

The G20's responsiveness to B20 anti-corruption recommendations 2010–2017

Part I: Baseline report

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Acronyms and abbreviations

ACWG	Anti-Corruption Working Group
B20	Business 20
C20	Civil Society 20
CEO	Chief Executive Officer
CoST	CoST – the Infrastructure Transparency Initiative
EITI	Extractive Industries Transparency Initiative
FATF	Financial Action Task Force
G20	Group of Twenty
G8	Group of Eight
HLRM	High Level Reporting Mechanism
ICC	International Chamber of Commerce
ILO	International Labour Organization
IMF	International Monetary Fund
L20	Labour 20
NGO	non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
OGP	Open Government Partnership
PACI	Partnering Against Corruption Initiative
S20	Science 20
SME	small and medium-sized Enterprise
SOE	state-owned enterprise
TI	Transparency International
U20	Urban 20
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
W20	Women 20
WCO	World Customs Organization
WEF	World Economic Forum
WTO	World Trade Organization
Y20	Youth 20

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Basel Institute on Governance and the B20

The Basel Institute on Governance has a long-standing working relationship with the B20 anti-corruption platform. In 2013 during the B20 Russia cycle, the Basel Institute on Governance was mandated to establish the [B20 Collective Action Hub](#) to disseminate knowledge of existing private sector-driven anti-corruption multi-stakeholder initiatives. The B20 Collective Action Hub also functions as the go-to support and facilitation centre for companies and other stakeholders interested in engaging in Collective Action. The Basel Institute is currently supporting the 2020 Saudi Arabia [B20 Integrity and Compliance Taskforce](#) as a network partner.

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1 Executive summary

Key points:

- *This paper analyses the responsiveness of the G20 leaders to the B20's recommendations on anti-corruption from 2010 to 2017.*
- *Most presidencies set up anti-corruption taskforces; Australia's presidency saw the most success in terms of uptake of anti-corruption recommendations with a dedicated taskforce plus anti-corruption as a cross-cutting theme.*
- *A close working relationship between the B20 and the G20 Anti-Corruption Working Group is beneficial for continuity despite the annually revolving presidency.*
- *Strategic alignment of B20 anti-corruption recommendations with G20 focus topics may help to increase uptake.*
- *G20 recommendations on anti-corruption have so far been limited to high-level statements and have not included action-oriented recommendations consistently called for by the B20, such as the use of High Level Reporting Mechanisms.*
- *Assessing the effectiveness of the B20 process on anti-corruption helps to tailor the B20 approach for upcoming cycles, demonstrate impact and set expectations.*

The Business 20 (B20) represents the important voice of the Group of Twenty (G20) business community. As such, it is understood and mandated by the G20 to be the dialogue platform between businesses and the G20 leadership. The B20 aims to develop recommendations for G20 uptake in topic-specific taskforces, or cross-thematic groups, to support the G20 agenda through a consolidated representation of interests, expertise, and concrete policy proposals.

Well over a hundred businesses have engaged in each B20 cycle to take up the opportunity to work collectively towards ensuring the voice of business is heard and taken into account at the G20 level. Is it working? Is it worth it?

In the last 10 years, three attempts have been made to measure the B20 uptake at the G20 level and to work towards strengthening and structuring the B20 engagement more effectively. The B20 itself measured its effectiveness during the 2013 Russian cycle and the 2017 Germany cycle. A third approach by the International Chamber of Commerce (ICC) was made to assess the impact of the B20 on the G20, covering the cycles from 2010 to 2016.

As the B20 impact evaluation attempts demonstrate, the question revolves around whether the B20 process can withstand a basic cost-benefit analysis. How do the time and resources spent weigh up against the outcomes/impact of the many recommendations that the B20 members have developed over the past years? This has been a central question that has accompanied the B20 process through the first seven cycles. This report aims to answer that question with regard to the anti-corruption work at the B20 and G20 level.

The consistent assessment of uptake throughout the 2010–2017 cycles enables a baseline comparison of the effectiveness of the B20 process over the first seven years. The anti-corruption workstreams and engagement platforms both at the B20 and G20 level also play an important part in how effective and impactful the B20 engagement has been over the years. Due to the nature of the rotating presidencies of the B20/G20 process, each host country can exert its full ownership of the process as well as selecting the issues and topics it wishes to focus on. This flexible approach has not, however, meant that each country re-invents the process. Over the years, soft frameworks have developed that allow for a basic level of continuity both at the B20 and G20 level.

Traditionally, the B20 anti-corruption process has involved the constitution of taskforces around the issues selected by the presiding country. The inclusion of an anti-corruption taskforce and its format as a dedicated B20 workstream has varied over the years. Over half of the B20 cycles between 2010–2017 have set up specifically mandated anti-corruption workstreams with various names but similar structures.

The B20 Australia cycle notably took a different approach. It set up the B20 Anti-Corruption Working Group (BACWG) to develop anti-corruption recommendations across all four B20 taskforces of its cycle, as well as developing separate high-level recommendations that cut across each of the taskforces⁶. As a result, the anti-corruption recommendations were made through various channels, enabling the topic to be brought to the G20 at different working levels. This potentially raised awareness and visibility. According to the ICC Scorecards effectiveness rating, the Australian cycle achieved the highest level of B20 recommendation uptake, which amongst other reasons could be related to this unique working mode.

The B20 Germany presidency in 2017 also took a different approach. It developed a cross-thematic group which integrated focus topics such as small and medium-sized enterprises (SMEs) and corruption into the discussion at all the B20 taskforce levels.

Under the Chinese (2015) and Japanese (2019) presidencies, the engagement reverted back to the format of the early B20 cycles (2010–2012) which brought the private sector together for a one-off G20 Business Summit.

In sum, there appear to be two main approaches. Setting up a separate anti-corruption taskforce has been the most consistently adopted approach. Benefits of this approach include clear ownership of the topic and the possibility of a more focused discussion through a sustained and coordinated process. Other B20 cycles decided to include corruption as a cross-cutting theme. This aligns with corruption as an issue that affects and relates to many of the other B20/G20 priority topics.

The B20 taskforces are chaired by representatives of the host government, usually from the business community, and supported by subject matter experts.¹ External support in the form of knowledge partners (civil society international organisations and business associations) also play an important part. The process has typically included the taskforce publishing a detailed anti-corruption document that sets out policy recommendations for the consideration of the G20 but is also directed at the business community more broadly. This document is submitted to the B20 Sherpa for inclusion in the final B20 document, which in turn is handed to the G20 Leaders at the B20 Summit for consideration in the G20 Leaders' Communiqué. At the B20 anti-corruption taskforce level, there is also typically the opportunity to present the full B20 anti-corruption policy paper and recommendations to the G20 Anti-Corruption Working Group to inform its work and identify future priorities.

Similarly to the B20, at the G20 level the process is not guided by fixed structures either, but rather through soft working structures such as the Sherpa Tracks, Working Groups and through the support of external partners such as the OECD. The latter has taken on quasi-Secretariat duties for the G20 and plays an important role to ensure a level of continuity in the rotating process.

The topic of anti-corruption has been on the G20 agenda since the 2009 [Pittsburgh Summit](#). One of the most significant additions to the G20 anti-corruption work was the establishment of a permanent [G20 Anti-Corruption Working Group](#) (ACWG) in 2010. This

¹ Examples include the big four accounting firms and international law firms as well as private consultants.

enabled a more strategic and active approach to the topic of corruption at the G20 level. It was an important step taken by the G20 Leaders to support the translation of high-level G20 commitments into actions at the country level. The ACWG brings together anti-corruption experts from G20 countries, including representatives from national anti-corruption authorities and international organisations relevant to the fight against corruption, such as the OECD, United Nations Office on Drugs and Crime (UNODC), International Monetary Fund (IMF), Financial Action Task Force (FATF) and World Trade Organization (WTO). It also receives input from relevant non-governmental organisations (NGOs).

The work of the ACWG is primarily structured through its bi-annual/tri-annual Anti-Corruption Action Plans, which are designed as the central working document to capture and translate the G20 commitment into action. The ACWG also reports on the progress made on an annual basis to the G20 Leaders, which in turn endorse the Action Plan in a Communiqué at the final Summit of each G20 cycle. The aim is to hold both the G20 process and member countries accountable for the actions they have committed to.

Over the first seven cycles, the B20 has covered a variety of topics. These range from continuous requests for all G20 countries to sign the UNCAC and OECD Anti-Bribery Convention in the early cycles to more business-focused recommendations such as the call on G20 governments to incentivise compliance. Some proposals have been action-driven, such as calling for the establishment of public-private partnerships and Collective Action initiatives, to varying degrees of success so far.

Throughout the assessment of the first seven cycles, the special and close working relationship of the B20 with the ACWG has been highlighted as unique in the G20 process. It has clearly and positively affected the overall trend and the uptake of anti-corruption recommendations made by the business community.

The analysis also highlights an increased level in the uptake of B20 recommendations following a more strategic alignment of the B20 with G20 focus topics, which was called for by the 2013 Russian G20-B20 Dialogue Efficiency Taskforce.

Additionally, the analysis also highlights that during the first seven years of the B20 anti-corruption recommendations, the G20 uptake has been limited to high-level recommendations. B20 activity-related recommendations were not taken up. The B20 has, for example, consistently called on G20 governments to work together with the private sector to foster anti-corruption Collective Action initiatives and to support the development of High

Level Reporting Mechanisms (HLRMs) to address corruption issues in public procurement – so far to little avail.

Engaging with other taskforces and including corruption considerations in other B20/G20 platforms can increase efficiency and uptake if the topic is brought to the attention of the G20 via different engagement channels and platforms. Introducing corruption as an underlying issue within other focus areas, as the German and Australian presidencies did, has also been regarded as a valid approach, notwithstanding the criticism that this approach could lead to watered-down recommendations due to a lack of focus and ownership of the issue. The Australian model of both a dedicated anti-corruption workstream and cross-cutting anti-corruption recommendations across its other taskforces resulted in the most number of recommendations being taken up at the G20 level.

The B20 anti-corruption workstream is a continuously evolving process that is still developing its working relationship with the G20 anti-corruption platforms, especially the ACWG. The ongoing assessment and review during the first seven cycles enable a certain level of continuity while also identifying ways to work towards maximising efficiency and uptake of B20 anti-corruption recommendations. The takeaways and lessons learned from previous cycles enable the B20 to identify windows of opportunity to further build and strengthen the relationship with the ACWG and to adapt its working mode to optimise and maximise exposure and uptake by the G20.

Taking stock and assessing the effectiveness in uptake not only helps to better tailor the B20 approach for upcoming cycles. It is also an important tool to demonstrate impact to engaged businesses, to strengthen sustainable engagement and to ensure the impact the B20 process is striving for reflects the expectation of the engaged business community.

2 Introduction

This paper examines the responsiveness of the G20 to the anti-corruption recommendations made by the B20 between 2010–2017. The start of this period saw several major developments. The B20 was established as the first engagement group to the G20, representing the business community. 2010 was also the year that the G20's prior work on anti-corruption was institutionalised to ensure greater continuity of work with the setting up of the Anti-Corruption Working Group (ACWG). The first ACWG Action Plan was also issued in

2010 and the ACWG was given a renewed mandate to continue its work, which it has done so, save for a break in 2016 during the Chinese G20 Presidency.

The B20 anti-corruption recommendations and their supporting reports have been channelled towards the ACWG as well as the G20 Leaders themselves. This paper describes the processes and the different formats for the B20 work deployed by the various presidencies. It then evaluates these for their effectiveness on the uptake and impact of recommendations made to the G20, i.e. the G20's responsiveness to the recommendations.

The level of responsiveness refers to the inclusion of the B20 recommendations on anti-corruption in G20 documents, such as various principles endorsed by the G20, the final Communiqués or other policy commitments endorsed and taken up by the ACWG in its working tools.

Between 2010 and 2017, three methodologies have been used to assess responsiveness to the B20 recommendations. Two were devised as self-assessments within the B20 process and one was developed and applied by the International Chamber of Commerce (ICC).

By identifying the policy actions that the G20 endorses with respect to the specific anti-corruption recommendations, the wider aim is to help other scholars to better identify their subsequent impact at a country level and thereby inform the B20's future anti-corruption engagement. While the impact at the country level of the B20 recommendations is important, it is a task that is beyond the scope of this review and is only addressed tangentially where referenced by the assessment methodologies.

This paper explores how the B20 anti-corruption recommendations flow into the G20 process by describing the soft frameworks and structures in which the B20 and G20 process operates. The seven-year period covered in the paper provides a changing political context for each presidency, which is a feature of the G20/B20 process. Utilising the existing tools to measure responsiveness, the paper highlights some of the major B20 anti-corruption themes and G20 reactions. This includes the focus topics that the G20 has taken up, but also issues that, despite continuous calls from the private sector, have not been acknowledged in the G20 anti-corruption work.

This is a baseline report which will be followed up by a similar assessment of the B20 anti-corruption cycles from 2018 through to 2020. The G20 presidencies since 2017 have not yet been measured under any of the three methodologies used prior to 2018, and nor has their

impact on the G20 yet been reviewed. Argentina (2018), Japan (2019), and Saudi Arabia (2020) will be reviewed based on a methodology that builds on the existing assessment tools, while also taking into account the unique and specific working modes and channels of communication between the B20 and G20 anti-corruption workstreams.

3 B20 within the G20 process

3.1 B20 process

The G20 is an international forum made up of “19 countries and the European Union, representing the world’s major developed and emerging economies. Together, the G20 members represent 85% of global GDP, 75% of international trade, and two-thirds of the world’s population. Because of its size and strategic importance the G20 has a crucial role to play for setting the path of the global economy.”²

Since its inception in 1999, the G20’s primary focus has been to work towards governing the global economy and to build and sustain prosperity. International trade and foreign direct investment are widely acknowledged to be the driving force to spread growth and prosperity in a globalised society and can also function as a common denominator to incentivise international decision-makers to come together.³

Despite the strong focus on economic growth, it took until 2010, in the wake of the financial crisis of 2008-09, to establish a structured and inclusive involvement of business in the G20 process. The G20 Leaders and its business community agreed, as outlined in the Cannes 2011 B20 report, that in order to counter the financial crisis and re-establish investor confidence a “deeper and more coordinated leadership from G20 countries is necessary, in particular, stronger cooperation between governments and other stakeholders to reverse these trends.”⁴ As a result the B20 (previously referred to as the G20 Business Summits), was initiated by the Canadian Council of Chief Executives (renamed Business Council of Canada

² [OECD web page about the G20](#).

³ [Foreign Direct Investment as a Key Driver for Trade, Growth and Prosperity: The Case for a Multilateral Agreement on Investment](#), World Economic Forum, 2013.

⁴ See B20 France report (2011): [Cannes B20 Business Summit Final Report](#)

in 2016) during the 2010 Toronto Summit.⁵ Since then, the B20 has been mandated to formulate recommendations to inform each G20 cycle.

As the first official engagement group to the G20,⁶ the B20 also paved the way for the establishment of further engagement platforms for a more inclusive debate at the G20 level. At the time of writing, engagement groups include the C20 for civil society, L20 for labour unions, W20 for women's issues, Y20 for youth engagement, S20 for the science community, and U20 for urban development.⁷

The B20 is the voice of the G20 business community. Its role is understood and mandated by the G20 to be the main dialogue platform between the business community and the G20 leadership. As such, it aims to develop recommendations for the G20 in topic-specific taskforces, or cross-thematic groups, to support the G20 through a consolidated representation of interests, expertise and concrete policy proposals.

The B20 process also promotes and enables dialogue among policymakers, civil society and business at the international level. There is no standing B20 Secretariat as the leadership rotates every year together with the G20 presidency. Each hosting country decides on the structure and format of its B20 process. The focus areas and topics are usually determined through surveys of stakeholders participating in previous B20 cycles.⁸

Traditionally, the process has involved the constitution of taskforces around the issues selected by the presiding country that bring together well over a hundred business representatives primarily from G20 countries. The inclusion of an anti-corruption taskforce as a dedicated B20 workstream has varied over the years. These taskforces are chaired by representatives of the host government, usually from the business community and supported

⁵ See B20 Russia report (2013): [G20-B20 Dialogue Efficiency Task Force – From Toronto to Saint Petersburg: Assessing G20-B20 Engagement Effectiveness](#)

⁶ [B20 Tokyo About page](#).

⁷ [B20 Questions and Answers](#).

⁸ For example see [B20 Germany newsletter](#).

by subject matter experts.⁹ External support in the form of knowledge partners,¹⁰ network partners,¹¹ concept partners¹² and expert partners¹³ often play an important role. For example, subject matter experts assist with the drafting of the B20 policy report as proposed by the taskforce members during the presidency. After several months of discussions, with multiple draft recommendations discussed by the B20 taskforce members, the final B20 policy document consists of a selection of policy recommendations from all of the B20 workstreams which are then ready to be put forward to the G20.

There are two levels at which the B20 anti-corruption recommendations can be included in the G20 process:

1. **High-level input of the B20:** For the anti-corruption B20 workstream, the process has typically included the taskforce publishing a detailed anti-corruption document that sets out policy recommendations for the consideration of the G20 but also directed at the business community more broadly. This document is handed over to the B20 Sherpa for inclusion in the final B20 document, which is in turn handed over to the G20 Leaders at the B20 Summit for consideration in the final Communiqué.
2. **Working-level input of the B20:** The B20 anti-corruption workstream typically also has the opportunity to present the full B20 anti-corruption policy paper and recommendations to the G20 ACWG to inform its work and the identification of future priorities.

⁹ Examples include the big 4 accounting firms and international law firms as well as private consultants.

¹⁰ “Knowledge Partners are international organisations who work with the B20 Secretariat and the representatives of the taskforce and action council Chairs. They are responsible for developing the analysis which supports the policy papers under the B20 Secretariat oversight based on the discussions carried out in the taskforces and action council. Knowledge partners also support the B20 Secretariat by providing inputs, carrying out research and coordinating processes under taskforces and action council.” See [B20 Saudi Arabia web page on partners](#).

¹¹ “Network Partners are international business organisations and networks. They provide essential support to taskforces and cross-thematic groups by feeding in their expertise as well as by engaging their broad international constituency in taskforce and cross-thematic group activities, and disseminating recommendations. The Network Partners also support advocacy activities and may participate in organising B20 events.” See [B20 Saudi Arabia web page on Network Partners](#).

¹² “Concept Partners are organizations with recognized expertise and knowledge on specific policy areas. They will provide technical support in reviewing and providing feedback on the proposed policy recommendations as well as guidance on aligning them with global trends and emerging policy issues.” See [B20 Saudi Arabia web page on partners](#).

¹³ See B20 Russia report (2013): [B20-G20 Partnership for Growth and Jobs: Recommendations from Business 20](#).

Ten countries have previously hosted the business community in such a process. The countries and the format of the anti-corruption workstreams are listed in Table 1.

3.2 Overview of the B20 anti-corruption workstreams

Year	Location	Workstream
2010	Seoul, South Korea	G20 Business Summit (no anti-corruption taskforce)
2011	Cannes, France	G20 Business Summit (no anti-corruption taskforce)
2012	Cabos, Mexico	Improving Transparency and Anti-Corruption Taskforce
2013	Saint Petersburg, Russia	Transparency and Anti-Corruption Taskforce
2014	Brisbane, Australia	B20 Anti-Corruption Working Group (BACWG)
2015	Antalya, Turkey	Anti-Corruption Taskforce
2016	Hangzhou, China	B20 Anti-Corruption Summit (no anti-corruption taskforce)
2017	Hamburg, Germany	Cross-thematic Group on Responsible Business Conduct and Anti-Corruption
2018	Buenos Aires, Argentina	Integrity and Compliance Cross-Thematic Group
2019	Osaka, Japan	B20 Summit (no anti-corruption taskforce)
2020	Riyadh, Saudi Arabia	B20 Integrity and Compliance Taskforce

Table 1: B20 anti-corruption workstreams from 2010–2020

Since the establishment of the B20, the anti-corruption workstream format has evolved from the traditional G20 Business Summit into dedicated anti-corruption taskforces that have been set up by the majority of B20 cycles since 2012, i.e., Mexico, Russia, Australia Turkey, Germany, Argentina and Saudi Arabia. Prominent outliers are the Chinese and Japanese B20 cycles, which returned to the original format of Business Summits. While China held a separate

B20 Anti-Corruption Summit, the topic of corruption did not feature heavily at the B20 Tokyo Summit.¹⁴

The absence of a dedicated anti-corruption taskforce does not mean that the topic of corruption was not addressed at all. The list of corruption-related issues has developed over time, and has been largely carried forward from year to year, albeit with some variations.

Over the different cycles, a variety of topics have been covered. These range from continuous requests for all G20 countries to sign the UNCAC and OECD Anti-Bribery Convention in the early cycles¹⁵ to more business-focused recommendations such as the call on G20 governments to incentivise compliance.¹⁶ There have also been action-driven proposals such as calling for the establishment of public-private partnerships and Collective Action initiatives.¹⁷

Annex 1 contains a comprehensive list of all B20 anti-corruption recommendations and G20 anti-corruption commitments made to date. Section 5 of this paper explores the uptake and focus areas of B20 recommendations under the 2010–2017 cycles in more detail.

Over the relevant years, different methods and structures have been deployed to address corruption, with an anti-corruption taskforce emerging as the preferred approach. Although it has been given different titles, such as Integrity and Compliance Taskforce,¹⁸ or Improving Transparency and Anti-corruption Taskforce,¹⁹ the working method remains similar and provides clear ownership of the topic within the B20 process.

The Germany presidency opted for a cross-thematic Working Group on Responsible Business Conduct and Anti-Corruption to introduce corruption as a cross-cutting theme into all of the B20 workstreams. The Australian cycle developed a hybrid model by setting up the B20 Anti-Corruption Working Group (BACWG) and introducing the topic into other taskforces where deemed appropriate, most notably in the B20 Infrastructure Taskforce.

¹⁴ See B20 Russia report (2013): [B20-G20 Partnership for Growth and Jobs: Recommendations from Business 20](#)

¹⁵ 2011 France, 2012 Mexico, 2013 Russia.

¹⁶ 2017 Germany.

¹⁷ 2013 Russia.

¹⁸ 2020 Saudi Arabia.

¹⁹ 2013 Russia.

Section 6.1 of this report analyses the effectiveness of these different engagement models in relation to the uptake and impact of B20 anti-corruption recommendations to the G20.

3.3 Stakeholders in the B20 anti-corruption workstreams

Besides business representatives from the G20 countries, the B20 anti-corruption workstream also engages with civil society through organisations including the [B-Team](#), [Open Government Partnership](#) (OGP), [Basel Institute on Governance](#) and [Transparency International](#) (TI). Other participants are from academia and business associations, notably the [International Chamber of Commerce](#) (ICC). Collective Action initiatives such as the World Economic Forum's Partnering Against Corruption Initiative ([PACI](#)) have contributed alongside international organisations including the [Organisation for Economic Co-operation and Development](#) (OECD), United Nations Office on Drugs and Crime ([UNODC](#)), International Labour Organization ([ILO](#)) and others.

Bringing together the business sector, policy makers, civil society and anti-corruption experts should help to shape the discussion and support the development of informed and practicable recommendations. Introducing initiatives that are pioneering new topics – such as the [B-Team](#)'s work on open and transparent beneficial ownership – not only helps focus and guide the discussion but can also provide the necessary challenge to the status quo that is needed to ensure a dynamic discussion.

3.4 B20 process and why measuring impact is important to engage business

The nature of the rotating presidency of the B20/G20 process allows each hosting country to exert its full ownership of the process as well as selecting the issues and topics it wishes to focus on without being weighed down by an overly bureaucratic structure. That has not, however, meant that each country re-invents the process. Over the years, some soft frameworks have developed that allow for a basic level of continuity both at the B20 and G20 level.

As highlighted in the 2013 Russian recommendations, contained in the *B20–G20 Partnership for Growth and Jobs*:

“The B20's authority rests on three pillars: representing business interests and priorities; sharing the G20 goal of generating Strong, Sustainable and Balanced

Growth; and engaging effectively with the G20 to get B20 priorities heard by the leaders. Consistency, continuity and transparency are key factors for B20 effectiveness. The investment in the dialogue made by both business and governments warrants actions which would maximise return on the investment made.”²⁰

In the relatively short history of the B20, three attempts have been made to assess the effectiveness and the engagement between the B20 and G20 platforms. The decision to participate in the B20 process should withstand a basic cost-benefit analysis: How do the time and resources invested weigh up against the outcomes/impact of the many recommendations that the B20 members have developed over the past years?

The B20 itself measured its effectiveness during the 2013 Russian cycle and the 2017 Germany cycle. A third approach by the ICC assessed the impact of the B20 on the G20 covering multiple cycles (2010–2016).

The first substantial internal B20 assessment of the impact of the B20 on the G20 process was conducted under the 2013 Russian presidency. As part of the B20 Russian process, a special G20-B20 Dialogue Efficiency Task Force was set up, suggesting that this was an area of interest for the participants both at the B20 and G20 level.²¹ The Taskforce developed a methodology to assess the uptake of B20 recommendations covering the 2010–2013 cycles. The Russian approach of using a specialised Taskforce to assess the “efficiency” of the B20 process was unprecedented, and has never been repeated since.

Simultaneously, the ICC as part of its engagement with the B20 through its G20 CEO Advisory Group developed a strategic annual analysis called the ICC G20 Business Scorecards. It published six editions covering the G20/B20 cycles from 2010–2016.²² The Scorecards analyse the inclusion of B20 recommendations and were intended as a policy tool to advocate for greater attention to business priorities and expectations.

According to the ICC methodology,²³ the Scorecards also function as a working tool for business to allow for a more structured and effective engagement with the G20. They are

²⁰ See B20 Russia report (2013): [B20-G20 Partnership for Growth and Jobs: Recommendations from Business 20](#)

²¹ See B20 Russia report (2013): [G20-B20 Dialogue Efficiency Task Force – From Toronto to Saint Petersburg: Assessing G20-B20 Engagement Effectiveness](#)

²² Available on the [ICC website](#); search for Scorecard.

²³ [ICC G20 Business Scorecard: 2nd Edition \(2013\)](#).

intended to inform the G20 on how its priorities and uptake of recommendations are received by the business community. They also enable the B20 to set priorities, honour commitments, and measure its progress over time.

The analysis, especially of the first couple of cycles, shows a year-on-year improvement in the score reflecting the uptake of B20 recommendations at the G20 level.²⁴ The low scores of the first official B20 cycles demonstrate that a new process takes time to establish itself and to effect change. Setting up the G20 ACWG in June 2010 was a vital addition to the G20 platform that enabled the B20 process to engage more strategically with the G20.²⁵

The ICC G20 Business Scorecards cover all the B20 themes in their assessment of the uptake by the G20. The ICC deployed a consistent methodology to assess each B20/G20 cycle, contextualising previous priority areas and recommendations into the assessment to bolster the possibility of continuity and more strategic input by the B20.

In 2017, the German B20 presidency, on the basis of the ICC Scorecard and B20 Russia analysis, developed its own methodology to assess the G20 responsiveness to the B20 recommendations as pertaining to its cycle.²⁶ The B20 Germany presidency called on subsequent B20 processes to continue to measure uptake of each G20 cycle in the form of a responsiveness report at the end of each presidency, to better harness the momentum of previous cycles. Notwithstanding this proposal, no further analysis has been made publicly available that covers the progress and impact of the B20 recommendations.²⁷

The efforts to measure the impact of the B20 work, as briefly summarised above, are for the most part limited to the assessment of the final B20 recommendations policy paper and the corresponding uptake in the written outputs of the G20, most importantly the final Communiqué.

²⁴ [A Business Platform to Shape the G20 Agenda](#).

²⁵ [ICC G20 Business Scorecard: 2nd Edition \(2013\)](#).

²⁶ See B20 Germany report (2017): [G20 Responsiveness Report - B20 Evaluation of the Hamburg G20 Leaders' Declaration: Shaping an Interconnected World. Measuring the Responsiveness of the G20 to the B20 Recommendations](#)

²⁷ The Saudi Arabia (2020) Integrity and Compliance Taskforce is developing an impact assessment to measure the adoption and implementation of B20 anti-recommendations put forward during the Riyadh cycle.

3.5 Call for a permanent B20 anti-corruption Secretariat

To bolster the effectiveness of the B20 process, and to bridge the gap of B20/G20 cycles that do not prioritise the fight against corruption, several longstanding B20 participants made a formal proposal to the 2015 Chair of the B20 Integrity and Compliance Taskforce to set up a permanent anti-corruption B20 Secretariat. The proposal called for the establishment of a Coalition for Global Integrity and Sustainable Growth to enable a “sustained and coordinated implementation of B20 anti-corruption recommendations without being bound by the short B20 timelines and often narrowly defined focus areas.”²⁸

The proposal was put forward by an active core group of private sector, civil society and international organisations. The group re-iterated that for the private sector, the implementation of measures elaborated by the B20 anti-corruption workstreams is “crucial to ensuring future support for the B20 anti-corruption efforts.”²⁹

Since 2015, engaged participants met on several occasions. However, the proposal has waxed and waned and ultimately lost momentum, not least because the B20 anti-corruption taskforces were re-established more often after 2017.

4 G20 anti-corruption work

4.1 Overview and introduction to the G20 process

Although there is no fixed structure for the G20 process, at the government level the process is invariably organised through soft working structures such as the Sherpa Tracks, Working Groups and continuous support from international organisations, such as the OECD taking on quasi-Secretariat duties. Civil society and the private sector are included through engagement groups and participation by international organisations is at the invitation of each presidency.

Common structural elements have evolved not least because of the focus on the outputs each year. The annual G20 Summit and the Leaders’ Declaration prescribe the work over the

²⁸ 2015 internal B20 draft strategy document.

²⁹ Ibid.

coming year. By way of example, the illustration below depicts the G20 Germany platform. It shows how the different actors and working modes that are involved in the process come together and collectively work to input and support the development of each G20 cycle towards the final Communiqué outlining the agreed policy commitments.



Figure 1: Overview of the G20 Germany process showcasing the different stakeholder and topics/ tracks informing the final G20 Summit. Source: B20 Germany³⁰

Just as there were calls to establish a permanent B20 Secretariat, there have been similar suggestions to develop a more permanent structure for the G20 process. For example, during the Cannes Summit in 2011, the proposal was put forward to set up a permanent Secretariat comparable to the UN model. A counter-proposal was made in Turkey to develop a cyber-Secretariat. It has also been commented that the OECD and other international organisations are de facto taking on some Secretariat duties.³¹

³⁰ See [B20 Germany About page](#).

³¹ Wouters, Jan, Van Kerckhoven, Sven, the OECD and the G20: [An ever closer relationship?](#) The George Washington International Law Review, 2010, Vol.43, Number 2.

4.2 Role of the OECD

Among the international organisations that work with the G20 presidencies, the OECD is probably unique in that it works at the highest level politically and also at the technical level in working groups.³² It is described as an active partner and strategic advisor to the G20. Over the years it has created or contributed to a wide range of documents that address the topic of corruption from different angles.³³

Despite these recurrent discussions, there appears to be no real appetite to establish a more permanent structure. The flexibility and agility of the G20 process provides each presidency with an opportunity to demonstrate leadership, and also to adapt the mechanism and determine its focus, culminating in the G20 Summit.

4.3 Anti-corruption under the G20 process

The topic of anti-corruption has been on the G20 agenda since the 2009 Pittsburgh Summit.³⁴ One of the most significant additions to the G20 process was the establishment of a permanent G20 Anti-Corruption Working Group (ACWG) which enabled a more strategic and active approach to the topic of corruption at the G20 level.

In the early stages of the G20 anti-corruption engagement, the process focused on identifying prudential standards to address terrorist financing, tax havens, and how countries deal with the proceeds of corruption. Ensuring that all G20 countries ratify the UNCAC³⁵ and OECD Anti-Bribery Conventions³⁶ was also a priority to enable a common basis to collectively

³² See [OECD web page about the G20](#).

³³ See [OECD web page on anti-corruption](#). Contributions to the G20 by the OECD on corruption topics include: [Chairs' summary: Partnering Against Corruption in Sports](#) (October 2018); [High Level Principles on the Liability of Legal Persons for Corruption](#) (2017); [High Level Principles on Organizing Against Corruption](#) (2017); [High Level Principles on Combatting Corruption related to Illegal Trade in Wildlife and Wildlife Products](#) (2017); [High Level Principles on Countering Corruption in Customs](#) (2017); [G20 Guide on Requesting International Cooperation in Civil and Administrative Proceedings relating to Corruption](#) (2017); [Compendium of Good Practices on the Publication and Reuse of Open Data for Anti-corruption across G20 Countries: Towards data-driven public sector integrity and civic auditing](#) (2017); [Compendium on Customs Integrity: Taking Stock of Good Practices](#) (2017); [Budget Transparency Toolkit](#) (2017); [G20 Seminar on Corruption and Economic Growth](#) (2016), which was built on [Consequences of Corruption at the Sector Level and Implications for Economic Growth and Development](#) (2015).

³⁴ [G20 Leaders Statement: The Pittsburgh Summit](#).

³⁵ [United Nations Convention Against Corruption](#).

³⁶ [OECD Convention on Combating Bribery in International Business Transactions](#).

address issues of corruption. Recurring themes included asset recovery, open data standards on beneficial ownership, corruption in public procurement, and customs.

4.4 G20 Anti-Corruption Working Group (ACWG)

The establishment of the G20 ACWG in June 2010 during the G20 Toronto Summit was an important step by the G20 Leaders to support the translation of high-level G20 commitments into actions at the country level. The ACWG brings together anti-corruption experts from G20 countries, including representatives from national anti-corruption authorities but also leading anti-corruption international organisations such as the OECD, UNODC, IMF, FATF and WTO, while also receiving input from relevant non-governmental organisations.³⁷

In 2010, the G20 Leaders:

“agreed to establish a Working Group to make comprehensive recommendations for consideration by Leaders in Korea on how the G20 can continue to make practical and valuable contributions to international efforts to combat corruption and lead by example, in key areas that include, but are not limited to, adopting and enforcing strong and effective anti-bribery rules, fighting corruption in the public and private sectors, preventing access of corrupt persons to global financial systems, cooperation in visa denial, extradition and asset recovery, and protecting whistleblowers who stand-up against corruption.”³⁸

During the Seoul Summit in November 2010, the newly established ACWG published its first Anti-Corruption Action Plan.³⁹ This was based on the G20 commitment to support the development of a common approach and work towards an effective global anti-corruption regime, by showing collective leadership and taking action in high-priority areas that affect G20 economies.⁴⁰

The work of the ACWG is primarily structured through its bi-annual/tri-annual **Anti-Corruption Action Plans**. These are designed as the central working document to capture and translate

³⁷ [First Monitoring Report of the G20 Anti-Corruption Working Group to G20 Leaders on Individual and Collective Progress made by G20 Countries in the Implementation of the Seoul Action Plan.](#)

³⁸ [Annex to the G20 Toronto Summit Declaration.](#)

³⁹ [G20 Action Plan Seoul.](#)

⁴⁰ [Ibid.](#)

G20 commitments into action. The ACWG reports on the progress made on an annual basis to the G20 Leaders, which in turn endorse the Action Plan in their Communiqué at the final Summit of each G20 cycle.

In 2013, the G20 Leaders endorsed the St. Petersburg Strategic Framework⁴¹ to further guide the work of the ACWG. Besides the Anti-Corruption Action Plans, the framework requires periodic updates and reports on progress made against the Action Plans. The aim is to further “identify priorities for action focused on practical and valuable contributions to international efforts to combat corruption which demonstrates leadership by example by the G20 countries.”⁴²

In addition to the Anti-Corruption Action Plans, therefore, the ACWG also publishes annual **Monitoring Reports**. These provide oversight of developments in both “individual and collective progresses made by G20 countries in the implementation of the Action Plan to be submitted to the G20 Leaders.”⁴³

The Monitoring Reports assess both the progress and activities taken on by the G20 ACWG, such as best practices and guideline documents produced as well as priority areas highlighted where work still needs to be done. It also teases out specific examples of the implementation of “significant” individual country progress that the ACWG agrees should be recognised. The country progress examples are based on questionnaire responses that countries provide on an annual basis. Additionally, to ensure continuity and momentum between the Action Plans, the Monitoring Reports also set out recommendations for Leaders to consider in line with the current Action Plan.⁴⁴

The ACWG has not used consistent terminology for its progress reporting against the Anti-Corruption Action Plans, but its **Monitoring Reports**, **Progress Reports** and **Accountability Reports** all cover the ACWG progress, selective country progress, and recommendations to the Leaders as set out in the St. Petersburg Strategic Framework.

⁴¹ [St. Petersburg Framework for the G20 Anti-Corruption Working Group](#).

⁴² Ibid.

⁴³ See footnote 37.

⁴⁴ Ibid.

The two sets of Anti-Corruption Plans for 2015–2016 and 2017–2018 are also accompanied by ACWG **Anti-Corruption Implementation Plans**. These outline specific deliverables for each action area set out in the Action Plans, both for the G20 countries and the work of the ACWG. They provide more detailed guidance to countries on what needs to be included in their annual progress reports. For the new topic of beneficial ownership, the G20 High Level Principles on Beneficial Ownership Transparency, which were adopted at the Brisbane Summit in 2014, included a commitment requiring countries to submit written plans that outline concrete steps to implement the Principles.

The table below provides an overview and timeline of the ACWG Anti-Corruption Action Plans and the corresponding reports on the ACWG and G20 countries’ progress and Implementation Plans.

4.4.1 Timeline of G20 ACWG Anti-corruption Action Plans and follow-up reports

G20 cycle	Anti-Corruption Action Plans	Monitoring/Progress/ Accountability Reports	Implementation Plans
Seoul (2010)	G20 ACWG Action Plan 2011–2012		
Cannes (2011)		Monitoring report on the implementation of the Seoul ACWG Action Plan	
Los Cabos (2012)	G20 ACWG Action Plan 2013–2014	G20 ACWG 2012 Monitoring Report	
St. Petersburg (2013)		Progress Report 2013	
Brisbane (2014)	G20 ACWG Action Plan 2015–2016	G20 ACWG Accountability Report June 2014	G20 ACWG Anti-corruption Implementation Plan 2015–2016
		Brisbane 2014 Anti-corruption update	

Antalya (2015)	G20 ACWG Accountability Report November 2015	National Implementation Plans on the High Level Principles on Beneficial Ownership Progress Report on the G20 Self- Assessment on Combatting the Bribery of Foreign Public Officials
Hangzhou (2016)	G20 ACWG Action Plan 2017–2018	Anti-Corruption Implementation Plan 2017– 2018
Hamburg (2017)	G20 Anti-Corruption Working Group Interim Report 2017 G20 ACWG Accountability Report 2016–17	
Buenos Aires (2018)	G20 ACWG Action Plan 2019–2021	G20 ACWG Accountability Report 2018

The ACWG has undertaken considerable work addressing some of the wider aspects of corruption and economic crime.⁴⁵ Report topics include high-level principles of mutual legal assistance, beneficial ownership and transparency, plus practical guides to asset tracing and requesting mutual legal assistance.

As far as the B20 anti-corruption process is concerned, the G20 leaders have reiterated the importance of the private sector and commended the engagement of companies in the fight against corruption as well as welcoming the commitments made by the B20 to build on the G20 Anti-Corruption Action Plans. The G20 leaders have also encouraged the G20 business

⁴⁵ The German [G20 ACWG web page](#) contains a list of useful resources.

community to examine and share best practices within the community to counter corruption more effectively.⁴⁶

The first Anti-Corruption Action Plan also takes special note of the “essential role of businesses in the anti-corruption efforts.”⁴⁷ Specifically, the G20 committed under its first ACWG Action Plan to encourage public-private partnerships and offer a significant opportunity for developing and implementing initiatives that engage the private sector in the global fight against corruption.

Subsequently, each Anti-Corruption Action Plan has included a section on the private sector. The B20 has also been able to present its policy recommendations to the ACWG and to participate in and give input to the ACWG meetings.

The establishment of the ACWG and monitoring mechanism demonstrates the emphasis and importance that the G20 placed on the topic and a commitment to moving forward collectively. But there is also criticism, primarily from civil society via the C20, that the measuring of progress and tracking of commitments are not as effective as they could be. This, they say, is due to outdated information and vague commitments, and even lack of transparency in the G20 assessment processes.⁴⁸ At the time of writing, the current G20 ACWG has begun to revise the accountability reporting process. It will be interesting to see if any new mechanisms that could be developed also open up new avenues for the B20 anti-corruption workstream to input and propose specific business-oriented activities.⁴⁹

Annex 1 contains a comprehensive list of all B20 anti-corruption recommendations and G20 anti-corruption commitments made to date.

5 Overview of assessment methods

As briefly outlined in section 2, three different methodologies have been devised and used to assess the effectiveness of B20 recommendations in the G20 process covering the 2010–

⁴⁶ See footnote 39.

⁴⁸ [C20 Anti-Corruption Working Group- Policy Paper 2020.](#)

⁴⁹ [Road to Riyadh: Can the G20 Fight Corruption?](#)

2017 cycles. The summary below gives an overview of the methodologies, taking into account that the approaches differ when it comes to the target audiences and or goals.

The three methodologies described below have all been devised to give an overall assessment of the entirety of the B20 process. While this high-level approach allows for commentary on how the B20 process is being received at the G20 level in general terms, the details of the different working modes and tools of the individual B20 workstreams are less easily taken into account.

5.1 ICC G20 Business Scorecards⁵⁰

The ICC G20 Business Scorecards compare B20 business recommendations with G20 commitments and directives conveyed in Summit Declarations from 2010 to 2016.

The purpose of the Scorecards was to generate a balanced and reliable measurement of the G20's performance in response to business recommendations that have been put forward to Heads of Government. The listing of recommendations and responses by category, along with the indicative scoring, intends to provide an effective way to concentrate attention on the need to track performance and monitor progress over time.

The ICC G20 CEO Advisory Group, together with the ICC and external policy experts, annually reviews and analyses the relevant G20 documents in light of the B20 recommendations made for each G20 cycle.

The assessment particularly emphasises the main G20 output document, the G20 Leaders' Communiqué. This is because it embodies the collective voice of the G20 Leaders and is understood to be the main mechanism setting out the commitments, priority areas and next steps.⁵¹ Generally, the actions of G20 member countries are not used to assess the score. Where they are used, it is to highlight a positive trend or momentum that is building. It is important to note that the score also does not evaluate the performance of the G20 as to whether the end goal is actually realised.

⁵⁰ [ICC G20 Business Scorecard second edition](#).

⁵¹ [ICC G20 Business Scorecard fifth edition](#).

According to the ICC, the analysis aims to support the business community to better set priorities, increase accountability for governments and intergovernmental organisations to honour commitments, and identify issues within the B20 process that hinder greater uptake by the G20. Designed primarily as a policy tool to enable business to advocate for greater attention to business priorities, the Scorecards can also function as a working tool for business to engage in a more structured and tailored manner with the G20.

5.2 Methodology of the ICC G20 Business Scorecards

The methodology⁵² applied in this assessment combines a quantitative and qualitative score.

5.2.1 Quantitative assessment

The quantitative score evaluates the response of the G20 and aggregates business recommendations for a numerical score based on three criteria:

- **Recognition:** If the G20 has recognised/addressed an issue raised by business, either actively (e.g. Leaders have referred to the issue in a Summit Communiqué) or passively (e.g. referencing the work of others or supporting initiatives that focus on the issue).
 - **Action:** If the G20 has taken action (e.g. set a goal, created a taskforce, called on an international organisation to act or requested a report).
- Adequacy:** If the G20's response/action is adequate in addressing business concerns.

For each of the criteria, one point is awarded if the G20 is considered to have met the criteria. A minimum score of 0 to a maximum score of 3 can be awarded.

5.2.2 Qualitative assessment

As the assessment ultimately aims to identify whether the G20 considers specific business priorities and whether the G20 as a collective body is effectively responding to recommendations, the numerical score is further translated to include a qualitative assessment.

⁵² See footnote 50.

- **An inadequate score** reflects that the G20 has not addressed the recommendation or the issue. This means **0** points are added to the score.
- **A poor score** means that the G20 took notice of the recommendation but no further action was taken in response. Under these circumstances, **1** point is added to the score.
- **A fair score** reflects the G20 recognising the recommendation and initiating some steps as a response. In this case, **2** points are added to the score.
- To achieve a **good score**, the recommendation needs to be effectively addressed. If that is the case, **3** points are added to the score.

In some of the analyses, the Scorecards have taken B20-relevant discussions at the G20 level into account or highlighted countries' actions to illustrate a trend, even when there is no direct uptake of a recommendation or action-oriented support by the G20 process.

The ICC G20 Business Scorecard is the only assessment tool that covers the majority of B20 cycles (2010–2016). Its consistent methodology enables a basic comparison of the effectiveness of B20 cycles over time, while also providing an important repository of business recommendations and corresponding commitments made by the G20.

5.3 B20–G20 Efficiency Dialogue Task Force report – From Toronto to St. Petersburg (2010–2013)⁵³

As the St. Petersburg Summit coincided with the fifth anniversary of the B20, this was regarded as an appropriate moment to assess the impact of the B20 recommendations as reflected in the G20 documents.

In order to do so, a special B20-G20 Efficiency Dialogue Task Force was set up under the Russian B20 cycle. This aimed to enhance G20 efficiency by responding to business interests and concerns and engaging the private sector in generating growth and jobs.⁵⁴

⁵³ See B20 Russia report (2013): [G20-B20 Dialogue Efficiency Task Force – From Toronto to Saint Petersburg: Assessing G20-B20 Engagement Effectiveness](#)

⁵⁴ See B20 Russia report (2013): [B20-G20 Partnership for Growth and Jobs: Recommendations from Business 20](#)

The Task Force initiated a comprehensive, rigorous and independent report produced by an international network of scholars headed by the International Organizations Research Institute of the National Research University Higher School of Economics and the G20 Research Group at the University of Toronto. The report covered all B20 recommendations made since Toronto and their impact on G20 decision-making, as reflected in the G20 documents,⁵⁵ with a particular focus on the recommendations made in Los Cabos during the previous B20 cycle. This allowed the B20 to identify and highlight its own best practices. The report's recommendations were found to be “instrumental in advancing the dialogue in the other B20 Task Forces.”⁵⁶ The report also laid the foundations for the B20-G20 Efficiency Dialogue Task Force recommendations as included in the final 2013 B20 policy document.

The methodology of the report applied a quantitative analysis of the percentage uptake of recommendations over the first B20 cycles by the G20. It also measured the percentage of recommendations made per B20 workstream in relation to the entire B20 process.

The extract below provides an example of the percentage of recommendations attributed to the anti-corruption workstream:

Table 1. B20 Recommendations Distribution by Areas and Summits

Area	Toronto		Seoul		Cannes		Los Cabos		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%
Corruption	0	0	0	0	6	5.1	15	19.7	21	8

Table 2: Number and percentage of B20 recommendations attributed to the anti-corruption workstream (B20-G20 Efficiency Dialogue Task Force report)

The analysis states that:

“Between the Toronto and the Los Cabos summit the B20 has made 21 recommendations on fighting corruption, which amounts to 8% of all B20 recommendations made over the period. In Cannes the B20 made six recommendations on anti-corruption, two of them were subsequently addressed by

⁵⁵ See B20 Russia report (2013): [G20-B20 Dialogue Efficiency Task Force – From Toronto to Saint Petersburg: Assessing G20-B20 Engagement Effectiveness](#)

⁵⁶ See B20 Russia report (2013): [B20-G20 Partnership for Growth and Jobs: Recommendations from Business 20](#)

the G20. It should be noted that by that time G20 had made 15 commitments on anti-corruption. In Los Cabos only four out of 15 B20 recommendations were reflected in the G20 documents. Overall, less than 29% (six out of 21) of the B20 recommendations have been translated into the G20 decisions, which is a relatively low score in comparison with other areas on the B20 agenda.”

In addition to this high-level analysis, the report also identified eight specific commitments from the Los Cabos cycle and analyses G20 country uptake. For the anti-corruption workflow, the report authors chose to analyse the implementation of the G20-endorsed Anti-Corruption Working Group Principles for Denial of Entry to corrupt officials.⁵⁷

They reviewed the compliance of all G20 countries to take action to stop corrupt officials to enter their borders, using the following assessment:

- **Lack of compliance:** The recommendation was not addressed in the G20 documents.
Score (-1)
- **Work in progress:** recommendation was addressed in the G20 documents but no commitments/mandates in line with this B20 recommendation have been agreed.
Score (0)
- **Full compliance:** means the B20 recommendation was addressed in the G20 documents and G20 actions or mandates are in line with this B20 recommendation.
Score (+1)

The average score identifying countries’ compliance with the G20 commitments came to – 0.7. Only six countries were found to be working towards or complying with the G20 ACWG principles.

The Task Force report focused primarily on identifying the high-level percentage uptake of B20 recommendations. It also dived into countries’ implementation of recommendations to sample impact on the ground and highlight the importance of implementation of commitments at the G20 level to determine impact.

⁵⁷ [G20 Common Principles for Action: Safe Havens](#).

5.4 Germany B20/G20 responsiveness report (2017)⁵⁸

The last assessment of B20 uptake was conducted under the German cycle, which reviewed its own “efficiency” following the conclusion of the G20 cycle in 2017.

The responsiveness report aimed to evaluate how the B20 policy recommendations are reflected in the G20 Leaders’ Communiqué and its annexes. The report does not evaluate the implementation of the G20 Communiqué at the country level. Instead, it purely aims to assess the responsiveness of the G20 to the B20 recommendations using its own qualitative and quantitative assessment methodology.

The methodology builds on the previous review mechanisms of the Russian G20 cycle and the annual ICC G20 Business Scorecards.

To enable a basic comparison with the scoring of previous cycles, the report used the ICC methodology to score the overall uptake of each B20 working stream and developed a more nuanced numerical scoring system for each of the individual B20 recommendations. The rating system takes into account the aim (goal) of a B20 recommendation, the similarities of the measures proposed at the G20 to the B20 level, and clarity of ownership of proposed measures.

		Score	Points
Goal	Do the goal of the B20 recommendation and the goal of the G20 commitment match?	Full congruence	50
		Medium congruence	30
		Low congruence	10
		No congruence	0
Measure	Are the same or similar measures suggested in the G20 documents as in the B20 recommendation?	Full congruence	40
		Medium congruence	30
		Low congruence	10
		No congruence	0
Ownership		Identical or similar	10

⁵⁸See B20 Germany report (2017): [G20 Responsiveness Report - B20 Evaluation of the Hamburg G20 Leaders’ Declaration: Shaping an Interconnected World. Measuring the Responsiveness of the G20 to the B20 Recommendations.](#)

	Are the same owners identified to execute the measure?	Different or no actors	0
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Table 3: Rating system used in the B20 Germany responsiveness report

The German B20 process strongly urged subsequent B20 cycles to take ownership of measuring the responsiveness of the G20 to B20 recommendations to tailor future input and increase the impact of the B20 platform. However, since the 2017 responsiveness report, no further assessments have been conducted for the B20 process.

To bridge this gap, the Basel Institute on Governance will provide a follow-up report to assess the effectiveness of the B20 recommendations from the 2018–2020 cycles, covering Argentina, Japan and Saudi Arabia.

6 Assessing the 2010–2017 B20 cycles and G20 responsiveness

The summary and subsequent analysis of the 2010–2017 B20 cycles are based on the existing assessments described above, namely the ICC G20 Business Scorecards, the responsiveness report from the Germany B20 cycle and the Russian B20 Dialogue Efficiency Task Force report.

The consistent assessment of uptake through the 2010–2017 cycles enables a baseline comparison of effectiveness of the B20 process over the years. Each cycle summary includes an overview of the B20 recommendations and the G20 commitments. The analysis aims to tease out the responsiveness of the G20 based on the three assessment methodologies.

For a full list of B20 recommendations and G20 commitments, please consult Annex I.

6.1 Early B20 cycles from Seoul (2010) to Los Cabos (2012)

During the first official G20 Business Summit in Seoul, no specific anti-corruption recommendations were made to the G20. It nevertheless remains an important cycle due to the establishment of the G20 ACWG and its first Anti-Corruption Action Plan, which included

a commitment to encourage private-public partnerships and further engage the private sector in the fight against corruption.⁵⁹

The Cannes (2011) and Los Cabos (2012) cycles saw an increase in the focus of the B20 on corruption recommendations. This also coincides with the establishment of the first B20 anti-corruption taskforce at the Los Cabos B20 process.

One of the main recurring themes and recommendations from the early B20 cycles that coincided with a G20 priority area was the call for all G20 countries to ratify the UNCAC⁶⁰ and OECD Anti-Bribery Convention.⁶¹ In 2011, the B20 criticised G20 members for the multiple G20 countries that had not yet ratified UNCAC despite their commitments at the 2009 Pittsburgh Summit. The B20 reiterated the importance of this step to curb corruption and level the playing field on the global market.

As G20 countries subsequently ratified the UNCAC, notably India (2011), Germany (2013), Saudi Arabia (2013), and Japan (2017), the focus of the business community shifted to calls for greater transparency in the implementation process at the country level, and the inclusion of the private sector in the country monitoring process.⁶²

To ensure a more strategic engagement of the B20 anti-corruption workstream with the G20, the B20 continuously recommended the G20 to establish a permanent public-private taskforce to ensure a better and continued dialogue. The G20 did not take this up. As a result, the anti-corruption working forums under the B20 lobbied to establish an exchange platform. The G20 did not take up this recommendation either. However, multiple G20 Leaders' Communiqués reiterate the commitment of the G20 to work closely with the B20 as an important partner.⁶³

During the Cannes cycle, the business sector called on the G20 Leaders to incentivise enterprises to establish effective policies to prevent corruption, and to engage with the private sector to promote education on business integrity. The business community also remarked

⁵⁹ See footnote 39.

⁶⁰ See footnote 35.

⁶¹ See footnote 36.

⁶² [G20 Anti-corruption work plan 2013-2014](#).

⁶³ [G20 Leaders' Declaration 2013, St. Petersburg](#).

that companies need to play their part and committed to identify and launch Collective Action processes.⁶⁴

At Los Cabos, in addition to reiterating previous recommendations, the business community also urged governments to streamline public procurement process including by considering implementing Integrity Pacts and High Level Reporting Mechanisms (HLRMs).⁶⁵

According to the analysis of the Russian Dialogue Efficiency Task Force, only two out of the six B20 recommendations on corruption put forward between 2010–2012 were taken up by the G20. The efficiency score of 29% is, compared to the percentage uptake achieved by other B20 workstreams, relatively low.⁶⁶

The ICC Scorecards also echoed the findings of the Russian Dialogue Efficiency Task Force, highlighting that the engagement between the B20 and G20 process was still in its development phase, and that setting up effective channels of communication takes time. These new processes and structures included the establishment of the G20 ACWG and, at the B20 level, the move from the annual Business Summits to more formalised and dedicated anti-corruption working streams.

6.2 Russian cycle: 2013

During the Russian cycle, the B20 focused on enhancing transparency in public procurement. The first ACGW progress report outlined the ongoing work, including publishing its members' policies and developing a compendium of good practices in procurement.⁶⁷ Moving towards a common standard or mechanism to ensure transparency in public procurement was not, however, undertaken systematically by the G20.

The first progress report not only ensured continued engagement with the B20, but also established a strategic framework⁶⁸ to guide its work, enabling a more structured and

⁶⁴ B20 France report (2011): [Cannes B20 Business Summit Final Report](#)

⁶⁵ [B20 2012 Recommendations](#). The High Level Reporting Mechanism is a corruption prevention tool co-developed by the OECD and the Basel Institute on Governance that enables companies to trigger an early warning system to prevent corruption within the public procurement process.

⁶⁶ See page 20 of B20 Russia report (2013): [G20-B20 Dialogue Efficiency Task Force – From Toronto to Saint Petersburg: Assessing G20-B20 Engagement Effectiveness](#)

⁶⁷ [Compendium of Good Practices for Integrity in Public Procurement prepared by the OECD](#).

⁶⁸ See footnote 41.

substantive engagement. This allowed more concrete and action-oriented work on the G20 anti-corruption commitments. This active engagement by the B20 at the ACWG level was showcased at the Ottawa ACWG meeting in 2013, where Leaders called for more concrete engagement with the private sector. They also supported the B20 proposal to promote the use of Integrity Pacts and HLRMs, and to establish a common resource platform to share and disseminate anti-corruption standards and practices among companies and governments. The G20 Leaders also committed to maintain and build on the enhanced dialogue between the G20 ACWG and the B20.⁶⁹

B20 representatives were also invited to participate in all of the ACWG meetings, which enabled interaction and exchange but without the formality of setting up a joint permanent B20/G20 platform as the B20 had originally envisaged.

Overall, the efficiency of the Russian B20 cycle achieved a score of 2.3 out of a possible maximum 3 points under the ICC Scorecards, reflecting an increase in uptake of recommendations by the G20. The B20 anti-corruption workstream benefited from clearer and more structured modes of working, and the Russian B20 cycle was also the first to set up a dedicated anti-corruption taskforce.

The process continued to build a strong dialogue and engagement between the B20 and G20. Significant strides were made towards developing platforms to share best practices in the field of anti-corruption. The G20 Leaders called on business representatives to develop capacity-building programmes and explore Integrity Pacts between companies and governments, as well as voluntary participation in public-private partnerships such as the Extractive Industries Transparency Initiative (EITI) and CoST – the Infrastructure Transparency Initiative. At the June 2013 ACWG meeting, representatives from governments, civil society and business discussed the B20 proposal to establish a “Collective Action Hub” with links to the business communities in G20 countries, which the ACWG welcomed. This has since been developed as the [B20 Collective Action Hub](#) on the Basel Institute website.

⁶⁹ See footnote 50.

6.3 Australian cycle: 2014

The Australian cycle received the highest score (2.75 out of possible 3 points)⁷⁰ of all the cycles analysed by the ICC Scorecard. This raises the question of what was different during the Australia cycle.

The Australian presidency set up a unique mode of working for the B20 anti-corruption workstream. It established an Anti-corruption Working Group that developed recommendations across all of the four B20 taskforces as well as developing separate cross-cutting recommendations to work towards positively impacting the global economy as a whole. This enabled the topic and B20 recommendations to get more exposure through different avenues and from different angles. As a result, anti-corruption recommendations were made by all five B20 Taskforces during the Australian cycle (Trade Taskforce, Infrastructure & Investment Taskforce, Financing Growth Taskforce, Human Capital Taskforce, Anti-Corruption Working Group).

For example, the Trade Taskforce called for G20 governments to ensure that all new trade agreements include specific anti-corruption clauses requiring signatories to uphold the UNCAC and OECD Anti-Bribery Convention and to implement HLRMs.⁷¹ The Transport Taskforce also recommended that HLRMs should be established or developed in relation to the procurement and execution of public infrastructure projects. The G20 did not pick up either recommendation.

The ICC Scorecard, which reviews the uptake of all B20 recommendations, reiterated again that the G20 ACWG during the Australian cycle was by far the most inclusive of G20 Working Groups. It allowed B20 representatives to participate not only in official ACWG meetings but also to submit suggestions and inputs for the future G20 anti-corruption agenda. This close partnership is reflected in the 2015–2016 ACWG Anti-Corruption Action Plan,⁷² which features several commitments closely aligned with the 2014 B20 recommendations. One example is the G20 pledge to work with the private sector to co-develop anti-corruption education and training programs for SMEs.

⁷⁰ [ICC G20 Business Scorecard fourth edition](#).

⁷¹ B20 Australia report (2014): [B20 Anti-Corruption Working Group Report to the B20 Office and Taskforce Chairs](#)

⁷² [2015-2016 G20 Anti-Corruption Action Plan](#).

The B20 also strongly recommended for G20 countries to come together with the private sector to form a working group to enable a more strategic approach towards harmonising G20 national anti-corruption laws and develop a unified approach that acknowledges corporate compliance programmes to maximise their efficiency. The ACWG did not support the development of a working group. It did however include the B20 in its Anti-Corruption Implementation Plan⁷³ to support G20 activities to help business better tackle corruption, build incentives for business to self-report, and encourage business to adopt codes of conduct and efficient supply chain integrity programmes.

The B20 lamented that enforcement of applicable legal frameworks such as the OECD Anti-Bribery Convention remained low and that only three jurisdictions of G20 signatories were actively enforcing the OECD Convention in 2013, namely the UK, Germany and the US.⁷⁴ Additionally, the G20 members did not acknowledge the B20's recurring recommendation to support the establishment of [HLRMs](#) as an effective corruption prevention tool in the public procurement process.

The G20 also surprised the B20 with its commitments regarding beneficial ownership transparency. These went beyond what the B20 had called for, which was to see a G20 endorsement of the G8 core principles⁷⁵ to ensure a globally consistent approach. The G20 Leaders, despite last-minute reservations from China, managed to agree and endorse the G20 High Level Principles on Beneficial Ownership Transparency.⁷⁶ The commitments go beyond the G8 pledge by aiming to identify high-risk sectors, consider enhanced due diligence in these sectors, and connect data collection on beneficial ownership to align with the G20 aim of closing tax loopholes.

Through the work of the B20 Infrastructure Taskforce, which featured anti-corruption considerations, the B20 called for the implementation of transparent procurement and approval processes. The G20 did not take this up. However, the ACWG published a Compendium of Good Practices for Integrity in Public Procurement.⁷⁷ It also committed in its

⁷³ [2015-2016 G20 Anti-Corruption Implementation Plan](#).

⁷⁴ [Exporting Corruption: Progress Report 2104: Assessing Enforcement of the OECD Convention on Combating Foreign Bribery](#).

⁷⁵ [G8 Policy Paper action plan principles to prevent the misuse of companies and legal arrangements](#).

⁷⁶ [G20 High-level Principles on Beneficial Ownership, Australia, 2014](#).

⁷⁷ See footnote 67.

2015–2016 Anti-Corruption Implementation Plan to develop G20 High-level Principles on Public Procurement through an analysis of global systems and to develop an implementation toolkit for governments.

6.4 Turkish cycle: 2015

The 2015 Turkey B20 cycle continued to highlight public procurement and beneficial ownership transparency, following on from the Australian cycle, and introduced customs as a new B20 anti-corruption focus topic.

The close working relationship between the B20 and G20 ACWG was also demonstrated once again during the Turkey presidency. The G20 identified broadening the engagement with the private sector as a G20 focus. Subsequently, the ACWG developed and the G20 adopted the G20 High Level Principles on Private Sector Integrity and Transparency.⁷⁸ The B20 also worked with the ACWG to co-develop an anti-corruption toolkit for SMEs.⁷⁹

The B20 pressed G20 countries to implement the Brisbane High-Level Principles on Beneficial Ownership Transparency and advocated for consistent regulation across jurisdictions to ease the compliance burden on companies. The ACWG followed up on the beneficial ownership commitments together with the World Bank and FATF⁸⁰ to create a support system for countries to achieve implementation while also requiring countries to report on actions taken to develop transparent beneficial ownership mechanisms in their national Anti-Corruption Implementation Plans.⁸¹ Overall, the business community felt that the gap between commitment and implementation was still significant, and that more support for governments and consultation with the private sector was needed to achieve beneficial ownership transparency across G20 jurisdictions.

The business community also called for a move towards a comprehensive digital environment for customs and border clearances. They laid out a five-year plan⁸² that included establishing public-private collaboration in all G20 countries, building on country performance reports, and

⁷⁸ [G20 High Level Principles on Private Sector Transparency and Integrity, Turkey 2015.](#)

⁷⁹ [Anti-corruption Toolkit for Small and Medium Sized Companies.](#)

⁸⁰ [FATF Follow up meeting.](#)

⁸¹ [National Implementation Plans on Beneficial Ownership.](#)

⁸² [B20 Anti-corruption Policy Paper, Turkey 2015.](#)

applying e-customs tools. The B20 also intended to develop a customs-specific Collective Action toolkit to support countries, companies and customs brokers to develop Collective Action Initiatives. The G20 did not follow the B20 recommendations, but endorsed the Mexican government's proposals to complete a scoping study of best practices and to have the WCO deliver a high-level position paper on best practices to counter corruption in customs.

The B20 anti-corruption taskforce under the Turkish presidency developed a specific public procurement workstream. This proposed incentivising anti-corruption programmes, introducing digital systems such as e-procurement and developing and promoting HLRMs.

The G20 ACWG did not take these considerations on board. However, in the 2015/16 Anti-Corruption Workplan, it endorsed the G20 Anti-Corruption Open Data Principles⁸³ and the G20 Principles for Promoting Integrity in Procurement.⁸⁴ The Leaders' Communiqué⁸⁵ endorsed principles pushing for integrated e-procurement and for countries to foster a culture of integrity and encourage all businesses to commit to compliance, transparency and integrity. The recommendation to develop and support HLRMs was again not picked up by the G20 but has featured consistently as a B20 recommendation since the Mexican cycle in 2012. Despite several attempts to encourage its adoption, the ACWG did not include the HLRM in its 2015/2016 Anti-Corruption Working Plan.

6.5 Chinese cycle: 2016

Under the Chinese presidency, the ACWG was suspended and all the anti-corruption work for the cycle was taken up by the B20. Instead of establishing a dedicated taskforce, the Chinese cycle decided to bring together business at a B20 Anti-Corruption Summit. This was a unique shift in the role of the B20. Overall China was criticised for not making the fight against corruption a priority under its presidency.⁸⁶

The anti-corruption workstream of the Chinese cycle received an ICC score of 2.0 out of 3, which is the lowest score since the early B20 cycles. This also aligns with the criticism that a

⁸³ [Introductory note to the G20 Anti-corruption open data principles.](#)

⁸⁴ [G20 Principles for Promoting Integrity in Public Procurement.](#)

⁸⁵ [G20 Leaders' Communiqué Antalya Summit, 15-16 November 2015.](#)

⁸⁶ See [Reuters article.](#)

one-off Summit does not enable consistent engagement in the same way as a dedicated taskforce.

The B20 Anti-Corruption Summit featured discussions on how to build capacity to enable stronger anti-corruption compliance efforts, bolster competition through a more transparent business environment, and foster stronger international anti-corruption cooperation to foster sustainable growth. The G20 2017–2018 Anti-Corruption Action Plan⁸⁷ continues to focus on the implementation of beneficial ownership commitments at the country level and further identifying best practices to address the risk of corruption in customs and border crossing. The topic of whistleblowers was added to the agenda, and together with the OECD, a compendium of best practices⁸⁸ was developed and presented.

At the Anti-Corruption Summit, six G20 members decided to lead by example and pledged to make public contracting open by default.⁸⁹ This was well received by the business community and raised the expectation that other G20 countries will follow suit. The G20 did not, however, respond to the B20 request to support companies, especially SMEs, to develop ethics and compliance standards that are in line with the requirement across the G20 jurisdictions.

Nevertheless, the preamble of the 2017–18 G20 Anti-Corruption Action Plan reiterates the important role of the private sector to support governments to prevent and uncover corruption. Additionally, private sector transparency was featured as one of the eight priority areas. The G20 committed to “exploring means of promoting a culture of integrity and supporting private sector anti-corruption initiatives, including for small and medium-sized enterprises and the non-financial professional service sector.”⁹⁰

The G20 also pledged to support the implementation of [commitments made at the 2016 London Anti-Corruption Summit](#), which outlined a substantive package of actions to tackle corruption across the board.

⁸⁷ [G20 Anti-corruption Action Plan 2017-2018](#).

⁸⁸ [G20 Anti-corruption Action Plan Protection of Whistleblowers](#).

⁸⁹ [Leading by example: implementing Anti-Corruption Summit commitments on transparency in public procurement](#).

⁹⁰ See footnote 87.

6.6 German cycle: 2017

The following analysis of the 2017 Germany G20/B20 cycle is based on the G20 Responsiveness Report⁹¹ prepared by the German B20 presidency following the conclusion of its G20 cycle.

Overall the report rates the uptake of B20 anti-recommendations at the G20 level at 42%, which the report authors consider at the lower spectrum of satisfactory.

The B20 anti-corruption workstream focused its efforts on continuing to push for the implementation of beneficial ownership transparency, and for G20 countries to recognise compliance efforts made by the private sector in addition to enhancing responsible business conduct in infrastructure projects.

The G20 High Level Principles on the Liability of Legal Persons,⁹² endorsed by the G20 leaders during the Germany cycle, offer some soft support to the B20 request for more acknowledgement of adequate compliance procedures. In these, the G20 leaders recognise that:

“efforts made by businesses to develop and implement effective anti-corruption internal controls, ethics and compliances programmes or measures, as well as voluntary self-reporting and cooperation by businesses with law enforcement, may also, where appropriate and consistent with a country’s legal system, be taken into consideration in legal proceedings, for example, as a potential mitigating factor or as a defense.”⁹³

Once again, the G20 did not take up the B20 recommendations concerning responsible business conduct in infrastructure projects, including exploring joint ways of fighting corruption in infrastructure projects through Collective Action initiatives such as Integrity Pacts and HLRMs.

⁹¹ See B20 Germany report (2017): [G20 Responsiveness Report - B20 Evaluation of the Hamburg G20 Leaders’ Declaration: Shaping an Interconnected World. Measuring the Responsiveness of the G20 to the B20 Recommendations](#)

⁹² Annex to G20 Leaders Declaration: [G20 High Level Principles on the Liability of Legal Persons for Corruption](#).

⁹³ Ibid.

7 What can we learn from the first seven B20 cycles?

Overall, the first seven B20 cycles show that the soft structures of engagement that have developed over the years enable the B20 anti-corruption workstreams to regularly access and provide input to the G20 anti-corruption decision-making functions. This is mainly through the B20 input into the Leaders' Communiqué and the working relationship with the ACWG.

The good working relationship between the anti-corruption B20 workstream and the G20 decision-making functions, mainly the ACWG, is central to this analysis. On the one hand it exemplifies the impact the B20 workstream has on the process through its consistent calls for a structured B20/G20 anti-corruption exchange platform. On the other hand, the strong working relationship also lays the foundation for upcoming B20 cycles to continue the process of communicating their anti-corruption recommendations effectively to the G20.

In 2013, the B20-G20 Dialogue Efficiency Task Force called on the B20 to align its focus areas with the G20's long-term goals in order to more strategically and effectively engage and increase the uptake at the G20 level. The following cycles, especially the Turkish and Australian cycles, did see a significant increase in their efficiency rating and more clearly reflected the current G20 anti-corruption priority areas. An example is the B20's repeated call for all G20 countries to sign the UNCAC and OECD Anti-Bribery Convention, which aligned with the G20 focus to ensure all G20 countries became signatories. As a result, the B20 recommendations were consistently echoed by the G20, which increased the effectiveness rating.

Beneficial ownership is another example where the B20 closely aligned with the G20 focus area. During the 2015 Australian cycle, in an unforeseen turn of events, the G20 commitments actually went considerably further than what the business community recommended. This is at least part of the reason why the Australian cycle received one of the highest scores in the ICC G20 Scorecards.

On the other hand, the work of the Infrastructure Transparency Taskforce during the Germany cycle in 2017 did not see any uptake of its anti-corruption recommendations. This may be because they were not aligned with the G20 focus of the cycle. This considerably affected the effectiveness score of the anti-corruption workstream overall.

The G20 has proactively supported the development of B20 anti-corruption tools and platforms, such as the B20 Collective Action Hub in 2013, and an SME learning platform in 2015. But to further understand what impacts the effectiveness of B20 recommendations, it is also important to mention the recurring themes that have not been picked up by the G20 despite being reiterated across multiple cycles.

One type of recommendation that has seen very little uptake by the G20 are those that call for specific actions and engagement with the private sector either at the G20 or country level. In the early cycles, G20 Leaders welcomed the establishment of multi-stakeholder Collective Action Initiatives, namely EITI and CoST. This was a promising start but did not lead to consistent G20 commitments.

The G20 has been even less responsive when it comes to committing to or including B20 proposed activities such as Integrity Pacts or the HLRM in the ACWG anti-corruption working tools. The B20 proposal calling for the establishment of HLRMs is unique in that it is the only anti-corruption tool that the B20 has called for consistently⁹⁴ to no avail. Besides the B20 anti-corruption taskforce recommendations, the HLRM has also been featured in the recommendations of the Trade Taskforce and Infrastructure & Investment Taskforce during the Australian cycle⁹⁵ and the Financing Growth and Infrastructure Taskforce during the German cycle.⁹⁶ Should the HLRM be endorsed and/or introduced into the ACWG Action and/or Implementation Plan, this would demonstrate a new level of impact for the B20 anti-corruption workstream, penetrating into the working level of the G20 and boosting the private sector and government engagement across the G20 countries.

The business community has also consistently called on G20 countries to acknowledge and incentivise the effective implementation of anti-corruption compliance programmes during the Turkey, China and Germany cycles as an important step to address bribery effectively. Aside from soft support on a voluntary basis during the Germany cycle,⁹⁷ the G20 has not picked up this B20 recommendation in the seven years of this review.

⁹⁴ Cannes, Los Cabos, St Petersburg, Sydney, Ankara, Berlin, Buenos Aires.

⁹⁵ See B20 Australia report (2014): [B20 Anti-Corruption Working Group Report to the B20 Office and Taskforce Chairs](#)

⁹⁶ See B20 Germany (2017): [B20 Cross-Thematic Group Responsible Business Conduct & Anti-Corruption](#)

⁹⁷ See B20 Germany report (2017): [G20 Responsiveness Report - B20 Evaluation of the Hamburg G20 Leaders' Declaration: Shaping an Interconnected World. Measuring the Responsiveness of the G20 to the B20 Recommendations](#)

The B20 cycles have also commented on the lack of consistency in the implementation of commitments at the country level. The implementation of beneficial ownership transparency mechanisms, for example, was criticised by business during the Germany cycle for a lack of consistency in country implementation of G20 commitments.⁹⁸ A growing number of countries have now established public registers for beneficial ownership, in part prompted by the inclusion of this requirement in the European Union's 5th Anti-Money Laundering Directive. However, consistent beneficial ownership transparency has not yet been achieved throughout the G20 jurisdictions. Inconsistencies in such standards amongst G20 countries undermine companies' efforts to manage their corruption risks.

In conclusion, the first seven G20/B20 cycles demonstrate a trend towards increased engagement and uptake of B20 recommendations. This correlates with the closer working relationship of the B20 with the ACWG and the strategic alignment of the B20 with G20 focus topics. The assessment also highlights, however, that by 2017 the B20 uptake at the G20 level was limited to high-level recommendations. B20 activity-related recommendations have neither been taken up by the G20 nor featured at the working level of the G20.

7.1 How the different B20 working modes could affect impact

Over the last seven years, the anti-corruption workstream has taken on different modes of working. To date, no assessment of how the different modes of working can affect the uptake at the G20 level has been conducted. Tailoring the working mode to increase the exposure of B20 recommendations at the G20 level could be a simple way for the B20 to increase its impact.

As identified in the B20 cycle analyses in section 5, the most common approach, implemented by over half the cycles in the relevant period, is the creation of an anti-corruption taskforce. The names of these taskforces have varied but the structure has remained similar.

It should be noted, however, that there are also several cycles that took different approaches:

The B20 Australia established the B20 Anti-Corruption Working Group (BACWG) to develop anti-corruption recommendations across all four B20 taskforces of its cycle, as well as

⁹⁸ Ibid.

developing separate high-level recommendations that cut across each of the taskforces to impact the global economy as a whole. As a result, the anti-corruption recommendations were made through various channels, enabling the topic to be brought to the G20 at different working levels and potentially raise awareness and visibility. According to the ICC Scorecards, the Australian cycle achieved the highest level of B20 recommendation uptake. This could be partly related to their unique working mode, and as such might be an interesting model for upcoming B20 cycles to emulate.

The B20 Germany presidency in 2017 took a different approach and developed a cross-thematic group that integrated focus topics such as SMEs and corruption into the discussion at all the B20 taskforce levels.

Under the Chinese presidency, the B20 was the only body to cover the corruption topic. This took place at a B20 Anti-Corruption Summit that brought together all relevant stakeholders. However, as this was as a one-off event it did not allow for the ongoing discussion and evolution of recommendations over months, as was the case in most other cycles. The decision of the Chinese presidency to cover the topic of corruption only through the B20 gave prominence to the B20 but was also criticised by engaged civil society and other stakeholders as reflecting a lack of commitment to addressing corruption under the Chinese presidency.

In sum, there appear to be two main approaches. Most cycles decided to create a separate anti-corruption taskforce. Adopting this approach has the benefit of clear ownership and the possibility of a more focused discussion through a sustained and coordinated process. Other B20 processes decided to include corruption as a cross-cutting theme. This aligns with corruption as an issue that affects and relates to many of the other B20/G20 priority topics.

Engaging with other taskforces and including corruption considerations in other B20/G20 platforms can increase efficiency and uptake if the topic is brought to the attention of the G20 via different engagement channels and platforms. Introducing corruption as an underlying issue within other focus areas has also been regarded as a valid approach, for example, by the German presidency, notwithstanding the criticism that this approach could lead to watered-down recommendations due to a lack of focus and ownership of the issue.

7.2 Looking forward: Identifying windows of opportunity for greater impact

The good working relationship and direct access of the B20 anti-corruption workstream to the ACWG are continually highlighted as being unique to the anti-corruption workflow. This raises the question of whether this relationship could be harnessed more effectively. Perhaps the B20 anti-corruption work could become more strategic in identifying opportunities to increase the exposure of the B20 anti-corruption workstream to G20 processes. Perhaps it could also be more responsive and ambitious in defining what impact means for the anti-corruption work of the B20.

For example, during the Saudi 2020 cycle, the ACWG will review its accountability mechanisms and working tools to assess its own impact. This could be an opportunity for the B20 to position itself to become more of an active stakeholder that inputs not only at the high level but also at the working level of the ACWG. Examples of working-level inputs include proposing activities in the Action and Implementation Plans that have not materialised to date. This would build on the St. Petersburg framework for the ACWG Anti-Corruption Action Plans, which requires close collaboration with the private sector and an open dialogue with the B20. Although this has seen the private sector being included in the ACWG meetings and mentioned in the bi-annual Action Plans, so far these mentions have been limited to more high-level commitments and not to action-oriented recommendations.

Refocusing on the impact and activities the B20 can undertake to address corruption risk in the G20 business community themselves could be another window of opportunity to strengthen impact. Looking back, especially at the early cycles, the B20 recommendations also set targets for the business community. Limiting the definition of “impact” to high-level G20 uptake of recommendations risks ignoring the array of initiatives that have been sparked and co-developed out of the B20 process. Aiming to bring about real change on the ground, these initiatives also highlight the importance of the B20 platform in bringing relevant stakeholders together to inform action.

For example, following the Turkish presidency in 2015, the Istanbul Association of Customs Consultancy and a local NGO developed the [Ethics Standards of Customs Brokers](#) and a sectoral Compliance Pact. The initiative sought to bring together Turkey’s customs operations, leading customs consultancy firms, and the public sector to address corrupt practices and competition issues relating to customs in Turkey. This initiative directly correlates with the B20 recommendation to support the establishment of country-level Collective Action in customs in

order to address corruption and competition issues. What this initiative demonstrates is that just because a recommendation is not taken up at the G20 level, this does not mean B20 stakeholders cannot develop and set up initiatives to further B20 recommendations that impact and work towards reducing corruption in the G20 business environment and beyond.

This is why the B20 anti-corruption taskforce recommendations remain important even if they do not appear in the G20's work. They provide ideas and inspiration that can also be picked up by others, including at the country level.

Another good example of B20 stakeholders taking the initiative comes from the 2018 Argentina B20/G20 cycle, where industry leaders co-developed an initiative aimed to support state-owned enterprises (SOEs) to build up their compliance capacities to better address their corruption-related risks. The B20 Integrity & Compliance Cross-thematic group paved the way for the OECD, in cooperation with the Basel Institute, to establish the [Compliance without Borders initiative](#). The initiative aims to mobilise experienced compliance experts via short-term secondments to help SOEs develop their compliance capacities. This initiative reflects and actively supports some of the 2018 B20 recommendations being translated into practice.⁹⁹

To capture and even more strategically develop these types of initiatives would require more resources and capacities to be developed at the B20 level. This type of proactive approach aligns with the 2015 proposal to set up a permanent B20 anti-corruption Secretariat (sometimes referred to as an "Integrity Coalition") that remains linked to the B20 process but is not completely subsumed into each B20 cycle. This type of structure and set-up would allow for a more proactive and impact-driven engagement.

8 Conclusion

The assessment of the first seven cycles shows that the B20 anti-corruption workstream is a continuously evolving process in itself. It is still developing its working relationship with the

⁹⁹ [B20 Integrity & Compliance Argentina](#).

G20 anti-corruption platform, the ACWG. And while at the G20 level, the ACWG has over the years developed its own reporting structures that allow for a certain level of continuity and accountability, the work of the B20 anti-corruption stream concludes with the presentation of its proposed recommendation within each cycle. There is no overarching structure that connects the B20 cycles.

However, the ongoing assessment and review during the first seven cycles enable a certain level of continuity while also revealing ways to work towards maximising the efficiency of the process and the uptake of B20 anti-corruption recommendations. The takeaways and lessons learned from previous cycles enable the B20 to identify windows of opportunity to build and strengthen the relationship with the ACWG and to adapt its working mode to optimise and maximise exposure and uptake by the G20.

As the B20 internal effectiveness assessments in 2013 during the Russian cycle and in 2017 after the German cycle show, taking stock and assessing the effectiveness in uptake not only allows to better target the B20 approach in upcoming cycles. It is also an important tool to demonstrate impact to engaged businesses and to strengthen sustainable engagement in the B20 process from the business community.

The 2010–2017 B20 cycles that are summarised and analysed in this baseline report will be followed up by an assessment of the B20 anti-corruption cycles from 2018 through to 2020. The G20/B20 cycles since 2017 have not yet been assessed under any of the three methodologies described in this report. In the follow-up report, the Argentina (2018), Japan (2019) and Saudi Arabia (2020) processes will be assessed based on a methodology that builds on the existing assessment tools, while also taking into account the unique and specific working modes and channels of communication between the B20 and G20 anti-corruption workstreams.

9 Annex I

Below is an overview of B20 anti-corruption recommendations and G20 anti-corruption commitments made over the last 10 G20/B20 cycles (2010 to 2019), juxtaposed to facilitate comparison. Although the rest of this paper only covers 2010–2017, the inclusion of 2018 and 2019 may be useful for readers seeking more recent information.

On the B20 side, it includes the relevant overarching B20 policy recommendations and/or where relevant recommendations from the B20 anti-corruption workstream/taskforce reports.

For the G20, the table includes the anti-corruption commitments as found in the G20 Leaders Declaration/Communiqué, plus mentions of the private sector in the G20 ACWG bi-annual Action Plans.

9.1 2010: South Korea

B20 taskforce or workstream: G20 Seoul Business Summit

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>Seoul G20 Business Summit Joint Statement by Participating Companies</p> <p>No anti-corruption recommendations were made to the G20 at the Seoul Business Summit.</p>	<p>G20 2010 Seoul Summit, Leaders' Declaration and Framework for Strong, Sustainable and Balanced Growth</p> <p>13. To provide broader, forward-looking leadership in the post-crisis economy, we will also continue our work to prevent and tackle corruption through our Anti-Corruption Action Plan; rationalize and phase-out over the medium term inefficient fossil fuel subsidies; mitigate excessive fossil fuel price volatility; safeguard the global marine environment; and combat the challenges of global climate change.</p> <p>Framework for Strong, Sustainable and Balanced Growth Anti-Corruption</p> <p>69. Recognizing that corruption is a severe impediment to economic growth and development, we endorse the G20 Anti-Corruption Action Plan (Annex III). Building on previous declarations, and cognizant of our role as leaders of major trading nations, we recognize a special responsibility to prevent and tackle corruption and commit to supporting a common approach to building an effective global anti-corruption regime.</p> <p>70. In this regard, we will lead by example in key areas as detailed in the Anti-Corruption Action Plan, including: to accede or ratify and effectively implement the UN Convention against Corruption and promote a transparent and inclusive review process; adopt and enforce laws against the bribery of foreign public officials; prevent access of corrupt officials to the global financial system; consider a cooperative framework for the denial of entry to corrupt officials, extradition, and asset recovery; protect whistleblowers; safeguard anticorruption bodies. We are also committed to undertake a dedicated effort to encourage public-private partnerships to tackle corruption and to engage the private sector in the fight against corruption, with a view to promoting propriety, integrity and transparency in the conduct of business affairs, as well as in the public sector.</p> <p>71. The G20 will hold itself accountable for its commitments. Beyond our participation in existing mechanisms of peer review for international anti-corruption standards, we mandate the Anti-Corruption Working Group to submit annual reports on the</p>

	<p>implementation of our commitments to future Summits for the duration of the Anti-Corruption Action Plan.</p> <p>G20 ACWG Action Plan 2011-2012</p> <p>Business is a stakeholder in anti-corruption efforts, and its engagement on the issue is essential. The G20 will encourage public-private partnerships and offers a significant opportunity for developing and implementing initiatives that engage the private sector in the global fight against corruption. To this end, the G20 will:</p> <ul style="list-style-type: none"> strengthen corporate efforts, by extending an invitation to the private sector to meet during the French Presidency, to examine best practices and other forms of business engagement in combating corruption and to consider how G20 corporations could share their on-going efforts. combat corruption in specific sectors, by working with industry and civil society to identify vulnerabilities in commercial transactions in a subset of specific sectors, with the goal of recommending multi-stakeholder initiatives for improvements in propriety, integrity and transparency by the end of 2011, for consideration by Leaders and implementation thereafter as appropriate.
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9.2 2011: France

B20 taskforce or workstream: B20 Cannes Business Summit

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>Cannes B20 Business Summit report 2011</p> <p>Anti-Corruption: Corruption is an intolerable impediment to the efficiency of the global economy, to fair competition among companies of all sizes and nationalities, and to sustainable global development. Such illicit behavior is an obvious cause of distortion of competitive markets as well as the hampering of economic growth and efforts to eradicate poverty. We have identified four initiatives that can move the fight against corruption forward on a global basis. They are:</p> <ul style="list-style-type: none"> Create a G20/B20 joint platform, supported by an explicit business commitment and accountable to G20 and B20 leaders, to maintain an ongoing, multiyear dialogue. Building on the Seoul Action Plan, G20 governments should 1) accelerate their commitment to ratify, enforce and monitor 	<p>G20 2011 Cannes Summit Final Communiqué of the Leaders</p> <p>Intensifying our Fight against Corruption: 29. We have made significant progress in implementing the Action Plan on combating corruption, promoting market integrity and supporting a clean business environment. We underline the need for swift implementation of a strong international legislative framework, the adoption of national measures to prevent and combat corruption and foreign bribery, the strengthening of international cooperation in fighting corruption and the development of joint initiatives between the public and the private sector.</p> <p>Cannes Summit Final Declaration Intensifying our Fight against Corruption</p> <p>85. Corruption is a major impediment to economic growth and development. We have made significant progress to implement the G20 Anti-Corruption Action Plan. We endorse our experts' report, annexed to this Declaration, which outlines the major steps taken both by individual countries and the G20 collectively, and sets out further actions required to ensure that G20 countries continue to make positive progress against the Action Plan. In this context:</p>

<p>the implementation of the OECD and UN conventions on anticorruption; 2) support negotiations within the WTO for a multilateral agreement on standards for procedures and transparency in government procurement; 3) incentivize enterprises to establish effective policies and procedures to prevent corruption, and 4) recognize public bodies and officials that demonstrate leadership in fighting corruption.</p> <ul style="list-style-type: none"> • Business must also play its part. The B20 undertakes to identify and launch appropriate collective action processes to address problems linked to specific country or regional contexts and industry sectors. The B20 also will promote the sharing of best practices, training materials and resources: 1) among the various sector-specific initiatives; 2) with public sector entities implementing integrity programs to combat the demand side of corruption; and 3) with small- and medium-sized entities lacking the experience and resources of multinational companies. • Business and government must work together to raise awareness of the costs and risks of corruption, especially by promoting education on ethics and business integrity at all level of public and private education. 	<p>86. We welcome the ratification by India of the United Nations Convention against Corruption (UNCAC). We also welcome the decision made by Russia to join the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. We commit to accelerate the ratification and implementation of UNCAC and to have a more active engagement within the OECD Working Group on Bribery on a voluntary basis. We further commend the member countries which are taking steps in the spirit of the Action Plan;</p> <ul style="list-style-type: none"> - We commend the first reviews on the implementation of UNCAC. We commit to lead by example in ensuring the transparency and inclusivity of UNCAC reviews by considering the voluntary options in accordance with the Terms of Reference of the Mechanism, notably with regards to the participation of civil society and transparency; - We support the work of the Financial Action Task Force (FATF) to continue to identify and engage those jurisdictions with strategic Anti-Money Laundering/Counter-Financing of Terrorism (AML/CFT) deficiencies and update and implement the FATF standards calling for transparency of cross-border wires, beneficial ownership, customer due diligence and enhanced due diligence; - We agree on a work program which includes a framework for asset recovery, building on the World Bank's Stolen Asset Recovery (StAR) Initiative, whistle-blowers' protection, denial of entry to corrupt officials and public sector transparency, including fair and transparent public procurement, with concrete results by the end of 2012. <p>87. We welcome initiatives aimed at increasing transparency in the relationship between private sector and government, including voluntary participation in the Extractive Industries Transparency Initiative (EITI). We also acknowledge the steps taken by some of us to request companies in the extractive industry to publish what they pay in countries of operation and to support the Construction Sector Transparency Initiative (CoST).</p> <p>88. We commend the enhanced engagement of the private sector to fight against corruption. We welcome the commitments by the B20 to build on our Action Plan and urge them to take concrete action.</p> <p>89. We hold ourselves accountable for our commitments and will review progress at our next Summit.</p>
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9.3 2012: Mexico

B20 taskforce or workstream: Improving Transparency and Anti-Corruption. Other task forces were: Food Security; Green Growth; Employment; Trade & Investment; ICT and Innovation; Financing for Growth and Development.

<p>B20 anti-corruption recommendations/workstream policy report</p>	<p>G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan</p>
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[Summary B20 2012 Improving Transparency and Anti-Corruption Taskforce Concrete Actions](#)

B20 key priorities for G20 governments

1. B20 strongly urges the establishment of a permanent G20 Working Group on AC through future G20 presidencies
2. G20 should streamline their public procurement process to address the demand-side of bribery and to encourage and further incentivize business against corruption
3. Piloting possible private sector engagement processes and mechanisms in the UNCAC review process and beyond
4. Other government recommendations not included above:
 - a. G20 should endorse common principles on asset disclosure for public officials
 - b. Compendium of best practices on the fight against solicitation\common principles on enforcement of foreign bribery legislation
 - c. G20 governments should introduce measures asking companies, including SOEs to certify that they have a robust anticorruption compliance program in place as an eligibility requirement to participate in public tenders and to benefit from export financing
 - d. Governments should address issues related to article 4.3 of OECD ABC and articles 48 and 49 of UNCAC concerning multiple jurisdictions, law enforcement cooperation, joint investigations and coordinated sanctions and should evaluate the need to revise national rules

New list of Recommendations

1. Ensure transparency in public procurement
 - a. Governments commit to conduct independent assessments of their procurement systems, for example through OECD procurement reviews or other international mechanisms;
 - b. Governments commit to put in place effective mechanisms to require public officials in vulnerable positions to disclose relevant assets
 - c. Business commit to elaborate a detailed diagnostic of risks in public procurement cycles, including in the pre-tendering and execution phase
 - d. Business commits to set up and regularly update ethics and compliance programs, taking into account international and industry standards;
 - e. Governments and business commit to enter integrity pacts, consistently with anti-trust regulations and to develop specific joint sectoral initiatives

[2012 Los Cabos G20 Leaders Declaration](#)

Intensifying the fight against corruption

77. Corruption impedes economic growth, threatens the integrity of markets, undermines fair competition, distorts resource allocation, destroys public trust and undermines the rule of law. We call on all relevant stakeholders to play an active role in fighting corruption.

78. Closing the implementation and enforcement gap remains an important priority, and we continue to make significant progress towards the full implementation of the Seoul G20 Anti-Corruption Action Plan, and the commitments made in the Cannes Monitoring Report. We reiterate our commitment to the ratification and full implementation of the United Nations Convention against Corruption (UNCAC), and to more active engagement with the OECD working group on bribery on a voluntary basis. We welcome continuing engagement from the B20 in the fight against corruption and, in accordance with the Terms of Reference of the review mechanism, will involve the private sector and civil society in the UNCAC review process on a voluntary basis. We endorse today the G20 Anti-Corruption Working Group principles for denial of entry to our countries of corrupt officials, and those who corrupt them, and will continue to develop frameworks for cooperation. We also endorse the Working Group's principles for financial and asset disclosure systems for relevant officials to prevent, identify and appropriately manage conflicts of interest.

79. We commit to enforcing anti-corruption legislation, and we will pursue those who receive and solicit bribes as well as those who pay them in line with our countries' legislation. To help facilitate international cooperation among G20 and non-G20 governments in their investigation and prosecution of corruption, we will publish a guide on Mutual Legal Assistance from G20 countries, as well as information on tracing assets in G20 jurisdictions. We renew our commitment to deny safe haven to the proceeds of corruption and to the recovery and restitution of stolen assets. We extend the mandate of the Anti-Corruption Working Group for two years to the end of 2014 and request the Working Group to prepare a comprehensive action plan, as well as a second

<ol style="list-style-type: none"> 2. <ol style="list-style-type: none"> a. Collective Action Initiatives: Invite all private sector participants to join existing Collective Action initiatives in their respective sectors/industries or initiate multi-sector initiatives in their respective countries of origin and all countries in which they operate b. Documentation of private sector-led Collective Action initiatives: Document, measure and share the existing private sector-led Collective action initiatives through a central hub for reference to all countries/sectors c. Adoption of Codes of Conduct and Other Tools: Communicate and foster the adoption of codes of conduct and other tools available to private sector participants in order to ingrain anti-corruption in each organization's corporate culture d. High-level Reporting Mechanisms: Continue establishing appropriate forms of high-level reporting mechanisms to address allegations of solicitation of bribes by government officials e. Public and private sector partnerships: Generate public sector and private sector partnerships to address the need to collaborate in anti-corruption initiatives 3. Engage the Private Sector to Participate in Peer Reviews Required by the UNCAC and Continue Consultation with the OECD Working Group on Bribery in the Context of its Monitoring Mechanism 4. Create Business Programs, Including Training, to Encourage Cross-fertilization within the Private Sector and Between Public and Private, with a Specific Focus on Capacity-building 5. Encourage the Adoption of Business Codes of Conduct—Specific Focus on SMEs 6. Strengthen the Legal and Regulatory Framework on Anti-Corruption. 	<p>Working Group Monitoring Report, both to be presented for consideration and adoption by Sherpas by the end of 2012.</p> <p>80. We extend the mandate of the Anti-Corruption Working Group for two years to the end of 2014 and request the Working Group to prepare a comprehensive action plan, as well as a second Working Group Monitoring Report, both to be presented for consideration and adoption by Sherpas by the end of 2012.</p> <p>G20 ACWG Action Plan 2013-2014 on the private sector:</p> <p>(13) Business is an important stakeholder in anti-corruption efforts and transparency within the private sector is critical. We will explore the potential and effectiveness of integrity pacts between business and governments and other mechanisms for sharing anticorruption expertise among businesses and governments and we will work with the B20 to achieve this. We call on representatives from the business community to develop capacity building programmes tailored to small- and medium-sized enterprises, including through supply chains and to report back on progress in early 2014.</p> <p>(14) We reiterate our support for public-private partnerships to combat corruption in specific sectors such as extractives industries and construction and our support for or implementation of initiatives such as EITI and CoST. We will share experiences and best practices from existing sectoral initiatives and carry out a risk-mapping analysis of those areas and sectors at greatest risk, including considering sectors identified by the B20 as a priority, as well as, where appropriate, cross-cutting issues such as the awarding of rights, licences or other similar benefits.</p>
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9.4 2013: Russia

B20 taskforce or workstream: Transparency and Anti-Corruption. Others: Investment and Infrastructure; Financial System – Restoring Confidence and Growth; Trade as a Growth Driver;

Innovation and Development as a Global Priority; Job Creation, Employment and Investments in Human Capital; G20-B20 Dialogue Efficiency.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>B20 Transparency and Anti-Corruption recommendations 2013</p> <p>Background to Recommendations:</p> <ul style="list-style-type: none"> • Recommendations restricted to two major concerns of the private sector: (1) how business can combat and resist the solicitation of bribes, especially when bidding in public tenders and 2) our ability, as companies, to guarantee the highest standards of integrity of our own employees and to build the capacity of our dealers, distributors and suppliers to aspire to similar standards • Combined with our recommendations to enhance the G20-B20 dialogue, to support the establishment of Anti-Corruption Centres of Excellence in each G20 country and to strengthen the role of the B20, the Collective Action Hub should become the centre of a wheel whose spokes will reach deep into every G20 country. • Number of successes – introduction in April 2013 of the first HLRM by the government of Colombia. <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Enhancing the dialogue between B20 and G20 and strengthening the role of B20 <ol style="list-style-type: none"> a. Recommend that B20... b. Involve private sector in UNCAC review mechanism c. Given important role of civil society in opposing corruption and the inclusion of anti-corruption in the C20 agenda, we recommend that the B20 TF should work closely with the C20 including through regular joint meetings of the G20 B20 and C20 starting from June 2013 2. Combating the solicitation of bribes <ol style="list-style-type: none"> a. We recommend that the G20 governments should include an agreement on transparency in government procurement in future rounds of global trade talks. b. We recommend that the G20 governments should benchmark their performance in government procurement when a new World Bank indicator is launched in 2013. c. We recommend that from 2013, the G20 governments should consider introducing a High Level Reporting Mechanism, and study the experience of countries which have already done so. 	<p>2013 St. Petersburg G20 Leaders Declaration</p> <p>Intensifying fight against corruption</p> <p>103. Corruption is a severe impediment to sustainable economic growth and poverty reduction and can threaten financial stability and the economy as a whole. Corruption is corrosive, destroying public trust, distorting the allocation of resources and undermining the rule of law. To provide a better understanding of the factors constraining the economic potential of countries affected by corruption, we make available the Issues Paper on Anti- Corruption and Economic Growth and encourage the OECD, in collaboration with the World Bank to continue work in this area.</p> <p>104. As a group of the world's largest economies, the G20 has the potential to create unstoppable momentum towards a global culture of intolerance towards corruption. We will redouble our efforts to achieve this goal, in particular by enhancing transparency and closing implementation and enforcement gaps. In this regard:</p> <p>105. We warmly welcome the ratification by Saudi Arabia of the United Nations Convention against Corruption (UNCAC). We will continue to encourage all G20 member- countries to ratify and implement the UNCAC, and encourage engagement with the OECD Working Group on Bribery with a view to explore possible adherence to the OECD Anti-bribery Convention as appropriate. We commit to lead by example by enhancing the transparency and inclusivity of our UNCAC reviews by making use on a voluntary basis of the options in the Terms of Reference to the UNCAC Review Mechanism.</p> <p>106. We reiterate our determination to combat domestic and foreign bribery, as well as solicitation, and endorse the non-binding Guiding Principles on Enforcement of the Foreign Bribery Offence and the Guiding Principles to Combat Solicitation.</p>

- d. We recommend that the G20 governments should encourage and support fair and transparent procurement practices outside the G20 countries as a part of their external trade and development programmes.
- 3. Training and capacity building in companies, SMEs, and of public officials
 - a. ...from 2013, G20 governments and B20 companies should support the development of courses in business ethics and responsible business practices in higher education establishments, business and law schools, corporate universities and training centres.
 - b. We recommend that, from 2013, B20 companies and business organizations should regularly exchange best practices in devising training for SMEs in their supply chains.
 - c. ...G20 governments should encourage Export Credit Agencies in their countries to provide anti-corruption training programmes for beneficiary companies.
 - d. ...G20 governments should encourage International Financial Institutions, including development banks, to make their loans, investments, guarantee and provision of other funding conditional on the beneficiaries of their financing having in place effective internal controls, ethical standards, and compliance and anti-corruption programmes.
 - e. ..G20 governments should implement annual training programmes for public officials on latest developments in national and international legislation. They should invite B20 companies and business associations, where appropriate, to support government training programmes by sharing their experience of corporate compliance programmes.
- 4. Encouraging Collective Action and Anti-Corruption globally in each G20 country
 - a. We recommend that the G20 governments and B20 companies should continue to support the establishment, by the end of 2013, of a Collective Action Hub to share best practices throughout the G20 countries and beyond.
 - b. We recommend that, throughout 2013 and 2014, each G20 government, in collaboration with the local business communities and with the support of the B20 companies, should set up or support independent and properly funded Anti-Corruption

107. We will continue to develop and strengthen frameworks to facilitate cooperation among G20 member-countries in the fight against corruption. We have established a G20 network to share information and cooperate in order to deny entry to our countries by corrupt officials and those who corrupt them, in accordance with national laws and regulations. To enhance international collaboration in the investigation and prosecution of corruption offences, as well as in the recovery of proceeds of corruption, we endorse the High-Level Principles on Mutual Legal Assistance.

108. We renew our commitment to ensure the independence of the judiciary, as well as to share best practices and enforce legislation to protect whistleblowers, ensure the effectiveness of anti-corruption authorities free from any undue influence, and promote the integrity of public officials.

109. We also place a high value on implementing and raising awareness regarding effective anticorruption education programs to build and reinforce a culture of intolerance towards corruption.

110. We express support for the FATF's ongoing work in the anti-corruption field. Leveraging anti-money laundering (AML)/countering the financing of terrorism (CFT) measures to fight corruption will remain a significant area of growing cooperation between anti-corruption experts of the G20 and FATF as well as increasing cooperation against tax crimes, addressing the risks posed by tax havens.

111. We will pay special attention to combating corruption in high-risk sectors. We commend the efforts to fight corruption in organization of sporting, cultural and other major international events and welcome the initiative to develop a Global Alliance for Integrity in Sports. We also commit to promote integrity in buy-and-sell relations between the public and private sectors, including public procurement and privatization of state-owned property. We welcome initiatives aimed at increasing extractive transparency, including voluntary participation in the Extractives Industries Transparency Initiative (EITI) and take note of the progress. We ask the G20 Anti-Corruption Working Group to further follow this issue.

<p>Centres of Excellence in each G20 country, which will act as the local counterparts for both the Collective Action Hub and the B20 Task Force. The Centres of excellence could for example work with the hub to analyse, share and promote effective Collective Action strategies and initiatives, and with the B20 Task Force to track and measure progress in the implementation of B20 recommendations and decisions.</p> <p>Conclusion</p> <p>We are ready to act now: The Collective Action Hub which we hope will be established this year will be a major repository of new approaches and techniques in how to avoid and resist corruption, the centre of a wheel whose spokes will reach deep into every G20 country. In our recommendations, those spokes will be represented by Anti-Corruption Centres of Excellence, which will track and measure progress in implementation of B20 recommendations and decisions, and which will promote best practices in corporate compliance and collective action.</p> <p>Reporting format: our proposal is that the Anti-corruption Centres of Excellence would monitor, measure and report on progress of implementation of B20 recommendations and decisions. This could be organised to coincide with the biannual meetings of the G20 Anti-Corruption Working Group and B20 Task Force. The reporting could be coordinated by the B20 permanent expert group and/or the Collective Action Hub.</p>	<p>112. We recognize that a culture of intolerance towards corruption will only be achieved if we work in partnership with business and civil society. We commit to maintain and build on the enhanced dialogue between the G20 Anti-Corruption Working Group and the B20 and C20, and have taken note of the recommendations of these two groups. In particular, we welcome the business community's initiatives to enhance anti-corruption collective actions and to develop institutional arrangements to promote anti-corruption compliance in the private sector.</p> <p>113. We welcome the progress which the G20 Anti-Corruption Working Group is making to implement its 2013-14 Action Plan and commend its Progress Report which is annexed to this statement. Recognizing that the fight against corruption will require sustained, concerted effort, we endorse the St. Petersburg Strategic Framework to guide the work of the ACWG and provide a foundation for the Action Plans. In 2014, we will advance our existing commitments and consider further G20 actions on the global fight against corruption.</p>
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9.5 2014: Australia

B20 taskforce or workstream: Anti-Corruption Working Group. Anti-corruption also cut across the other taskforces: Trade; Infrastructure & Investment; Financing Growth; Human Capital.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>B20 Anti-Corruption Working Group Report to the B20 Office and Taskforce Chairs</p> <p>Overall recommendations:</p> <p>1. G20 Governments agree to harmonise laws related to anti-corruption that incentivise companies to build best practice compliance programs and self-report compliance breaches; and:</p>	<p>G20 Leaders' Communiqué Brisbane Summit, 2014</p> <p>Building a stronger, more resilient global economy:</p> <p>14. We endorse the 2015-16 G20 Anti-Corruption Action Plan that will support growth and resilience. Our actions are building cooperation and networks, including to enhance mutual legal</p>

a. form a working group consisting of business and enforcement agencies to map jurisdictional differences, propose regulatory change that recognises anti-corruption programs and self-reporting, and monitor progress.

2. G20 Governments endorse the G8 core principles around transparency of ownership and control of companies and legal arrangements.

3. G20 governments to commit to enforcing the existing OECD Anti-Bribery Convention and the UN Convention against Corruption, and:

1. take steps to install and/or build capacity for high level reporting mechanisms in at-risk public offices where any party can report violations of anti-bribery and anti-corruption laws;
2. strengthen cooperation between law enforcement agencies and national HLRMs and appoint a lead agency where multiple jurisdictions are involved; and
3. make information on enforcement procedures and actions publicly available.

Trade taskforce recommendations:

4. G20 governments to commit to begin immediate implementation the trade facilitation agreement, with priority given to:

- a. transparency of fees, charges, procedures, timeframes and regulations; and
- b. implementation of one-stop and automated customs procedures.

5. G20 governments ensure that all new trade agreements include specific anti-corruption clauses, requiring signatories to uphold the UN Convention against Corruption and OECD Anti-Bribery Convention, and install High Level Reporting Mechanisms (3.a).

Human capital taskforce and recommendations:

1. G20 Governments agree to harmonise laws related to anti-corruption that incentivise companies to build best practice compliance programs and self-report compliance breaches; and

a. form a working group consisting of business and enforcement agencies to map jurisdictional differences, propose regulatory change that recognises anti-corruption programs and self reporting, and monitor progress.

Infrastructure & Investment Taskforce recommendations:

6. G20 governments apply best practice procurement processes in all large and/or publicly significant infrastructure projects:

assistance, recovery of the proceeds of corruption and denial of safe haven to corrupt officials. We commit to improve the transparency of the public and private sectors, and of beneficial ownership by implementing the G20 High-Level Principles on Beneficial Ownership Transparency.

[G20 ACWG Action Plan 2015-2016 on the private sector](#)

Private sector transparency and integrity: G20 countries recognise that they must continue to work closely with business and civil society to reduce corruption. For businesses, bribery and other forms of corruption can have a serious impact on their commercial viability, including by distorting competition, increasing the costs of cross-border transactions, and threatening the stability of their trading and investment environment. G20 countries recognise that governments cannot fight corruption alone, and the private sector is an essential partner in helping us to achieve our anti-corruption goals. G20 countries commit to continuing to work with the private sector and civil society to combat corruption, including by developing anti-corruption education and training for business, with a particular focus on SMEs, and by examining best practices for encouraging businesses to implement robust compliance programs and self-report breaches of corruption laws.

<p>1. projects must comply with recognised best practice, either those developed through the G20 ACWG, or one of the World Bank, UNODC or OECD guidelines; and</p> <p>2. High Level Reporting Mechanisms should be installed or developed in relation to procurement and execution of public infrastructure projects (3.a).</p> <p>7. G20 governments incentivise companies bidding for large and/or publicly significant infrastructure projects that have in place best practice anti-corruption compliance programs. Companies that can demonstrate this capacity should receive awarded bonus points and positive recognition in the bidding process. Governments should also:</p> <p>1. support verification of the quality of these compliance programs by recognised professional bodies or accredited experts;</p> <p>2. consider entering into integrity pacts and/or independent monitoring over the life of the project; and</p> <p>3. encourage knowledge sharing and capacity building initiatives amongst businesses to develop compliance programs throughout their supply chain.</p> <p>8. IMITs should require signatories to enforce their anti-corruption and transparency obligations, undertake capacity building for public officials, and install high level reporting mechanisms to govern the treaty.</p> <p>Financing Growth Taskforce</p> <p>2. G20 governments endorse the G8 core principles around transparency of ownership and control of companies and legal arrangements.</p>	
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9.6 2015: Turkey

B20 taskforce or workstream: Anti-Corruption (AC). Others: Financing Growth; Trade (T); Infrastructure and Investment (I&I); Employment (E); SMEs and Entrepreneurship Taskforce.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>B20 Anti-Corruption Taskforce Policy Paper 2015</p> <p>RECOMMENDATION 1: Implement G20 principles related to transparency and ownership.</p> <p>Value: Increased transparency and means to recovery of stolen assets.</p>	<p>G20 Leaders' Communiqué Antalya Summit, 2015</p> <p>Enhancing resilience:</p> <p>16. In support of our growth and resilience agenda, we remain</p>

<p>Target: Achieve adherence to the G20 principles across the member countries.</p> <p>Action: Benchmark how companies meet beneficial ownership standards and use leading practices to develop guidance on how they can meet the G20 high-level principles.</p> <p>RECOMMENDATION 2: Reduce corruption and improve efficiency in trade by moving towards a comprehensive digital environment for customs and cross-border systems through public-private collaboration in all G20 countries within five years.</p> <p>Value: Efficient cross-border trade and increased foreign direct investment.</p> <p>Target: G20 member countries adopting digital systems within five years.</p> <p>Action:</p> <ul style="list-style-type: none"> • Prepare a comparative performance report on customs automation in G20 countries. • Create a case for change for customs brokers. • Prepare a customs-specific collective-action toolkit for use by brokers. <p>RECOMMENDATION 3: Commit to encourage enforcement of the OECD Anti-Bribery Convention and UN Convention against Corruption.</p> <p>Value: Improvement of clarity for business regarding expected standards of conduct and simplification of compliance requirements</p> <p>Target: Japan to sign the OECD Convention; 36 states to sign UNCAC</p> <p>Action: Encourage the governments of India and Indonesia to adopt OECD Anti-Bribery Convention.</p> <p>RECOMMENDATION 4: Promote integrity in public procurement by incentivizing business-compliance programs, instituting digital systems, and continue to develop the concept of high-level reporting mechanisms (HLRMs).</p> <p>Value: By improving the efficacy of the procurement cycle, ensure better service delivery and use of public money, leading to the betterment of the overall investment climate in countries.</p> <p>Target: Adoption of different public procurement mechanisms across the G20 countries.</p> <p>Action:</p> <ul style="list-style-type: none"> • Develop guidance and models to support the development of and incentivize effective anti-corruption compliance programs. 	<p>committed to building a global culture of intolerance towards corruption through effectively implementing the 2015-2016 G20 Anti-Corruption Action Plan. We endorse the G20 High-Level Principles on Integrity and Transparency in the Private Sector which will help our companies comply with global standards on ethics and anti-corruption. Ensuring the integrity and transparency of our public sectors is essential. In this regard, we endorse the G20 Anti-Corruption Open Data Principles and the G20 Principles for Promoting Integrity in Public Procurement, and we welcome the ongoing work on asset disclosure frameworks. We will further work to strengthen international cooperation, including where appropriate and consistent with domestic legal systems, on civil and administrative procedures, as an important tool to effectively combat bribery and to support asset recovery and the denial of safe haven to corrupt officials and those who corrupt them. We welcome the publication of our Implementation Plans on beneficial ownership transparency and will continue our efforts in this regard.</p>
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<ul style="list-style-type: none"> • Develop and encourage the implementation of e-procurement systems by G20 members. • Continue developing the concept of High-Level Reporting Mechanisms (HLRMs) and promote it among G20 countries. <p>RECOMMENDATION 5: Provide SMEs in G20 countries with practical means to strengthen their resistance to corruption and enable them to begin to</p> <p>Value: Strengthen SME resistance to corruption through education and raising awareness.</p> <p>Target: Dissemination of the toolkit to SMEs in G20 countries by the next B20 conference.</p> <p>Action: Produce an anti-corruption toolkit for SMEs, including a training module.</p>	
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9.7 2016: China

B20 taskforce or workstream: No B20 Anti-Corruption Task Force. Instead, an Anti-Corruption Policy Paper of the B20 Anti-Corruption Forum. Taskforces: Trade and Investment; Infrastructure; Employment; Financing Growth; SME Development.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>B20 2016, China, anti-corruption policy paper:</p> <p>Strengthening intergovernmental cooperation against corruption, and supporting the building of capacity for stronger anti-corruption compliance.</p> <p>Recommendation 1: Encourage stronger international anti-corruption cooperation to foster sustainable growth.</p> <p>Actions</p> <ul style="list-style-type: none"> • Encourage stronger international cooperation in the enforcement of anti-corruption laws, including those that have been adopted in accordance with international conventions and related G20 High-Level Principles. • Continue to encourage more dialogue between government and business in an effort to promote 	<p>G20 Leaders' Communiqué Hangzhou Summit 2016</p> <p>More Effective and Efficient Global Economic and Financial Governance</p> <p>20. Financial transparency and effective implementation of the standards on transparency by all, in particular with regard to the beneficial ownership of legal persons and legal arrangements, is vital to protecting the integrity of the international financial system, and to preventing misuse of these entities and arrangements for corruption, tax evasion, terrorist financing and money laundering. We call on the FATF and the Global Forum to make initial proposals by the Finance Ministers and Central Bank Governors Meeting in October on ways to improve the implementation of the international standards on transparency, including on the availability of beneficial ownership information of legal persons and legal arrangements, and its international exchange.</p>

better understanding of best practice in anti-corruption – both in the public and private sectors.

Recommendation 2: Promote a more transparent environment for business in an effort to bolster competition.

Proposed Actions:

- Work together with business to promote beneficial ownership transparency and ensure better adherence among the private sector to the new policies and regulations.
- Promote integrity in public procurement by adopting transparent e-procurement systems and encouraging best practice in effective corporate compliance programs.
- Support transparent electronic customs clearance pilot programs to reduce the risk of corruption and promote trade.
- Ensure that Whistleblower protection laws are in place and effective, and consider introducing provisions to reward Whistleblowers for reporting corruption and other wrongdoing.

Recommendation 3: Support capacity-building to enable stronger anti-corruption compliance efforts.

In summary, both businesses and governments need to implement training and compliance programs that build capacity and recognize ethical behaviour within their work force. Responsible employers are already doing this, but inconsistent regulation among G20 countries complicates the compliance process and leads to higher costs.

- Bolster incentives for companies to both build best-practice compliance programs and self-report compliance breaches.
- Provide companies, SMEs in particular, with training programs and toolkits to identify and address third-party risk management and compliance.

22. Recognizing the detrimental effects of corruption and illicit finance flows on equitable allocation of public resources, sustainable economic growth, the integrity of the global financial system and the rule of law, we will reinforce the G20's efforts to enhance international cooperation against corruption, while fully respecting international law, human rights and the rule of law as well as the sovereignty of each country. We endorse the G20 High Level Principles on Cooperation on Persons Sought for Corruption and Asset Recovery and welcome Chinese initiative to establish in China a Research Center on International Cooperation Regarding Persons Sought for Corruption and Asset Recovery in G20 Member States, which will be operated in line with international norms. We commit to continue the G20 Denial of Entry Experts Network. Consistent with our national legal systems, we will work on cross-border cooperation and information sharing between law enforcement and anti-corruption agencies and judicial authorities. We call for ratification by all the G20 members of the United Nations Convention Against Corruption and welcome the launch of the second cycle of its review mechanism. We will endeavor to apply effectively the extradition, mutual legal assistance and asset recovery provisions of the above Convention and other applicable international conventions. We endorse the 2017-2018 G20 Anti-Corruption Action Plan to improve public and private sector transparency and integrity, implementing our stance of zero tolerance against corruption, zero loopholes in our institutions and zero barriers in our actions. We ask the Anti-Corruption Working Group to develop an implementation plan before the end of 2016 as a flexible framework to carry this work forward with renewed high-level attention and urgency. We also welcome outcomes of the London Anti-Corruption Summit in May 2016 and the OECD Ministerial Meeting in March 2016.

[G20 Anti-Corruption Action Plan 2017-2018 on the private sector](#)

Private sector integrity and transparency: We will continue to work closely with business and civil society in tackling corruption. The G20 will explore means of promoting a culture of integrity and supporting private sector anti-corruption initiatives, including for small and medium sized enterprises (SMEs) and in the nonfinancial professional services sector. We will encourage stronger partnerships, consistent with national law, between governments, anti-corruption authorities, regulators, law enforcement, financial intelligence units (FIUs), business and civil society.

9.8 2017: Germany

B20 taskforce or workstream: Cross-thematic Group on Responsible Business Conduct and Anti-Corruption. Others: Cross-thematic Group on SMEs and Taskforces on Trade and Investment; Energy, Climate and Resource Efficiency; Financing Growth and Infrastructure; Digitalization and Employment and Education.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>Shaping an Interconnected World. 2017 B20 policy recommendations</p> <p>Assuming Responsibility</p> <p>Recommendation 18: Establishing Beneficial Ownership Transparency – G20 members should increase their efforts to implement beneficial ownership transparency so that risks related to the ultimate owner(s) can be identified.</p> <p>Recommendation 19: Recognize Compliance Efforts – G20 members should be supportive of a company's proactive engagement by providing positive recognition of effective anti-corruption and compliance systems.</p> <p>Recommendation 20: Enhance Responsible Business Conduct in Infrastructure Projects – G20 members should increase transparency and accountability at all stages of the project cycle in order to mitigate the risk of corruption and increase efficiency.</p> <p>B20 Cross-Thematic Group responsible business conduct & anti-corruption Policy paper</p> <p>Promoting Integrity by Creating Opportunities for Responsible Businesses</p> <p>Recommendation 1: Establish Beneficial Ownership Transparency</p> <p>G20 members should increase their efforts to implement beneficial ownership transparency so that risks related to the ultimate owner(s) can be identified.</p> <p>Policy Action 1.1: Implement Beneficial Ownership Action Plans: G20 members should continue to lead the world in realizing beneficial ownership transparency by progressively implementing their action plans, raising global standards of data quality, exploring possibilities of connecting ownership information, and monitoring implementation progress.</p> <p>Policy Action 1.2: Ensure Availability of Information: G20 members should ensure easy access to, and efficient use of, beneficial ownership information</p>	<p>G20 Leaders' Declaration Hamburg 2017: Shaping an interconnected world</p> <p>Fighting Corruption: We remain committed to fighting corruption, including through practical international cooperation and technical assistance, and will continue to fully implement the G20 Anti-Corruption Action Plan 2017-18. We endorse four sets of High Level Principles aimed at fostering integrity in the public and private sector. By endorsing the High Level Principles on the Liability of Legal Persons, we commit to ensuring that not only individual perpetrators but also companies benefitting from corruption can be held liable. We commit to organising our public administrations to be more resilient against corruption. We will intensify our fight against corruption related to illegal trade in wildlife and wildlife products. Wildlife trafficking is a threat to the planet's biodiversity, economic development, and, among others, health and security, and is facilitated by high levels of corruption, which the G20 cannot tolerate. We also endorse the High Level Principles on Countering Corruption in Customs and publish a guide on requesting international cooperation in civil and administrative proceedings. We will continue our work to address integrity in sports and urge international sports organisations to intensify their fight against corruption by achieving the highest global integrity and anti-corruption standards. In this respect, we strive for a common understanding regarding corruption risks in bids to host</p>

by laying down clear rules governing access to information, and facilitating access for users through adequate measures and guidance.

Policy Action 1.3: Improve Exchange of Information: G20 members should facilitate the timely and effective exchange of beneficial ownership information at the national and international levels by defining or adopting data standards, providing guidance on legal set-ups in their country, and assisting developing countries in improving company registers.

Recommendation 2: Recognize Compliance Efforts: G20 members should be supportive of a company's proactive engagement by providing positive recognition of effective anti-corruption and compliance systems.

Policy Action 2.1: Acknowledge Adequate Measures: G20 members should recognize corporate compliance efforts when awarding public contracts and when imposing sanctions for breaches, and they should explore additional ways to acknowledge compliance efforts.

Policy Action 2.2: Encourage Self-disclosure and Self-cleaning: G20 members should be encouraged to harmonize their administrative and legal approaches to self-disclosure of compliance breaches, recognize effective and safe internal reporting, and support adequate self-cleaning.

Policy Action 2.3: Promote a Culture of Integrity: G20 should continue its commitment to building a global culture of intolerance towards corruption by reinforcing international cooperation, including the promotion of key international instruments, supporting the provision of capacity building and training for SMEs and in non-G20 countries, as well as improving education on anti-corruption and integrity in schools and universities.

Recommendation 3: Enhance Responsible Business Conduct in Infrastructure Projects

G20 members should increase transparency and accountability at all stages of the project cycle in order to mitigate the risk of corruption and increase efficiency.

Policy Action 3.1: Promote Responsible Government Conduct and Transparency: G20 members address the demand side of corruption and should ensure that public infrastructure projects are selected, planned, awarded and managed openly and accountably by promoting integrity in their own organizational structures and processes and by enhancing reporting about project risks, impacts, progress and costs.

Policy Action 3.2: Ensure Recognition of Responsible Businesses: G20 members should promote integrity among participating businesses by specifying requirements related to RBC, by encouraging coherent sustainability reporting, and by providing awareness training on anti-corruption and integrity.

major sport events. We are also committed to fighting corruption in contracts, including in the natural resources sector. We call for ratification and implementation by all G20 members of the UN Convention against Corruption and for a strong involvement in its review process.

<p>Policy Action 3.3: Support Collective Action: G20 members should promote Collective Action, that are initiatives between different businesses, and between businesses and the public sector, which foster integrity (such as Integrity Pacts and High Level Reporting Mechanisms). G20 should initiate a study that explores joint ways of fighting corruption and misconduct in infrastructure projects.</p>	
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9.9 2018: Argentina

B20 taskforce or workstream: Integrity & Compliance Taskforce. Others: Energy Resource Efficiency & Sustainability; Digital Economy & Industry 4.0; Trade & Investment; Financing Growth & Infrastructure; Employment & Education; Sustainable Food System; SMEs Development.

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>Integrity & Compliance Taskforce Policy Paper</p> <p>RECOMMENDATION 1: Enhance integrity and transparency in public procurement with a focus on infrastructure projects- To address the susceptibility to corruption of the public procurement process, this recommendation seeks to establish incentives for companies that adhere to high quality standards of integrity and compliance in the form of an eligibility requirement or affirmative competitive preference, ensure the participation of all stakeholders in the procurement process including maximizing the use of digitalization for this purpose, and promote collective action between the public and private sectors.</p> <p>Policy Action 1.1: Establish standardized incentives in public infrastructure procurement - G20 Members should establish and enforce incentives, in a way that is consistent with applicable procurement laws, for companies that adhere to high quality standards of integrity and compliance while providing the corresponding guidance and support to small and medium enterprises (SMEs) that would address barriers to their Involvement in public procurement.</p> <p>Policy Action 1.2: Ensure openness, fairness, transparency and accountability in the entire procurement cycle of public infrastructure- G20 Member Governments should ensure that all stakeholders are able to participate in the procurement process by enabling timely access to information that is provided in line with the G20</p>	<p>G20 2018 Buenos Aires Leaders' Declaration: Building consensus for fair and sustainable development</p> <p>29. We remain committed to prevent and fight corruption and lead by example. We agree on the new action plan 2019-2021 and endorse Principles on Preventing Corruption and Ensuring Integrity in State-Owned Enterprises and on Preventing and Managing Conflicts of Interest in the Public Sector. These will foster transparency and integrity in the public and private sectors. We will continue practical cooperation to fight corruption including in line with our G20 commitments. We will further explore the links between corruption and other economic crimes and ways to tackle them, including through cooperation on the return of persons sought for such offences and stolen assets, consistent with international obligations and domestic legal systems. We ask relevant international organizations to report back to us on those issues during the next presidency. We call for the effective implementation by all G20 countries of the UN Convention Against Corruption, including the criminalization of the bribery</p>

Anti-Corruption Open Data Principles and across the contracting process and contract cycle, identifying opportunities to employ technology in the procurement process, and streamlining procedures.

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

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

Policy Action 2.1: Ensure that SOEs commit and adhere to high quality standards of integrity and compliance, and assume accountability to stakeholders including reporting publicly on anti-corruption programs - G20 Members should demonstrate their continuing commitment to upholding integrity by (1) applying high quality standards of integrity and compliance within the public sector itself, and (ii) ensuring that SOEs and other companies-including SMEs-implement the same standards in line with international good practice and SOE anti-corruption guidelines, and publicly disclose such standards, particularly in connection with procurement and bidding processes.

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

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

Policy Action 3.1: Implement previously established beneficial ownership action plans and ensure consistency in beneficial ownership regulation

of foreign public officials, and note the work towards possible adherence to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

[G20 2019-2021 Anti-corruption Action Plan: Strengthen and promote integrity and transparency in the public and the private sector](#)

In the private sector: Building on the 2015 G20 High Level Principles on Private Sector Transparency and Integrity and on the 2017 G20 High Level Principles on the Liability of Legal Persons for Corruption, the ACWG will work 5 with the business community and civil society to further explore means of promoting a culture of integrity and transparency and supporting private sector anti-corruption initiatives, including for small and medium sized enterprises (SMEs). Considering the previous work by the ACWG regarding integrity and anticorruption, we will continue to share experiences and information, including on privatization processes.

<p>including for Designated Non-Financial Businesses and Professions (DNFBPs) and legal professional privilege- G20 Members should ensure the implementation of beneficial ownership action plans. making sure that regulation of beneficial ownership is consistent, to remove regulatory arbitrage and to aid businesses who need to provide and use this information from having to comply with differences across jurisdictions. This will ensure a level playing field for all and remove prospective barriers to entry.</p> <p>Policy Action 3.2: Mandate public registers of beneficial ownership that utilize globally consistent data classifications and verification of information- G20 Members should ensure access to beneficial ownership information by mandating public registers of beneficial ownership that utilize globally consistent data classifications and verification of Information. This will combat corruption and money laundering at all levels of government and corporate business dealings, as well as ensure transparency in public procurement across the supply chain.</p> <p>Policy Action 3.3: Develop rules for effective and efficient exchange of information- G20 Members should scale the availability and use of beneficial ownership information by creating rules to ensure its effective and efficient exchange. International standards on data privacy, data handling and data classification must be defined.</p>	
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9.10 2019: Japan

B20 taskforce or workstream: B20 Tokyo Summit

B20 anti-corruption recommendations/workstream policy report	G20 anti-corruption commitments / ACWG Anti-Corruption Action Plan
<p>B20 Tokyo Summit Joint Recommendations: Society 5.0 for SDGs</p> <p>Integrity for All</p> <p>Business underlines the importance of responsible business conduct and integrity at all levels. The fight against corruption must remain a priority and must be addressed in close dialogue among business, government, and society more broadly. Corruption undermines good governance, erodes trust and threatens investment. While reiterating the importance of transparent, fair governance and the rule of law, the B20 call on the G20 to implement the following actions as a prerequisite for growth in accordance with domestic laws and regulations.</p>	<p>G20 2019 Osaka Leaders' Declaration</p> <p>ANTI-CORRUPTION</p> <p>20. We remain committed to play a leading role in the global efforts to prevent and fight against corruption, as well as promoting integrity, by implementing the G20 Anti-Corruption Action Plan 2019-2021 while strengthening synergies among related international instruments and mechanisms. Recognizing that countering corruption is an important requisite for ensuring quality and reliability of infrastructure, we welcome the Compendium of Good Practices for Promoting Integrity and Transparency in Infrastructure Development as part of our further work. We endorse the High Level Principles for Effective Protection of Whistleblowers. We renew our commitment</p>

<p>(1) Address the demand side of bribery as well as the supply side through promoting collective actions such as the following;</p> <p>A) Anti-corruption declaration</p> <p>B) Integrity pact</p> <p>(2) Ensure transparency in public procurement with a focus on mid- and long-term projects.</p> <p>(3) Pursue the implementation of the requirements of the past G20 communiqués regarding beneficial ownership transparency.</p> <p>(4) Rebuild trust in institutions fostering the highest standards of ethics, integrity, and compliance for both demand and supply sides.</p> <p>(5) Enhance a culture of integrity through education and encourage business to adopt a compliance culture within their companies while governments take into consideration compliance efforts and voluntary self-disclosure by business.</p>	<p>to pursuing high level international cooperation between G20 members in the fight against corruption and to lead by example through the effective implementation of the United Nations Convention against Corruption, including its review process. We will intensify our efforts to combat foreign bribery and to ensure that each G20 country has a national law in force for criminalizing foreign bribery as soon as possible. We take note of the efforts towards adherence to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. We will continue practical cooperation to fight corruption and reaffirm our commitment to deny safe haven to persons sought for corruption and their proceeds of corruption consistent with our G20 and international commitments and our domestic legal systems and will work more closely on asset recovery cooperation. We look forward to the scoping paper on international cooperation dealing with serious economic offenders and recovery of stolen assets in relation to corruption to be prepared by relevant international organizations. In addition, we also welcome the work on the linkages between corruption and gender being undertaken by relevant international organizations.</p>
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