⁾

- ¹⁾ Summary of Project Activities was reported in Annual Report 2017 (1) = University of Cairo
- ²⁾ Summary of Project Activities was reported in Annual Report 2016 (4) = Ethics Angola, IACA, Ethos, Maala
- ³⁾ Summary of Project Activities was reported in Annual Report 2015 (9) = Basel, CEU, COCIR, CBI, PRME, UNGC, San Andres, Makati, UNDP
- ⁴⁾ Summary of Project Activities was reported in Annual Report 2014 (14)
- ⁵⁾ Summary of Project Activities was reported in Annual Report 2013 (2)
- ⁶⁾ Summary of Project Activities was reported in Annual Report 2012 (1)

= Total number of all summaries 31

Integrity Partner

Oživení, Czech Republic in cooperation with Transparency International Slovakia and the Economics Institute of the Academy of Sciences of the Czech Republic

Partnership for Governance Reform – Kemitraan, Indonesia

POLMED (The Polish Chamber of Commerce of Medical Devices), Poland

Sequa gGmbH, Germany in cooperation with German Agency for International Cooperation (GIZ), Chengdu General Chamber of Commerce (Province of Sichuan), China, and Hunan Provincial Chamber, China

Transparency International Bulgaria

Transparency International Italy

Transparency International Mexico

Transparency International USA in cooperation with Social Accountability International, USA

United Nations Development Programme Regional Bureau for Arab States, USA

United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – Incentives to Corporate Integrity

United Nations Office on Drugs and Crime (UNODC), Austria – UNCAC Outreach and Communication

United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – The 6P's

University of Cairo, Center for Economic and Financial Research and Studies (CEFRS), Egypt

Vietnam Chamber of Commerce and Industry (VCCI) in cooperation with the International Business Leaders Forum (IBLF), United Kingdom

Total funding volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Czech Republic, Slovakia	0,6 M	-	completed as of March 2014 ⁴⁾
	Indonesia	1,5 M	-	completed as of December 2014 ⁴⁾
	Poland	0,46 M	-	completed as of September 2014 ⁴⁾
	China	1,49 M	-	completed as of March 2014 ⁴⁾
	Bulgaria	0,45 M	-	completed as of February 2014 ⁴⁾
	Italy	0,6 M	-	completed as of March 2014 ⁴⁾
	Mexico	0,23 M	-	completed as of May 2014 ⁴⁾
	USA, Global	0,66 M	-	completed as of September 2014 ⁴⁾
	Arab States Region	1,78 M	-	completed as of December 2014 ³⁾
	India, Mexico	1,12 M	-	completed as of September 2014 ⁴⁾
	Global	0,75 M	-	completed as of September 2014 ⁴⁾
	India, Mexico	1,22 M	-	completed as of September 2014 ⁴⁾
	Egypt	0,85 M	-	completed as of February 2017 ¹⁾
	Vietnam	0,5 M	-	completed as of September 2012 ⁶⁾
		37,7 M	0 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 37,7 M for the First Funding Round.

List of projects funded under the Second Funding Round:

Integrity Partner
Al Akhawayn University in Ifrane (AUI), Morocco
Basel Institute on Governance, Switzerland, in cooperation with the Organisation for Economic Co-operation and Development (OECD), France, and the Foundation for the Global Compact, USA
Beijing New Century Academy on Transnational Corporations (NATC), China
Confederation of Indian Industry (CII), India
Ethics and Reputation Society / Etik ve Itibar Dernegi (TEID), Turkey
Foundation for the Global Compact, USA, in cooperation with the Egyptian Junior Business Association, Egypt
Global Compact Network India (GCNI), India
Global Compact Network Korea (GCNK), Korea, in cooperation with the Global Competitiveness Empowerment Forum (GCEF), South Korea
International Anti-Corruption Academy (IACA), Austria
MedTech Europe ⁵⁾ (formerly Eucomed), Belgium
Organisation for Economic Co-operation and Development (OECD), France
Organisation for Economic Co-operation and Development (OECD), France
Pan African Lawyers Union (PALU), Tanzania
Pearl Initiative, United Arab Emirates
The Ethics Institute, South Africa, in cooperation with the Institute of Directors Mozambique, Mozambique (IoDMZ)

¹⁾ Summary of Project Activities for entire project period was reported in Annual Report 2017 (2) = NATC, PALU

²⁾ Summary of Project Activities for entire project period was reported on in Annual Report 2018 (10) = Al Akhawayn University, MedTech, OECD (Russia), POLMED, TEID, TI Italy, TI Secretariat, UNGC Egypt, UNGC Korea, WU Vienna

³⁾ Summary of Project Activities for entire project period reported in Annual Report 2019 (10) = Basel Institute on Governance, CII, Global Compact Network India, OECD (Morocco), TEI (Mozambique), TEI (South Africa), TI España, UNODC (Colombia), UNDP (Egypt, Morocco and Tunisia), UNDP (Iraq and Libya)

⁴⁾ Summary of Project Activities for entire project period reported in Annual Report 2020 (2) = IACA, PEARL

⁵⁾ Transfer from Eucomed to MedTech effective January 1, 2017

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Morocco	0,55 M	-	completed as of May 2018 ²⁾
	Global	4,00 M	-	completed as of December 2018 ³⁾
	China	1,50 M	-	completed as of September 2017 ¹⁾
	India	0,70 M	-	completed as of March 2019 ³⁾
	Turkey	1,76 M	-	completed as of November 2017 ²⁾
	Egypt	1,40 M	-	completed as of June 2018 ²⁾
	India	0,73 M	-	completed as of March 2019 ³⁾
	Republic of Korea (South Korea)	0,90 M	-	completed as of March 2018 ²⁾
	Global	-	4,98 M	completed as of December 2019 ⁴⁾
	Middle East and North Africa	0,85 M	-	completed as of May 2018 ²⁾
	Morocco	-	0,70 M	completed as of December 2018 ³⁾
	Russia	1,55 M	-	completed as of June 2018 ²⁾
	Africa	0,93 M	-	completed as of September 2017 ¹⁾
	GCC countries (United Arab Emirates, Kingdom of Saudi Arabia, Bahrain, Qatar, Kuwait, Oman)	0,88 M	-	completed as of October 2020 ⁴⁾
	Mozambique	0,55 M	-	completed as of September 2019 ³⁾

¹⁾ Summary of Project Activities for entire project period was reported in Annual Report 2017 (2) = NATC, PALU

²⁾ Summary of Project Activities for entire project period was reported on in Annual Report 2018 (10) = Al Akhawayn University, MedTech, OECD (Russia), POLMED, TEID, TI Italy, TI Secretariat, UNGC Egypt, UNGC Korea, WU Vienna

³⁾ Summary of Project Activities for entire project period reported in Annual Report 2019 (10) = Basel Institute on Governance, CII, Global Compact Network India, OECD (Morocco), TEI (Mozambique), TEI (South Africa), TI España, UNODC (Colombia), UNDP (Egypt, Morocco and Tunisia), UNDP (Iraq and Libya)

⁴⁾ Summary of Project Activities for entire project period reported in Annual Report 2020 (2) = IACA, PEARL

⁵⁾ Transfer from Eucomed to MedTech effective January 1, 2017

Integrity Partner

The Ethics Institute, South Africa

The Polish Chamber of Commerce of Medical Devices (POLMED), Poland

Transparency International Secretariat (TI-S), Germany

Transparency International España (TI-España), Spain

Transparency International Italia (TI-It), Italy, in cooperation with the Centro Ricerche e Studi su Sicurezza e Criminalità (RiSSC), Fondazione Centro Studi Investimenti Sociali (CENSIS), Istituto per la Promozione dell'Etica in Sanità (ISPE-Sanità), Italy

United Nations Office on Drugs and Crime (UNODC), Austria

United Nations Development Programme (UNDP), USA

United Nations Development Programme (UNDP), USA

Wirtschaftsuniversität WU, Vienna University of Economics and Business Administration, Austria

Total Funding Volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	South Africa	0,80 M	-	completed as of September 2019 ³⁾
	Poland	0,65 M	-	completed as of September 2018 ²⁾
	Global	3,06 M	-	completed as of September 2018 ²⁾
	Spain	1,27 M	-	completed as of January 2019 ³⁾
	Italy	1,12 M	-	completed as of September 2018 ²⁾
	Colombia	1,20 M	-	completed as of January 2019 ³⁾
	Arab Region including Egypt, Morocco and Tunisia	-	2,27 M	completed as of September 2019 ³⁾
	Arab Region including Iraq and Libya	1,52 M	-	completed as of September 2019 ³⁾
	Africa	1,70 M	-	completed as of March 2018 ²⁾
		27,62 M	7,95 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 35,554 M for the Second Funding Round.

List of projects funded under the Third Funding Round:

Integrity Partner
Basel Institute on Governance, Switzerland, in cooperation with the Organisation for Economic Co-operation and Development (OECD), France
Beijing New Century Academy on Transnational Corporations (NATC), China
East China Normal University (ECNU), China
East-West Center, USA
Etik ve İtibar Derneği (TEİD), Turkey
Eurocham, (Chambre de Commerce Européenne en Côte d'Ivoire), Ivory Coast
Foundation for the Global Compact, USA
Fundación Poder Ciudadano (Transparency International Argentina), Argentina
Global Compact Network Korea (GCNK), Korea, in cooperation with the Korea Sustainability Investing Forum (KoSIF)
International Anti-Corruption Academy (IACA), Austria
Kazakhstan Bar Association (KazBar), Kazakhstan
Maritime Anti-Corruption Network (MACN), Denmark ¹⁾ in cooperation with the Convention on Business Integrity, Nigeria

¹⁾ Transfer from Business for Social Responsibility (BSR) to Maritime Anti-Corruption Network (MACN) effective April 1, 2021

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	-	2,86 M	activities in progress
	China	-	1,50 M	activities in progress
	China	0,80 M	-	activities in progress
	Indonesia	0,80 M	-	activities in progress
	Turkey	0,80 M	-	activities in progress
	Ivory Coast	0,80 M	-	activities in progress
	Global	1,70 M	-	activities in progress
	Argentina	0,80 M	-	activities in progress
	Korea	0,80 M	-	activities in progress
	Global	1,50 M	-	activities in progress
	Kazakhstan	0,80 M	-	activities in progress
	Nigeria	1,00 M	-	activities in progress

Integrity Partner
Organisation for Economic Co-operation and Development (OECD), France
The Ethics Institute, South Africa
The Ethics Institute, South Africa
The Polish Chamber of Commerce of Medical Devices (POLMED), Poland
Transparency International Bulgaria, Bulgaria
United Nations Office on Drugs and Crime (UNODC), Austria
United Nations Office on Drugs and Crime (UNODC), Austria
United Nations Office on Drugs and Crime (UNODC), Austria
United Nations Office on Drugs and Crime (UNODC), Austria
Wirtschaftsuniversität Wien (WU), Vienna University of Economics and Business, Austria
Total Funding Volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Regional - Bosnia and Herzegovina, Croatia and Serbia	-	1,70 M	activities in progress
	Mozambique	0,80 M	-	activities in progress
	South Africa	1,00 M	-	activities in progress
	Poland	-	0,69 M	activities in progress
	Bulgaria	-	0,75 M	activities in progress
	Colombia	1,10 M	-	activities in progress
	Global - with focus on Kenya, Mexico, Pakistan	1,00 M	-	activities in progress
	Myanmar	0,80 M	-	activities in progress
	Regional - Egypt, Iraq, Libya and UAE	2,40 M	-	activities in progress
	Regional - Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia	0,80 M	-	activities in progress
		17,70 M	7,50 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 25,2 M for the Third Funding Round.

List of projects funded under the Golden Stretch Funding Round

Integrity Partner
Basel Institute on Governance, Switzerland
Foundation for the Global Compact, USA
International Anti-Corruption Academy (IACA), Austria
Maritime Anti-Corruption Network (MACN), Denmark
Organisation for Economic Co-operation and Development (OECD), France
Transparency International e.V., Germany
United Nations Office on Drugs and Crime (UNODC), Austria
Wirtschaftsuniversität Wien (WU), Vienna University of Economics and Business, Austria
Total funding volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	3,50 M	-	activities in progress
	Global – with focus on Argentina, Bangladesh, Brazil, Egypt, India, Indonesia, Kenya, Malaysia, Thailand, and Ukraine	4,00 M	-	activities in progress
	Global	2,00 M	-	activities in progress
	Regional – Bangladesh, India and Pakistan	2,00 M	-	activities in progress
	Global – with focus on Algeria, Croatia, Saudi Arabia, Serbia, South Africa, Uzbekistan	3,00 M	-	activities in progress
	Global – with focus on Argentina, Romania, and Spain	1,00 M	-	activities in progress
	Global – with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan	4,00 M	-	activities in progress
	Regional - Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia and selected Belt and Road Initiative countries	1,00 M	-	activities in progress
		20,50 M	-	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 20,5 M for the Golden Stretch Funding Round.

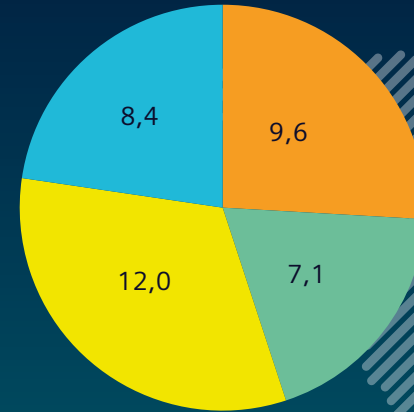
B.

Siemens Integrity Initiative

Siemens Integrity Initiative covers all major growth regions and high-risk countries with 85 projects and a total committed funding of ~ USD 120 M

The chart illustrates the regional spread and balance of the First, Second, Third and Golden Stretch Funding portfolio

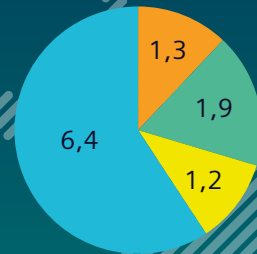
Global Projects



37,1 M

19 Projects with activities in many countries and 28 Golden Stretch country modules

Americas



10,8 M

7 Projects, 3 sub-projects, 5 country modules

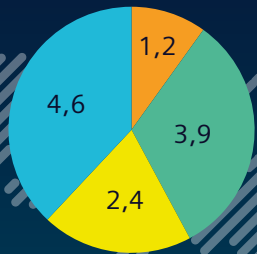
Region/Country of implementation (number of project proposals)

○ Bubble size = Approximate value of funding

- First Funding Round
- Second Funding Round
- Third Funding Round
- Golden Stretch Funding Round

Note: Schematic illustration only.
Country Modules estimates vary depending on budget structure.
Due to rounding, numbers presented may not add up precisely to the totals provided. Status: October 1, 2021

Central & Eastern Europe



12,1 M
10 Projects
3 country modules

Kazakhstan



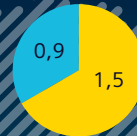
0,8 M
1 Project

Uzbekistan



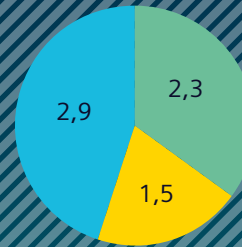
0,7 M
2 country modules

Russia



2,4 M
1 Project
1 sub-project

China



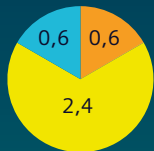
6,7 M
5 Projects
1 sub-project

South Korea



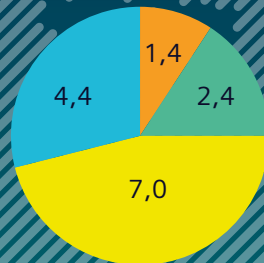
2,5 M
3 Projects

Southern Europe



3,6 M
3 Projects
2 country modules

Middle East



15,2 M
10 Projects,
1 sub-project
4 country modules

Pakistan



0,3 M
1 country module

Myanmar



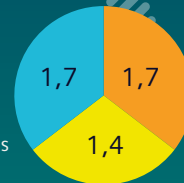
0,8 M
1 Project

Bangladesh



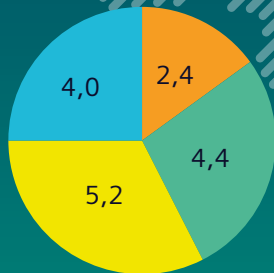
0,6 M
2 country modules

India



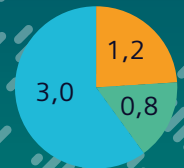
4,8 M
3 Projects,
3 sub-projects
1 country module

Africa



16,0 M
14 Projects,
3 sub-projects
4 country modules

Asia-Pacific



5,0 M
4 Projects
4 country modules



Project profiles and highlights of activities in 2021

The following pages contain project objectives and funding volumes as agreed with Integrity Partners in the respective funding agreements.

For ongoing projects under the Third Funding Round and Golden Stretch Funding Round the descriptions of activities undertaken in this year (2021) were provided by the Integrity Partners in their respective Annual Progress Report 2021 and approved by the relevant Integrity Partners for external use.

Integrity Partners submitted the following documentation, which was the basis for the review of progress:

- Annual Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Annual Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds
- Updated Work Plan and Updated Budget for 2022 where relevant

For Integrity Partners in the First and Second Funding Rounds that have completed their activities, a Final Report including the following information was provided and used as the basis for review:

- Final Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Final Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds
- Payment and expense overview
- External evaluation of impact



All **31** Siemens Integrity Initiative **First Funding Round** projects were completed by March 3, 2017. Key activities over the entire project period were reported on in one of our previous Annual Reports and therefore no First Funding Round Projects are included in this Annual Report.

To obtain information on the thirty-one (**31**) fully completed projects please refer to the previous Annual Reports 2012, 2013, 2014, 2015, 2016 and 2017 of the Siemens Integrity Initiative.

The respective projects are: Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC) I, Central European University (CEU), COCIR, Convention on Business Integrity (CBI), Federation of Korean Industries-International Management Institute (FKI-IMI), Foundation for the Global Compact (UN PRME), Foundation for the Global Compact (UNGC / 5 countries), Fundación Universidad de San Andrés (FUdeSA), Humboldt Viadrina School of Governance, International Anti-Corruption Academy (IACA), Austria, International Business Leaders Forum (IBLF), Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil, Maala Business for Social Responsibility, Israel, Makati Business Club (MBC), Organisation

for Economic Co-operation and Development (OECD) - MENA, Oživení, Partnership for Governance Reform (PGR) – Kemitraan, The Polish Chamber of Commerce of Medical Devices (Polmed) I, Sequa, Transparency International Bulgaria, Transparency International Italy, The Ethics Institute, South Africa, Transparency International Mexico, Transparency International USA, United Nations Development Programme (UNDP), University of Cairo, three UNODC I projects, and VCCI.

All **24** Siemens Integrity Initiative **Second Funding Round** projects have completed their activities by March 2, 2021.

Information on key activities over the entire project period for the **24** projects were already reported in the Annual Report 2017 (2 projects), Annual Report 2018 (10 projects), Annual Report 2019 (10 Projects) and Annual Report 2020 (2 projects).

The respective projects are: Al Akhawayn University in Ifrane (AUI), Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC), Confederation of Indian Industry (CII), Etik ve Itibar Dernegi (TEID), Foundation for the Global Compact, Global Compact Network India (GCNI), Global Compact Network Korea (GCNK), International

Anti-Corruption Academy (IACA), MedTech Europe, Organisation for Economic Co-operation and Development (OECD) Morocco project, Organisation for Economic Co-operation and Development (OECD) Russia project, Pan African Lawyers Union (PALU), Pearl Initiative (PEARL), The Ethics Institute (TEI) Mozambique project, The Ethics Institute (TEI) South Africa project, The Polish Chamber of Commerce of Medical Devices (POLMED), Transparency International Secretariat (TI-S), Transparency International España (TI-España), Transparency International Italia (TI-It), United Nations Office on Drugs and Crime (UNODC), United Nations Development Programme (UNDP) Egypt, Morocco and Tunisia project, United Nations Development Programme (UNDP) Iraq and Libya project and Wirtschaftsuniversität Wien (WU).

Further information is provided on www.siemens.com/integrity-initiative.

For all projects the Project Profiles in Section C were provided by the Integrity Partners and approved by them for external use.

C1.

First Funding Round Projects: Project profiles and highlights of activities up to 2017

For projects under the First Funding Round the descriptions of activities undertaken over the entire project period were provided by the Integrity Partners in their respective Final Progress Reports and approved by the relevant Integrity Partners for external use.

All 31 First Funding Round projects have been fully completed and reported on in the Annual Reports of 2011, 2012, 2013, 2014, 2015, 2016 and 2017.

No First Funding Round projects are covered in this Section C1.



C2.

Second Funding Round Projects: Project Profiles and highlights of activities up to 2020

For projects under the Second Funding Round the descriptions of activities undertaken over the entire project period were provided by the Integrity Partners in their respective Final Progress Report and approved by the relevant Integrity Partners for external use.

All 24 Second Funding Round projects have been fully completed and reported on in the Annual Reports of 2017 (2 projects), 2018 (10 projects), 2019 (10 projects) and 2020 (2 projects).

No Second Funding Round projects are covered in this Section C2.



C3.

Third Funding Round Projects: Project Profiles and highlights of activities in 2021

For the 22 projects under the Third Funding Round the descriptions of activities undertaken in 2021 were provided by the Integrity Partners in their respective Annual Progress Report 2021 and are approved by the relevant Integrity Partners for external use.

All 22 projects are active and implementation of activities is in progress.



DESCRIPTION OF INTEGRITY PARTNER

Established in 2003, the **Basel Institute on Governance** is an independent and international non-profit organisation working around the world with public and private partners to prevent and combat corruption and strengthen governance.

- The Collective Action team supports companies and multi-stakeholder groups with advice on Collective Action initiatives and hosts the B20 Collective Action Hub.
- Compliance advisors help organisations strengthen governance systems and implement effective anti-corruption compliance programmes.
- The International Centre for Asset Recovery (ICAR) assists countries in tracing and returning stolen assets with training, case and legal advice, and digital tools including the Basel AML Index and Basel Open Intelligence.
- The Public Governance team researches the root causes of corruption and develops evidence-based anti-corruption approaches.
- The Green Corruption team works across the Basel Institute's divisions to apply anti-corruption and governance approaches to issues of environmental crime and degradation.

Name of Integrity Partner:

Basel Institute on Governance in cooperation with the Organisation for Economic Co-operation and Development

PROJECT:

Positioning Collective Action as a Compliance Norm

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global	5 years	2,86 M	Switzerland

This project implemented by the Basel Institute on Governance and the Organisation for Economic Co-operation and Development aims to embed Collective Action in compliance by developing a global norm, bolstering its application, and innovating Collective Action to address demand-side bribery and human rights synergies through three objectives.

First, the project seeks to position Collective Action as a norm by key standard-setting and enforcement institutions. Through strategic awareness-raising and advocacy, the project will encourage targeted institutions to create stronger incentives for more private sector and other actors to engage in Collective Action.

Second, it will equip compliance professionals and Collective Action practitioners with effective methodologies for launching and sustaining Collective Action initiatives through peer-learning and best-practice sharing.

Third, the project will generate innovation in anti-corruption Collective Action in two areas. To address the demand side of bribery the project will scale up the use of High Level Reporting Mechanisms (HLRM). In response to corporate demands for increased effectiveness of compliance systems, the project will identify ways to capitalise on synergies between bribery prevention and human rights protection through Collective Action.

PROJECT AT A GLANCE:

To embed Collective Action in compliance by developing a global norm, bolstering its application, and innovating to address demand-side bribery and human rights synergies

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

- Active participation in and contributions to public forums and bilateral meetings to promote Collective Action as a norm led to the inclusion of Collective Action in Chile's National Anti-Corruption Strategy as well as in the [UNGASS Political Declaration](#) and the final draft of the OECD Draft Revised Recommendation for Further Combating Bribery of Foreign Public Officials
- As a Network Partner to the B20 Italy, the Basel Institute supported the inclusion of Collective Action in the [B20 Italy Integrity & Compliance Policy Paper](#)

- The Basel Institute and the OECD hosted a series of focus group discussions and webinars in order to promote the High Level Reporting Mechanism in Indonesia and Malawi. Additional interest was also noted in Tunisia, Eastern Europe and SADC member countries, namely South Africa, Malawi, Seychelles, Mauritius and the Democratic Republic of the Congo
- An increase in interest for training and peer learning activities has been noted. The Basel Institute developed a 2.5-day training course on Collective Action for the Southern African Development Community (SADC) member countries, which was attended by 45 participants from 14 countries
- The Basel Institute conducted 10 roundtable discussions with representatives of 52 private sector organisations to identify potential synergies between the human rights and anti-corruption agendas and good practices
- The continuous outreach efforts and updating of the B20 Collective Action Hub increased the reach of this free online resource centre to more than 19 000 views. Its database now includes 281 initiatives

Impact

- Through active participation in key global forums, bilateral meetings, awareness raising and outreach, Collective Action as a norm was promoted which led to several policy endorsements
- An increased interest in Collective Action methodologies and best practices is noted. Numerous inquiries have been received for technical assistance from government agencies and practitioners, including Siemens Integrity Initiative Integrity Partners and the private sector
- The concept of dual-purpose Collective Action focusing on human rights and anti-corruption is gaining traction

DESCRIPTION OF INTEGRITY PARTNER

NATC is a non-profit independent legal entity specialized in researching the global and China’s strategy of Transnational Corporations (TNCs), corporate governance, management structure, and corporate philosophy and culture with a focus on corporate social responsibility.

NATC has gained recognition from government agencies and from foreign and domestic companies for its research work. Drawing upon its research capability, NATC submits policy recommendations for the Ministry of Commerce and other government agencies, and at the same time offers consulting advice to Chinese and foreign TNCs.

Since 2011, NATC has conducted two rounds of Siemens Integrity Initiative projects, which provides a platform for practice and promotion as well as communication and exchange on the subjects of corporate governance, compliance and anti-commercial corruption for every aspect of governments, industries, scholars and media to further improve the corporate governance and compliance of domestic and overseas enterprises.

Name of Integrity Partner:

Beijing New Century Academy on Transnational Corporations (NATC)

PROJECT:

Improving the Effectiveness of Compliance Programs of Chinese Enterprises

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
China	3 years	1,50 M	China

NATC will improve effective compliance management of Chinese enterprises and push compliance Collective Action in China through making efforts in the following three objectives.

Firstly, through submitting policy recommendations to government departments, unifying key driving partners and building an alliance in the target industries to address key compliance issues, publishing compliance books and conducting compliance forums to promote tools and best practices for effective compliance management, NATC will support enterprises in three target industries (energy, industry and healthcare) to improve the effectiveness of compliance management.

Secondly, NATC will promote a “Belt and Road” initiative with emphasis on compliance and integrity by enhancing commitment from relevant Chinese departments, unifying pilot enterprises to address key compliance risks, as well as capacity building and best practices sharing for the enterprises.

Lastly, NATC will contribute to bringing up compliance talents through developing a training curriculum for compliance practitioners at different levels and conduct trainings accordingly. NATC will also have dialogue with relevant Chinese departments to push them to list compliance professionals as an official profession in China.

PROJECT AT A GLANCE:

Promoting effective compliance management and enhancing compliance and integrity culture of Chinese enterprises

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

NATC continued its efforts to enhance effective compliance management in Chinese enterprises in the following ways:

- Supported the compliance pilot program of the Beijing State-owned Assets Supervision and Administration Commission by assisting in drafting Compliance Management Guidelines for Municipal State-owned Enterprises, and by assisting municipal State-Owned Enterprises in enhancing their compliance operations
- Drafted compliance templates and manuals for the pilots in the energy sector to improve Codes of Conduct, assess compliance risks, and improve their overall compliance programs
- Supported the “Certification Standard of Compliance System for Shenzhen Enterprises” research project initiated by the Justice Bureau of Shenzhen
- Supported the compliance pilot program of Shenzhen Bao’an district by giving guidance to and assisting pilot enterprises in strengthening the commitment of employees to compliance and by improving compliance specific policies and procedures
- Supported and coordinated the policy recommendation process for the professionalization of compliance practitioners in China which led to “corporate compliance officers” becoming officially recognized as a new profession by the state government in March 2021
- Organized 3 compliance training programs, which trained over 220 compliance professionals, and provided elementary and intermediary compliance skills for nearly 100 Chinese enterprises

Impact

- Assistance given in the energy sector and the Beijing municipal SOEs pilots has strengthened compliance systems and enhanced the culture of integrity
- Support given to the Shenzhen Bao'an District has enabled enterprises to strengthen compliance risk management in their transnational operations which contributes to a culture of integrity and a clean business environment
- The professionalization of compliance practitioners in China together with compliance training programs has alleviated the shortage of compliance skills and will further drive the training and certification of compliance professionals

DESCRIPTION OF INTEGRITY PARTNER

Founded in Shanghai in October 1951, the **East China Normal University** (ECNU) is one of the most prestigious universities in China and is sponsored by the national programs “Project 211” and “Project 985”. ECNU offers doctoral programs in 30 of its first-level disciplines and master’s programs in 37 first-level disciplines and is authorized to confer 20 professional master’s degrees and doctoral degree in education. The university sponsors or supervises the publication of 23 academic journals and periodicals, as well as four English-language academic journals.

The Research Center for Corporate Compliance (RCCC) of ECNU is the first non-profit research organization in China that provides platforms for researchers, compliance practitioners and policymakers to communicate. The orientation of the research center is to achieve the combination of the research on law and other fields with close practices of compliance and to train people so that they become experts on corporate compliance.

Name of Integrity Partner:

East China Normal University

PROJECT:

Great China Compliance

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

China

3 years

0,80 M

China

The project seeks to develop a compliance education program for college students and professionals. Companies and universities will be able to benefit from our project and its positive outcomes.

Furthermore, group work on compliance R & D and annual meetings for Collective Action will be launched as one aspect of the project.

The project will be divided in two parts. The first part covers the compliance education program. The higher education of corporate compliance will be integrated as a subject in the system of higher education.

A short-term Corporate Compliance Program will be launched as a simple version of compliance education for students and professionals (one step at a time from the city of Shanghai

to the region of Shanghai, and then countrywide).

The second part of the program refers to Collective Action in the form of publications, working groups, and annual meetings. These activities seek to share compliance knowledge and techniques.

An annual meeting of the healthcare sector in Shanghai will be planned to summarize the healthcare compliance development.

At the end of the project, the standards of corporate compliance higher education will be established, the first experiences of which will have been undertaken; thus, the compliance awareness and compliance techniques of compliance professionals in the healthcare sector in China will be enhanced.



PROJECT AT A GLANCE:

The project will address the lack of higher education for compliance professionals and promote Collective Action Initiatives in the healthcare sector to raise skills and competence of compliance professionals, improve compliance standards and reduce corruption

KEY ACTIVITIES

(OCTOBER 2020– SEPTEMBER 2021):

- The [Annual Meeting](#) was convened with focus on the 'Non-Prosecution Agreement based on Compliance in China'. With more than 100 professionals in attendance, awareness was raised and discussions with the Supreme People's Procuratorate of China and Shanghai's People's Procuratorate was facilitated
- [Compliance courses for college students](#) were held with a total of 43 postgraduates from various universities who participated and received certificates of completion
- Compliance awareness was raised for 64 compliance professionals who participated in the [compliance training program](#) and received certificates of completion
- Strong focus was given to the recognition of the Corporate Compliance Officer as a new profession by the government mainly through the ISO 37301 colloquium, public WeChat comments and the "[Study on Corporate Compliance Officer as a new occupation](#)" publication
- [3 new books on compliance](#) were published, namely 'the Higher Education of Corporate Compliance and its Curriculum', 'the Handbook of Compliance Officer' and 'the Compliance-based Regulation'

Impact

- Academic activities by the 'Great China Compliance' team strengthened the education and training of a new generation of compliance officers at college-level and contributed to the professionalization of compliance officers and improved compliance management
- [Collective Action](#) facilitated by the 'Great China Compliance' team through the annual meeting, compliance seminars, publications and active involvement of stakeholders like the judicial authority and universities promoted the institutionalization of compliance and integrity in enterprises

DESCRIPTION OF INTEGRITY PARTNER

The **East-West Center** (EWC) was established by the United States Congress in 1960 and serves as a resource for information and analysis on critical issues of common concern, bringing people together to exchange views, build expertise, and develop policy options. Headquartered in Honolulu with an office in Washington, DC, the EWC is a non-profit organization that promotes better relations and understanding among the people of the Asia-Pacific region through cooperative study, research, and dialogue.

The EWC's 21-acre Honolulu campus, adjacent to the University of Hawaii at Manoa, is located midway between Asia and the United States mainland and features research, residential and international conference facilities. The EWC brings together more than 3 000 individuals per year from around the world to participate in its programs and has 65 000+ alumni.

Name of Integrity Partner:

East-West Center in cooperation with the Indonesian Institute for Independent Judiciary (LeIP)

PROJECT:

Advancing the Indonesian Fight Against Corruption

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Indonesia	4 years	0,80 M	USA

This project addresses three of the most pressing issues in the ongoing efforts to combat endemic corruption in Indonesia:

1. uneven performance of the new regional Anti-Corruption Courts (ACC) that were created to re-place a single centralized ACC
2. a confused and inadequate legal framework for the protection of whistle-blowers and justice collaborators in corruption cases, and
3. ineffective measures to address widespread corruption in the private sector and, more specifically, shortcomings in compliance regimes and internal protection for the whistleblowers

This is an opportune time to address these issues because the Indonesian government has identified "effective prevention and eradication of corruption" as a national priority, beginning in 2019.

To begin to achieve this goal, the Government enacted the National Strategy for the Prevention and Eradication of Corruption and announced that the Corruption Eradication Commission (KPK) will lead its implementation.

The project's three objectives will respond directly to the Indonesian need for support in a broad range of anti-corruption activities.



EAST-WEST
CENTER



PROJECT AT A GLANCE:

To enhance the capacity of Indonesian judiciary, governmental institutions, the National Anti-Corruption Commission and private enterprises to combat corruption more effectively

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- Published the [“Anti-Corruption Courts in Indonesia: Between Expectation and Reality”](#) research report on the performance of Anti-Corruption Courts in Indonesia addressing problems and challenges constraining the performance of the courts, including operational policy recommendations for the enhancement of the performance of Anti-Corruption Courts in Indonesia. This means that this project has succeeded in providing a comprehensive assessment on the performance of Anti-Corruption Courts that has not been done since their establishment in 2002

- Endorsement from Supreme Court leadership, leadership of the Anti-Corruption Commission, and Anti-Corruption Court’s judges of the findings and policy recommendations to improve the legal framework and institutional aspects of the Anti-Corruption Courts
- Enhanced strategic partnership with key decision makers in the judiciary, the Anti-Corruption Commission and relevant ministries as a result of intensive communications and consultation in the dissemination of law and policy recommendations from the Anti-Corruption’s research report
- Raised public awareness on the problems and challenges of the Anti-Corruption Court’s performance in Indonesia through social media engagements and dissemination of infographics and media coverage on the main challenges of the Anti-Corruption Courts in Indonesia

Impact

- The Report fills the gap in the absence of comprehensive assessment on the Anti-Corruption Courts in Indonesia. It addresses the current shortcomings of anti-corruption adjudication in Indonesia. As such, this Report will be essential for parliamentarians, judicial actors, civil society, and policymakers to promote better performance of the Anti-Corruption Courts in Indonesia
- The leadership personnel of the Supreme Court and the Anti-Corruption Court endorse the research and considered the assessment to be accurate and the recommendations to be operational. This shows positive direction towards change in the policies and governance of the Anti-Corruption Courts that can be promoted by the Supreme Court
- Public awareness was raised on the problems and challenges of the Anti-Corruption Courts performance, which creates momentum for change of the Anti-Corruption Courts legal framework and institutional governance

DESCRIPTION OF INTEGRITY PARTNER

The **Ethics and Reputation Society** (Etik ve İtibar Derneği – TEID) is a not-for-profit NGO founded in 2010 with competence in integrity risk management and anti-corruption aiming to develop and encourage adherence to internationally recognized business ethics principles within the Turkish business environment. TEID acts as a point of reference for private sector companies to implement the principles of business ethics and with the public sector in the pursuit of a socio-economic environment that incentivizes compliance with these principles.

TEID has over 175 corporate members with a total yearly income exceeding 15% of Turkey’s GDP, employing more than 800.000 persons.

All corporate members are signatory of TEID Integrity Pledge, which is Turkey’s biggest cross-sectoral Collective Action initiative. TEID has also several roles and memberships in international anti-corruption initiatives.

Name of Integrity Partner:

Etik ve İtibar Derneği – TEID

PROJECT:

Leveling the Playing Field with the Turkish Integrity Center of Excellence - TICE

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Turkey	3 years	0,80 M	Turkey

Since 2014, the Turkish Integrity Center of Excellence (TICE) has been working on elevating the awareness on corruption effects and developing tools to combat corruption in the private sector while also setting an example for the public sector with its content development and capacity building activities.

With this project at hand, TICE aims now to take its efforts to the next level and elevate the integrity risk management abilities of local companies to match the high “extended enterprise integrity risk management” standards of multinational companies. TICE will contribute with two specific objectives:

1. provide practical solutions that transform companies’ intent into impact by leveraging behavioral and institutional dimensions of integrity to therefore be in better accord with the extended enterprise integrity risk management priorities of Multi-National Companies (MNCs)
2. develop Collective Action to disseminate and incentivize standardized sustainable and responsible business conduct by building alliances against corruption

TICE’s priority is to reach out to local companies in selected sectors and cities. Large companies and MNCs operating in Turkey will play a leveraging role to help their supplier Small and Medium Enterprises (SMEs) to establish their own anti-corruption compliance program.

PROJECT AT A GLANCE:

To level the playing field by increasing the extended enterprise risk management capabilities of multi-national corporations (MNCs) and local conglomerates by building alliances against corruption

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- TEID developed several partnerships with local, sectoral, regional and professional organizations to expand its field of action
- 7 350 participants and 3 294 companies (including 434 companies from the ISO 500 list, 737 companies from the Industry Sector and 165 companies from the Healthcare Sector) were reached through 47 online events, workshops, meetings, training sessions, conferences and summits
- Bigger scale events such as the 8th International Ethics Summit & TEID Ethics Forum attracted diverse participants with broad outreach to various cities, regions, professions and functions. Video recordings are available on the [TEID YouTube channel](#)

- TEID is well established as a center of reference on business integrity with publications such as [INmagazine](#), [INbooks](#) and [INguides](#), and with supportive resource products such as [a due diligence form](#), the [selfIN checklist for SMEs](#), an [ethics glossary](#) and training modules on third-party risk management
- TEID Academy's Corporate Ethics and Compliance Management Certification Program enabled a wider geographic reach through 3 online editions and reached 62 participants from 39 companies (including 10 companies from the ISO 500 list and 19 non-member companies)
- 8 awareness-raising events on integrity and business ethics and the Ethics and Compliance function and profession reached 440 high school and university students
- TEID prepared the TEID Academy's Corporate Ethics and Compliance Management Certification Program requirements with the Vocational Qualification Authority to facilitate recognition of the profession by the authorities

Impact

- TEID's corporate membership has increased by 30 since the beginning of the project and includes 11 from the ISO 500 list
- TEID Academy's Corporate Ethics and Compliance Management Certification Program 9th edition saw the certification of ethics and compliance professionals reach over 180
- TEID's events or training programs has led to the implementation of compliance policies or the revision of the Code of Ethics in 7 top 100 companies from ISO 500 list and 1 company from the ISO 1000 list

DESCRIPTION OF INTEGRITY PARTNER

The **European Chamber of Commerce** (Eurocham) in Ivory Coast (IC) was created in 2009 at the initiative of businesspeople and leaders, mostly companies and multinational groups established in Côte d'Ivoire.

The main activities of Eurocham aim at the following objectives:

- Representing the European business community in the Republic of Ivory Coast vis-à-vis the public authorities, corporate organizations and European bodies
- Facilitating the development of business activities originating from European countries
- Promoting industrial and commercial exchanges between the EU and the IC as well as European investments in IC
- Contributing to the improvement of the business climate and the use of good practices through constructive dialogue with the Ivorian authorities, in collaboration with other consular chambers and professional organizations
- Contributing to the economic integration of the sub region, the West African Monetary and Economic Union (UEMOA) and the Economic Community of West African States (ECOWAS), in terms of trade and free movement of goods and services and sustainable development
- Being a source of information and networking for member companies
- Providing technical and practical services to its members
- Carrying out concrete actions of advocacy and lobbying in support and defense of the interests of its members, as part of their specific common concerns

Name of Integrity Partner:

Eurocham (Chambre de Commerce Européenne en Côte d'Ivoire)

PROJECT:

African certification of corporate governance

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Ivory Coast	5 years	0,80 M	Ivory Coast

This project aims to support the efforts of the Ivorian Government and specialized agencies by encouraging and providing support to Small and Medium Enterprises (SMEs) in the implementation of good corporate governance measures.

The first objective of this project is to raise awareness about the importance and benefits of implementing good corporate governance measures. Examples of good practices and ways to implement these practices will be presented to participating SMEs through a year-long training scheme and the dissemination of a monthly newsletter.

The second objective, after the training period, aims to provide support to 60 SMEs for three years. During this time, at least three good corporate governance measures will be implemented in each SME (one per year) with the help and support of an Expert Consultant.

At the end of the three years, by March 2024, all SMEs who have successfully implemented at least three good corporate governance measures will receive the Certificate of Good Governance.

This certificate will serve as a competitive and commercial advantage for SMEs. The certification will be guaranteed by the private sector itself through the promotion of the Certificate to Eurocham's members and partners.

PROJECT AT A GLANCE:

Encouraging the implementation of at least three good corporate governance measures by SMEs through the attribution of a Good Governance Certification

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

- 4000 companies were made aware of the [African Certification of Corporate Governance \(ACCG\)](#) project, of which 100 were selected from 113 applications to participate in training sessions
- Training sessions received very positive participant feedback and enabled participants to become aware of anti-corruption and good corporate governance practices, to build their capacities and to share their experiences with other Small and Medium Enterprises (SMEs)

- The training sessions covered 4 main subject areas, namely "Governance and Strategic Planning", "Governance and isolation of the Manager", "Risk management and anticipation" and "Good governance: the question of ethics and company values"
- Each of the subject areas were followed by tests to assess the understanding of participants, following which 60 companies were invited to join the certification program. As a next step in the process, these 60 companies are currently undergoing a Corporate Governance maturity assessment
- 6 newsletters were published and widely shared with participants, stakeholders, and civil society, and various other newsletters on topics such as business economics were shared with ACCG participants

Impact

- Stakeholders, participants and SMEs have increased their awareness on topics such as anti-corruption and corporate governance, two topics rarely addressed in Ivory Coast
- There is strong interest in anti-corruption practices and good corporate governance from stakeholders, program participants, and partners involved in other EUROCHAM activities. Ivory Coast has started to focus more on anti-corruption measures, and projects like this one can inspire other initiatives, especially in the private sector and civil society

DESCRIPTION OF INTEGRITY PARTNER

The **Foundation for the Global Compact** was established in 2006 and registered as a 501(c) (3) non-profit organization under New York State law. The Foundation is based on the principle that transparency, integrity and public-private collaboration is essential to finding lasting solutions to pressing global problems.

The Foundation supports the activities of the United Nations Global Compact including fundraising, outreach and engagement with business stakeholders. This is a policy and engagement platform for businesses that are committed to aligning their operations and strategies with the Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

Name of Integrity Partner:

Foundation for the Global Compact

PROJECT:

Scaling up Anti-Corruption Collective Action within Global Compact Local Networks

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global	4 years	1,70 M	USA

The project titled "Scaling up Anti-Corruption Collective Action within Global Compact Local Networks" aims to:

1. mainstream Collective Action and enhance its understanding and implementation locally
2. mobilize multi-stakeholder efforts to identify and develop plans to address corruption challenges within a country/sector, and
3. engage with governments and other stakeholders to enhance public-private cooperation in fighting corruption

To this end, the project will adopt a three-pronged approach:

1. development of an Anti-Corruption Collective Action Playbook for Global Compact Local Network(s) (GCLN) to mainstream

the understanding and uptake of Collective Action

2. global launch and roll-out of the Playbook to enable Local Networks in understanding and using the Collective Action methodology to identify and address corruption issues
3. support select GCLNs in their Collective Action initiatives. Underlying this approach will be an overarching goal of facilitating public-private cooperation on Collective Action through policy dialogue and engagement with governments and non-business stakeholders

The project will endeavor to mainstream Anti-Corruption Collective Action and enable GCLNs to engage the private sector and other stakeholders in understanding, initiating and supporting Collective Action.



PROJECT AT A GLANCE:

To enable Local Networks to engage the private sector and other stakeholders in Anti-Corruption Collective Action and to facilitate public-private cooperation through policy dialogue and engagement with governments and non-business stakeholders

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- Developed, launched and translated the “[Uniting against Corruption: A Playbook on Anti-Corruption Collective Action](#)” in collaboration with Global Compact Local Networks and with support from strategic partners
- Participated in the [Special Session of the General Assembly against Corruption](#), co-organized a [video conversation](#) between the United Nations Global Compact CEO and Executive Director and the President of the 75th Session of the United Nations General Assembly, and co-organized with the United Nations Office on Drugs and Crime the “[In the Margins of UNGASS: High-level Forum for the Private Sector](#)”

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

ard Anti-Corruption Program for Legal Entities

Impact

- The [Playbook on Anti-Corruption Collective Action](#) and continued United Nations Global Compact Anti-Corruption Collective Action Working Group has increased the understanding and thought leadership on Collective Action among Global Compact Local Networks and relevant stakeholders
- The initiatives led by the Global Compact Local Networks in Brazil, India, Kenya and Ukraine have made significant progress in moving the needle on tackling corruption in their respective business environments by:
 - strengthening public-private relationships on anti-corruption
 - increasing stakeholder engagement in their Collective Action initiatives, including an additional 101 company signatories to the Kenyan Code of Ethics and 20 company signatories to Ukraine’s Memorandum for support of Collective Action
 - raising awareness through partnerships with media outlets and participation in local, regional and global events.

DESCRIPTION OF INTEGRITY PARTNER

Fundación Poder Ciudadano, the Argentine chapter of Transparency International, has almost 30 years of experience leading the fight against corruption and promoting transparency in Argentina.

Our mission: to promote citizen participation, transparency and access to public information to strengthen the institutions of democracy through Collective Action.

Our "Integrity in the Private Sector" Program together with our expertise in public procurement, position us as a technical and legitimate voice to interact and mediate between the State and its suppliers in order to improve the integrity environment.

We are pioneers in working with Integrity Pacts and Multisector Integrity Agreements in the country, and recognized as a proactive organization aimed at promoting reform processes that uphold the principles of integrity, transparency and ethics in the state and business relationship.

Name of Integrity Partner:

Fundación Poder Ciudadano

PROJECT:

Virtuous alliance: SMEs and public enterprises Co-creating environments of integrity for sustainable and inclusive growth

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Argentina

3.5 years

0,80 M

Argentina

This proposal aims to contribute to the development of a virtuous alliance between Small and Medium Enterprises (SMEs) and Public Enterprises and will focus on the co-creation of integrity environments for sustainable and inclusive growth.

We propose

1. to raise awareness about the importance of integrity as a condition for improving the competitiveness of SMEs and public companies in the energy sector in Argentina
2. to strengthen SMEs and public companies, through the incorporation and elevation of compliance standards; and

3. to promote preferential public policies and regulations in order to improve SMEs participation in public procurements, such as decartelization mechanisms and fight against corruption

We will evaluate the levels of integrity of SMEs and public companies in the energy sector, allowing us to create a training and support system for SMEs that enables them to adapt their structures to current legal obligations and access to good practices and international standards in terms of compliance.

We will build a broad alliance between civil society, sector representatives and specialists to influence decision makers to generate preferential public policies and increase the participation of SMEs in public procurement processes and improve their competitiveness.

PROJECT AT A GLANCE:

To improve integrity environments in the State-Market relationship, strengthening SMEs and Public Enterprises in the energy sector, in Argentina

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

- The virtual [launch event](#) of the project on December 2, 2020 was transmitted live on YouTube and was attended by high-level speakers from the energy sector, academia and civil society, and had more than 70 participants in total. [The video of the event on YouTube](#) received more than 200 views on the same day, and by September 2021 received more than 380 views
- [Energy Sector Integrity and Transparency Roundtables](#) were held with various stakeholders from the energy sector to identify the main sectoral challenges in improving integrity and transparency. 3 initial roundta-

bles were held with an average of 42 participants per roundtable, representing energy sector companies, sectoral chambers, integrity and transparency specialists and public companies. Taking into account the good results of the first 3 roundtables, a further [virtual meeting on Compliance and Political Financing](#) was held on how compliance programs can help companies comply with existing regulations and ensure transparency in political contributions

- 2 diagnoses of integrity and transparency policies in 218 [private enterprises](#) and 33 [State-owned enterprises](#) in the energy sector were made and provided up-to-date sector-specific information on integrity programs
- The stakeholder engagement strategy continued in the 2nd year of implementation and included 20 meetings with new energy sector stakeholders. To further promote the project, 2 new [Collaboration Agreements](#) were signed with the Association of Electrical Energy Distributors of the Argentine Republic (ADEERA) and Aconcagua University (UDA) respectively

Impact

- The collaborative engagement with various key stakeholders from large and small companies, compliance and anti-corruption experts, energy chambers and associations, universities and NGOs raises awareness and improves transparency and integrity in the energy sector
- The up-to-date information on integrity in companies in the energy sector is key for the design and implementation of integrity policies in companies and their value chain, as well as evidence-based public policy decisions

DESCRIPTION OF INTEGRITY PARTNER

The Global Compact Network Korea

(GCNK) is the Local Network of the UN Global Compact (UNGC) operating in Korea, and aims to promote the UNGC Ten Principles in the areas of Human Rights, Labor, Environment and Anti-corruption. The GCNK has played a key role in disseminating those values to the UNGC participants in Korea from the public, private and non-profit sectors by holding various workshops, conferences, conducting Corporate Social Responsibility (CSR) projects, translating UNGC & CSR related materials, and promoting social dialogue since its establishment in 2007.

The GCNK specializes in developing cooperative partnership among various stakeholders, and one of the key activities of GCNK is to gather, shape and develop collective voices of private and public sector organizations for further collaborative dialogue to advance corporate responsibility in the areas of Human Rights, Labor, Environment and Anti-corruption.

Name of Integrity Partner:

Global Compact Network Korea in cooperation with the Korea Sustainability Investing Forum (KoSIF)

PROJECT:

Business Integrity Society (BIS)

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Republic of Korea	3 years	0,80 M	Republic of Korea

An enabling environment accompanied by rule of law and enhanced compliance capacity of market players must go hand in hand to promote a high level of corruption-free society. Business Integrity Society (BIS) aims to achieve the overall project goal by addressing the following two key objectives during its project years from October 1, 2019 to September 30, 2022.

The first objective is to create an enabling environment through legislation revision and policy proposal on Environmental, Social, Governance (ESG) disclosure, Stewardship Code Guideline and Procurement Act that will lead to increase in transparency and integrity of Korean companies when doing business.

The second objective is to incorporate effective compliance systems and enlarge anti-corruption capacity in all levels of management including CEOs, executives and working levels by effective training, tool and guidance. The anti-corruption training programs will cover cross sectors as well as focus on healthcare and energy industry.

This project will invite key players in the market including National Assembly, Government Ministries, National Pension Funds, Companies, Business Associations, Civil Society and Academia to successfully implement activities and maximize the project impact.

PROJECT AT A GLANCE:

An enabling environment accompanied by rule of law and enhanced compliance capacity of market players must go hand in hand to promote a high level of corruption-free society

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- The BIS team proposed a legislative revision to the Government Procurement Act which requires the government to take anti-corruption agendas into account in public procurement. The proposed amendment under the so-called 'Sustainable Public Procurement Act' mandates the consideration of Environmental, Social, Governance (ESG) values including anti-corruption, which is voluntary under the original act
- The BIS team launched the Anti-corruption Policy Forum with 15 members of the National Assembly to lay the groundwork for future legislative activities related to ESG disclosure and public procurement. In addition, the team continuously communicated with

major pension funds to support the adoption of the anti-corruption agenda as the focus area in the Stewardship Code Guideline

- The BIS team encouraged public and private sector participation in the anti-corruption pledge for the Half-day Summit and Pledge Ceremony. A total of 67 anti-corruption pledges were submitted and approximately 200 representatives participated in the event
- The Healthcare Anti-corruption Seminar was held to discuss the high level of corruption risks in the healthcare industry and to provide key solutions. Along with the publication of the healthcare guidance book, the BIS team provided opportunities for compliance officers to build capacity in these areas
- The BIS team conducted two surveys on corporate anti-corruption awareness and legislation trends, to which over 3 000 people responded. The project team also translated an anti-corruption publication to Korean to augment the effectiveness of company anti-corruption policies. In addition, the BIS team posted 20 global trends posts, 4 event and outcome reports, and 74 news articles on the BIS website <http://www.bis.or.kr> which receives around 600 hits per month

Impact

- A bill to enhance the anti-corruption aspects in public procurement was submitted to the National Assembly on August 31st, 2021. If the bill is passed, an enabling environment will be facilitated by leveraging public purchasing power
- Despite the prolonged effects of the COVID-19 pandemic, many forums and seminars including the anti-corruption policy forum, CEO forum, BIS summit, pledge ceremony, and working-level seminars were successfully held. These events have created momentum and raised public awareness on anti-corruption activities and requirements within the business community
- Through consistent and wide-reaching communications such as press releases, publications, surveys and website content, the BIS team has motivated both company employees and the general public to take interest in corporate anti-corruption issues

DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 76 State Parties and 4 international organizations.

It is the only international organization with a mandate focused solely on fighting corruption through education, research, cooperation, and technical assistance delivery.

IACA strives to complement the United Nations' work in the field of sustainable development, including through project implementation and provision of technical assistance, and to facilitate the implementation of the United Nations Convention Against Corruption (UNCAC).

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society.

The Academy currently offers four master's degree programmes, three post graduate programmes as well as various capacity-building trainings.

IACA also creates platforms for dialogue and networking on anti-corruption issues.

Name of Integrity Partner:

International Anti-Corruption Academy

PROJECT:

"GEAR UP" to fight corruption

COUNTRY OF IMPLEMENTATION: DURATION: USD (MILLION): REGISTERED IN:

Global

5 years

1,50 M

Austria

Within the five years of the project, IACA will train and educate participants in its academic degree programmes, Summer Academy trainings at IACA, Regional Summer Academy (RSA) and Regional Alumni Conference.

Students and participants will be provided with a neutral platform for learning with innovative curricula in a unique, international, interdisciplinary, and inter-sectoral setting. Educational activities during academic studies, trainings as well as the RSA and Regional Alumni Conference, will include practice oriented techniques which will drive incremental change and impact, including compliance and AC labs, panels and roundtable debates, field trips, ethical dilemma trainings, simulation games, industry specific assessments, and Collective Action workshops.

World class practitioners and academics will be involved.

The RSA and the Regional Alumni Conference will be organized in parallel in Africa, in a region of high impact.

These two activities will contribute to increasing the anti-corruption and Collective Action initiatives in the region as well as to growing and strengthening the existing alumni network.

The project will place particular emphasis on enhancing the impact of participants' activities. For this purpose impact driven academic activities will be used together with incentives, and follow-up or monitoring mechanisms.

Building upon IACA's institutional strengths, the ultimate goal of the Project is to put theory and knowledge into practice with real impact.

PROJECT AT A GLANCE:

To empower professionals to fight corruption, improve compliance, pursue Collective Action initiatives, and strengthen the anti-corruption alumni network

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

- The first four modules of the [Master in Anti-Corruption \(MACS\)](#) and the [International Master in Anti-Corruption Compliance and Collective Action \(IMACC\)](#) 2020 programmes were implemented. In the second academic year, which started in October 2021, the Project provided support to 21 professionals from Least Developed Countries and Emerging Markets through full or partial scholarship

- New MACS and IMACC 2021 classes commenced with studies in October 2021. In the first academic year, the Project provided in total 19 scholarships to highly qualified candidates from Least Developed Countries and Emerging Markets, selected through a merit-based admission process. These scholarships will provide far-reaching outcomes in reducing corruption in students' home countries and by helping to create a level playing field
- The [International Anti-Corruption Summer Academy 2021](#) was successfully implemented in an online format, with 59 participants from all over the world taking part in the programme. In total, 35 tuition fee waivers were awarded to highly qualified participants from Least Developed Countries and Emerging Markets

Impact

- Through IACA's IMACC and MACS 2021 programmes, IACA's Summer Academy and IACA's other short courses, it is expected that the knowledge and skills of students and participants will be developed and strengthened, leaving them well placed and motivated to use their newly acquired skills in various innovative ways to prevent corruption in their respective home countries or institutions, and in so doing contribute to clean and stable business environments

DESCRIPTION OF INTEGRITY PARTNER

The Chamber of Legal Consultants "**Kazakhstan Bar Association**" is a self-regulated organization established on the basis of compulsory membership for the purpose of regulating the activity to provide legal assistance and control over the activities of their members with respect to their compliance with the requirements of the legislation of the Republic of Kazakhstan on advocacy and legal assistance, rules and standards of the Chamber, the Code of Professional Ethics included in the Register of the chambers of legal consultants.

Name of Integrity Partner:

Kazakhstan Bar Association in cooperation with the Legal Policy Research Centre

PROJECT:

Implementation of a systematic, structured and effective policy of improving business integrity and developing corporate governance in Kazakhstan according to OECD standards

COUNTRY OF IMPLEMENTATION: DURATION:

Kazakhstan

3 years

USD (MILLION):

0,80 M

REGISTERED IN:

Kazakhstan

The Project activities are aimed at achieving 2 objectives:

1. Creating an enabling favorable legal environment and implementing international anti-corruption obligations by encouraging the Government to incorporate international anti-corruption standards into the laws of Kazakhstan by amending certain provisions of its anti-corruption legislation
2. Promoting international anti-corruption standards and clean business practices in corporate and academic circles by bringing draft amendments before the Government to introduce additional legislative requirements for companies to develop, adopt and implement anti-corruption standards and internal control, ethics and compliance systems

Representatives of the private sector, public administration, academia and students will be trained through online and offline project training.

Findings made as a result of diagnostics and OECD reporting will be used for promotional materials on the implementation of anti-corruption standards in business, the development of a culture of integrity and ethics and compliance in business.

Owing to the project, 40% of companies in piloted sectors will implement and actively use a complete and high-quality compliance system.

PROJECT AT A GLANCE:

The project goal is to reduce the level of corruption in Kazakhstan by implementing a systematic, structured and effective policy of improving business integrity and developing corporate governance according to OECD standards

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- The project has developed a [package of legislative proposals](#) aimed at promoting anti-corruption compliance mechanisms in Kazakhstan's business sector, which were supported by the Anti-Corruption Agency and the National Chamber of Entrepreneurs. A new strategy was outlined to promote the package of legislative amendments through a parliamentary initiative. The package was presented on the International [Online Forum on the development and promotion of compliance in Kazakhstan](#). About 200 representatives from key state bodies, the business community and the legal and expert community took part in the event

- Two alternative monitoring reports on Kazakhstan's implementation of the Organisation for Economic Co-operation and Development (OECD) recommendations were prepared
- The project organized [training for 60 compliance officers](#) from 51 Kazakhstani large and medium-sized companies. The participants gained knowledge and skills on international and national standards relating to anti-corruption in business and the standardization of compliance functions
- The first Anti-Corruption Compliance School was held in an online format for 122 representatives of state authorities, as well as teachers and students from Kazakhstani universities
- The project initiated 6 publications in the national media and more than [30 social media posts](#) on anti-corruption compliance to promote the topic of compliance in the business sector

Impact

- The need to introduce anti-corruption compliance mechanisms into private business has been recognized by the project's key stakeholders
- The legislative proposals developed by the project are supported by a Member of Parliament. It is planned to promote the draft law through a parliamentary initiative in 2022
- Active promotion of compliance standards in the business community through training events contributes to the development and implementation of anti-corruption compliance in 51 Kazakh companies

DESCRIPTION OF INTEGRITY PARTNER

The **Maritime Anti-Corruption Network (MACN)** is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Established in 2011, MACN is comprised of companies within the main sectors of the maritime industry. With over 160 companies from the maritime industry represented, MACN members own or manage over 50 percent of the total global tonnage in the maritime industry.

Since its inception, MACN has become one of the preeminent examples of an industry led Collective Action network.

Name of Integrity Partner:

Maritime Anti-Corruption Network (MACN) in cooperation with the Convention on Business Integrity

PROJECT:

MACN Nigeria - Business Action Against Corruption (BAAC)

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Nigeria	3 years	1,00 M	Denmark

This project will scale-up the Maritime Anti-Corruption Network's (MACN) Collective Action program in Nigeria, with the aim of improving efficiency of seaports and terminals services in Nigeria and enabling effective corruption prevention through improved compliance and create a culture of integrity.

The project will lead to clean business and fair market conditions for seaports and terminals users in Nigeria, by enabling stronger business Collective Action amongst port users in Nigeria, stronger government compliance environment, proving public-private arrangements for oversight of compliance.

The project will be facilitated over three years by MACN and The Convention on Business Integrity (CBI). Through this new project we are expanding to multiple agencies and port users, enabling inter-industry and public-private sector dialogue on integrity issues, and equipping local players with proven Collective Action methodologies to drive change.



PROJECT AT A GLANCE:

To establish more effective seaports and terminals services in Nigeria and adopt corruption prevention practices via improved compliance with Standard Operating Procedures

KEY ACTIVITIES (OCTOBER 2020 – SEPTEMBER 2021):

- MACN and CBI have organized a series of events that has reached close to 400 port users and has raised awareness on the Standard Operating Procedures and the Grievance Mechanism. Through the project activities new stakeholders were reached who were previously not aware of the Standard Operating Procedures and the Grievance Mechanism. The project team has seen an increase in use of the Grievance Mechanism to resolve corruption challenges, and more companies are integrating government-defined Standard Operating Procedures into their daily operations

- MACN and CBI have created an Integrity Alliance with over 120 port users and elected a Steering Committee with senior representatives from the industry. Membership is based on a clear set of expectations (such as a Code of Conduct) and members are urged to report corruption and conduct business with integrity
- MACN and CBI have developed a training module on Leadership and Ethics and trained over 100 government officials
- As a response to the project team's request in 2020, the office of the President has pronounced that the Nigerian Shippers Council (NSC) will govern Standard Operating Procedures compliance in ports, and this is officially incorporated into the [Nigerian Ports Process Manual \(NPPM\)](#). NSC now has a mandate to enforce compliance and is coordinating training to improve consequence management
- CBI has supported the drafting of a Consequence Management framework for the [National Policy on Ethics and Integrity](#) launched by the [Independent Corrupt Practices Commission \(ICPC\)](#)

- The project team has secured collaboration with civil society through the Center for International Private Enterprise and the National Seafarer's Welfare Board and Seafarers Assistance Network

Impact

- Port users are increasingly using the Grievance Mechanism and integrating Standard Operating Procedures in their operations. This contributes to making ports operations more effective and corruption free
- By forming the Integrity Alliance, the industry is better positioned to demand compliance with the Standard Operating Procedures and stronger government enforcement
- Trained government officers are better equipped to handle Standard Operating Procedures compliance. This will further build private sector trust in and utilization of Standard Operating Procedures and the Grievance Mechanism and contribute to cleaner port operations

DESCRIPTION OF INTEGRITY PARTNER

The **Organisation for Economic Co-operation and Development** (OECD) is an international organisation that works to build better policies for better lives. OECD's goal is to shape policies that foster prosperity, equality, opportunity and well-being for all. The OECD draws on almost 60 years of experience and insights to better prepare the world of tomorrow. Together with governments, policy makers and citizens, the OECD works on establishing international norms and finding evidence-based solutions to a range of social, economic and environmental challenges.

The OECD has been working with South East Europe since 2000. Governments, business leaders and civil society have worked together under the leadership of the OECD to meet economic challenges, including weathering the global economic and financial crisis and preparing for European Union accession. The OECD has supported the region to design and implement reforms to foster private sector development and competitiveness, attract more and better investment and raise living standards.

Name of Integrity Partner:

Organisation for Economic Co-operation and Development

PROJECT:

Fair Market Conditions for Competitiveness in the Adriatic Region			
COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Bosnia and Herzegovina, Croatia and Serbia	3 years	1,70 M	France

The project intends to support the creation of a level-playing field and fair market conditions in three pilot countries from the Adriatic Region (Bosnia and Herzegovina, Croatia and Serbia) in order to enhance competitiveness and integrity in a sustainable and inclusive way. It aims to gather government officials, business representatives, civil society and academia to form a "Collective Action" to address country-specific drawbacks by applying international standards, by:

- Raising awareness about OECD standards and good practices of anti-corruption, integrity and fair competition for competitiveness with governments, business and civil society

- Building capacity and foster the implementation of concrete OECD recommendations with regard to the transparency and efficiency of anti-corruption and competition authorities
- Promoting the latest knowledge on international standards and practices in the area of anti-corruption and integrity for competitiveness in academic curricula

PROJECT AT A GLANCE:

Help create fair market conditions in the Adriatic Region by promoting OECD standards via a Collective Action community, by supporting the design and implementation of actionable policy recommendations

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

Over the last year, the Project contributed substantially to raising the awareness among regional stakeholders about OECD standards and good practices in support of a level competitive playing field, building capacity among key actors and promoting integrity by means of enhanced university curricula. The main activities include the following:

- Engagement with more than 100 experts participating in more than 30 OECD webinars and local events on anti-corruption, integrity and fair competition
- [Second series of roundtables on Collective Action](#) in the Adriatic Region (16 - 17 Sep-

tember 2021) bringing together over 230 participants to discuss OECD and international good practices and avenues for reform

- 4 Policy Briefing Notes (total of 9/12) on key OECD legal instruments and international good practices tailored to the region's needs and providing guidance for reform
- Regular discussions with regional stakeholders to take stock of the main challenges to a level playing field in South East Europe as the basis of the elaboration of three tailored country-specific publications
- 3 meetings with the Academia Expert Groups from 9 universities to enhance academic curricula in support of integrity
- 8 monthly newsletters to maintain the regional momentum and disseminate knowledge
- Regular [project website](#) updates to disseminate knowledge (with 1 263 regional users at this stage)
- 12 posts on social media (e.g., Twitter account of the OECD SEE Division, @OECDglobal, @Andreasschaal (posted by the Director of OECD Global Relations and Linked-in))

Impact

- The Collective Action Community maintained high levels of engagement and participation in relevant OECD events, seeking to strengthen their expertise and discussing avenues for reform. Collective Action Community members now have a better understanding of how a range of OECD instruments can support creating fair market conditions
- Collective Action Community members gained comprehensive knowledge on how to level the competitive playing field through the dissemination of tailored documents, including 4 additional Policy Briefing Notes available on the Project webpage in the local languages
- Collective Action Community members got familiar with the High Level Reporting Mechanism as a key instrument for reform. Its practical application in the South East Europe region will be further prepared

DESCRIPTION OF INTEGRITY PARTNER

The Ethics Institute is an independent institute producing original thought leadership and offering a range of services and products related to organizational ethics.

Vision: Building an ethically responsible society

Mission: Enabling and supporting the cultivation of ethical organisations

What we do: We pursue our vision and mission through thought leadership and an organizational ethics-related offering, including training offerings, advisory services, assessments, audit services, products and videos

Name of Integrity Partner:

The Ethics Institute (TEI)

PROJECT:

Collective Action to advance business integrity in Mozambique			
COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Mozambique	5 years	0,80 M	South Africa

This project focuses on interventions using a Collective Action approach. The purpose is to strengthen business integrity capacity, contributing to reducing corruption in business activities, resulting in enhanced business practices in Mozambique.

The first objective is to initiate and maintain the formation of a Coalition for Organisational Integrity (COI) in Mozambique.

The second objective aims to strengthen ethics management capacity of the participants of the COI by training its representatives on institutionalising business integrity.

The third objective is focused on the development and implementation of an ethics and anti-corruption training program for small-and-medium enterprises (SMEs).

In sum, this project aims to establish an effective Collective Action platform to affect significant change in business conduct, as thought-leaders engage in the sharing of best practices. This could result in improved procurement, stakeholder management and relations between business and the public sector.

PROJECT AT A GLANCE:

To enhance the ease of doing business by forming a coalition for organizational integrity and expanding business ethics management capacity in Mozambique

KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):

- The [Coalition for Organisational Integrity](#) continues to gain momentum and serves as a Collective Action platform by hosting Leading Practice Masterclasses focused on topical issues
- 269 representatives from 145 companies attended 6 masterclass sessions
- 38 discussions with large or multinational companies were conducted
- 7 introductory discussions with professional associations and institutions were convened
- 2 oil, gas and energy sector best practice sessions were hosted with 39 participating extractive industry representatives
- 7 individuals attended the Ethics Officer Certification Programme of whom three successfully certified as Ethics Officers
- A total of 4 companies completed an Ethical Culture Maturity Assessment
- A code of ethics was reviewed for a key state-owned enterprise in Mozambique
- 4 Boards of Directors attended a Governance of Ethics Training session with a total of 68 delegates in attendance
- The Ethically Aware Supplier Induction (EASI) programme is being implemented in close cooperation with an in-country partner, [Mozambique Enterprise Solutions](#) (MozUp)
- 3 ethics training sessions were hosted, 2 in Portuguese and 1 in English. 81 individuals from small and medium enterprises were accredited as ethically aware suppliers and 3 Mozambican nationals qualified as EASI trainers
- The [Coalition for Organisational Integrity website](#) content, supported by social media posts on [Facebook](#), [Linked-In](#) and [YouTube](#), keep engagements current

Impact

- Sustained dialogue and requests for interventions among [Coalition for Organisational Integrity](#) participants on topical issues
- Noticeable increase in media statements on the importance of ethical leadership and corruption prevention
- Increased knowledge of integrity standards and the anti-corruption imperative among Mozambican SMEs

DESCRIPTION OF INTEGRITY PARTNER

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What we do: We pursue our vision and mission through thought leadership and an organizational ethics-related offering, including training offerings, advisory services, assessments, audit services, products and videos

Name of Integrity Partner:

The Ethics Institute (TEI)

PROJECT:

Combating municipal and procurement corruption in South Africa

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
South Africa	5 years	1,00 M	South Africa

Based on TEI's experience with local government, it was established that ethical challenges at municipal level will not be solved without an intervention on the ethics of political leadership. TEI and relevant national government structures conceptualised an intervention for developing a national code of ethical governance in municipalities. The code should be the outcome of a structured national dialogue and consultation, should have broad societal legitimacy, and should give practical guidance on the ethical intricacies faced by political and administrative leaders in municipalities.

The second objective is the implementation of an Ethically Aware Supplier Induction (EASI) training and accreditation programme that will allow small-and-medium enterprises (SMEs) to

be accredited as 'Ethically Aware Suppliers'. The aim is to create a network of large organisations that are committed to utilising ethically aware suppliers, and a network of trainers who will continue to train suppliers in their organisations resulting in a culture of ethical business and co-accountability escalating across all procurement relationships.

The third objective aims to build capacity in the Gauteng Provincial Government to support municipalities' ethics initiatives. The development of an ethics management monitoring and reporting tool will assist ethics officers structure interventions and improve reporting to oversight structures. This will ensure external oversight of ethics remains a drive of improved governance.

PROJECT AT A GLANCE:

Using strategic levers of ethical change to combat municipal and procurement corruption in South Africa

KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):

- The [Local Government Ethical Leadership Initiative](#) is running with a strong Advisory Committee consisting of respected societal leaders, and a Working Group with government and civil society representation
- Research was conducted in all 9 provinces with the help of provincial champions. This included 30 focus groups and 10 interviews
- A quantitative survey with 2 500 responses was conducted and a draft research report produced with strong findings to guide the next stage of the project
- The [Ethically Aware Supplier Induction \(EASI\)](#) programme saw 11 large companies participate in the project with 5 bringing their suppliers on board

- [202 enterprises have been brought onto the programme](#), with 164 of these being SMEs
- Two virtual train-the-trainer sessions were held
- The Gauteng Municipal Integrity Programme provided continuous support to capacitate Gauteng Provincial Government's municipal Ethics Relationship Managers, with 12 online capacitation sessions held
- At least 5 Ethics Relationship Managers are independently supporting municipalities with ethics management
- An [Ethics Officer Certification Programme](#) was held with 20 participants, both from the provincial government and municipalities
- 18 support meetings were held with Gauteng municipalities and Ethics Relationship Managers
- A draft Ethics Management Monitoring and Reporting Tool was developed after individual consultation sessions with 6 municipalities

Impact

- Through its research [Local Government Ethical Leadership Initiative](#) has provided clarity on factors that undermine ethical leadership in local government. This sets the scene for the robust societal discussion required to address these issues
- There are early signs that the [Ethically Aware Supplier Induction \(EASI\)](#) project might become a rallying point for organisations who want to promote ethical business, but more work needs to be done to capitalise on this
- The Gauteng Municipal Integrity Programme has built community of ethics practitioners, improving ethics initiatives in the province

DESCRIPTION OF INTEGRITY PARTNER

POLMED is the biggest and the most recognized organization representing manufacturers and distributors of medical devices in Poland. It represents the common interests of its members, offers support in all matters regarding the functioning of the Polish medical devices market, legal solutions etc.

POLMED acts as a source of information for its members, protects their interests and conveys their views to the decision makers in the industry and the government. POLMED has been involved in the promotion of ethical business conduct among medical devices market participants since 2010. It strongly emphasizes the importance of the medical devices industry's Code of ethics, which is to be respected by all member companies. POLMED is a member of MedTech Europe.

Name of Integrity Partner:

The Polish Chamber of Commerce of Medical Devices (POLMED)

PROJECT:

MedKompas III			
COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Poland	4 years	0,69 M	Poland

The project with its objectives and activities is the result of POLMED's experience in the market and its observation of the healthcare system and participants needs.

The MedKompas III project is highly innovative in respect of its size and impact on the healthcare system. It foresees numerous trainings on anti-corruption law and ethical standards of cooperation with 1200 participants, several public debates, many anti-corruption system implementations where each implementation will have an impact on around 700 individuals employed in a given hospital.

The MedKompas III project focuses on two main objectives which are:

Objective 1: Creating fair market conditions by reducing the susceptibility to corruption among the Polish healthcare system participants

Objective 2: Prevention of illusory implementation of anti-corruption procedures in hospitals which will contribute and lead to creation standards for fair market conditions

Both objectives are crucial in fighting corruption and raising the importance of compliance in healthcare systems.

PROJECT AT A GLANCE:

To create fair market conditions and reduced susceptibility to corruption among the Polish healthcare system participants by providing education on new planned anti-corruption legislation as well as by implementing professional anti-corruption solutions and systems in hospitals

KEY ACTIVITIES

(OCTOBER 2020 – SEPTEMBER 2021):

- 15 online training sessions focusing on anti-corruption and ethical issues were convened for the employees of 15 hospitals all over the country. 11 of these 15 hospitals showed interest in implementing anti-corruption systems with the support of the [MedKompas](#) project
- 874 healthcare employees including hospital directors, hospital management, doctors and nursing staff participated in the training sessions
- 63% of employees trained indicated in their feedback a reduced susceptibility to corruption which would in turn result in a change in behavior
- The [MedKompas](#) project team have continued with the implementation of anti-corruption compliance systems in hospitals. In this reporting period the project team:
 - fully implemented a compliance system in 1 hospital in Zamość, which means 430 employees and healthcare professionals are now governed by internal anti-corruption procedures
 - was finalizing the implementation of compliance systems in a further 2 hospitals – one in Otwock and another in Krasnystaw – which means a further 1 400 employees will also be governed by internal anti-corruption procedures
 - launched the implementation of compliance systems in 8 hospitals in Szczecin, Mońki, Bydgoszcz, Złotów, Kraków, Gliwice, Opole and Warszawa respectively
- As an accompanying event to the XVI Health Care Market Forum, MedKompas convened an online public debate on October 10, 2020 covering the topic “[Tools supporting anticorruption activities in healthcare system in the light of draft law on transparency in public life](#)”
- [MedKompas](#) has collaborated with the Polish Hospital Federation and gained full support for project activities. This cooperation and support enhance the potential for direct contact with hospital directors and affirms the well established reputation of POLMED and the MedKompas project
- Further project information is available on the [MedKompas website](#), [LinkedIN](#) and [Twitter](#)

Impact

- The project supports the creation of ethical business relations between private sector and public hospitals by spreading knowledge and implementing anti-corruption systems in Polish hospitals
- Enhanced knowledge and awareness of trained healthcare participants, together with the obligation to comply with anti-corruption rules and procedures as introduced through anti-corruption systems, helps to build and embed ethical standards and business conduct among hospitals, healthcare professionals and medical companies

DESCRIPTION OF INTEGRITY PARTNER

Transparency International Bulgaria, being part of Transparency International – the global coalition against corruption, is a non-profit organization working on promotion of integrity and fighting corruption in Bulgaria for more than 20 years.

TI’s mission is to unite the efforts of government institutions, local authorities, private sector and media in order to carry out systematic reforms and take concrete action against the spread of corruption in the country.

TI’s vision is a world where governments, politics, business, civil society and the daily lives of people are free of corruption.

TI’s values are transparency, accountability, integrity, solidarity, determination, justice and democracy.

Name of Integrity Partner:

Transparency International (TI) Bulgaria

PROJECT:

Setting the Ground for Business Integrity in Bulgaria

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Bulgaria	4 years	0,75 M	Bulgaria

The project “Setting the Ground for Business Integrity in Bulgaria” ultimately aims at encouraging the adoption of voluntary anti-corruption and compliance standards and fostering a culture of integrity in business in Bulgaria.

The initiative will target the development and promotion of high-quality sectoral integrity standards in the key sectors of Energy, Industry and Healthcare, ensure pioneers to adopt and distribute them through their supply chains, and establish a better understanding of the need for business integrity in Bulgaria.

The proposed set of activities includes a participatory approach that includes all relevant stakeholders. TI will develop the sectoral integrity standards and ensure their endorsement by key business associations.

The project will map the targeted sectors and secure buy-in from at least three businesses that possess the potential to become pioneers of successful change.

TI will work with them to make sure the standards are adapted to their needs and will engage actively in the development of a model for the further promotion of the same principles and procedures through the pioneers’ supply chain.

Finally, the project will advocate the importance of the topic towards relevant institutions and provoke a more targeted dialogue with them.

PROJECT AT A GLANCE:

Encourage the adoption of voluntary anticorruption and compliance standards and foster a culture of integrity in business in Bulgaria, ultimately ensuring fair competition

KEY ACTIVITIES

(OCTOBER 2020 – SEPTEMBER 2021):

- 3 business associations – the American Chamber of Commerce, the Bulgarian Chamber of Commerce and Industry, and the Bulgarian Swiss Chamber of Commerce – proactively promoted Transparency International Bulgaria’s (TI-Bulgaria) business integrity standards to their members
- The project team continued work with 2 companies in the Industry sector, 1 company from the Healthcare sector and 1 company from the Energy sector to implement business integrity standards
- TI-Bulgaria in cooperation with the Ministry of Economy started an initiative to improve the investment climate in Bulgarian municipalities. The overall objective of the initiative

is to both promote good governance in municipalities and to stimulate them to promote business integrity on local level

- As recommended by TI-Bulgaria, the [National Strategy for Preventing and Combatting Corruption](#) adopted by the government includes business integrity standards
- TI-Bulgaria advocated to the Minister of Health to add business integrity in the [National Health Strategy 2021-2030](#)
- Sofia University in cooperation with TI-Bulgaria developed a course in business integrity
- TI-Bulgaria initiated the development of blockchain verification and a smart contract application
- The [Business Integrity Club](#) was established at a public event on September 28, 2021
- The project team completed the publicly accessible section of the [Business Integrity project website](#) and developed the internal members only section of the website
- Further project information and publications [in the media relating to the first event](#) of the Business Integrity Club can be found on the

[Business Integrity project website](#) and on TI-Bulgaria social media accounts [YouTube](#), and [Facebook](#)

Impact

In the second implementation year the project started seeing indications of impact in the business environment as follows:

- cooperation with established business organizations was strengthened
- work on the integrity systems of specific companies started
- policy level change was initiated by having business integrity principles included in the Republic of Bulgaria’s national strategic documents

DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

UN Office on Drugs and Crime (UNODC)

PROJECT:

On the Level: Business and Government against Corruption in Colombia (Phase II)

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Colombia	4 years	1,10 M	Austria

Since 2015, UNODC has led “On the Level”, a Collective Action project in Colombia that brought together the public and private sectors to enhance corruption prevention and enforcement, supported by the UN Global Compact Network Colombia and the Secretary of Transparency of the Presidency.

Building on that, the new project will promote a culture of integrity and a better understanding of corruption in public procurement.

It will focus on two industries vulnerable to corruption: energy and healthcare.

In particular, the project will review existing legislation and public policy to identify corruption risks and typologies and provide recommendations on improving public procurement

in Colombia. Beneficial ownership will be addressed in this context.

The project will also promote the signing and implementation of Integrity Pacts involving representatives from the public sector, energy and healthcare industries, guilds, small and medium sized enterprises (SMEs), as well as civil society organizations (CSOs).

The Pacts will underline the importance of transparency in public procurement and raise awareness on corruption’s impact on the Sustainable Development Goals.

The project will have a strong online communication strategy to promote knowledge sharing and the dissemination of relevant tools on anti-corruption.

PROJECT AT A GLANCE:

To promote a culture of lawfulness in public procurement in the energy and healthcare sectors in Colombia as a mechanism to prevent and fight corruption

**KEY ACTIVITIES
(OCTOBER 2020 – SEPTEMBER 2021):**

- Prepared, validated and presented two diagnosis documents on corruption and beneficial ownership in public procurement in the energy and healthcare sectors in Colombia. The documents provide an overview of corruption risks, mitigation measures and recommendations on how to improve the policy framework
- Held 5 sessions of the Network of Compliance Officers with approximately 100 participants per session. The compliance officers received trainings on strategies to prevent and fight corruption and were encouraged to share good practices from their companies to learn from each other
- Conducted 8 webinars to strengthen awareness and knowledge of business integrity among the Compliance Officers' Network
- Launched the first publication on good practices of Colombian companies in the area of anti-corruption together with the United Nations Global Compact Network Colombia and the Alliance for Integrity. The results of the publication were also integrated into the interactive online map of good practices on the On the Level website
- Developed a communication strategy and improved the design of the On the Level website to enhance awareness-raising, knowledge sharing, and the dissemination of tools to prevent and fight corruption in the public and private sectors

Impact

- Promoted integrity in public procurement in the energy and healthcare sectors in Colombia by raising awareness of main corruption risks and building capacities of key stakeholders to effectively mitigate such risks
- Contributed to a clean business environment by strengthening public-private dialogue, peer-to-peer learning and the sharing of knowledge and good practices in the area of anti-corruption among Colombian companies

DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

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- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

PROJECT:

UNODC Global Integrity Education

COUNTRY OF IMPLEMENTATION: DURATION: USD (MILLION): REGISTERED IN:

Global (with focus on Kenya, Mexico, Pakistan)	3 years	1,00 M	Austria
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The project will establish and implement an effective integrity education programme that fosters ethical decision-making in the private sector and empowers employees to serve as “ethics ambassadors” in companies.

The project’s most innovative aspects are: integrity education modules co-created by academics and business practitioners; student-focused teaching methods; and graduates who join the private sector as key ethics players.

The project will increase ethical commitment in the private sector by involving business managers in localizing education materials for universities and implementing on-the-job ethics courses that fit the work environments of

industries vulnerable to corruption (e.g. law firm, banks). It utilizes bottom-up and top-down approaches for the highest impact. Significantly, the project will establish a link between university education and practical training, ensuring that ethics education is an ongoing process continuing from the formation to the career stage. Impact studies aimed at monitoring, evaluating and learning (MEL) will be carried out periodically to ensure goal attainment.

The project will be implemented in Kenya, Mexico and Pakistan, and will inform a global audience of educators and practitioners connected through UNODC’s worldwide networks.

PROJECT AT A GLANCE:

To equip young graduates with ethical mindsets and strategies at the start of their careers in the private sector and empower them to become a driving force for ethical business

KEY ACTIVITIES

(OCTOBER 2020 – SEPTEMBER 2021):

- 16 contextualized and UNODC-validated university integrity modules were developed as teaching resources
- 3 contextualized, self-paced e-learning courses for lecturers in Kenya, Mexico and Pakistan were created to build their understanding of the modules and innovative teaching methods
- 295 lecturers from 18 universities in the target countries were trained to deliver the UNODC university modules to students
- Around 7 650 students from universities in Kenya, Mexico and Pakistan were taught on the UNODC university integrity modules and now possess increased awareness of ethical issues and knowledge of how to prevent and fight corruption in the private sector
- 15 business practitioners in target countries delivered guest lectures to provide real-life case studies and to make the teaching more practice-oriented
- Support group meetings for lecturers and business practitioners were facilitated on the local level and on the global level to share experience and knowledge and to strengthen dialogue
- The design of the Monitoring, Evaluation and Learning studies was reviewed and improved. It features a mixed-method approach that includes three parts: a qualitative, a quantitative and a demographic assessment. Feedback from lecturers and subject matter experts was incorporated into the study design that was rolled out in September 2021

Impact

- Contextualized university integrity modules that build ethical attitudes are offered in universities in Kenya, Mexico and Pakistan
- Lecturers in the target countries have improved capacity to teach integrity in a contextualized manner to their students
- Young graduates equipped with ethical mindsets and strategies at the start of their careers become a driving force for ethical business
- Dialogue between the private sector and academia on business integrity is strengthened through joint working groups and guest lectures

DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

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- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

PROJECT:

Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Myanmar

3 years

0,80 M

Austria

Reducing opportunities for corruption and creating a culture of integrity by enhancing public-private dialogue and improving the legal framework against corruption.

Corporate integrity is rarely at the top of the agenda in the private sector and most private companies in Myanmar have not yet adopted codes of conduct or guidelines on corporate integrity. The lack of anti-corruption standards is slowing down development in most of the important economic sectors. For example, the licensing system in the extractive industries is open to corruption and risk of conflict of interest.

Bribery, particularly involving public officials, is reported as common in daily business and civilian interactions. Public-private dialogue and collaboration to design incentives for strengthening corporate integrity and cooperation have started recently but are only at early stages and are only concentrated in specific sectors.

To address the defined gaps, this project will promote the adoption of anti-corruption legislation; the development and adoption of codes and guidelines in the private sector; as well as the development of a culture of integrity in businesses in Myanmar.

PROJECT AT A GLANCE:

To reduce opportunities for corruption and to create a culture of integrity by enhancing public-private dialogue and improving anti-corruption legal frameworks

KEY ACTIVITIES

(OCTOBER 2020 – SEPTEMBER 2021):

- Developed an analysis framework to conduct a benchmarking of good practices in the area of business integrity suitable for upscaling in Myanmar
- Carried out the initial benchmarking assessment and held 8 interviews with experts and practitioners in the area of business integrity
- Conducted desk research and gathered input for the development of the first draft of the model business code of conduct and the standard operating procedures
- Finalized a legal analysis of the anti-corruption legislative framework related to beneficial ownership transparency and provided recommendations for improvement
- Held meetings with the Myanmar Women Entrepreneur Association and drafted an outline for collaboration on the development and implementation of a model business code of conduct for Micro, Small and Medium Enterprises (MSMEs) and for training and awareness-raising campaigns

Impact

- Raised awareness of the private sector's vital role in preventing and fighting corruption and of the impact that corruption has on the private sector and society as a whole
- Created entry points for increased dialogue and Collective Action among private sector entities with the aim to strengthen business integrity in Myanmar
- Strengthened the understanding of the anti-corruption framework in Myanmar with a focus on beneficial ownership transparency and provided recommendations for improvement

DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

PROJECT:

Strengthening the private sector capacity to prevent corruption and enhance integrity in the Arab Countries

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Egypt, Iraq, Libya and United Arab Emirates	4 years	2,40 M	Austria

Reducing corruption by strengthening anti-corruption frameworks, public-private sector dialogue, and private sector capacity to enhance integrity.

The UNODC project on “Strengthening the private sector capacity to prevent corruption and enhance integrity in the Arab Countries” aims to reduce opportunities for corruption by strengthening public sector anti-corruption frameworks, private sector capacity to enhance integrity, and by stimulating public-private sector dialogue.

Project implementation will be guided by the United Nations Convention against Corruption (UNCAC) which represents the only legally binding universal anti-corruption instrument and covers many different forms of corruption.

The project will assist six Arab countries (Egypt, Iraq, Libya, United Arab Emirates and two additional countries to be selected during the project implementation) to introduce legislative improvements to combatting corruption in the private sector; improve communication between the public and private sectors by providing a common venue for further interaction, dialogue and knowledge sharing; and provide guidance to companies and Small and Medium Enterprises (SMEs) to develop their anti-corruption code of ethics and compliance programmes.

PROJECT AT A GLANCE:

To reduce corruption by strengthening countries' anti-corruption frameworks, public-private sector dialogue, and private sector capacity to enhance integrity

KEY ACTIVITIES

(OCTOBER 2020 – SEPTEMBER 2021):

- A regional study on “Corruption Challenges and Associated Risks Faced by the Private Sector in Egypt, Iraq, Libya, Morocco, Sudan and the United Arab Emirates” was conducted, and will serve as a background reference to guide the project implementation and discuss future cooperation with countries covered
- A legal assessment on “Combating Corruption in the Private Sector in Iraq” was finalized and discussed with Iraqi government counterparts in an expert group meeting

- In coordination with the Commission of Integrity of the Republic of Iraq, UNODC organized two workshops with 43 participants from Iraqi SMEs on enhancing anti-corruption and business integrity measures in the private sector and on the Corruption Risk Assessment Toolkit
- In coordination with the Libyan Ministry of Economy and Industry, UNODC organized a workshop for 16 representatives from SMEs operating in Libya
- Three workshops were held at the Egyptian National Anti-Corruption Academy in partnership with the Egyptian Ministry of Trade and Industry and the Administrative Control Authority. The training benefited a total of 38 participants from Egyptian SMEs
- In the United Arab Emirates, an expert group meeting was organized with regional compliance experts from multi-national tech companies to discuss and refine the Corruption Risk Assessment Toolkit
- In total, 18 participants from SMEs operating in the United Arab Emirates along with relevant government entities took part in an in-person workshop on business integrity measures

Impact

- Increased the awareness of SMEs in the region about the project objectives and activities
- Increased knowledge of a number of SMEs about integrity standards and channels to report corruption
- Established a dialogue among anti-corruption private sector experts within and outside the region on means to support SMEs to conduct corruption risk assessment and develop compliance programmes
- Increased the awareness of SMEs in the region about the Corruption Risk Assessment Toolkit, its methodology and use
- Encouraged some governments in the region to improve the legal and institutional anti-corruption framework for business integrity by providing legal and policy recommendations

DESCRIPTION OF INTEGRITY PARTNER

WU (Vienna University of Economics and Business) is Europe’s largest Business and Economics University offering degree programs as well as a wide range of specialization areas and research opportunities. Project responsibility will be undertaken by the Institute for Austrian and International Tax Law.

The Institute for Austrian and International Tax Law is one of the world’s largest academic institutions engaged in the research and teaching of the tax law. The Institute has a longstanding tradition in organising international conferences and trainings both for practitioners and tax administrations.

Name of Integrity Partner:

Wirtschaftsuniversität Wien (Vienna University of Economics and Business)

PROJECT:

Tax Transparency and Corruption

COUNTRY OF IMPLEMENTATION: DURATION: USD (MILLION): REGISTERED IN:

Ghana, Kenya, Nigeria,
Rwanda, South Africa,
Uganda, Zambia

4 years

0,80 M

Austria

The project aims to change the dynamics of the interaction between business and tax administrations and to deepen the cooperation between tax authorities and other law enforcement agencies in countering tax evasion and other financial crimes.

The project would promote the concepts of good tax governance and the importance of a transparent tax system for economic development and how law enforcement agencies and tax authorities can cooperate to counter the misuse of beneficial ownership and client-attorney privileges to counter evasion and money laundering.

The project will be developed with the view of attaining the following objectives:

1. Identifying and mobilizing stakeholders in national tax administrations and private sectors and setting out a research agenda
2. Drafting model national tax legislation and international tax agreements with an aim of strengthening country specific anti-avoidance rules, improving the effectiveness of the tax administrations to get access to information and fostering better cooperation between tax authorities and Multi-National Enterprises (MNE’s)
3. Creating a network of “ambassadors” of key institutions in Africa who will be able to disseminate and promote the outcomes from the project

PROJECT AT A GLANCE:

The project aims to change the dynamics of the interaction between business and tax administrations and to deepen the cooperation between tax authorities and other law enforcement agencies in countering tax evasion and other financial crimes

**KEY ACTIVITIES
 (OCTOBER 2020 – SEPTEMBER 2021):**

- Published the [Cooperative Compliance Handbook](#) in August 2021
- Held 22 meetings since project start covering 5 thematic focus areas on Beneficial Ownership, Client-Attorney Privilege, Cooperative Compliance, Interagency Cooperation and Unexplained Wealth Orders
- Created the first draft reports on each of the five thematic focus areas and initiated a joint publication on Unexplained Wealth Orders with the World Bank
- 200 participants from 27 African countries participated in the second virtual conference on 14-15 July 2021
- Contributed to the Financial Action Task Force call for public consultation on Recommendation 24 at the request of the United Nations Office on Drugs and Crime
- Finalized a joint paper with the World Bank on Inter-Agency Cooperation
- Received a growing number of requests for participation and presentations in external conferences and meetings and workshops
- Contributed to a chapter in the [World Bank Anti-Corruption Report](#) in 2020 on Inter Agency Cooperation seen from the perspective of tax administrations and to the [United Nations High Level Panel on International Financial Accountability, Transparency and Integrity for Achieving the 2030 Agenda \(the FACTIPANEL\) report](#) and publication of numerous articles
- Continued to build and strengthen partnerships for Collective Action with key international organizations including the United Nations Office on Drugs and Crime, World Bank, Stolen Asset Recovery Initiative, International Monetary Fund, African Tax Administration Forum, African Union, United Nations Conference on Trade and Development, United Nations Office on the Special Adviser on Africa, Extractives Industry Transparency Initiative, Open Ownership and African Development Bank

Impact

- The beneficial ownership focus group has attracted growing interest from the Extractives Industry Transparency Initiative and Tax Justice Network Africa
- Increased interest and engagement of civil society in the project, particularly beneficial ownership and inter-agency cooperation, to inform their own research and support to countries
- South Africa have indicated the intention to establish a beneficial ownership registry

C4.

Golden Stretch Funding Round Projects: Project Profiles and highlights of activities in 2021

All 8 projects under the Golden Stretch Funding Round build upon previous funding rounds and the descriptions of activities undertaken in 2021 for all 8 projects were provided by the Integrity Partners in their respective Annual Progress Report 2021 and are approved by the relevant Integrity Partners for external use.

All 8 projects are active and implementation of activities is in progress.



DESCRIPTION OF INTEGRITY PARTNER

Established in 2003, the **Basel Institute on Governance** is an independent and international non-profit organisation working around the world with public and private partners to prevent and combat corruption and strengthen governance.

- The Collective Action team supports companies and multi-stakeholder groups with advice on Collective Action initiatives and hosts the B20 Collective Action Hub.
- Compliance advisors help organisations strengthen governance systems and implement effective anti-corruption compliance programmes.
- The International Centre for Asset Recovery (ICAR) assists countries in tracing and returning stolen assets with training, case and legal advice, and digital tools including the Basel AML Index and Basel Open Intelligence.
- The Public Governance team researches the root causes of corruption and develops evidence-based anti-corruption approaches.
- The Green Corruption team works across the Basel Institute's divisions to apply anti-corruption and governance approaches to issues of environmental crime and degradation.

Name of Integrity Partner:

Basel Institute on Governance

PROJECT:

Towards new horizons for Collective Action

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Global

3 years

3,50 M

Switzerland

This project aims to sustain and expand the use of Collective Action to prevent corruption and promote responsible business.

It will leverage the Basel Institute's experience in mentoring and supporting current and upcoming Collective Action leaders; showcase its wide applicability; and market Collective Action through the B20 Collective Action Hub and key partners.

The project will multiply strategic efforts to embed Collective Action as a norm and bring it into new sectors, including through initiatives that combine anti-corruption and related sus-

tainable development goals. The supporting marketing strategy includes a global index, conferences and annual awards. The B20 Collective Action Hub will aim to achieve long-term sustainability as the global go-to centre on Collective Action. Online courses and a virtual help desk will provide a space for all interested parties to gain and share advice, skills and knowledge on Collective Action.

The project will culminate in a comprehensive volume of learnings from Siemens Integrity Initiative-funded projects to promote clean business and level the playing field.

PROJECT AT A GLANCE:

To leverage the Institute's leadership and experience in Collective Action by mentoring and supporting other current and potential Collective Action leaders, by showcasing its applicability in a wide range of corruption related risk areas and by marketing the concept of Collective Action so that it will be sustainably anchored through the B20 hub and key integrity partners

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

- Finalization of a concept note for the mentorship programme which will enable mentees to apply best practices in Collective Action and act as multipliers of Collective Action methodologies

- Development of an internal strategy for the establishment of a Collective Action help desk and online training platform with a view to increasing awareness of Collective Action and its uptake
- Development of a monitoring and evaluation framework, with guidance from an external expert, consisting of baseline and target indicators at the outcome level to monitor progress towards the objectives of the project as well as indicators to measure the overall impact of the project
- Elaboration of a social media strategy and communications plan for the B20 Collective Action Hub and dedicated [Collective Action Twitter \(@FightBribery\)](#) and [LinkedIn accounts](#) as well as established baselines to measure the outcome of our marketing efforts

Impact

- The focus of this first project year has been on the definition of internal strategies to implement the different activities under each objective. To this end, the Basel Institute developed a robust monitoring and evaluation framework that stipulates baseline and target indicators as well as means of data collection which will enable impact measurement towards the prevention of corruption and the establishment of fair market conditions

DESCRIPTION OF INTEGRITY PARTNER

The **Foundation for the Global Compact** was established in 2006 and registered as a 501(c) (3) non-profit organization under New York State law. The Foundation is based on the principle that transparency, integrity and public-private collaboration is essential to finding lasting solutions to pressing global problems.

The Foundation supports the activities of the United Nations Global Compact including fundraising, outreach and engagement with business stakeholders. This is a policy and engagement platform for businesses that are committed to aligning their operations and strategies with the Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

Name of Integrity Partner:

Foundation for the Global Compact

PROJECT:

Advancing Collective Action against Corruption through Global Compact Local Networks

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Argentina, Bangladesh, Brazil, Egypt, India, Indonesia, Kenya, Malaysia, Thailand, and Ukraine	3 years	4,00 M	USA

The project titled Advancing Collective Action against Corruption through Global Compact Local Networks ("Project") aims to expand and build upon the activities under the Siemens Integrity Initiative Third Funding Round United Nations Global Compact project "Scaling up Anti-Corruption Collective Action within Global Compact Local Networks" by:

- advancing the adoption of the "Uniting against Corruption: A Playbook on Anti-Corruption Collective Action" as a global resource,
- enabling Global Compact Local Networks ("GCLNs") to initiate and facilitate local and regional Collective Action initiatives and
- scaling UN Global Compact's engagement in public-private policy dialogue to bring the private sector voice to the global anti-corruption agenda

To this end, the Project will adopt a three-pronged approach:

1. transform the Collective Action Playbook into an e-learning course to increase the understanding and uptake of the Collective Action methodology
2. support select GCLNs in developing and carrying out Collective Action initiatives and
3. strategically engage with governments and other relevant stakeholders on current global thematic focus areas to enhance public-private cooperation in the fight against corruption



PROJECT AT A GLANCE:

Advance the Collective Action Playbook, enable Global Compact Local Networks to initiate and facilitate Collection Action initiatives and scale the United Nations Global Compact's engagement in public-private policy dialogue to accelerate responsible business practices and create a cleaner business environment

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

- Launched the Golden Stretch Funding Round Project with 10 Global Compact Local Networks, including introducing the Collective Action methodology, overall Project work plan and projected outcomes and impact, advice for setting up the Project at the local level and general guidance to successfully develop and implement a Collective Action initiative with business participants

- Developed a strategic plan to engage with governments and other relevant stakeholders on current global thematic focus areas to enhance public-private cooperation in the fight against corruption, starting with [G20 B20 Indonesia 2022](#) in collaboration with the Indonesia Global Compact Network

Impact

- Increased knowledge sharing and understanding of Collective Action among Project Global Compact Local Networks, as many Networks are engaging in Collective Action for the first time

DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 76 State Parties and 4 international organizations.

It is the only international organization with a mandate focused solely on fighting corruption through education, research, cooperation, and technical assistance delivery.

IACA strives to complement the United Nations' work in the field of sustainable development, including through project implementation and provision of technical assistance, and to facilitate the implementation of the United Nations Convention Against Corruption (UNCAC).

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society.

The Academy currently offers four master's degree programmes, three post graduate programmes as well as various capacity-building trainings.

IACA also creates platforms for dialogue and networking on anti-corruption issues.

Name of Integrity Partner:

International Anti-Corruption Academy

PROJECT:

TEACH (Train and Educate Anti-Corruption Champions) to Fight Corruption

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Least Developed Countries and Emerging Markets	3 years	2,00 M	Austria

IACA will train and educate participants in its master's programmes, Summer Academy trainings at IACA, and the Regional Summer Academy (RSA) programmes. Regional Alumni Conferences will be organised in parallel to the RSA in Latin America (Central and South America) and Asia (South and South-Eastern Asia), both regions with high potential for impact.

An innovative objective of this project is the design and implementation of the Collective Action Impact Centre, which will guide and mentor participants throughout the implementation of Collective Action initiatives in Least Developed Countries and Emerging Markets.

Finally, IACA will gather and systematize empirical evidence of Siemens funded projects' outcomes aimed towards developing a clean business environment and leveling the playing field. This evidence will include a learning and training toolkit for further replication and implementation.

Building upon IACA's institutional strengths, the rationale behind the project is to put theory and knowledge into practice with real impact, and to promote and harvest Collective Action initiatives driven and implemented by IACA Alumni.

PROJECT AT A GLANCE:

Through training, education, Collective Action and the promotion of alliances between champions, IACA contributes significantly to the global fight against corruption

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

- In order to further strengthen the overall project goal and to diversify and broaden the stakeholder reach, the scope of the project activities was enhanced by inclusion of the newly developed Master in Anti-Corruption and Diplomacy (MACD)

- The project team has started design and implementation activities for the Collective Action Impact Centre, and has advanced in the systematization of thematic focus areas, the design of the methodology for implementation and preparation of the learning platform
- Planning activities to gather and systematize empirical evidence of the outcomes of IACA projects funded by the Siemens Integrity Initiative have been completed, and the collation and analysis of information is underway

Impact

- At this stage of the project, it is too early to measure or pass comment on change or impact

DESCRIPTION OF INTEGRITY PARTNER

The **Maritime Anti-Corruption Network (MACN)** is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Established in 2011, MACN is comprised of companies within the main sectors of the maritime industry. With over 160 companies from the maritime industry represented, MACN members own or manage over 50 percent of the total global tonnage in the maritime industry.

Since its inception, MACN has become one of the preeminent examples of an industry led Collective Action network.

Name of Integrity Partner:

Maritime Anti-Corruption Network (MACN)

PROJECT:

MACN Regional Expansion: Collective Action Against Maritime Corruption

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Regional with focus on Bangladesh, India and Pakistan	3 years	2,00 M	Denmark

This project enables MACN to expand its Collective Action methodology to Pakistan and Bangladesh and deepens MACN's ongoing engagement in India.

The project will take lessons learned from MACN's most mature Collective Action in Nigeria, partly funded through the Siemens Integrity Initiative, and will build on a similar intervention logic. In Nigeria, MACN has shown how public-private roundtables and a dedicated Private Sector Anti-Corruption HelpDesk result in corruption challenges being resolved and empower the private sector to resist and report corruption.

Through this project, MACN will launch the same type of activities in India, and further localize capacity to drive Collective Action by the local maritime value chain and NGOs.

MACN will partner with the United Nations Global Compact in Pakistan, Bangladesh, and India, to establish local Collective Action alliances in each country and deploy MACN's Collective Action tools and methodology.

Key national maritime associations, and the local maritime value chain, will be equipped with tools and resources to promote and implement Collective Action and provide support on anti-bribery practice to local business beyond the life of this project.



PROJECT AT A GLANCE:

Improve governance and efficiency of ports by promoting corruption prevention practices and Collective Action among local NGOs and across the local logistics value chain

KEY ACTIVITIES (JULY 2021 – SEPTEMBER 2021):

- The project inception included onboarding the project implementation team and Steering Committee, contracting, defining scope of work with partners, establishing the Monitoring and Evaluation framework, arranging kick-off calls and establishing strategies for alliance building
- Preparation for the activities related to capacity building and public-private partnerships and dialogue include recruiting for the anti-corruption function in India, and tailoring e-learning and training modules to local needs, particularly those of port agents and the next generation of seafarers. A strategy for engaging key ministries, departments and agencies is being developed
- In Bangladesh and Pakistan, a decisive first step towards scaled-up Collective Action against corruption was taken. This included drafting Code of Conducts for the Alliances, developing stakeholder engagement strategies and undertaking outreach to major container carriers, the port agent community, exporters, business associations, and other relevant actors in the supply chains
- The project launch included a press release which was shared on social media (Facebook and [LinkedIn](#)) and industry media ([Seatrade Maritime](#), [Maritime Executive](#), [Hellenic Shipping News](#), [Maritime Gateway](#))
- The project team initiated a communications campaign aimed at raising awareness about the project. So far news about the project received over 9 000 views on social media

Impact

- Through successful stakeholder engagement, important first steps have been taken towards establishing a Collective Action Alliance in India, Bangladesh and Pakistan. Increased industry participation will, in turn, contribute to resilience against corruption and increased efficiency in the ports sector
- With the implementation of the communications campaign, MACN has prepared the ground for increased awareness around the project, setting the stage for scaling up the project in the next implementation year

DESCRIPTION OF INTEGRITY PARTNER

The **Organisation for Economic Co-operation and Development** (OECD) is an international organisation that works to build better policies for better lives.

Our goal is to shape policies that foster prosperity, equality, opportunity and well-being for all.

We draw on almost 60 years of experience and insights to better prepare the world of tomorrow.

Together with governments, policy makers and citizens, we work on establishing international norms and finding evidence-based solutions to a range of social, economic and environmental challenges.

Name of Integrity Partner:

Organisation for Economic Co-operation and Development

PROJECT:

Fair Market Conditions for Competitiveness in six OECD partner countries

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Algeria, Croatia, Saudi Arabia, Serbia, South Africa, and Uzbekistan	3 years	3,00 M	France

This project intends to support the creation of a level-playing field and fair market conditions in the six target countries in order to enhance competitiveness and integrity in a sustainable and inclusive way. It is designed to build on the experience and demonstrated impact of the ongoing project to create fairer market conditions in the Adriatic region, funded by the Third Funding Round of the Siemens Integrity Initiative.

Although this group of countries is very heterogeneous with varying institutional capacities, unique legal and regulatory frameworks and distinct policy priorities, they suffer from significant levels of corruption, a lack of transparency, and anti-competitive behavior. Addressing the most pressing issues and underlying constraints in each country in a joint effort by engaging with government officials, business representatives, civil society and academia, will allow building mutual trust and reinforcing processes towards fairer practices in the economy and society.

This project will address country-specific drawbacks by promoting international standards, exchanging best practices, increasing capacities and empowering stakeholders. More specifically, through this project the OECD seeks to:

- Raise awareness about effective practices to fight corruption across the economy and society;
- Intensify the policy discussion involving the public;
- Provide tailor-made advice and hands-on recommendations;
- Translate policy guidance into concrete reform actions;
- Integrate the latest knowledge and approaches into academic curricula;
- Strengthen institutional capacities, inter-ministerial cooperation and stakeholder consultations.

PROJECT AT A GLANCE:

The goal is to help create fair market conditions in target countries by promoting OECD standards via a Collective Action community and by supporting the design and implementation of actionable policy recommendations. In turn, it is anticipated to support economic growth and employment creation in the beneficiary countries

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

The main launch activities included setting up a “Horizontal work” coordination structure across the six country project teams and developing the Monitoring and Impact evaluation framework. Overall project work momentum was launched through an announcement of the project during the September 2021 Collective Action Community meetings.

Algeria

- Awareness raised about project among key stakeholders
- Ministry of Foreign Affairs appointed as a coordinating point

- Consultant secured to lead research for the competition assessment
- Questionnaire finalised in database

Croatia

- Additional stakeholders identified, with a focus on civil society, to expand project reach and impact
- Additional stakeholders brought in to join the Collective Action Community in Croatia

Saudi Arabia

- Awareness raised on the project with key stakeholders
- Key information collected on anti-corruption and business integrity legal framework
- Additional stakeholders identified, with a focus on the private sector and civil society, to expand project reach and impact

Serbia

- Additional stakeholders identified, with a focus on civil society, to expand project reach and impact
- Additional stakeholders brought to join the Collective Action Community in Serbia

South Africa

- Awareness raised and commitment created on the project design and objectives through the interaction with key stakeholders, both through the Embassy in France and the capital

Uzbekistan

- Commitment and awareness of the project raised with the Antimonopoly Committee of Uzbekistan and other key stakeholders
- Initial Collective Action Community contact list drafted

Impact

- In the first three months the project team created awareness about the importance of Collective Action in all six countries and established collaboration with key groups of stakeholders including government entities, the private sector, civil society and academia during Collective Action meetings (Adriatic region), an Antimonopoly Committee meeting (Uzbekistan) and official communication with embassies and ministries (Algeria, South Africa and Saudi Arabia)

DESCRIPTION OF INTEGRITY PARTNER

Transparency International is a global Movement with over 100 chapters around the world dedicated to a vision of a world free of corruption.

The TI Secretariat (TI-S), based in Berlin, is an independent not-for-profit organization with over 25 years of experience working to promote transparency, accountability and integrity at all levels and sectors of society.

TI-S tackles corruption on the regional and global stage by supporting national chapters and coordinating the Movement's international initiatives that seek to hold power to account for the common good.

In collaboration with chapters and contact groups, the Secretariat produces numerous research tools, policy positions, and advocacy strategies.

It serves as a knowledge center, offering valuable insights and new approaches to fighting corruption through research, advocacy, and coalition building.

Name of Integrity Partner:

Transparency International e.V.

PROJECT:

Bolstering Integrity in Public Contracting: A Reinvigorated Approach and Coalition on Integrity Pacts

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Argentina, Romania, and Spain	3 years	1,00 M	Germany

Transparency International aims to address corruption in public procurement by reinvigorating the Integrity Pact as an anti-corruption standard and expanding global and national coalitions promoting its adoption in critical investments and regulation. The initiative will:

1. Reframe and strengthen the Integrity Pact as a global anti-corruption standard by developing an updated global narrative. This will ease its understanding among broader audiences and provide a clear reference for consistent adoption while leaving space for national adaptation.

2. Widen the number of policy and business leaders who promote the application and implementation of the Integrity Pact as an anti-corruption standard through global advocacy.
3. Embed the Integrity Pact standard in key contracting projects or regulation in three countries.

Working at the national level, TI chapters in Argentina, Romania and Spain will build cases for the adoption of the IP anti-corruption standard and its integration into public contracting regulation and convince government leaders to commit to its implementation in flagship public investments or formal adoption.

PROJECT AT A GLANCE:

To reinvigorate the Integrity Pact as an anti-corruption golden standard and expand global and national coalitions promoting its adoption in critical investments and regulation

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

- Set-up the project implementation team and launched the recruitment for the Project Associate and the Public Contracting Specialist
- Prepared the project management structure covering the work plan, an issues log and a risk register
- Defined the scope, structure and composition of the project Steering Committee and held a kick-off meeting with the Siemens Integrity Initiative Project Office

- Held an internal kick-off meeting with Transparency International national chapters in Spain, Argentina, and Romania on 2 September 2021 to align on the project's objective, involved stakeholders and timeline
- Initiated the set-up of the Monitoring and Evaluation system and the validation of work plan
- Conceptualised a global survey on Integrity Pacts and defined the objectives, data collection format and timeline

Impact

- It is too early to measure impact because of the short implementation period at the inception stage of the project

DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

PROJECT:

Global Action for Business Integrity

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan and 1 global outreach component	3 years	4,00 M	Austria

Despite progress in recent years, corruption remains a key impediment to sustainable development. Corruption imposes high costs on doing business, it deters investment and stifles competition. The COVID-19 pandemic intensified the challenges to business integrity by disrupting supply chains and producing rapid shifts in corruption risks for many companies.

As a response, Collective Action by the public sector, the private sector, civil society and academia is needed to develop innovative and sustainable solutions to prevent and counter corruption.

The UNODC project Global Action for Business Integrity aims to support this process and to reduce corruption by strengthening legal frameworks, public-private dialogue and private sector capacity to enhance integrity in accordance with the relevant provisions of the United Nations Convention against Corruption (UNCAC).

The project is active in seven target countries: Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia and Uzbekistan.

In addition, the project's global component will play a critical role in upscaling effective approaches, achieving sustainability and mainstreaming the good practices identified under this project into global policy forums.

PROJECT AT A GLANCE:

To reduce corruption by strengthening legal frameworks, public-private dialogue and private sector capacity to enhance integrity

KEY ACTIVITIES

(JULY 2021 – SEPTEMBER 2021):

- A [launch webstory](#) and posts on social media platforms were released to raise awareness for the Global Action for Business Integrity project. The social media posts generated around 15 000 views and more than 550 engagements across all platforms
- Meetings with government counterparts were held, including the Minister of Commerce of the Kingdom of Saudi Arabia and the Minister of Electricity and Renewable Energy of the Arab Republic of Egypt, to raise awareness of business integrity and garner support for the implementation

- Communication material on the project was produced, including a standard presentation, to support outreach and stakeholder engagement
- A draft concept for a global webinar series on business integrity was developed and shared with partners such as the United Nations Global Compact and the World Economic Forum

Impact

- Increased interest in and awareness of the topic of business integrity among key stakeholders in target countries

DESCRIPTION OF INTEGRITY PARTNER

WU (Vienna University of Economics and Business) is Europe's largest Business and Economics University offering degree programs as well as a wide range of specialization areas and research opportunities. Project responsibility will be undertaken by the Institute for Austrian and International Tax Law.

The Institute for Austrian and International Tax Law is one of the world's largest academic institutions engaged in the research and teaching of the tax law. The Institute has a longstanding tradition in organising international conferences and trainings both for practitioners and tax administrations.

Name of Integrity Partner:

Wirtschaftsuniversität Wien (Vienna University of Economics and Business)

PROJECT:

Good governance in a digital and open trading environment

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Regional with focus on Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia, and selected Belt and Road Initiative	3 years	1,00 M	Austria

New digital technologies have transformed the way that African citizens work, live and play and the way they interact with their governments. New opportunities for inter-African trade are opening up with the African Continental Free Trade Area Agreement (AfCFTA).

With a young digital savvy population and a rapidly expanding digital infrastructure, Africa is well placed for this transformation. Nevertheless, new technologies and open borders carry the risk of facilitating Illicit Financial Flows (IFFs).

This project focuses on how African countries can minimize the risk and maximize the benefits from this more open and technologically sophisticated environment.

To achieve this transformation will require the active participation of civil society organizations (CSOs). It will require that Financial Intelligence Units (FIUs), Tax and Customs Departments, Trade Ministries, Anti-Corruption Authorities, Justice and Finance Ministries and other relevant institutions all seamlessly cooperate and engage in information exchange.

Achieving more effective actions against corruption and other forms of illicit financial flows will require action on all three aspects of this project: exploring how digital technologies can improve the response of law enforcement bodies; ensuring the interests of these bodies are taken into account as the African Trade Agreement is implemented and engaging CSOs in this debate.

PROJECT AT A GLANCE:

Adapt approaches of regulatory and tax agencies cooperation to counter tax and financial crimes in a digital and free trade environment and strengthening Civil Society Organizations' engagement in the policy debate

**KEY ACTIVITIES
(JULY 2021 – SEPTEMBER 2021):**

- Completed the overall concept note on the interaction between the Africa Continental Free Trade Agreement, taxation and Illicit Financial Flows in collaboration with the African Tax Administration Forum, and presented to United Nations Conference on Trade and Development Africa team, African Union and the Africa Continental Free Trade Agreement Secretariat
- Created focus groups on Technology, Trade and on Civil Society Organizations
- Established a strategic partnership with the Tax Justice Network Africa, and prepared a memorandum of understanding
- Initiated the signing of a memorandum of understanding with the African Tax Administration Forum, expected to be finalized in October 2021
- Established a Blockchain research group to explore the potential of this technology to counter illicit financial flows
- Initiated desktop research to map the research gaps for each of the project objectives
- A [project website](#) was launched in September 2021

Impact

- Being only 3 months into the project, it is too early to assess any impact yet

D1.

Annex –
Siemens Golden Stretch
Press Release

Annex – Siemens Golden Stretch Press Release

SIEMENS

Press

Munich, July 7, 2021

Siemens Integrity Initiative

**Siemens to again support international
initiatives in the fight against corruption**

- **Siemens announces projects for Golden Stretch Round**
- **Committed funding to total US\$20.5 million**
- **Volume of Siemens Integrity Initiative above US\$100 million**

Building on the first three rounds of the Siemens Integrity Initiative, Siemens AG has again announced projects to receive funding to drive and support clean markets. Initially launched in 2010, the initiative has a volume of more than US\$100 million. The new projects will enhance the initiative's portfolio to reach a total of 85 projects in over 50 countries and increase its committed funding to nearly US\$120 million.

Funding will be provided to projects that are committed to joining forces in order to fight corruption under the "Collective Action" banner. Collective Action plays a key role in ensuring clean business and fair competition and is attracting more and more dedicated supporters. The Siemens Integrity Initiative is part of the July 2009 settlement between Siemens and the World Bank and the March 2013 settlement between Siemens and the European Investment Bank (EIB).

A total of eight additional projects will receive between US\$1 million and US\$4 million each over a period of three years. Building on the Third Funding Round launched in 2018, and taking into account the application and selection criteria published at [siemens.com/integrity-initiative](https://www.siemens.com/integrity-initiative), a selection of shortlisted candidates were invited in December 2020 to apply for additional funding.

Siemens AG
Communications
Head: Judith Wiese

Reference number: HQCOPR202106296242EN

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Page 1/3

A team of experts from different specialist areas and regions subjected the projects to careful due diligence before presenting them to the Siemens Steering Committee for approval and then to the World Bank as part of the non-veto process and to the European Investment Bank for informational purposes.

"This is the final funding round under the settlement with the World Bank. In selecting the projects to be supported, we placed particular emphasis on how the sustainability of their activities and results can be ensured beyond 2024, and on how our partners will inspire, support and engage local non-governmental organizations and the public and private sectors through their longstanding networks and institutional standing. We're pleased to again support diverse projects in order to promote fair competition and fight corruption with a portfolio balanced by region and topic," said Sabine Zindera, Head of the Siemens Integrity Initiative and Vice President in Legal and Compliance at Siemens.

In this round, funding will be provided to the following organizations:

- the Basel Institute on Governance, Switzerland
- the International Anti-Corruption Academy (IACA), headquartered in Austria
- the Organization for Economic Co-operation and Development (OECD), headquartered in Paris
- the Maritime Network on Anti-Corruption (MACN), Denmark
- the Transparency International Secretariat, headquartered in Berlin
- the United Nations Global Compact (UNGC), headquartered in New York through the Foundation for the Global Compact
- the United Nations Office on Drugs and Crime (UNODC), headquartered in Vienna
- the Vienna University of Economics and Business with a focus on tax law, Austria

Projects were selected with a view to achieving a balanced portfolio of topics and a wide regional distribution of funding. To further round off the portfolio, this funding round will focus on projects with activities in the Adriatic Region, Algeria, Argentina, Bangladesh, Brazil, Colombia, Egypt, Ethiopia, Ghana, India, Indonesia, Italy, Japan, Kenya, Nigeria, Malaysia, Pakistan, Romania, Rwanda, Saudi Arabia, South Africa, Spain, Thailand, Uganda, Uzbekistan and Zambia. Additional globally

oriented projects and projects that are focused on least developed countries (LDCs) and emerging markets (EMs) will extend the current portfolio to over 50 countries.

As part of the settlement between Siemens and the World Bank, the World Bank has had the right since 2009 to audit the distribution of US\$100 million in funding over a 15-year period. The World Bank may also veto Siemens' selection of projects and organizations. As part of the settlement between Siemens and the European Investment Bank (€13.64 million over five years), the EIB has the right to reject the projects proposed.

The Annual Reports of the Siemens Integrity Initiative, information about the funding rounds, the selection process, the detailed profiles of the projects selected and the independent 2017 Mid-term Review of the Initiative are available at [siemens.com/integrity-initiative](https://www.siemens.com/integrity-initiative).

This press release is available at <https://sie.ag/36fE1Oj>

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Siemens AG (Berlin and Munich) is a technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. By combining the real and the digital worlds, Siemens empowers its customers to transform their industries and markets, to transform the everyday for billions of people. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In addition, Siemens holds a minority stake in Siemens Energy, a global leader in the transmission and generation of electrical power. In fiscal 2020, which ended on September 30, 2020, the Siemens Group generated revenue of €55.3 billion and net income of €4.2 billion. As of September 30, 2020, the company had around 293,000 employees worldwide. Further information is available on the Internet at www.siemens.com.

D2.

Annex –
Additional Siemens Reports

Annex – Additional Siemens Reports



Siemens Report for fiscal 2021

Siemens has published the [Siemens Report for the fiscal year 2021](#). It provides detailed information about the business development of the company, its earnings, assets, and finances.



Siemens Sustainability Report 2021

The [Sustainability Report 2021](#) provides on 167 pages a wealth of information about Siemens and its activities and includes:

1. Siemens at a glance and our DEGREE framework
2. Our sustainability management
3. Governance – responsible business practices
4. Environment – preserving nature and resources
5. Social – Contribution to people and society
6. Our sustainability indicators
7. Annex

More information on Collective Action is available on www.siemens.com/collective-action

In addition to this report, Siemens publishes information on its activities in its comprehensive Annual Report at the end of the fiscal year.

This Siemens Integrity Initiative Annual Report 2021 has been compiled to the best of our knowledge and includes information that has been submitted to the Siemens Integrity Initiative Project Office through March 02, 2022.

Information provided in Section C is created and approved for external use by each Integrity Partner.

This document contains links to other websites.

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About Siemens

Siemens AG (Berlin and Munich) is a technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. By combining the real and the digital worlds, Siemens empowers its customers to transform their industries and markets, helping them to transform the everyday for billions of people. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In addition, Siemens holds a minority stake in Siemens Energy, a global leader in the transmission and generation of electrical power. In fiscal 2021, which ended on September 30, 2021, the Siemens Group generated revenue of €62.3 billion and net income of €6.7 billion. As of September 30, 2021, the company had around 303,000 employees worldwide.

Further information is available on the Internet at www.siemens.com.

