



Journal Alliance for Integrity



Journal

Alliance for
Integrity

In order to guarantee good readability, the consistent replacement of the generic masculine by the use of both the female and male forms was not applied. We kindly ask for your understanding.

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"Constantly we are asking ourselves, which topics and trends will **guide us in the future**. The era of digital transformation offers numerous opportunities and challenges for the **strengthening of transparency and integrity**."

Editorial



Noor Naqschbandi

Director, Alliance for Integrity

Dear readers,

The Alliance for Integrity has grown steadily as a global network since its launch in October 2015. Over the past three years, we have established regional hubs in Brazil, Ghana, India, Indonesia, and Mexico, and our Secretariat in Berlin oversees the global network from Germany.

The Alliance for Integrity was founded with the aim of increasing transparency and integrity in global supply chains. The constant growth of the global network and the continuous engagement of our partners and supporters since the inception of our activities, underline the importance and relevance of this aim.

Our partners and supporters from the private sector, business associations, the public sector and the civil society appreciate our practical and comprehensive approach. Together we developed and implemented many practical solutions and tools, especially for small and medium-sized enterprises (SMEs). In addition, our global network enables us to not only value these practical experiences from different countries and regions but also bring them onto global platforms, such as the Business 20.

Constantly we are asking ourselves, which topics and trends will guide us in the future. The era of digital transformation offers numerous opportunities and challenges for the strengthening of transparency and integrity. We are looking forward to utilising the knowledge and experiences acquired in our network in order to continue finding practical solutions and charting new paths, as we already did, for example, through our new TheIntegrityApp.

With this in mind, we would like to review our activities over the past three years with this Journal. It is a great opportunity to thank our partners and supporters for their commitment so far. We are looking forward to working together with you again in the coming years in a result-oriented and trustful manner.

A handwritten signature in dark ink, appearing to read 'Noor Naqschbandi'.

Noor Naqschbandi

Alliance for Integrity

Businesses take action

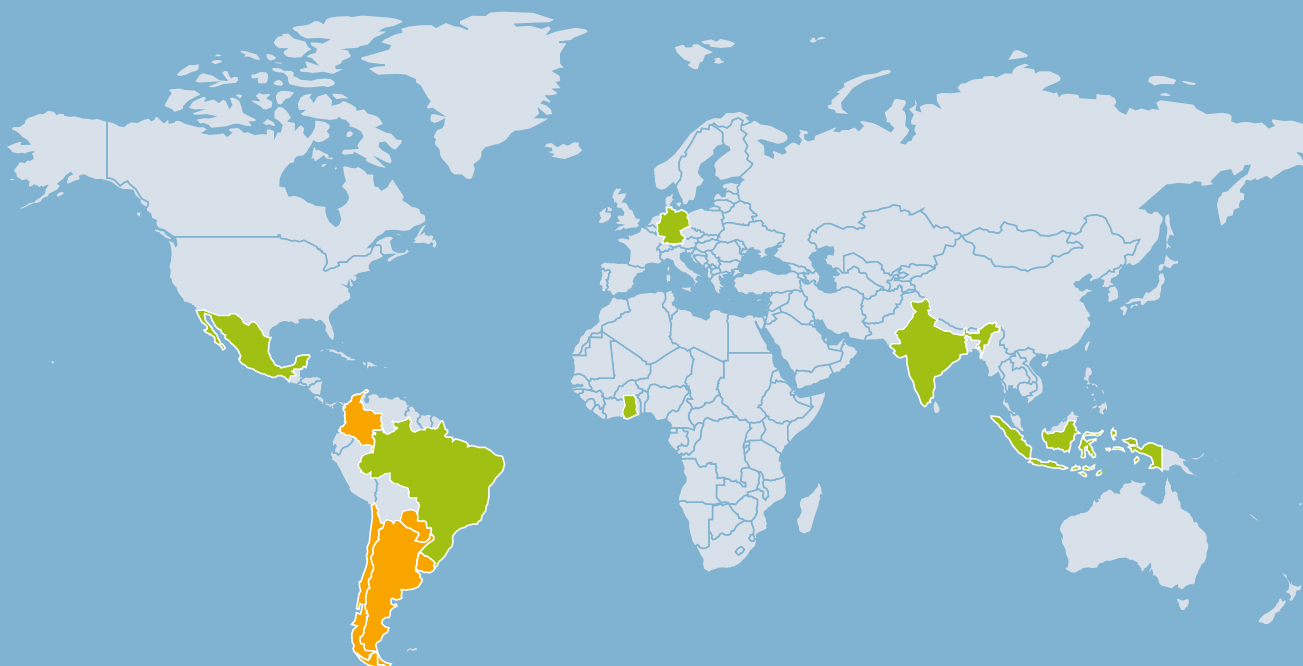
Corruption is a substantial impediment to sustainable development. Preventing corruption therefore contributes to reducing inequalities; it strengthens the rule of law, enables investments and improves the business environment. Moreover, globalisation interconnects economies at a large scale and the private sector assumes a crucial role in the prevention of corruption. As a result, the German Federal Ministry for Economic Cooperation and Development (BMZ) launched the Alliance for Integrity in collaboration with the German private sector to achieve greater transparency and integrity in international value chains. This global network offers a neutral platform when bringing together all relevant stakeholders from the private sector, business associations, the public sector and civil society to

discuss challenges and solutions in order to enhance fair market conditions. The initiative operates globally, with hubs in Africa, Asia, and Latin America and a Secretariat based in Berlin, Germany. The Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH is implementing the project. The Alliance for Integrity has the support of many local and multinational companies, business associations, and public sector institutions alongside with civil society as well as international organisations, e.g. Transparency International and the United Nations Office on Drugs and Crime (UNODC). Together these active stakeholders aim to foster business integrity through a Collective Action approach.

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Regions

The Alliance for Integrity is a global initiative present in the following countries.



The Alliance for Integrity encourages its partners and supporters to share their experiences in a variety of industries on local, regional, and global level, e.g. within the governance bodies or working groups. Information and knowledge is also provided within the network by working jointly on practical tools, e.g. handbooks drafted by and for practitioners. These tools give good practice examples and suggestions on how to implement compliance measures in companies. The Alliance for Integrity also provides digital solutions, like its online Support Desk and TheIntegrityApp to companies willing to improve their compliance capacities. With its business-to-business training programme “De Empresas Para Empresas (DEPE)”, the Alliance

for Integrity is strengthening the capacities of small and medium-sized enterprises (SMEs) to prevent corruption. Experienced compliance officers from local or international companies train the staff of companies of different sizes who have little or no previous knowledge in the field of anti-corruption.



Success stories

Brazil – Building a code of ethics – an example from Rio Grande do Sul

The company Scherer Informática is a small IT company located in Porto Alegre with about 15 employees. They did not have any knowledge of or anyone responsible for anti-corruption and compliance issues at Scherer Informática before getting in touch with the Alliance for Integrity in 2016.

Contribution by the Alliance for Integrity

Paulo Ckless, Director of Scherer Informática, participated actively in a DEPE corruption prevention training session in October 2016 in Porto Alegre. The purpose of the training is to provide tools for SMEs to implement a compliance programme. Mr Ckless was motivated to set up a code of ethics and conduct for his company. After completing the training, he contacted the Alliance for Integrity to request support and assistance by sharing the draft

of the ethics code. The request was passed on to the DEPE trainers, who gave support and tips for the company to draw up the code in December 2016. Furthermore, the Alliance for Integrity provided them with assistance in the implementation phase. In-house training on the code of ethics for all Scherer Informática employees started in March 2017.

New situation

Internally, Scherer Informática uses the newly draw up document, the code of ethics and conduct, to disseminate its values among the employees and to prove management's commitment to business integrity. Externally, the code of ethics and conduct outlines the conduct they expect of their suppliers. It is now available on their website as well: <http://schererinformatica.com.br/codigo-de-conduta-scherer/>

"I would like to thank you for sending the examples of **ethics codes** as they were **very useful** in enabling us to create our own."

Paulo Ckless, Director of Scherer Informática



"We now have an **Operational Risk Manager** and a team to handle issues of risk assessment, anti-corruption and compliance following our participation in the **Alliance for Integrity's Compliance Training for Businesses** in Accra in August 2016. This development supports the company's efforts to deal with corruption and compliance risks as it looks forward to further expanding its operations."

Yaw Boafo, Internal Audit Officer, CFC Savings and Loans

Ghana – CFC Savings & Loans now has an Operational Risk Manager

CFC Savings and Loans has been operating as a non-bank financial institution in Ghana since 2010. As at June 2017, the company had a total of 240 employees and operated 21 branch offices with the head office located in Accra. Although it took compliance issues seriously, it did not look closely at the issue of operational risk and compliance and did not have anyone specifically in charge of that area of their operations because they did not realise the critical need for it. The Internal Audit Department was responsible for a broad area of activities including internal compliance issues.

Contribution by the Alliance for Integrity

Following the participation of their Internal Audit Officer in the Compliance Training for Businesses in Accra in August 2016, the company decided to implement the

lessons learned. The company also subsequently participated in the Alliance for Integrity's awareness-raising events including the conference on "Making Compliance Attractive for Businesses in Developing Countries" held in Accra on June 15, 2017 and has explored some of the practical tools designed by the Alliance for Integrity including the No eXcuses Pocket Guide and the publication Ensuring Compliance: A practical handbook for Ghanaian Businesses.

New situation

The company, in its bid to be a good corporate citizen and position itself for growth, decided to constantly undertake activities such as risk assessment, internal measures as well as collective measures (such as Alliance for Integrity activities) to prevent corruption or non-compliance with laid-down principles. As a result, the company created the



position of Operational Risk Manager and new staff member Frank Bisiw was recruited for the role in November 2016. As at June 2017, the new Operational Risk Department had a total of four personnel. Since the creation of the Operational Risk Department, the company has been able to handle compliance issues more effectively and efficiently and does not have to rely on the Internal Audit team, which was not resourced sufficiently to handle compliance and operational risk issues on a day-to-day basis. The company has been addressing issues related to compliance internally and in its interactions with external parties including clients, suppliers and regulatory agencies. These positive developments were a result of the participation in the Alliance for Integrity's Compliance Training for Businesses and the aforementioned awareness-raising tools.



Indonesia – Strengthening compliance capacities of female entrepreneurs in Bandung

According to a recent World Bank Study*, female entrepreneurs in Indonesia still encounter serious gender gaps and often face more challenges in doing business compared to their male peers, including challenges in coping with compliance issues. The aim of this training session was to promote and strengthen corporate integrity in the regions of Indonesia and, above all, to strengthen compliance capacities of female entrepreneurs or SMEs owned by women.

Contribution by the Alliance for Integrity

On June 16, 2017 the Alliance for Integrity conducted its one-day “From Companies to Companies” compliance-training programme for female entrepreneurs in Bandung. 41 female entrepreneurs from Bandung, nearby regions and Jakarta participated in the training course. With the aim of creating a comfortable training situation and foster

a dynamic discussion on a topic which still is considered taboo amongst women, the one-day training course was delivered by three female trainers. The trainers, Ms Miranda Andamsari, Compliance Officer Merck Group Indonesia, Ms Ranny Fathia, Compliance Associate PT Siemens Indonesia, and Ms Nunki Juniarti, owner of PT Aria Prima Enterprise shared their experience and provided the participants with practical knowledge on different types of corruption and internal as well as external corruption prevention measures. Furthermore, the participants learnt how to handle ‘grey areas’ in day-to-day business.

New situation

The training increased the knowledge of participating female entrepreneurs of different types of corruption and how to deal with grey areas in their business environment. The training also triggered a lively and open discussion and

* Women Entrepreneurs in Indonesia “A Pathway to Increasing Shared Prosperity”, The World Bank Office Jakarta, April 2016

"With this kind of training programme, **small and medium-sized enterprises** that want to operate with integrity and zero tolerance for corruption are **being better prepared.**"

"Hopefully **this training can encourage** other small and medium-sized enterprises to form an anti-corruption community."

Istiana Ilma Sakina, Entrepreneur

encouraged the participants to get involved in a peer-to-peer exchange on different challenges and corruption issues they faced in male-dominated business environments such as the construction or mining industries. Participants gained insights into how to deal with those challenges in this context. They were also made aware of current legal and regulatory frameworks regarding corporate liability and the importance of anti-corruption mechanisms in their companies to gain a competitive advantage in today's business environment. Furthermore, the training also raised the participants' awareness that combating corruption cannot be fought alone and encouraged them to get involved in collective actions through relevant business associations or communities as an effective way to raise the voice of women entrepreneurs regarding this issue. They expressed a great deal of interest in participating in upcoming awareness-raising activities or discussions run by the Alliance

for Integrity on this particular topic in the future. As a follow-up to the positive outcomes of the training programme and to fulfil the participants' request to get involved with the Alliance for Integrity, a special Female Entrepreneurs and Professionals Working Group was founded in Bandung on August 12, 2017. The Working Group brings together female entrepreneurs and professionals from major women's business associations. At the inaugural meeting, participants shared their experiences with corruption in day-to-day business and set out on the task of finding and implementing practical solutions to mitigate risks. In the next few months, the members of the Working Group will engage in dialogues and activities to strengthen internal compliance measures in their institutions and will also collaborate to seek potential solutions to the tricky real-life situations that they encounter.

Facts and figures

Capacity building on a global scale

The Alliance for Integrity offers its three-phased compliance and corruption prevention training programme in Africa, Asia, and Latin America.

Phase 1: Train-The-Trainer

In order to become a trainer, compliance officers of local or multinational companies are introduced to the content and method of the Alliance for Integrity's corruption prevention programme for businesses.

Phase 2: Corruption Prevention Training

Trainers instruct local companies with little or no experience in compliance related issues. The experts' knowledge and practical advice are helpful in order to develop and implement an adequate compliance management system.

Phase 3: Support Desk

Implementation is the key and the greatest challenge. During this phase an online Support Desk provides additional information (e.g. manuals) for the newly trained companies and specific questions are answered by experts of the Alliance for Integrity's network.



1047

Organisations participating in Trainings

Germany

1589

Participants in Trainings

India

Ghana

Indonesia

158

Active trainers, of which

131

are company representatives

Reports of partners

Changing dynamics: Leading not in spite of, but because of business integrity



Shankar Jadhav

Head of Strategy Legal Commercial
Infrastructure Marketing & Corporate
Communications
Bombay Stock Exchange

Shankar Jadhav is Chief Strategy Officer at the Bombay Stock Exchange (BSE), Asia's oldest stock exchange and the world's largest with more than 5400 companies listed and the world's fastest exchange with a response time of 6 microseconds.

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"It was the best of times, it was the worst of times, it was the age of wisdom, it was the age of foolishness, it was the epoch of belief, it was the epoch of incredulity, it was the season of light, it was the season of darkness, it was the spring of hope, it was the winter of despair." This quote from Charles Dickens Tale of Two Cities resonates well in the current times of a globalised economy that opens doors full of exciting opportunities and overwhelming challenges. The single most defining factor that will determine whether it really is the best of times, or the worst of times, will be the current and future generation of business leaders. As industry leaders leading the world into the new future, the onus of sustainable and inclusive development largely lies with the leaders and how they decide to run their businesses. There has been a sea-change in the role of a leader over the years and it is no longer limited to the wealth maximisation. Leaders and companies who are responsive to this changing expectation for greater accountability and transparency from all stakeholders, including shareholders, the government and the general public, are the ones that are seen to be ahead of the curve and are expected to be leading the pack. However, having said this, what sets a true leader apart from the rest is his/her ability to recognise business integrity as more than just

doing the 'right thing' because it makes business sense, but because it makes sense morally and ethically. In the current dynamic global business scenario, there is a need to adapt oneself and the organisation to the changes without compromising on core values. Today the primary responsibility of a leader is to build a core set of non-negotiable values and principles and to ensure these are understood and practised by the employees and partners. Throughout the world, the tide is turning towards a stronger demand for responsible business conduct which is supported by robust compliance systems and frameworks. Globally there is mounting pressure on businesses to operate in a socially, environmentally and economically responsible manner. BSE believes that the primary purpose of bringing integrity into business practice is to improve the quality of information available to providers of financial capital by communicating broader and more relevant information that can assist in effective capital allocation decisions and cleverly align it to the strategic management of the company. The relationship between companies and their stakeholders has never been more important than it is today. Open communication along with trust in both management and the board are critical to building long-term relationships with investors, which

ALLIANCE FOR INTEGRITY CONFERENCE BRINGING INTEGRITY INTO BUSINESS PRACTICES & APPROACHES & WAYS



"Today the **primary responsibility** of a leader is to build a core **set of non-negotiable values and principles** and to ensure these are understood and practised by the employees and partners."

allows companies to stand out amongst an ever-increasing range of global investment options. We at BSE use a number of mechanisms to propagate the importance of integrity and sustainability in the capital market ecosystem. India's Ministry of Corporate Affairs (MCA) first issued National Voluntary Guidelines in 2009. These guidelines were subsequently revised in 2011 and the 9 principles stated in it emphasise that businesses must endeavour to become responsible actors in the society so that their every action leads to sustainable growth and economic development. The Securities & Exchange Board of India (SEBI), the regulator for the securities market in India, has made business responsibility reporting (BRR) mandatory for the top 500 companies according to market capitalisation commencing from April 1, 2017. BSE has always been at the forefront in supporting initiatives by regulators that promote better business integrity. In a bid to enhance business integrity, Global Reporting Initiative (GRI) and BSE entered a formal memorandum of understanding (MoU) in mid-2016 to work collaboratively and support the top 500 listed companies in establishing sustainability reporting processes and preparing sustainability reports. BSE is a member of IR Lab and actively spreads awareness about

Integrated Reporting (IR) and how it helps the company manage processes and activities in a more effective way and, most importantly, build awareness of the heterogeneous capital, resources, and relationships used and likely to be required in building better business. In the governance domain, BSE successfully introduced the Corporate Governance Scorecard in December 2016 in collaboration with International Finance Corporation (IFC), a World Bank Organisation. The focus of this scorecard tool is to enable companies to evaluate their commitment to good corporate governance practices, shareholder rights, accountability and the board of directors, the control environment, disclosure, integrity and transparency. This is an approach to adopting global best practices which extends beyond mere compliance. We see the Alliance for Integrity as a natural partner in this journey. Being an international initiative, it serves as an aggregator and dispenser of good practices and knowledge, which is key to the success of promoting business integrity and fighting corruption. The global initiative is uniquely positioned to bring champions, thought leaders, practitioners and believers together on a single platform to strengthen this movement – for the pursuit of ever higher business integrity standards for equitable and inclusive growth.

"Open communication along with **trust in management and the board** are critical to building long-term relationships with investors, which allows companies to stand out amongst an ever-increasing range of global investment options."

B20 Cross-Thematic Group Responsible Business Conduct & Anti-Corruption



Dr Klaus Moosmayer
Chief Compliance Officer
Siemens AG

Chair of the 2017 B20
Cross-Thematic Group on
Responsible Business Conduct &
Anti-Corruption under the
G20 Presidency of Germany

Responsible Business Conduct and Anti-Corruption was a major pillar in the B20 framework under the German G20 Presidency 2017. As a consequence a Cross-Thematic Group was established in order to come up with strategic but also pragmatic recommendations and best practice examples in order to give the view of the business community to the G20 leaders.

As Concept Partner of the Cross-Thematic Group, the Alliance of Integrity under the leadership of Noor Naqschbandi was a crucial success factor. This was due to their strategic alignment with the public sector and civil society and their experience in international anti-corruption work which is reflected also in the recommendations and our comprehensive booklet. To raise standards of living, economic growth is indispensable. Job creation, training, and education, innovation and technology development – business plays an integral part in improving living

conditions around the globe. Foreign direct investment can positively contribute to local economic development. Around the world, countless companies are committed to Responsible Business Conduct (RBC), improving health and safety at work, living conditions, society, environment, and consumer welfare. More and more companies are integrating this concept in their value chains. An important aspect of Responsible Business Conduct is fighting corruption. Corruption reduces efficiency and increases inequality. It distorts the efficient allocation of resources. It raises the costs of doing business. It undermines the trust in governments and erodes the rules of law. According to the World Economic Forum the cost of corruption equals more than five percent of global GDP (US\$ 2.6 trillion). Much has already been done to fight corruption. But we can do better. B20 Germany thus decided to establish a Cross-thematic Group on Responsible Business Conduct and Anti-Corruption.

Key Recommendations

Establish Beneficial Ownership Transparency
Recommendation 1: G20 members should increase their efforts to implement beneficial ownership transparency so that risks related to the ultimate owner(s) can be identified.

Policy Action: 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 owner-

The group consists of 112 members from 26 countries (including the category “international”).



ship information, and monitoring implementation progress.

Policy Action: Ensure Availability of Information – G20 members should ensure easy access to, and efficient use of, beneficial ownership information by laying down clear rules governing access to information, and facilitating access for users through adequate measures and guidance.

Policy Action: 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.

Recognise Compliance Efforts

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

Policy Action: Acknowledge Adequate Measures – G20 members should recognise 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: Encourage Self-Disclosure and

Self-Cleaning – G20 members should be encouraged to harmonise their administrative and legal approaches to self-disclosure of compliance breaches, recognise effective and safe internal reporting, and support adequate self-cleaning.

Policy Action: 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.

Enhance Responsible Business Conduct in Infrastructure Projects

Recommendation 3: 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: Promote Responsible Government

Conduct and Transparency – G20 members should address the demand side of corruption and should ensure

B20 Cross-thematic Group Responsible Business Conduct & Anti-Corruption

Chair

Dr Klaus Moosmayer, Chief Compliance Officer, Siemens

Co-Chairs

Dr Andrey Bugrov, Senior Vice-President, MMC Norilsk Nickel

Andre Oliveira, Member of South America Executive Team, BASF

Corinne Lagache, Senior Vice President, Group Compliance Officer, Safran

Jorge Mandelbaum, President, CIPPEC

Anny Tubbs, Chief Business Integrity Officer, Unilever

Knowledge Partner

KPMG

Network Partners

Business and Industry Advisory Committee to the OECD (BIAC)

International Chamber of Commerce (ICC)

Concept Partner

Alliance for Integrity

that public infrastructure projects are selected, planned, awarded and managed openly and accountably by promoting integrity in their own organisational structures and processes and by enhancing reporting about project risks, impacts, progress and costs.

Policy Action: 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.

Policy Action: Support Collective Action – G20 members should promote Collective Action, that is 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.

Business 20

The Business 20 (B20) is the official G20 dialogue with the global business community. On September 4, 2016, the leading German business associations BDI, BDA, and DIHK, mandated by the German Chancellery, assumed the B20 presidency. Chair of B20 Germany is Dr Jürgen Herhaus.

Since September 2016, more than 800 representatives from companies and business associations developed

recommendations for the G20 on a consensual basis.

B20 Germany is organised in seven working groups: Trade and Investment, Energy, Climate & Resource Efficiency, Financing Growth & Infrastructure, Digitalisation and Employment & Education, Responsible Business Conduct & Anti-Corruption and SMEs. In February 2017, the B20 Health Initiative was launched. Each group is headed by a chair and several co-chairs. The approximately 100 members of each group represent all G20 countries and sectors of the economy.

Efficiency and transparency for a better infrastructure in Argentina



Trenes Argentinos Infraestructura is a state-owned Argentinian company that is in charge of the construction, development and administration of the railway infrastructure of the country. In 2016, a process of profound cultural change in public enterprises guided by the national authorities was initiated in Argentina. This change is characterised by professionalism and management ethics. For this reason, at Trenes Argentinos Infraestructura, we began to perform different tasks and activities that include, but are not limited to transparent operations, improve processes, achieve greater efficiency, and prevent corruption. At the same time, we decided to start implementing good corporate governance practices in order to strengthen the institutions and achieve an adequate accountability to the public.

"This is the way we understand the excellent opportunity that was presented to us – the cooperation for the implementation of a **culture of integrity**, both for our employees and for our value chain, in tune with our **corporate values**: integrity and transparency, teamwork, professionalism and strive for excellence, responsibility and commitment."

During the process of cultural transformation, we carefully selected different initiatives that empower us to achieve our institutional objectives. When we decided to cooperate with the Alliance for Integrity we observed that its training programme “From Companies for Companies” – in Spanish: “De Empresas Para Empresas (DEPE)” has just been adapted for state owned enterprises for the first time in Argentina. This is the way we understand the excellent opportunity that was presented to us – the cooperation for the implementation of a culture of integrity, both for our employees and for our supply chain, aligned with our corporate values: integrity and transparency, teamwork, professionalism and strive for excellence, responsibility and commitment. The Alliance for Integrity, not only allowed us to train

more than 30 company employees with middle and senior management positions, but also gave them greater awareness of the impact that corruption and the lack of transparency can have on the company’s business and even on their professional careers. The commitment of Trenes Argentinos Infraestructura to support the Alliance for Integrity has started in 2017 and has been showing positive results and is evidence of the responsibility taken by the top management of the company in the fight against corruption, both within the company and beyond.

Guillermo Luis Fiad

President

Trenes Argentinos Infraestructura



Partner interviews

Dr Volker Treier in an interview with the Alliance for Integrity on the role of the initiative in the context of international economic relations

Dr Volker Treier

Deputy Chief Executive Officer
Association of German Chambers of
Commerce and Industry (DIHK)

Coordinator of the Worldwide
Network of the German Chambers
of Commerce Abroad (AHKs)

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You are involved with the Alliance for Integrity, a multi-stakeholder initiative. What are the most important motives for the DIHK to support the Alliance for Integrity?

German companies are highly active worldwide and here they come across general conditions which are difficult at times. Knowledge of how to set up your own organisation, your own company to act with integrity and be compliant, is an essential prerequisite to economic success today. This means anti-corruption, compliance, integrity and corporate social responsibility are a necessary basis for economic success these days. The more difficult the country, the greater the need. German Chambers of Commerce Abroad can support their member companies more and more to achieve this – including with the Alliance for Integrity project.

The classic respectable businessman stands for decency and good morals in conducting his business. Many companies have a mission statement in which ethical principles are formulated. Our question is, do the Alliance for Integrity's programmes reach the companies, including at management level?

The respectable businessman is an important basis on which businessmen and women have acted for decades,

even centuries. The world keeps spinning and new legal requirements arise. Of course, this image of the respectable businessman leaves room for interpretation. The Alliance for Integrity has managed to break down this concept of the respectable businessman into specific issues. It has succeeded in passing on experiences, especially from larger globally-active German companies, to their business partners: "How do I have to train employees so they behave with integrity?" The will alone is not enough, experience and skills are also required. How should or how do companies have to position themselves and in the process realise that acting with integrity is not an end in itself, but results in a direct commercial benefit. This form of knowledge and transfer of expertise has become possible through the Alliance for Integrity.

You have already touched on the issue. The globalised world is becoming ever more complex and economic standards are being re-established everywhere and all the time, especially at international level. How would you describe the global presence of the DIHK?

DIHK has a strong global presence and is becoming increasingly well-networked. And not only with German companies, which are globally active and are therefore building bridges worldwide. We too build bridges via our network of German Chambers of Commerce and



Industry in German Chambers of Commerce Abroad throughout the world, whether they are companies or local authorities in the countries concerned. One challenge is to link up institutions and companies with one another and within the network, relying less on bilateral connections from individual countries to Germany and vice versa only. We are active in over 90 countries, with 130 locations. This global coverage matches almost 100% the breadth of Germany's export volume and direct investments, in other words, jobs being created through German subsidiaries in many countries around the world.

The Alliance for Integrity offers corruption prevention training courses in various countries. Is the success visible or quantifiable?

If you look at the input values, the success is absolutely visible. A total of 702 companies or organisations have taken part in the training courses. They, in turn, are disseminators for what they have learnt and what they have also passed on within the training course. The knowledge about what 'compliance' or 'acting with integrity' mean for a company, for partner organisations, perhaps even for competitors comes into focus, and the understanding of the mutual rules of play is shared. Moreover, the insights gained from these training courses are further spread into the corporate world and also to the local authorities.

People are talking about fighting corruption or about corruption prevention training courses. The input values are quantifiable. The output values, I'm convinced they are there, they are the reality but are more difficult to measure. What we can say is that awareness of the issue in internationally-positioned German enterprises has increased significantly.

You mentioned the topic of networking. One of the tasks of the Alliance for Integrity is to support people in doing clean business. Our question is, do managers benefit in the long term from acting transparently and with integrity?

The managers benefit, but more importantly, the companies themselves benefit. And therefore, not only the managers, but everyone who is involved in the company, which means all the employees. Corruption and bribery in themselves are certainly a waste of resources which could be put to better use and which are lost to the company. If we can prevent right from the start managers and therefore entire organisations from being tempted to gain unfair advantages, or individuals from these organisations or companies from gaining such advantages, then this ultimately means an added value that is commercially measurable. This is then also measurable for the managers who act as role models. In the public consciousness –

fortunately – the stigmatisation of corruption and bribery is increasing significantly. In this respect, for managers who make a stand in this anti-bribery and anti-corruption movement, it is also beneficial for their careers. However, this is not the main motivation to become involved. Underlining the advantages to the community as a whole is the right way forward – individual benefits on top of this are neither detrimental nor should they be criticised.

Individuals acting with integrity is closely linked to the transparency of an economy. Considering the legitimate demand for transparency, how do you succeed in guaranteeing the independence and autonomy of economic activity?

As long as transparency plays by the mutually-agreed rules, transparency has a high value. If transparency takes place asymmetrically, then honesty doesn't pay. As Germans, we want to be a good example and also influence the rules of play so that they are fair – and that means applicable to all and followed by all equally – or, if they are not, they are then punished with a referee accepted by all parties, to use the language of football. We definitely want to get one step ahead as a role model and provide increased transparency. However, this also requires political support so that we can make the circle of those who forge ahead as large as possible. Otherwise, those who want to progress further cannot progress at all because they immediately fall behind. In general, the term has positive connotations. However, it also has one or two limitations. Transparency must be granted to those who are entitled to it. In many cases, this entitlement requires a legal basis. Sometimes, however, if the outcome of a business negotiation is made transparent, this is considered sufficient. But in this case, we don't know who, at what time, made what demands to make a claim for people who have nothing to do with the company. In this sense, I cannot support applying the term 'transparency' to its full extent. The most important thing is that transparency is practised by as many people as possible and that it is part of the general rules of play.

You have suggested that it is not the honest ones that lose out, but those who look ahead. In the public eye, people speak of 'shrewdness'. What do you say to the people who think it's not worth the effort?

In general, the answer to these kinds of folk sayings, and I don't mean that derogatively, as we're all descendants of country folk after all, is "honesty is the best policy!" That is the guiding principle.

For sustainability too?

In relation to the work of the Alliance for Integrity, it must be made clear that acting with integrity can reap commercial advantages and, therefore, almost egoistic advantages, if we break it down to individuals. That there must be no contradiction, especially if we succeed in making honest behaviour a common rule beyond the individual. The Alliance for Integrity provided starting points on a very practical level. Companies that, on account of their size and their significance in the market, are obliged – and to some extent also have it easier – to practise acting with integrity and to implement it in the organisation, to integrate it into the DNA of the company, so to speak. The Alliance for Integrity motivated these companies to share their knowledge. For the companies that are in their value-added chain, are suppliers, are customers. We have to strengthen the building of structures in the companies so that we can say "honesty is the best policy". On their own, companies, like people, are sometimes too weak if it is not developed into a general rule. But the good thing about the project is that people start implementing the good practice from bottom up. The next step – and this would be the most desirable – is for the rules to be reflected in the legislative framework or administrative behaviour in difficult countries too. Let's not deceive ourselves, in many developing and emerging countries, and also in developed industrialised countries, this is not always the case. But the Alliance for Integrity has succeeded in turning the compass from the saying "honesty never pays" slightly towards "honesty is the best policy".

Thank you very much!

Prof Dr Edda Müller in an interview with the Alliance for Integrity on the role of the initiative in civil societies and on the responsibility of decision-makers

Prof Dr Edda Müller

Chairwoman of Transparency International Deutschland e.V.

Honorary Professor of the German University of Administrative Sciences, Speyer, former Minister for the Environment and Nature in Schleswig-Holstein and Chairwoman of the Federation of German Consumer Associations

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You are involved with the Alliance for Integrity, a multi-stakeholder initiative. What are the most important motives for Transparency International Deutschland e.V. to support the Alliance for Integrity?

The tasks of Transparency are to make sure that stakeholders throughout the world conduct their business with integrity. We know that corruption is often the result of irresponsible business practices, so any initiative that contributes to companies acting responsibly is important to us. As this is very difficult to enforce through legal, binding regulations in a global context, voluntary initiatives such as the Alliance are hugely important, and that is why we support the Alliance for Integrity.

At the beginning of 2016 a global decline in corruption was reported. Since then, however, reports on the subject have become more frequent. What is the current situation? Are we going forwards or backwards in stemming corruption?

That's a difficult question. Corruption is a dark crime. On the one hand, you could argue that the more is exposed, the more corruption takes place. However, you can also argue the other way around, that the rate of exposure is related to increased awareness of the problem. The fact is, we are looking more and therefore more is revealed –

through people or through control mechanisms that have been implemented at a national level. In Germany, for example, we have the tax authorities. Auditors are required to report slush funds, which wasn't the case before. We have a smorgasbord of measures. Whether the overall level of corruption has actually decreased or increased, is difficult to answer.

Through our investigations, in particular the Corruption Perceptions Index, we can see that there are definitely success stories. An improvement in the corruption score, for example, which would have been unheard of a few years ago. I'm happy to mention Georgia here. Georgia has improved tremendously in recent years and the reason for this is, above all, a decline in 'everyday' corruption. By this I mean bribes, or what we also call 'petty corruption'. According to our definition, these are cases in which a person has a legal entitlement to certain services from the local authority but is pressured into paying a bribe for them. In Georgia, still under Saakashvili, a massive anti-corruption campaign was implemented. A large number of people were dismissed from the administration and a very strict regime was introduced. At the same time, citizens had a specific place to turn to if they received demands for bribes. And, since no one likes paying bribes, the credibility of this programme obviously had an effect and resulted in a decline in corruption.



I mention this because the widespread view is that corruption is endemic in some cultures – due to certain behaviours, the establishment of clans and so on. However, you can also see with these kinds of examples that governmental structures, the institutional arrangements, can also bring about change. This does not mean, by the way, that what we call grand corruption, in other words, the highest level of corruption, is no longer a problem in Georgia, as in many other countries too. It just takes place in a much more subtle form. Particularly in international business, it is often consultants or agents, performers who receive money for their services. It is difficult to prove that this is corruption.

Since 1997, the key year for fighting corruption by the OECD Convention, foreign bribery is no longer tax deductible as ‘useful expenditure’ in Germany. This proves that something has already changed in the mindset, in the entire system. Yet we too still have grand corruption. One of the key points is to close the demand side. If you receive money somewhere as a corrupter, you have to do something with it. Consequently, making transfers into the financial world difficult, closing tax havens and creating transparency are all important endeavours. What actually belongs to whom? These are the crucial factors, along with confiscation of the ill-gotten gains and repatriation to those who were robbed.

You have already touched on this issue: The globalised world is becoming ever more complex and therefore so too is the relationship between business, civil society and politics. What tools does Transparency International have to establish transparency and where do you begin?

Our instrument is our international network. We have over one hundred chapters, as we call them. So, we are represented in many, many countries. There are always two sides involved in corruption. Corruption does not only take place in certain countries, but with business partners or stakeholders who come from somewhere else and are often from industrialised countries. Here it is essential to introduce checks on both sides. And, above all, to ensure there are also effective civil-society forces to create transparency in the recipient countries. They observe what actually happens with the money. Being an international network, Transparency ensures as an instrument in itself that there are civil-society forces in the individual countries. This is not easy. I always have renewed motivation whenever I come back from general meetings, for instance, and see what my colleagues in other countries achieve for their institutions, often at a great risk to themselves. In contrast, here, we are in an easy and comfortable situation.

You spoke about the complexity of the global process. I don't know if it really is that complex. What happens worldwide is determined by a relatively small number of multinational corporations, so you have to begin with the most important companies. This will also be important with the implementation of the National Action Plan on Business and Human Rights. In industry dialogues, we have to analyse where the hot spots are, where the

actual problematic areas are. The difference to before is that the economic outlooks of individual companies are extremely short-term focused. This is linked to share trading, with the daily fluctuations of share prices. In these cases, we often have a management that runs a company for five years and then bows out, at times with enormous gains, even though it has run companies into the ground.

"So, two challenges for the new government relate to **whistle-blower protection and corporate criminal liability**. The third area is the whole issue **surrounding the regulation of lobbying**. This area has a lot to do with the fact that we are increasingly seeing a loss of confidence in the democratic institutions in Germany. This is dangerous for our democracy and we therefore need more monitoring, more regulation and more transparency here."

We all know of historical trekking and trade routes into the Orient, to China, India and so on. This global economic interdependence has always existed. Now, and I think this is very important, we are using the theories by David Ricardo to substantiate free trade. His reasons for free trade were comparative cost advantages. You go where the costs of production are lower, and in this context, Ricardo was thinking of natural factors such as weather conditions, ground conditions and so on.

Today, the factors are what we can describe as social and environmental dumping. The shoes are produced in Asia because you can get the leather tanned very cheaply there, you don't need to have any consideration for the environment and, above all, you can have them produced by workers receiving starvation wages and that is the problem. Here, we still have no social or environmental barriers and no transparency in relation to manufacturing conditions.

What are your three expectations from the new German government on the issue of preventing corruption?

One of the key demands we have had for years, and an area in which we hope the new government will make progress, is whistle-blower protection with respect to fighting corruption and other criminal activities. A lot can be exposed by insiders only, but people have to overcome hurdles to expose illegal activity. It requires moral courage, and this must not be punished; it is an intolerable situation and it must be changed. The second point is corporate criminal liability, where there is no obligation to prosecute. Public prosecutors are not required to act; under current law, the principle of fault applies. The reason for this is that you cannot put a company in prison, but only a physical person.

Due to the principle of fault, we now have the current situation with VW. No one knew anything, did they? And what we in politics consider a matter of course, that a minister must resign regardless of whether he knew anything or not, because either he knew and didn't react accordingly, or he didn't know, which means he didn't have control over his workplace. In any case, he did not fulfil his responsibilities properly. But because of the legal conditions, this is different in the corporate world and has to change. I always say that the people within the companies too are not born corrupt or criminal. No engineer at VW came up with the idea to install that type of software by himself, but was driven to do so by the general conditions provided by the company. There is a lot of unlawful activity in companies because the wrong incentives are created and because no one looks. Those who secure business deals are promoted or receive a bonus, and no one asks: "Where did he get that from?" or "how did he actually achieve that?" So, two challenges for the new government relate to whistle-blower protection and corporate criminal liability. The third area is the whole issue surrounding the regulation of lobbying. This area has a lot to do with the fact that we are increasingly seeing a loss of confidence in the democratic institutions in Germany. This is dangerous for our democracy and we therefore need more monitoring, more regulation and more transparency here.

One of the tasks of the Alliance for Integrity is to support people and initiatives in order to increase transparency and integrity. Our question is, do politicians and managers benefit from acting with integrity and transparency?

I don't think so. I think that's the way the current system, the sign of the times, is. Even though the people are morally outraged, of course. We see this in examples like the president of FC Bayern Munich, who evaded almost 30 million Euros in taxes. And his supporters didn't resent

him for it. The man obviously doesn't have the slightest sense of guilt. The feeling of what is right and what is wrong has disappeared. Or let's look at the CEO of Air Berlin. He had a contract, according to which – regardless of whether he ran the company into the ground or not – he still receives his salary a few years later and then a huge settlement. In this case, thousands of people lost their jobs and this person, who was responsible, continues to receive his salary for the next few years.

We haven't yet reached the point where we can expect any significant social change. Take this injustice in the case of VW with respect to possible sanctions. Consumers have practically no rights even though it affects their direct property, and they relied on the emissions levels being correct for their cars. But for the shareholders, immediately there were legal proceedings and the questions of whether the issuer informed the world too late that the share price could drop. And then you think, perhaps some of the citizens might say, "But we want to talk about our consumer policy and what legal instruments do we actually have?" But you get the impression that no one is really interested in that, don't you?

Individual persons acting with integrity is closely connected to the confidence the public has in state and social institutions and, not least, in a democracy. How can trust be built for the long term?

First of all, decency and being guided by values are something that are instilled in the family, in your upbringing, and I think something has gone awry here in the last few decades. And we are talking about dominant cultures. Whether they are German or Islamic or something else. What is crucial are the values that shape the coexistence and the cohesion of the people. And it's about historical roots. If I just look at our school system and this ignorance of historical connections from which you could learn something. And then there is a strong focus on economic factors. Trust – that's a difficult question.

I'm not one of those who say we have to do everything transparently. The chancellor's diary and who she drank coffee with today is not my concern. When investigating the confidence people have in political institutions, including throughout Europe, there is always the same astounding conclusion: that the completely non-transparent institutions – the Federal Constitutional Court, banks, also Deutsche Bank previously – enjoy considerable confidence. In other words, institutions which are not subject to any political scrutiny.

I think one of the greatest failures in Germany is an illiteracy with respect to political and democratic processes.

Transparency is important, but it must be considered sensibly. In lobbying, for example, we don't say that every contact a politician or civil servant has with a stakeholder must be disclosed, but when a bill is drafted, we want to know which interests have been considered in relation to a specific issue. I come from a ministry myself, and everyone in politics knows that you speak more with those who are against something than with those who are for it. It makes perfect sense! Somehow you have to win over the others. You need majorities. That's the normal process. So, what do I read into it if I know that for a certain draft law, a civil servant has spoken ten times with the VCI (German Chemical Industry Association) and only twice with the BUND (German Federation for the Environment and Nature Protection). It's absurd. It means we have to consciously structure these instruments according to content. We are therefore calling for a legislative footprint for each individual draft law and I'm travelling through the country explaining to members of parliament to take the opportunity in the first reading to debate what interest group influence there is in a bill. The first reading of a parliamentary debate would certainly be more interesting then. There would be far more equal opportunity in the consultation of interests. This does not apply in the consideration as this depends on the voters, the election result. Of course, particular interests are favoured, depending on the government.

The range of issues from transparency, integrity and right through to corruption are often associated with violence, threat and extortion. How openly and freely can you carry out your work?

Absolutely freely, and that's just what I do. I think that the lack of freedom in our system begins with the individual. In other words, whether you have the courage to take a clear position or not. Fortunately, we don't have to worry about threat in the sense of sanctioning, imprisonment or punishment within our circles here in Germany. As a non-governmental organisation, we are consciously independent from public funding. This means we don't have to rely on demonstrating good behaviour to receive financial support. And that shouldn't matter either. After all, we don't want to say he is for me, so he gets money and he is against me, so doesn't get any money. As I said, we don't have to worry about that in Germany. But the situation looks quite different for our colleagues in our international network.

The issue of corruption is more in the public eye than ever before. Fake news has become socially acceptable. What do you say to people who think honesty never pays?

I don't know if you know the philosopher Precht, who described certain phenomena in a very bold and memorable way. On the subject of a sense of fairness, he describes an experiment with two monkeys. Are you familiar with it?

No, not as an example.

The monkeys sit in an open cage, separated by a dividing wall, and when they carry out certain orders, they receive either a piece of cucumber or a grape. So, if they do it properly, they receive a grape and if not, they only get the cucumber. This is done for a while and the monkeys understood and then the scientists began to treat one of the monkeys unfairly; it always just received the cucumber, even though the other one didn't do what it was supposed to.

Oh, that's mean.

The other one always receives a grape. At first, the monkey looked at this and then it got angry and threw the cucumber at the scientist's head.

Precht described the same phenomenon with an experiment involving students playing a money game. The game was played properly and fairly for a while. Then two students were instructed to cheat. At first, the others think it is an error or oversight. But after a while, they all cheat. The reaction in this case is to say, "I'm not stupid." And that's why a positive role-model is important. If we look at compliance in the companies, we always say, "tone from the top." In other words, it depends on management. They are the role models and it's the same in the political system too. I assume that 95 percent of political actors in Germany are not corrupt. But some individuals do not behave correctly. And then the others say, "if they do that or if the chief executive behaves like that, then I'd be stupid to behave properly." The fact that not everyone does that – and I've become cynical – is because they don't have the chance to do so in their position. Corruption and corrupt behaviour is to do with having both the opportunity and the power. This is actually a huge problem: the behaviour, the moral standards.

Of course there are people, and we call them Michael Kohlhaas types, who, regardless of what happens, do what they can and react, and thankfully there are still some around. We therefore have to protect these people, the 'whistle-blowers'. And we have to make it clear that it is important for society that people take on this kind of responsibility

Thank you very much.

Minister Wagner de Campos Rosário in an interview with the Alliance for Integrity on the role of the public sector in anti-corruption efforts

Minister Wagner de Campos Rosário

Ministry of Transparency and Comptroller
General, Brazil

Master's degree in Fighting Corruption and Rule
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Degree in Military Sciences from the Agulhas
Negras Military Academy (Brazil)

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Good Morning, Mr Rosário – As a Minister in the field of transparency and anti-corruption in Brazil, you are engaging with the Alliance for Integrity, an initiative promoted by the German government. Can you tell us the most important reasons for supporting the activities of the Alliance for Integrity in Brazil?

Alliance for Integrity is a very important partner, completely aligned with our goals regarding anti-corruption within the Brazilian private sector. Supporting the activities of Alliance for Integrity in Brazil means fostering the adoption of compliance programmes, but on a larger scale, mainly because we can reach a bigger number of companies when working together. We also profit from the Alliances' expertise abroad, that gives us examples of successful strategies and practices. Lastly, another very important reason would be Alliances' network of partners, either in Brazil or abroad, that gives us the opportunity to get different perspectives on the matter.

Corruption is a global issue, affecting all countries alike. In the particular case of Brazil, what have been the greatest challenges and biggest successes in the fight against corruption over the last few years? How could these challenges be turned into successes?

Let me start with the main successes. It's the first time in the Brazilian history that we see the prosecution and punishment of so many people for corruption, including many powerful figures and the dismantling of complex criminal organisations. The recent crises have shown that our institutions are solid and are working increasingly better in the fight against corruption. We are seeing large-scale operations involving several different institutions such as the Ministry of Transparency and Comptroller General (CGU), the Federal Police, the Public Prosecutor's Office and the Judiciary, all working together, sharing information and coordinating actions. This process has strengthened our institutions and has given hope to the Brazilian people.

In my opinion, the biggest challenge is that this country still has a lot of people who believe that there is no solution for corruption in Brazil, no way out. And the better the institutions work, the more visible corruption becomes and it can give the impression that corruption has actually increased. By working at the same time in prosecution and prevention, we hope to change people's perception and demonstrate that we are on the right path and that the solution depends on the engagement of our citizens too, not only on governmental actions.



The work of the Ministry of Transparency and Comptroller General is internationally acknowledged. CGU is an important player doing meaningful work. Could you give us insight into the ways the Ministry is currently operating in the field of corruption prevention? What are the key measures, the Brazilian government has launched to promote transparency?

We understand well that corruption is a complex problem that cannot be solved through prosecution alone. So we focus much on prevention and work in several different fronts, such as transparency, social participation and the promotion of integrity.

Specifically related to transparency, in Brazil, the Access to Information Act, Law 12.527 adopted in 2011, was a great paradigm shift. It establishes procedures for the exercise of the right to access to information. Anyone can request public information from Brazilian bodies and entities, free of charge and without the need of any justification. The disclosure of public information, that used to be the exception, became the rule and secrecy became the exception. In the Federal Government, CGU is the entity responsible for monitoring compliance with this law and the correct implementation of its provisions. We also evaluate and offer

states and municipalities support in their efforts to comply. CGU is also responsible for the Transparency Portal of the Federal Government, which discloses a broad range of information about the management of the Federal Government's resources, making it possible for citizens to become inspectors of the application of public funds. We also invest in effective channels for the interaction between the citizens and the Administration, such as Ombudsmen. Moreover, CGU monitors the implementation of the Open Data Policy of the Federal Government. The idea is that every governmental body makes available as much data as possible in open formats, in a way that the information can be freely accessed, used, modified and shared. We also maintain a portal where the entities upload their data and anyone can easily access.

Since its launch in Brazil in 2016, the Alliance for Integrity has been working closely with the Brazilian private sector. Recently, the initiative has also been engaging more and more with the public sector by offering corruption prevention training sessions for state-owned enterprises (SOEs). This engagement also reflects the Alliance for Integrity's aim of creating a space for knowledge exchange between public and private sector. How would you evaluate this

engagement with SOEs? Do you think SOEs can learn from integrity and compliance measures successfully implemented in the private sector, or is this an instance of comparing apples and oranges?

It's not at all comparing apples and oranges. I have no doubt that SOEs can learn much from successful integrity and compliance measures of the private sector. Many of them can be replicated in the public sector. However, we must be aware that public sector's reality is different. Several of these measures need to be adapted to be effective or even to make sense for SOEs.

SOEs work with a complex reality, in which it is important that they use the benchmarking of the private sector, while operating in accordance with the regulations of the public sector.

In 2016, the Brazilian SOE's Governance Law introduced a new regime for SOEs, establishing clearer rules to strengthen the governance and integrity in Brazilian state owned enterprises. Just to mention a few examples, it created criteria for the indication of members of SOE's board of directors, the obligation to adopt a code of conduct and, also, to create a department responsible for risk management.

Worldwide, people are losing their trust in politics and democratic institutions. In Brazil there is a saying "Roubam, mas fazem" (They steal, but at least they do something). How does your institution deal with this mentality?

This mentality is the opposite of what this institution believes in and a serious challenge for Brazil. Corruption has a much greater impact in society than the stolen money itself. It's like a systemic disease that affects the whole body. It impacts competition, disturbs the markets, decreases trust, harms democracy and the rule of law, increases inequality and so on. And the most harmed are the ones already in the most vulnerable situations. We believe that changing this mentality is essential for the fight against corruption. Therefore, we also invest in campaigns and the spread of knowledge, especially with a focus on the youth. The biggest potential to change this country lies with the youth.

After the Panama Papers where mostly illicit financial flows were in the focus, we are now in the midst of another international incident, namely the Paradise Papers. This deals with aggressive tax evasion and lacking integrity. Do we face a change in paradigms here?

These scandals placed some topics very high in the international agenda such as tax evasion, beneficial ownership, terrorism, money laundering and lack of integrity and transparency both in governments and private enterprises. These matters used to be mostly discussed separately in specialised forums, but these incidents made evident that they are intertwined and must be approached in a comprehensive and integrated manner. They also reminded the world that cooperation is the key to tackle these problems and showed the negative impacts one single country can have when it does not comply with international standards. One of the most effective ways to fight corruption is to follow the money. In many cases of corruption in Brazil, we have seen the payment of bribes through offshore companies whose beneficial owner was difficult to identify. With more transparency and international cooperation, Brazilian officials were sometimes able to pin down the offenders.

Transparency and corruption are big issues in the media. What is known as "Fake news" is something people seem to have an increasing tolerance of. What would you say if someone told you "Honesty doesn't pay"?

This mentality needs to change. But to do that, we must go further than the moral discourse. We need to change the incentives. For example, due to excessive bureaucracy and lack of information, it's sometimes so difficult for a small enterprise to follow all the rules that it works as an incentive to remain irregular. The frameworks must reward honesty as well as punish dishonesty and never the other way around.

Working together with other ministries, CGU has recently launched a new channel of communication between the Administration and citizens and businesses. Through it, anyone is able to complain about unnecessary bureaucracy. Every single complaint has to be analysed and answered with a plausible explanation for the proceedings or the commitment to change them.

Brazil's Clean Company Act adopted in 2013, Law 12.846, made it possible to hold companies responsible for the corrupt acts of their employees and provides strict civil and administrative penalties. This law created strong incentive for companies to have good integrity and compliance programmes.

I am very optimistic. As you can see, things are changing for the better in Brazil. We know we still have a lot of work to do. But I am sure we are on the right track.

Thank you very much.

"One of the **most effective ways to fight corruption is to follow the money**. In many cases of corruption in Brazil, we have seen the payment of bribes through offshores whose beneficial owner was difficult to identify. With more transparency and international cooperation, Brazilian officials were sometimes able to pin down the offenders. [...]

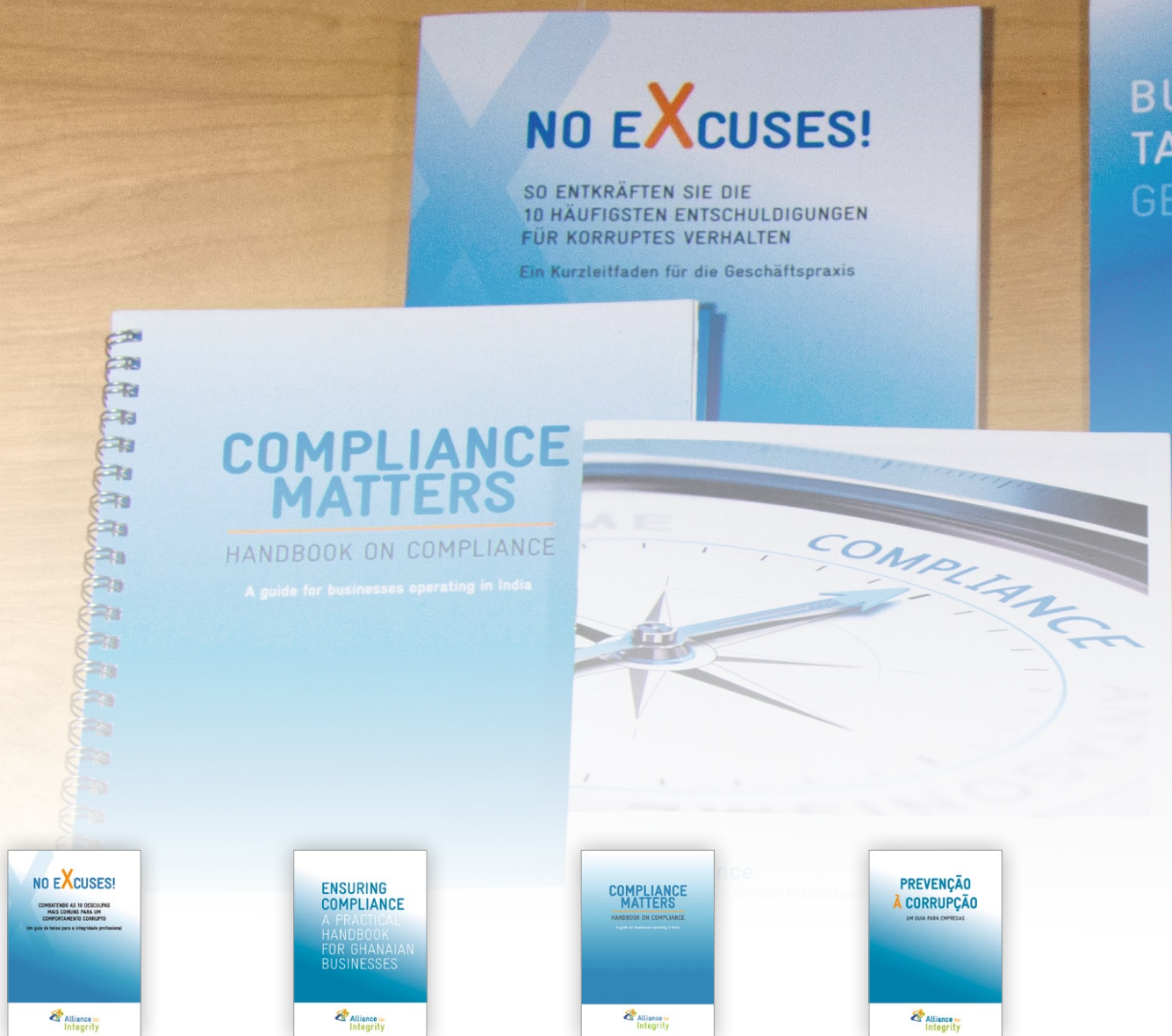
I am very optimistic. As you can see, **things are changing for the better** in Brazil.

We know we still have a lot of work to do. But I am sure we are on the right track."

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