

# ALLIANCE FOR INTEGRITY JOURNAL 2023



Alliance **for**  
Integrity

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# Foreword



**Svenja Schulze**  
German Federal Minister  
for Economic Cooperation  
and Development

## Dear Readers,

**JUST AFTER** Germany's due diligence act entered into force at the beginning of this year, I visited Ghana. I wanted to get a first-hand impression of the working conditions of the people at the beginning of the supply chain. And I wanted to find out to what aspects we need to pay attention in Germany as we implement our act, so that people will benefit and will enjoy better living and working conditions.

During my visit, I met Linda Ampah, a textile factory manager. She said, "Of course it's possible to produce for the global market under fair conditions – all it takes is the will to do it." She also told me that the supply chain act would help her, especially against competitors, as the act would enable her to demonstrate better than other companies that there is no child labor or exploitation at her factory. This is one of the goals of the act – producers that operate under fair conditions should be able to benefit from that, and so should their workers. Fair supply chains work best if it is to enterprises' advantage to produce under fair conditions. In Linda Ampah's case, this has worked well. However, voluntary commitments are not enough. That is why the German government introduced the due diligence act, thus creating binding guidelines for enterprises so as to make supply chains worldwide more just. And I am also lobbying for strong due diligence legislation at the European level.



Due diligence legislation includes, among other things, an obligation for enterprises to assess human rights risks in their supplier companies and respond to them. Such risk analyses are not always easy for businesses, especially not for the many small and medium-sized enterprises (SMEs) in the early stages of the supply chain. In addition, we are unfortunately sometimes faced with corrupt practices. For example, inspection reports may be written even though no inspection ever took place. So it is clear that real protection of human rights requires effective action against corruption.

That is why the German Development Ministry joined forces with the Federation of German Industries and the UN Global Compact Network Germany to launch the Alliance for Integrity. Together, we created a network of different partners in order to foster integrity in the economic system worldwide, thus fighting corruption. The Alliance for Integrity promotes responsible business conduct and engages in activities on the ground to ensure that SMEs will not have to meet their obligations on their own. It assists them in complying with the requirements – for instance by providing practice-oriented training on the ground. And it adjusts its support to the local situation and works with local players that are familiar with that situation, for instance local civil society organizations.

During my visit to Ghana, I was able to see for myself that our cooperation in the Alliance for Integrity is helping to get people to openly talk about corruption. I was particularly impressed by Linda Ampah and generally by the work of Ghana's women entrepreneurs. Together, they are campaigning for the representation of women in the effort to design standards for enterprises, and for enabling women to assert their rights without being put under pressure through corrupt practices – because it will only be possible to fight corruption on a truly lasting basis if women enjoy equal participation. This is the only way to make supply chains really fair.

Svenja Schulze  
German Federal Minister for Economic Cooperation  
and Development

## Our Tools and Activities

The Alliance for Integrity is a business-driven multi-stakeholder initiative and acts as an interface between the private sector, the public sector, civil society and international organisations. Since its inception in 2015, a range of tools and activities that support and reinforce compliance-related capacities of companies and their business partners was developed.



### Corruption Prevention Trainings

The Alliance for Integrity's Corruption Prevention Training is a capacity-building programme to promote clean business practices and a level playing field as a means to a stable, secure and responsible business investment climate. It is often referred to as 'from companies to companies' or 'DEPE', the acronym of its Spanish version 'De Empresas Para Empresas'. In Indonesia it is called DUKU, in India VSVK.



addressing SMEs from different sectors.



addressing SMEs from the health sector.



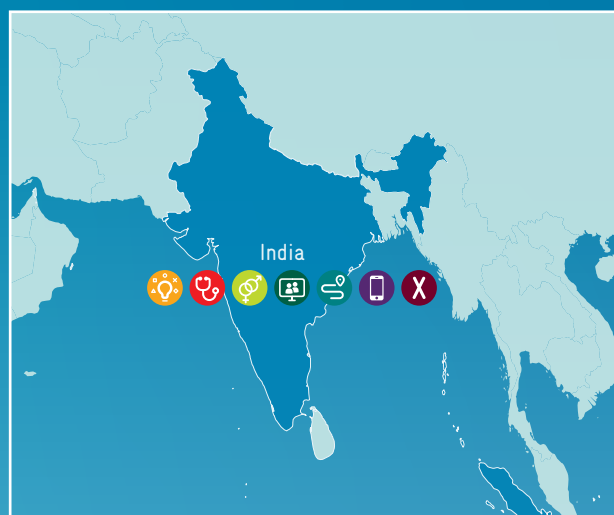
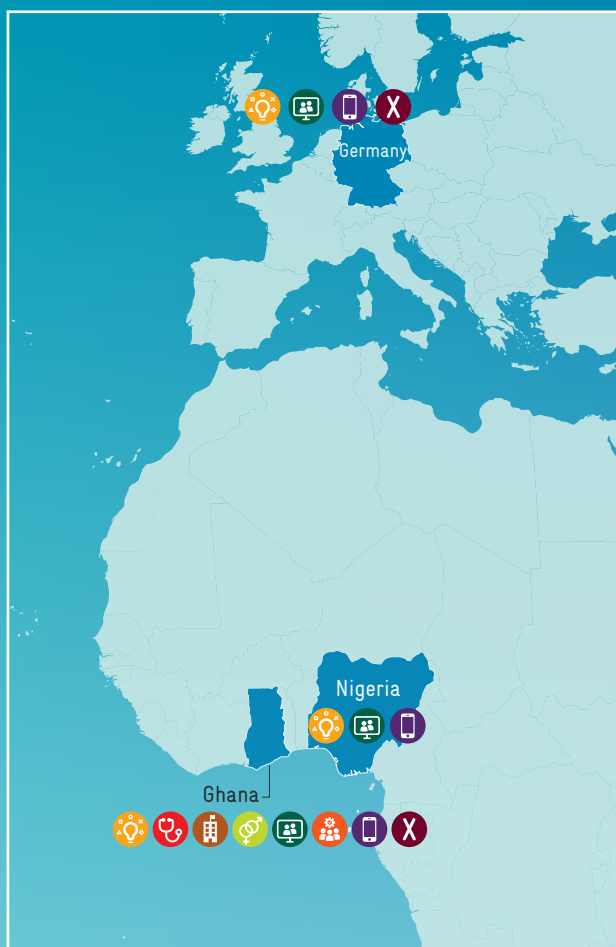
addressing representatives of state-owned enterprises.



addressing SMEs from the forestry sector.



addressing SMEs from the construction sector.



**Gender-specific dialogues and trainings support** businesswomen in addressing corruption and companies in implementing a gender-specific approach.



On the online **Trainer Platform**, trainers of the Alliance for Integrity can share and develop training materials.



An **Integrity Journey** is a mentoring programme for SMEs on corruption prevention and business integrity, including online seminars and a corruption prevention training, available for specific sectors, e.g. agriculture, textile.



**Regional Working Group Latin America Platform** for compliance experts to discuss relevant topics in the region and coordinate joint activities (e.g. annual Regional Conference Latin America)



The **Working Group on Awareness Raising** develops tools and provides orientation to prevent corruption, foster integrity, and build capacity for compliance.



The **Working Group on Anti-Corruption and Human Rights** provides a platform for exchange on the nexus between integrity and the respect of human rights.



**The IntegrityApp** is a digital tool for the self-assessment of compliance programmes. By answering a practical and short questionnaire, a company will receive a score between 0 and 100 indicating its status quo in terms of compliance. Available in English, German, Portuguese, Spanish, French and Bahasa Indonesia.



The **No eXcuses Guide** is a pocket guide for business practitioners with the ten most common excuses for corruption used in the country and how to counter them.

# Integrity and compliance: reinforcing each other to make compliance effective

A recent publication by the United Nations Global Compact Network Germany (UNGCD) and the Alliance for Integrity presents the key characteristics and central fields of action in the way businesses manage integrity.

**T**ODAY, more than ever, corporate responsibility towards sustainable development is not only a major concern – it is increasingly demanded by customers, business partners, suppliers, policy-makers and other stakeholders. In the for-profit sector, the most important aspects of sustainability are often summarized as ESG, a comprehensive concept that aims at the common good and includes the aspects of environment, social and corporate governance. Increasingly, companies are having to comply with a growing number of rules and requirements related to these topics – and they understand that a resilient and effective corporate culture, based on values and ethics, is key to fostering an environment where rules-based compliance management can be kept to a minimum. This is the background against which the UNGCD and the Alliance for Integrity have invited German companies to share their practices and jointly develop recommendations. This co-creative process has resulted in the publication ‘Corporate Integrity’ which also provides a catalogue of practice.

“In the best case and as a component of a sustainable corporate culture, integrity is the commitment of each individual to behave impeccably and the values of the company are part of the lived corporate identity.”

Janine Sliwa, Compliance Manager,  
Deutsche Bahn Connect GmbH

‘Corporate Integrity’ was conceived for corporate decision-makers. It provides an introduction to and overall guidance on integrity management, explains how it contributes to achieving corporate responsibility and presents valuable suggestions for the concrete implementation and design of integrity in the corporate sector.

## Companies learning from their peers



The publication CORPORATE INTEGRITY presents various companies, such as Mercedes-Benz, Metro AG and Deutsche Bahn Connect GmbH, which provide their views on integrity and related topics, and how they ensure and handle the challenges of building a culture of integrity internally.



### Corporate responsibility? Integrity? Compliance?

The publication presents each of these concepts, starting with a definition of integrity management as well as related success factors and opportunities. “In ethics, integrity is perceived as a quality, which is reflected in an intuitive understanding of honesty and sincerity with regard to the motives for one’s own actions,” the authors explain.

‘Corporate Integrity’ also explains why and how integrity management and compliance management are “two complementary approaches to achieving corporate responsibility”. Compliance forms the backbone of the integrated management of corporate responsibility; integrity, on the other hand, “forms its heart”, the authors write. The key differences? While compliance management has been established “with the aim of ensuring compliance

“In our view, acting with integrity is value-based action. It therefore goes beyond simply following rules.”

**Dr André Uhlmann**, Chief Compliance Officer,  
TK Elevator GmbH

with internal and external rules and avoiding misconduct as best as possible”, integrity management goes further as it is “based on a commitment to uphold basic moral values, aims to align decisions and actions with the company’s own values and principles. Integrity management is primarily intrinsically motivated.”

The figure below shows how integrity and compliance management complement each other:

	Compliance-Management	Integrity Management
<b>Motivation/ Driver</b>	Mainly external pressure (national and international laws and regulations, standards, etc.)	Predominantly intrinsic motivation (out of conviction and discernment)
<b>Aim</b>	Prevention of illegal behaviour	Forecasting of moral conduct
<b>Approach</b>	Clear rules, guidelines, controls	Values, leadership and corporate culture
<b>Topics</b>	Avoidance of violations of the law (legal compliance)	Improving the effectiveness of legal compliance and integration societal, social and environmental issues for managing corporate responsibility

### Key fields of action in integrity management

In a second chapter, the ‘Catalogue of practice’ presents four central fields of action and concrete structural recommendations “for implementing integrity management in the company as well as possible measures and tools that have proven particularly effective in practice”. The four fields are:

1. Corporate values and corporate culture
2. Leadership and leadership culture
3. Governance and organisation
4. Communication and training

In each of these four key fields several more concrete measures are briefly described, and relevant best practice is presented. These are complemented by an introduction to practical means for their measurability and Key Performance Indicators (KPIs).

Corporate governance can be seen as the backbone of a company’s efforts to drive sustainability – not only in the fight against corruption but also regarding the respect of human rights and environmental legislation. A culture of integrity is at the very heart of this effort and enables all actors involved – from the workforce to the suppliers and business partners – to do the right thing. ●





^ Beate Wesoly

## “We are consistently working on our understanding of integrity”

In order to meet their responsibility along global value chains, German companies are increasingly committed to effectively introducing integrity into corporate culture and practice. The “Working Group on Integrity in Companies”, which the Alliance for Integrity set up together with UN Global Compact Germany, promotes exchange on these topics. BEATE WESOLY, Senior manager of the Integrity Program at Mercedes-Benz Group AG takes part in these exchanges and explains her company’s approach to integrity.




Ms. Wesoly, what does integrity mean at, and for, Mercedes-Benz and how do you implement it in the company?


**BEATE WESOLY:** For Mercedes-Benz, integrity means doing the right thing. In other words: We adhere to internal and external rules, align our own actions with our corporate principles and also listen to our inner compass. For the Mercedes-Benz Group, integrity is a central element of corporate culture and, as an enabler, an integral part of our sustainable business strategy. As the Mercedes-Benz Group, we encourage and enable our employees to consistently stand up for our corporate principles and align our actions accordingly - these include fairness, responsibility, respect, as well as openness and transparency. Our Code of Conduct, the so called “Integrity Code”, which applies across

the Group, provides orientation because it serves as a common set of values, defines the guidelines for our actions and helps us make the right decisions – especially in situations for which there are no clear rules or in which these can be interpreted differently, an attitude of integrity is important. To promote a corporate culture of integrity, we have been running the Infopoint Integrity since 2015. It serves as a central point of contact for employees and employees of other Group companies with questions about ethical conduct. In addition, our employees have access to a global network of local contacts for integrity, compliance and legal issues. They evaluate the inquiries from our employees and, if necessary, initiate appropriate measures. It is also important for us to work consistently on our understanding of integrity, to continuously develop it further and to constantly check ourselves. Surveys such as the employee survey

play an important role here. The feedback from our employees is both a yardstick and a compass: we find out where we stand with our culture of integrity and can use the results to develop and implement specific measures.


 **How does Mercedes-Benz see the relationship between integrity and compliance? Where are the differences, where are the similarities?**

For us, integrity and compliance are two sides of the same coin and together they contribute to supporting our clear commitment to responsible action. This is also reflected in our definition of integrity, in which the aspect of compliance – the expectation of our employees to abide by laws, rules and voluntary commitments – is firmly anchored. In day-to-day business, however, there are always situations for which there are no clear rules or in which these can be interpreted differently. An attitude of integrity is important here, which is specified in our corporate principles. This is about, for example, encouraging employees to voice their opinion when something isn't right or doesn't feel right. Thus we encourage a 'speak-up' culture. To do this, we create an atmosphere in which things can be called by their proper name without the threat of negative consequences. Other opinions are appreciated, questioning is encouraged. We expect our managers, in particular, to act with integrity in their function as role models and to give employees orientation. We have also formulated this in our code of conduct.


 **Your company is part of the Integrity Working Group of the Alliance for Integrity and the UN Global Compact Network Germany. What is the added value of such initiatives for your company?**

For us as a company, initiatives such as the Integrity working group offer the opportunity to enter into a methodical exchange with science and other companies. This helps us to keep up to date with the discussions on anchoring integrity in everyday business and, of course, to contribute our experiences and methods.

Thanks to the professional management of this initiative by the Alliance for Integrity, the UN Global Compact Network Germany and the scientific support of a renowned chair for integrity and compliance, a practice catalogue, 'Integrity in companies', was created in 2022; it's an excellent reference work with concrete suggestions which we at Mercedes-Benz can also integrate in our activities.

 **Would you say that integrity must be lived in companies? If yes, how? What are the best practices at Mercedes-Benz to strengthen the culture of corporate integrity?**

Yes, I can definitely confirm that. Integrity is part of our corporate culture and is visible in many situations in everyday work, such as when making decisions and when working together. We are consistently developing our integrity programme for all employees and are now shifting the focus from the theoretical discussion of integrity, i.e. the why, to living integrity in everyday business life, i.e. the what and how. The tried and tested practice means sticking to the topic and constantly giving impetus to the organisation, in which the employees take responsibility for their actions and their decisions, and thus live integrity in everyday work.

 **What is still to be done, or rather: what small and large challenges does Mercedes-Benz still face in anchoring integrity in the company? How do you approach this now and in the future?**

Embedding integrity is not just an organisational issue, it starts with each individual staff member. Especially in the context of the transformation that our company is currently undergoing, it is important for us to strengthen integrity by showing positive examples and thereby promoting integrity. That is because acting with integrity is an important factor for us to be successful in the long term. It is also why we will pay even more attention to the effectiveness of our measures and their effects in the future, so that our integrity programme is even more specifically prepared for the challenges that we face as an automotive company. ●

## Why enforcing integrity and compliance along supply chains is so complex

**T**HE impact of private sector activities on human rights, the environment and the climate are often the result of complex interactions along global supply chains. In many cases, those who experience the harmful consequences of global activity – be it forced or unpaid labour, unfair wages, gender-based discrimination, polluted water or air, or violated land rights of local communities – are disadvantaged populations in developing countries, often in the global South. The business activity ultimately – or at least partly – responsible for these consequences, however, often originates in the global North, either directly in the form of production or resource extraction in third countries, or indirectly in the form of systematic procurement decisions for the lowest bidder without establishing adequate controls.

Globally active companies are increasingly recognizing their respective responsibility in fostering integrity not only in their own directly controlled operations, but also in their supply chains. In 2011, following decades of discussion, the UN Guiding Principles on Business and Human Rights (UNGPs) were formally adopted as a global standard for private sector responsibilities, covering their impact on human rights. As part of the same process, the UN Global Compact (UNGC) was founded to bring together, on a voluntary basis, private sector and civil society organisations

willing to work to respect and advance human rights, environmental protection and the prevention of corruption. In the past decade, many originally voluntary standards have increasingly been turned into law and regulatory requirements, such as the UK Modern Slavery Act, the Uyghur Forced Labor Prevention Act, or most recently the German Supply Chain Due Diligence Law. The upcoming EU Corporate Sustainability Due Diligence Directive represents a further milestone in this development.

Where such requirements and standards are infringed, corruption, lack of transparency and inadequate corporate governance are often at the heart of the problem. Many or most business practices severely impacting local populations are already illegal in the countries in which they occur. Forests are often protected by law, strict pollution standards are set, sophisticated labour laws are enacted. However, the challenge, all too often, is that law enforcement is systematically being undermined by corruption, bribery or collusion. Examples abound: from bribing customs officials and smuggling toxic chemicals into Europe, to bribing officials for retaining the rights to continue much-criticized mining operations. The most recent case was the role of corruption in the mass infringement of building standards complicit in the high death toll following the recent earthquake in Turkey and Syria.



“Relationships within your supply chain are on the brink of change: The traditional top-down mindset will fade away and a trust-based cooperation with your supply chain will prevail. Enhancing together sustainability levels brings opportunities for commercial success and grounds for a better society and environment.”

**Dr. Bernhard Lippsmeier, LL.M.,** Head of Governance, Risk & Compliance/Chief Compliance Officer, Volkswagen Caminhões e Ônibus, Brazil



## Towards an integrated approach for integrity and ethical business practices across supply chains

Combating the negative impacts of business activities requires an integrated approach, aimed at fostering all facets of integrity and ethical business practices across supply chains – including a company's own activities, its direct suppliers' activities, and crucially also its relations with indirect suppliers up to the sourcing of raw materials.

Based on our recently published study "Fostering integrity in supply chains", Alliance for Integrity has identified three focus areas for its work with its partners in the private sector, public sector and civil society to develop, implement and advocate such an integrated approach.

### 1. Empowerment-based, eye-level dialogue across supply chains

Recent supply chain regulations primarily address large, often multi-national companies with widespread operations, vast resources and huge commercial power over their suppliers. But it is crucial for companies not abuse that power by simply passing on their requirements to suppliers by stipulating contractual clauses, confronting them with inflexible reporting requirements or threatening punitive actions for non-compli-

ance. Instead, companies should engage with their direct and indirect suppliers at eye-level, sharing their needs and regulatory requirements, listening to the suppliers' perspectives, providing capacity-building, tools and resources where needed, and remaining flexible wherever possible without softening standards.

### 2. Integrated, integrity-based execution

At an operational level, discharging due diligence duties and fostering supply chain integrity requires a whole set of tools and processes, personnel and resources. Many of these elements will have to be tailored to the specific human rights and environmental risk profiles of companies. Nonetheless, integration or harmonization with existing compliance and integrity management systems is crucial. Given the strong interdependence of human rights, environmental, corruption and other compliance risks, siloed processes or structures are unlikely to be effective. What's more, they are likely to create costly redundancies, with similar processes running in parallel. While this may be affordable for large companies, smaller suppliers would struggle and be at a competitive disadvantage.

### 3. Collective action for systemic change

Collective action is a crucial tool for achieving a long-term impact on complex supply chains. At individual company level, driving collective action among its important direct suppliers may be a valuable lever to impact conditions in the vast web of indirect suppliers.

At industry level, industry-wide collective action can be vital for unifying industry-wide standards, sharing best practice and increasing supplier transparency. And at a societal level, multi-stakeholder collective action – involving civil society and government partners – presents a path to changing vital background conditions, such as the nationwide prevalence of corruption, unequal enforcement of regulations, unclear land rights, etc.

Fostering integrity in supply chains is a key priority for Alliance for Integrity. Activities tailored to country- and partner-specific needs are being conducted in many partner countries, including Argentina, Brazil, Chile, Colombia, Ecuador, Ghana, India, Indonesia, Mexico, Paraguay and Peru, as well as in Germany.

## Towards a cross-company grievance and whistleblower mechanism in India

Corporate responsibility and compliance are topics of utmost importance in India and beyond. In order to empower and encourage Indian companies and their international customers, to increase transparency and combat human rights abuses in their supply chains, the Alliance for Integrity and the Indo German Chamber of Commerce are jointly developing a cross-company grievance and whistleblower mechanism.



FairVoice was developed in line with BAFA guidelines and international frameworks.

**F**OR the Indian economy, reporting mechanisms hold particular promise. Given the labour-, resource- and land-intensive nature of many key industries and the potential for social conflict that goes along with it, establishing trust and communication between companies and those impacted by their actions can create major benefits for all parties. Likewise, given complex supply chains, the platform for employees of lower-level suppliers to report misconduct “up the value chain”, for example, can be a potential game-changer for fostering integrity across deep supply chains.

Thus, such reporting mechanisms will be of crucial importance not only for Indian society at large, but also for individual companies facing ever-growing expectations

with respect to human rights due diligence, integrity and compliance, often driven by novel regulations with global impact such as the German legislation on supply chain due diligence and the upcoming EU supply chain directive.

In fact, many Indian companies lack the knowledge, resources and scale to effectively implement a supply chain-spanning reporting mechanism, which is especially relevant for SMEs. To address this issue, and to foster integrity and ensure a level playing field for smaller companies, the Alliance for Integrity and the Indo German Chamber of Commerce are launching a joint project to establish a cross-company grievance and whistleblower mechanism. It will allow employees, members of local communities and other stakeholders to report grievances

or suspicions of misconduct, including the use of a dedicated online portal. It enables smaller suppliers to gain easy access to a state-of-the-art reporting system for their employees and local communities, thereby strengthening transparency, resilience and trust between these suppliers and their larger international buyers. It also helps them to become and remain an integral part of international supply chains and increase their sourcing potential. “Vyapar se Vyapar ko” (from companies to companies) is the unique approach of this business-led multi-stakeholder initiative: Companies

active in the Indian market will be able to contribute their comments and ideas at all stages of the planning and development of the mechanism as well as its execution.

As a first step, a pilot programme is already underway. Funded by the German Federal Ministry for Economic Cooperation and Development, the cross-company mechanism is expected to go live with a limited number of participating companies in the third quarter of 2023. A large platform, open to all qualifying companies, is planned to be launched post-pilot. ●

**Reporting mechanisms** are a key tool for preventing, detecting and remediating corporate misconduct. Two types of such mechanisms exist:

- A **whistleblower system** is primarily geared towards a company's employees and business partners; traditionally, it focusses on corruption, fraud and other compliance risks
- A **grievance mechanism** typically aims at those impacted by misconduct, e.g. local populace or civil society. It facilitates detection and remediation of the violation of human rights, labour laws as well as environmental impacts.

Despite significant differences between them, both mechanisms address similar challenges and share the same opportunities. Both are crucial for ensuring responsible business practices and fostering integrity across supply chains.



“Grievance mechanisms are an essential tool to help foster integrity in India’s supply chains, and for Indian suppliers to continue or commence business with European customers. We are therefore pleased to be involved in the development of a first cross-company grievance and whistleblower mechanism for the country’s corporate sector.”

Stefan Halusa, Director-General of the Indo-German Chamber of Commerce

## Alliance for Integrity Ghana Network welcomes German ministers

IN February 2023, Federal Development Minister Svenja Schulze and Federal Labour Minister Hubertus Heil visited Ghana to learn about and meet people who are at the beginning of global supply chains. Accompanied by the new Director-General of the International Labour Organisation ILO, Gilbert Hounbo, they saw at first hand how implementing Germany's new legal supply chain regulations can lead to better working and environmental conditions. In addition, the visit also included a meeting with the Alliance for Integrity's Ghanaian network members.

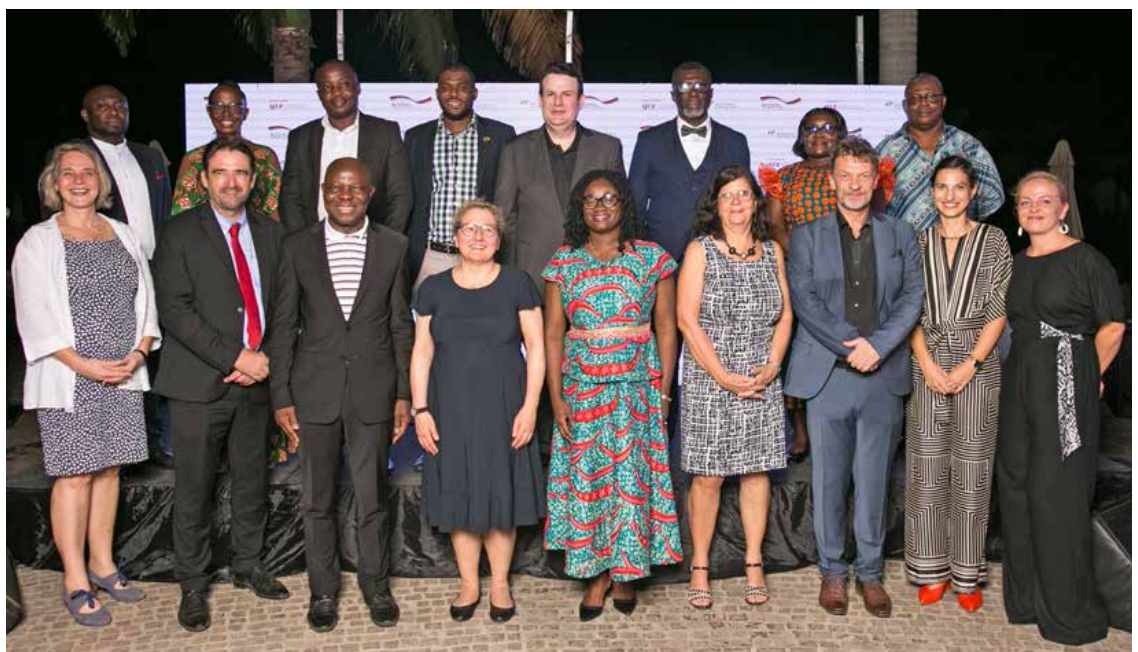
In her welcome speech during an evening reception in Ghana's capital Accra, Minister Schulze emphasized the similarities between Ghana and Germany, pointing in particular to the importance of democracy for both countries. Minister Heil addressed the nexus between good governance, compliance and the protection of human rights. These comments were made against the background that between eighty and ninety percent of Ghana's workforce – mainly young people – work in the informal sector, a sector often characterised by precarious working conditions and low wages; child labour is also widespread.

Ms Kosi Yankey-Ayeh, CEO of the Ghana Enterprise Agency, the government's SME support agency, and Chair of the Alliance for Integrity in Ghana, welcomed the German

delegation and addressed the importance of women as key players in supply chains. Women entrepreneurs need to be supported and empowered to transform the Ghanaian economy, she stated. According to Yankey-Ayeh, the Alliance for Integrity offers the framework for breaking new ground together with all stakeholders. During the ensuing panel discussion, the chairwoman of the Ghana Integrity Initiative, the president of the Ghanaian Association of Engineers and a Compliance Officer from Fidelity Bank, who works as a facilitator within the framework of the Alliance for Integrity, described their motivation for the fight against corruption and shared some of their successes.

In addition to compliance training for SMEs carried out by Compliance Officers from large companies throughout Ghana, the Alliance for Integrity offers various dialogue formats, handouts and digital tools. Altogether, they aim to raise awareness of the damage caused by corruption and its consequences: human rights violations and environmental destruction, poor infrastructure development and various others. In addition, they provide SMEs with the necessary tools to act with integrity in an environment characterized by corruption. As one element in the supply chain, these SMEs will subsequently also contribute to implementing the new German supply chain regulations. ●

The reception gathered representatives from the private sector, political institutions and the civil society.







## Strong women, strong businesses

^ The members of the Gender Working Group at a workshop on the adaptation of the ethical negotiation training toolkit for female entrepreneurs in Ghana.

**T**HE Women for Integrity Series (WISe) brings together women across all spheres – from academia, businesses, civil society and public services – to collectively proliferate anti-corruption efforts in Ghana and elsewhere. It was launched by the Alliance for Integrity during the Covid-19 pandemic in 2020 in partnership with the Ghana Enterprises Agency and the Ghana Integrity Initiative to provide women entrepreneurs with an opportunity to explore and harness practical solutions to address integrity issues in their businesses.

Four editions have been held to date, covering topics like the specific challenges of upholding integrity in the face of the pandemic's heightened impact on women, as well as

global tools, trends, and solutions to fight corruption. In 2022, WISe grew internationally and provided a cross-regional platform for women from Brazil, Ghana, India, and Mexico to discuss ethics in business negotiations. Alliance for Integrity then hosted a WISe Gender Working Group workshop to provide input for the adaptation of existing materials on ethical negotiation training which were originally developed for female entrepreneurs in Colombia and Mexico. To support female entrepreneurs in Ghana who face similar challenges, the toolkit is currently being adapted into the Ghanaian context to train the first selected group of female leaders, who in turn will act as trainers afterwards. ●



## “I want to see women equipped with the right tools”

At 37.2 percent, Ghana has the third highest percentage of women-led businesses in the world – and the Ghana Enterprises Agency (GEA) has an important role to play in this context. As a government agency under the Ghanaian Ministry of Trade and Industry, GEA is mandated to strengthen and develop Micro, Small and Medium Enterprises (MSMEs). One of its priorities is the promotion of women entrepreneurs. We sat down with Ms KOSI YANKEY-AYEH, CEO of GEA, to find out more.



You have dedicated yourself to the cause of gender and anticorruption for many years and have supported, among other things, the Women for Integrity Series, or WISe for short, within the network of the Alliance for Integrity in Ghana. Could you tell us a bit more about the background and early days of your work, and what motivates you today?

**KOSI YANKEY-AYEH:** Yes, thank you. I have indeed helped with the Women Integrity Series which recently ran its fourth event series. I contributed to the setting up of WISe and have since never relented in my commitment to support the Alliance for Integrity to efficiently implement the initiative. Additionally, I have featured in WISe and other events organised by the Alliance for Integrity – through presentations on topics like women as anti-corruption agents or on collective action and the need to protect MSMEs and women entrepreneurs and traders. All these engagements are relevant to shaping discussions and actions



^ Kosi Yankey-Ayeh is the Chief Executive Officer (CEO) of Ghana Enterprises Agency GEA. She has chaired the Advisory Group of Alliance for Integrity in Ghana since early 2022.

that will bring the needed change to level out opportunities for MSMEs and provide a conducive business environment. I am motivated by the desire to empower women to achieve the highest heights, to equip women's groups with leadership skills, and help these women to motivate each other using their network as channels for identifying, reporting, and discussing gender related corruption challenges they face. I want to see women equipped with the right tools to enable them to be more transparent and compliant.




Could you briefly describe the current landscape for SMEs in Ghana and explain some of the particular challenges female entrepreneurs and women in business face when trying to build up and maintain a successful and sustainable business?

Ghana's government is focusing on entrepreneurship and has introduced the YouStart initiative as a key vehicle to create one million jobs in three years under the Ghana




CARES Obaatanpa Programme. It assists young entrepreneurs in gaining access to capital, training, technical skills and mentoring to enable them to launch and run their own businesses. Factors such as mobilising the relevant resources, and establishing new partnerships through local, regional, and global networks are driving entrepreneurial culture and empowering young people, especially women to create sustainable jobs for themselves and others. GEA is implementing about thirteen projects under its Youth Entrepreneurship and Employment Programme for the job creation agenda. Under YouStart, the GEA is implementing the Entrepreneurship Training and Grant Support and the World Bank-funded Ghana Jobs and Skills Project. The Young Africa Works Project has also created and sustained approximately 90,000 jobs over the past three years.

But in spite of women entrepreneurs' contribution to economic growth, there are still some specific barriers that limit women's participation in businesses. These include financial constraints, difficulties in complying with regulatory procedures, or poor access to information and markets. Furthermore, they are often excluded from male-dominated distribution networks and face higher risk of abuse, including corruption and harassment at borders. Women also lack information and communication technologies as well as the relevant human resources to support their operations.

 Under your guidance, the Ghana Enterprises Agency has entered close collaboration with the Alliance for Integrity to further empower female entrepreneurs. What joint activities have been implemented so far? And could you give us a "sneak preview" of the future activities of this collaboration?

In the beginning, GEA made several general contributions to the work of Alliance for Integrity as we form part of its working group. We designed the GEA Business Integrity Project to embed the learnings and tools of the Alliance for Integrity in its operation. The project's key activities include awareness-raising and dialogue sessions with stakeholders, networking events for beneficiaries, partners and relevant sector business associations and financial institutions, business integrity workshops as well as mentoring and coaching. We have also established a GEA help desk to coordinate network activities and the learnings after the project and provide support to SMEs implementing compliance programmes.

Agency staff and technical assistants from project partners make up the various units to ensure the transfer of knowledge and sustainability. We will continue these efforts by delivering our programme and sustain these efforts through the Ghana Women Rise Network and as part of our Ghana Women Entrepreneurship Summit. We really want to bring about continuous improvement and revise our workplace policies to give the efforts on gender more prominence and build on the capacity of MSMEs, especially those owned by women.

 By joining forces in collective action, a growing number of actors in Ghana has dedicated themselves to increasing integrity in the economic system. Where do you see those efforts going, and what are your expectations for the future? What needs to be done to effectively address corruption in Ghana?

The Government of Ghana is committed to anti-corruption and transparency initiatives and has taken serious steps in this direction. As part of GEA's transformation, the Agency is mandated to support MSMEs, especially to reduce administrative hurdles faced by the businesses. Up to 70 per cent of GEA's clientele belong to a growing generation of women entrepreneurs who always want to do the right thing. This creates an opportunity to inculcate responsible business practices and build a solid corporate culture. The GEA wants to use the Alliance for Integrity network to break the stereotypes of gender biases at the workplace and in the community, so that women entrepreneurs can stand up for their rights and push for things to be done right. This can be done by bridging the gap between women and men while empowering women to be successful in the world of business.

To sum up, collective action to promote business integrity and anti-corruption is imperative. Such an agenda requires commitments from all partners and actors from various sectors to engender deliberate realistic interventions to promote integrity and transparency. The various actors must get involved with clear cut roles and targets. In addition, law enforcement also helps to maintain order, establish a set of generally accepted standards, resolve disputes, and protect rights when it comes to business and relations to customers, government authorities and other businesses. ●



## The Integrity Journey: a game-changer for Indian businesswomen

^ The six-months programme invited representatives of female-led enterprises and business representatives from all business sectors.

**IMPLEMENTING** the fundamentals of compliance and integrity in one's business is relatively straightforward – but embedding integrity in the core of an enterprise, building a culture of integrity and becoming a true champion for ethical business practices is a longer journey. In 2021, the Alliance for Integrity first developed a novel format to support SMEs in this process: the Integrity Journey. In an in-depth, six-month mentoring programme, a selected cohort of SME leaders with common challenges and a shared belief in the importance of integrity is empowered to become champions for integrity and anti-corruption – within their own companies, but also as multipliers in their communities and professional networks.

After successful roll-outs in Brazil and Argentina, Alliance for Integrity's latest Integrity Journey focused on women entrepreneurs in the Indian state of Rajasthan. With one of the lowest SDG scores among Indian states, Rajasthan's

entrepreneurs face significant challenges, and women entrepreneurs, doubly so. Gendered power relations, discrimination and economic vulnerability mean that Rajasthan's women entrepreneurs, like women entrepreneurs everywhere, are often far more vulnerable to corruption and extortive practices. They also face particular forms of corruption, such as sextortion or the strategic abuse of gendered notions of honour and shame.

In Rajasthan, with one of the lowest scores on gender equality among Indian states, this is particularly likely to occur. In nine sessions, combining dedicated training modules on key integrity topics with forums for open discussion of challenges and experience, 24 women entrepreneurs gained the know-how and tools to combat corruption within their companies and communities – and a network of like-minded allies.



The Integrity Journey in Jaipur finished with an action day on which the women entrepreneurs had the opportunity to discuss their issues and challenges with their mentor and exchange experiences. “We are happy and proud that our participants got back to us with a lot of positive feedback. Most of them now have their own code of conducts, they are able to draft their own contracts, have got their trademarks registered, feel confident to apply for public tenders etc. In addition, it is crucial for them to spread the knowledge and set an example in their networks and communities in Rajasthan and beyond”, summarized Seema Choudhary, Network Manager India at the Alliance for Integrity, the results of the course. ●



“I feel privileged to have participated in the Integrity Journey. Now I know why it is so important to incorporate integrity into our policies like norms, contracts, and legalities, and how it can be done easily and effectively. I also became very confident, because I can reach out to Alliance for Integrity whenever I need to. The course has laid a foundation for which I am grateful.”

**Aparna Makkar**, co-founder, Mandarmala and Samvad Setu Education Pvt. Ltd.



[www.youtube.com/  
@AllianceforintegrityOrg/videos](https://www.youtube.com/@AllianceforintegrityOrg/videos)



“The Integrity Journey was an eye-opener for me as I learnt a lot, for example, about the code of conduct or intellectual property. The course has given me a direction on how I can evolve and grow as a successful businessperson.”

**Neerja Palisetty**, founder, Sutrikaar Creations



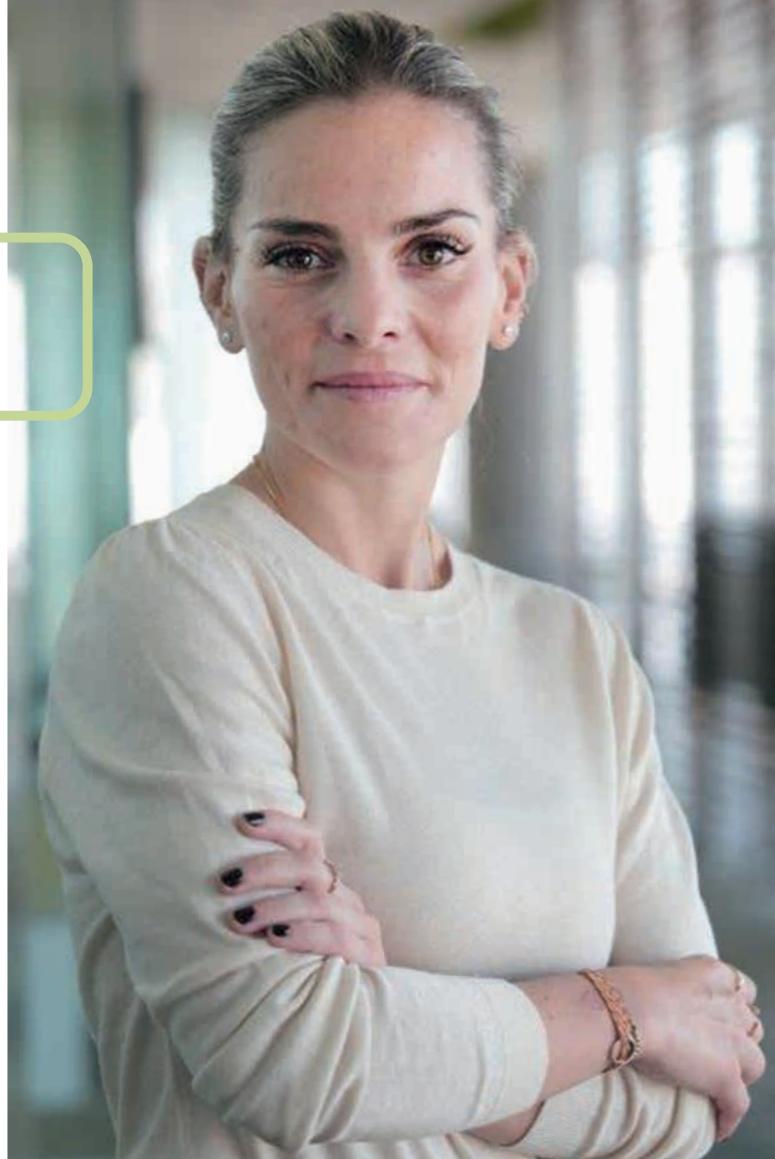
“The programme has been really helpful to me and helped me to structure my company and to solve problems. For the first time, I got familiar with compliance rules and could establish a code of conduct for our company. The exchange with various women entrepreneurs was very valuable to me.”

**Nishtha Pandey**, founder, Skillyak Pvt. Ltd.



“It is no longer possible to think of integrity without considering the gender perspective”

MARIA ARCHIMBAL is the Chief Compliance Officer of YPF S.A. The energy supplier has operations in Argentina, Brazil, and Chile. We sat down with her to learn more about the company's work on compliance and integrity as well as her specific approach on gender and diversity.



^ Maria Archimbal, Chief Compliance Officer of YPF S.A. in Argentina



What does compliance mean at and for YPF? When did you start your compliance journey and where does the company stand today?

**MARIA ARCHIMBAL:** Ethics, transparency and integrity are cornerstones that have guided the business of our 100-year-old company. For YPF, doing the right thing is not one more way of doing things, but the only way of developing our activity. As a company that operates in Brazil, Chile, and Argentina and that is listed on the stock exchange in the United States, YPF is subjected to a plethora of regulations, characterizing it as a multijurisdictional corporation subjected to local and international regulations. As such, our vision of compliance is not only abiding with these standards, but most importantly, but it is the company's conviction to always do things the right way. This means ethically. At YPF, our daily work is oriented to reflect that ethics and transparency are part of our DNA.

YPF created an independent and autonomous compliance unit in late 2018, renewed its code of ethics and designed most policies and procedures for an efficient integrity programme. When I was appointed Chief Compliance Officer of YPF in 2021, we defined three guiding pillars under which the programme would work: top management, the organisation, and third parties. Furthermore, considering an expanding compliance agenda, we incorporated issues related to sustainability, gender, diversity and governance. Additionally, we manage and monitor the compliance programme in seven affiliates to promote a co-ordinated implementation for the companies of the group.



In December 2022, you participated in a panel on the feminist approach to fighting corruption at the International

**Anti-Corruption Conference. What inspiration and learnings did you take away from this event?**

This was a great enlightening and learning experience to share ideas with outstanding colleagues in the field which helped me broaden my view and learn a lot about the different realities that companies in other countries are going through. My own contribution to the discussion focused on the corporate view and how companies implement policies, procedures, and initiatives in order to fight gender-based corruption. There is a global need to speak up against corruption. More panels, workshops and other activities on different aspects of corruption and gender should be supported globally. I strongly believe that there is a lot to be said, explained and learned that has not yet been said, and we, as women fighting corruption, have the responsibility to bring it up when the chance comes.

**Why is it important to include a gender and diversity perspective in a compliance programme? Are there any specific challenges to this? How would you address them?**

Years ago, compliance was linked to a specific set of regulations related to corruption that organisations had to comply with. In the last couple of years, the agenda has started bringing new issues to the table: sustainability, gender, diversity, human rights, in a broader view of integrity. This is also a consequence of a new set of actors and stakeholders in the field who are advancing a mindset change with which I agree: companies are not only responsible for the profit that they make but will also be held accountable for their impact on the environment and, in a broad sense, their stakeholders and the communities within which they operate. In this context, it is no longer possible to think of integrity or anticorruption without considering how much a gender and diversity perspective would complement the approach.

I believe that companies should make their commitment to a gender and diversity perspective visible internally and externally. In the case of YPF, we have expressly stated gender and diversity as one of our six corporate values in the code of ethics and added specific mention to the gender and diversity perspective in our integrity clause for third parties.

**You are also involved in a working group that develops a publication on a gender and diversity perspective in corporate compliance programmes. What can you already tell us about the work in progress?**

The working group has been a great initiative and the experience was both, very enlightening and inspirational. I appreciate that different companies and organisations get together to speak about this. The roundtables with different leaders with the mandate to implement such initiatives in different sectors and size of companies helped me broaden my knowledge and gave me new tools and ideas to further implement in YPF.

The preliminary results are already very sound. They will serve as a toolkit to deepen the gender perspective in companies that have already started this work and, at the same time, serve as a very good starting point and first approach for those companies who are still taking baby steps on these issues.

**Based on your recent experience regarding gender, diversity and compliance, what general recommendations would you present to companies in Argentina? What would you recommend to SMEs starting a gender and diversity strategy for their compliance programme?**

My first recommendation to a company in Argentina would be to consider the gender perspective. Given the diversity of companies, they should act based on an analysis of their sector, their specific activities, their exposure to risks and the likelihood to be effective. In the case of SMEs, the first thing I would tell them is: Don't be afraid, you can do it. One of the first things we must fight against is the fear of not-doing, because you can't do something big. It is very important that each company understands that there are a lot of things to do, and those things can be done according to the scope, capacity and pace of the company.

Last but not least, my general advice for both SMEs and bigger companies would be to start at your own pace, with your specific resource capacity, according to your sector and activities of your organisation. You can build your own plan, but start, and start now. ●

## A worldwide network of committed trainers

Since 2016, Alliance for Integrity has been conducting the training programme “From companies to companies”, in which experienced compliance officers from large national and multinational companies voluntarily train SMEs on preventing corruption and integrity. To date, almost 4,500 enterprises in the 14 countries the Alliance for Integrity operates activities have benefitted from this programme.

**T**HE success and impact of the more than 200 training courses conducted over the last six years has been possible due to a pool of 265 voluntary facilitators, who take time out of their corporate agendas to share experience, knowledge and practical tools with programme participants. In each course they provide different perspectives on anti-corruption in a specific industry. Over time, training material has been developed for agriculture, construction, healthcare, telecommunications, insurance and the forestry sector. It has also been adapted to specific target groups such as CEOs, cooperatives, women entrepreneurs, state-owned enterprises and start-ups.

All programmes pursue three main objectives: to provide knowledge on corruption and how to identify it, to motivate companies to prevent and fight corruption, and to provide practical tools to implement a compliance programme. The programme focuses on SMEs due to their specific role in any economy: According to the World Bank they account for over 90 per cent of enterprises and generate more than 50 per cent of employment in developing countries. SMEs are also the most affected by corruption, and a corruption scandal, a fine or the loss of contracts due to corruption can quickly lead to bankruptcy.

In countries or sectors with systemic corruption, motivating SMEs to prevent and fight corruption is a challenge. Alone, SMEs are minor players with little power to make systemic changes in a big marketplace. In this context, the added value of the facilitators – who are compliance experts from companies working in the same country as the respective SMEs – is their experience and conviction that change is possible. In so called Train-the-Trainer workshops, the new facilitators receive information about the training methodology and content, and how to adapt specific terminology and examples to the reality of SMEs. They then train SMEs by providing options on how to deal with difficult situations and practical cases, for instance. The trainers also remain available after the course to support SMEs in creating a collective action approach to look for solutions.

Together with its partners, Alliance for Integrity pursues the goal of capacity-building for SMEs as a crucial element to achieving long-term results in the fight against corruption. Only the support of large companies and other stakeholders can provide SMEs with the tools they need to stop being victims of corruption and start being heroes of integrity. ●

### A label of excellence

Different institutions recognize “From companies to companies” (DEPE) as a good practice in anti-corruption training. For instance, the EU-Commission recommends the approach in its “Handbook on good practices in the fight against corruption”. Brazil’s ‘National strategy against money laundering and anticorruption’, which brings together all Brazilian anticorruption institutions, recognized it as a significant step forward in integrity in SMEs.



### An app full of benefits

The course is complemented by additional tools such as TheIntegrityApp, a digital solution to self-assess one’s compliance programme against international standards. This app is used at the beginning of each course to identify the status of the participating SMEs’ compliance programme. It also provides the opportunity to evaluate each companies’ individual risks. The same assessment is conducted six months later to measure the training programme’s impact and possible improvements. Furthermore, an online support desk provides complementary material and participants can ask questions on implementing their company’s compliance programme.



[theintegrityapp.com](https://theintegrityapp.com)





"Through the DEPE training, we can take the first steps with SMEs and local companies to implement a compliance programme. We also

exchange experience and challenges in the different businesses and look for a joint solution. Building trust, exchanging experiences and networking are key for the success of this training."

**Dalma Parisi**, Head of Compliance South America, Siemens (Argentina)



"I joined the Alliance for Integrity as a trainer to create awareness amongst SMEs, who are the real backbone of the economy, on global best practices –

by imparting practical knowledge to ensure that SME do compliant business with integrity and expand their reach internationally also. It positively motivates and inspires me to thrive and achieve higher results."

**Ashish Jain**, Legal, Secretarial, Compliance and Privacy officer, Giesecke & Devrient (India)



"Integrity helps maintain your business reputation and is essential for retaining your clients and stakeholders' support while at the same time

setting the right tone for your team. Business integrity is needed to keep a company on the right track and to achieve its goal. Understanding the value of integrity motivates me to be a trainer to share and support other entrepreneurs concerning goals for better ethics in business."

**Nunki Juniarti**, Managing Director, Aria Prima Communiline (Indonesia)



"The DEPE training helps SMEs understand that having an integrity programme is not only a matter for large corporations and that it

does not need large investments to implement these programmes or for people in the company to understand them. The key is to design it for the needs of each organisation and that there are always tools or methodologies for SMEs to implement good practices."

**Maria Paula Arango**, Compliance Officer, Darnel Group (Colombia)



"Greater achievements in the fight against corruption cannot be chalked up in isolation by individuals, businesses and

governments. To effectively fight corruption in all of its forms, businesses should work together through awareness creation and collaboration."

**Frank Abdulai Iddrisu**, Financial Crime Investigator, Fidelity Bank (Ghana)



"As a DEPE trainer, I was privileged to have an incredible audience from a vast geographical region, truly dedicated to the promotion of an

environment of integrity in their organizations and to learning. I learned about the implementation challenges commonly faced by SMEs but above all I was positively surprised with the level of maturity and commitment of this diverse group of professionals dedicated to business integrity. Definitely an enriching exchange!"

**Isabela Hollanda**, Governance Officer, Women Corporate Directors (Brazil)

## Strengthening integrity in public infrastructure



From integrity development programmes in Latin America to a virtual scenario-based learning tool for engineers in Ghana and public-private dialogues in Indonesia – the Alliance for Integrity supports the fight against corruption in infrastructures by leveraging its approach of multi-stakeholder collective action in various focus countries. The following pages feature some of Alliance for Integrity's collective action activities in the infrastructure sector, focussing on different aspects in response to the diverse conditions on the ground, the nature of the challenge and the capabilities of Alliance for Integrity's networks.

**D**EPENDING on the geographical region and context, it is estimated that ten to thirty per cent of global infrastructure costs are lost due to mismanagement, inefficiency, and corruption. These figures illustrate that the risk of corruption in the global infrastructure sector are particularly high. Construction costs lost to bribes may vary globally from five to twenty percent or even more. This is especially significant for developing and emerging economies, where construction costs can be up to 45 per cent higher due to corruption. Corruption in infrastructure projects can lead to suboptimal planning and the wasteful use of materials, putting people's lives at risk and threatening the environment. It is also an obstacle to sustainable development as it hinders investment and competitiveness.

Yet, public infrastructure is key to sustainable development – from health and education to energy supply, clean water and sanitation: Most Sustainable Development Goals (SDGs) imply an improving public infrastructure, since reliable public infrastructure holds the potential to promote inclusive and sustainable industrialisation and to foster in-

novation. At the same time, establishing and maintaining public infrastructure is costly, requiring long-term planning and the coordination of public and private actors. The construction of mass transit systems, power supplies or sewer networks, to name a few, involves public procurement, large investments and complex project plans, making effective oversight challenging.

To strengthen integrity in the infrastructure sector, sectoral collective actions have proven effective; they promote rules that companies will actively comply with at both national and international level. The Collective Action approach taken by the Alliance for Integrity in the infrastructure sector recognises the value of small and medium enterprises (SMEs) given the crucial role they play as subcontractors in many large projects, creating a significant share of global GDP and driving job growth and innovation. Yet, SMEs often lack the resources necessary to implement best practices in anti-corruption and compliance, making them particularly vulnerable to bribery and corruption. Against this background, Alliance for Integrity's Corruption Prevention Trainings 'DEPE' particularly focus on SMEs in various sectors. ●

## Preventing corruption in Latin America's infrastructure sector

As part of its activities in Latin America, the Alliance for Integrity has been cooperating with a broad variety of network partners to improve compliance in the infrastructure and construction sectors in Argentina, Brazil, Mexico, and Peru. DEPE programmes in Latin America focus on the construction sector and raise awareness of the benefits of creating an ethical culture in the workplace. Participants are introduced to topics such as corruption prevention and risk management for subsequent discussions. Practical sessions enable participants to apply acquired learnings, and a wide variety of materials and resources is distributed to strengthen their knowledge and skills.

**ARGENTINA:** Since 2017 Alliance for Integrity has been teaming up with the German-Argentinian Chamber of Commerce (AHK Argentina) and the Argentine Chamber of Construction (CAMARCO). To date, the partners

have conducted 15 DEPE corruption prevention courses in 13 cities from 12 Argentine provinces, providing a total of 160 SMEs in the construction sector, with tools to counter corruption. To promote Collective Action among its affiliated companies, AHK Argentina and the United Nations Office on Drugs and Crime (UNODC) signed a sectoral agreement for rapid implementation of the United Nations Convention against Corruption (UNCAC) in the country in 2020. The project was implemented in 2021.

**BRAZIL:** In May 2022, a first DEPE programme for the construction sector was conducted with the Brazilian UN Global Compact Network. Facilitators included the compliance officer of EDP Brazil, the compliance and data protection officers of Saint-Gobain Brazil as well as the development and training director of Mercedes-Benz Bus.

**MEXICO:** Following the Peruvian and Brazilian examples, the first DEPE programme for Mexico's construction sector was held at the facilities of the Mexican Chamber of the Construction Industry (CMIC) in August 2022.

**PERU:** In 2021, and in collaboration with USAID Peru, the Peruvian Superior Organism of State Contracting (OSC) and the Presidency of the Peruvian Ministerial Council, the Alliance for Integrity launched a one-year programme comprised of five DEPE courses and a follow-up with SMEs from the construction and public infrastructure sectors. Some 142 SME representatives were given awareness training, learning how to prevent corruption through internal compliance systems, external measures to reduce risk from third parties and collective actions.





## The role of Ghana's engineers in fighting corruption

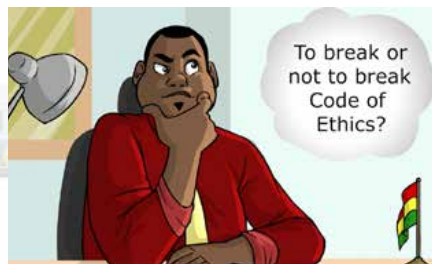
→ Due to the growing vulnerability of Ghana's infrastructure sector to corruption, the Alliance for Integrity and the Ghana Institution of Engineering (GhIE) established a strategic partnership in November 2018. It recognises the crucial role of engineers in fighting corruption as they are typically involved in each step of any infrastructure project; engineers can see the big picture, have considerable influence and, given their technical back-

ground, can easily spot various forms of corruption such as violation of safety standards, materials fraud and others.

→ Together with the GhIE, Alliance for Integrity has been providing Ghanaian engineers with awareness training since August 2022, helping them recognise corruption and integrity-related challenges. A so-called Scenario-Based Learning (SBL) initiative started at the Alli-

ance for Integrity Working Group level when GhIE expressed interest to partner up to jointly design a digital learning tool to enhance integrity and ethics among their members. This digital tool includes a broad variety of information and different scenarios on anti-corruption laws, conflict-of-interest situations, bid rigging, bribery and facilitation payments, and hospitality.

→ The partnership aims to reach over ten thousand engineers across the private and public sectors in Ghana. Considering their central position and function in infrastructure projects, considerable impact is expected, and the SBL has since been included in the mandatory requirements for all GhIE members as part of their internal requirements for good standing. ●



↗ Methods on integrity and business ethics in Ghana are also taught through video material.

## Joining forces with OECD

Since its creation in 1961, the Organisation for Economic Cooperation and Development OECD has been working on evidence-based international standards and possible solutions to a range of social, economic and environmental challenges. The organisation provides a unique platform and knowledge hub for data and data analysis, the exchange of experience and good practice as well as advice on public policies and international standard-setting. In 2018, the OECD joined the global Steering Committee of the Alliance

for Integrity and started supporting it. In 2020, the Alliance for Integrity was then invited to become a member of the OECD-coordinated Trust in Business Network (TriBuNe), a global multi-stakeholder community of C-suite leaders from the private sector, government, academia and civil society committed to strengthening trust in the business ecosystem. In recent years, the Alliance for Integrity has fed various experience and learnings from its network into the OECD's international exchange formats and working groups such

as the Blue Dot Network, a multilateral effort designing a trusted global framework for quality infrastructure investment and promoting principles of sustainable infrastructure development around the world. In this context the Alliance for Integrity is contributing to the Infrastructure Anti-Corruption Toolbox (I ACT), a holistic multi-stakeholder approach to empower actors across the infrastructure value chain to prevent, detect and report corruption and support a level playing field for business. ●



# A public-private dialogue on infrastructure corruption in Indonesia

**A**CCORDING to estimates supported by the Indonesian Anti-Corruption Agency (KPK), up to 50 per cent of infrastructure funding in the country may be lost due to corruption. The results – unbuilt hospitals and schools, shoddy roads, crumbling public houses – are felt by many Indonesians in their everyday lives.

As the official engagement group of the Group of 20 (G20), an intergovernmental forum comprising 19 countries and the European Union, the September 2022 B20 summit in Bali served as a venue to raise and address this issue. The B20 represents the global business community with a mandate to deliver actionable policy recommendations on the priorities established by each presidency and to spur economic growth and development.

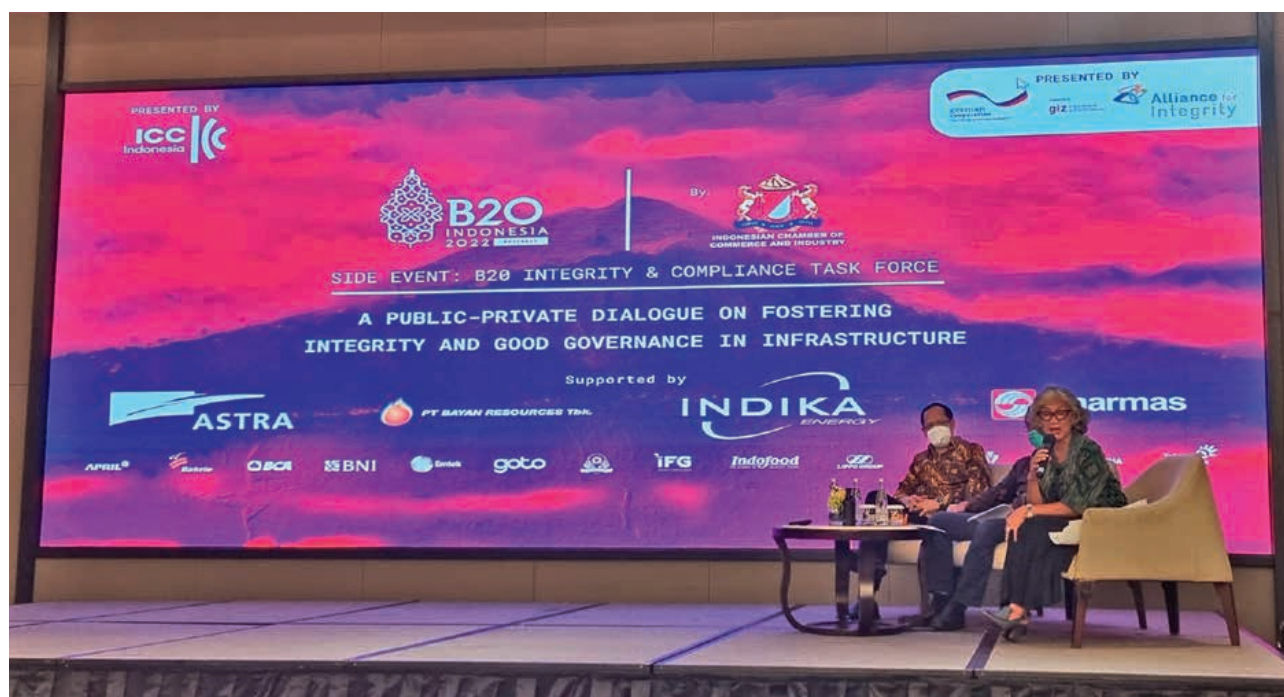
Here, the Alliance for Integrity and the International Chamber of Commerce (ICC) Indonesia organised a half-day event entitled “A public-private dialogue on fostering integrity and good governance in infrastructure” on behalf of the B20 Integrity and Compliance Task Force. Public and private sector representatives from Indonesia’s Ministry of Public Works and Housing, the Indonesian Good and

Services Procurement Agency, WASKITA Toll Road, ASTRA INFRA, the Basel Institute on Governance, Transparency International Indonesia, the business associations KADIN and the ICC all shared ideas and described challenges in the fight against corruption in the infrastructure sector.

One highlight was the presentation of the key findings and recommendations of an ongoing study on corruption in Indonesia’s infrastructure sector which analyses factors driving corruption along the infrastructure value chain and identifies crucial interdependencies between different stages of the process. The prevalence of bribery in the procurement stage, for example, leads to substandard building during implementation stage which, in turn, feeds expectations to corrupt the project evaluation. The study identified a range of approaches to address these issues which participants explored further after the presentation. The final version of the study includes input received during the conference and is freely available on the Alliance for Integrity website. ●



Free download  
of the study



## Anti-corruption in Brazil's and Argentina's health sector

In times of crisis, the need for quick decisions and the adequate distribution of limited resources like Personal Protective Equipment (PPE), respirators or vaccines make the health sector particularly vulnerable to corruption. To ensure the health of both patients and staff at work, high compliance standards and effective corruption prevention measures are crucial. In Latin America, the Alliance for Integrity helps to develop anti-corruption capacity in the health sector.

**D** **DECLARING** a state of emergency in 2020/21, several countries suspended regulations governing public contracts, which may have actually facilitated fraud. Examples of corruption and misconduct cases linked to the pandemic include the case of the “vacunagates”, where politicians were vaccinated illegally before the population. In a different country, a businessman was sentenced to prison for selling body bags overpriced by 1.300 % during the pandemic. Actually, overpriced ventilators were also acquired by different governments across Latin America.

To foster integrity in the corporate sector, the Alliance for Integrity had previously developed a corruption prevention training programme to support healthcare companies in their compliance efforts. Thanks to the flexibility of the network, the experts were able to quickly digitalize the format and adapt the content to the specific challenges due to the state of emergency and added aspects that would help companies to recover from the consequences of the Covid-19 pandemic.

In August 2021, a total of eleven Brazilian healthcare SMEs received live DEPE training which marked the first activity of the Alliance for Integrity in Brazil's northeast region. A first virtual training programme was held in Brazil in November 2021, at the peak of the pandemic, in partnership with the Comptroller General of the State of Pernambuco. Participants from twelve companies operating in the national healthcare sector learnt how to gradually raise their companies' integrity standards based on practical case studies and international best practices. A regularly conducted risk assessment, for example by using the “TheIntegrityApp”, an effective compliance management system, or a good understanding of correct behaviour in dilemma situations were elements of this webinar. Another programme for the healthcare sector took place in Bahia in August 2022, showing the relevance of the topic for the recovery after the pandemic.



**Mariana Regueira Corti**, Director of the Compliance Competence Center of AHK Argentina and DEPE trainer for the Alliance for Integrity

“In the context of the post-Covid19-pandemic, integrity and mitigation of corruption risks in the health area became especially relevant and cooperation between organization is important for strengthening institutions.”

In Brazil's neighbouring country Argentina, training in the health sector has taken place since 2017. Local implementation partner, AHK Argentina, has executed a number of courses together with the Argentine Chamber of Medical Supplies and Equipment (CADIEM). In 2021, AHK Argentina and CADIEM also cooperated with the United Nations Office on Drugs and Crime (UNODC) for the rapid implementation of the United Nations Convention against Corruption (UNCAC) in times of COVID-19. In a virtual DEPE course conducted by AHK Argentina in October 2021, a total of 62 national health companies were trained in anticorruption practices.

DEPE programmes in the health sector are planned to continue in both countries as the Covid-19 pandemic has clearly demonstrated this sector's vulnerabilities to corruption and need to improve the compliance standards. ●

The Alliance for Integrity is part of a working group created by the Brazilian Association of Health Technology Industry. Its objective is to create an observatory to raise awareness on the proper commercialization of products complying with international and local standards.

## Videos for an ethical health sector

A series of video clips produced by the Alliance for Integrity addresses representatives of Indonesia's health sector. The short movies raise key concerns such as the responsible promotion of pharmaceutical products, clearly defined tender processes in private-to-private procurement processes, and corruption prevention in the provision of personal protective equipment and other medical equipment.

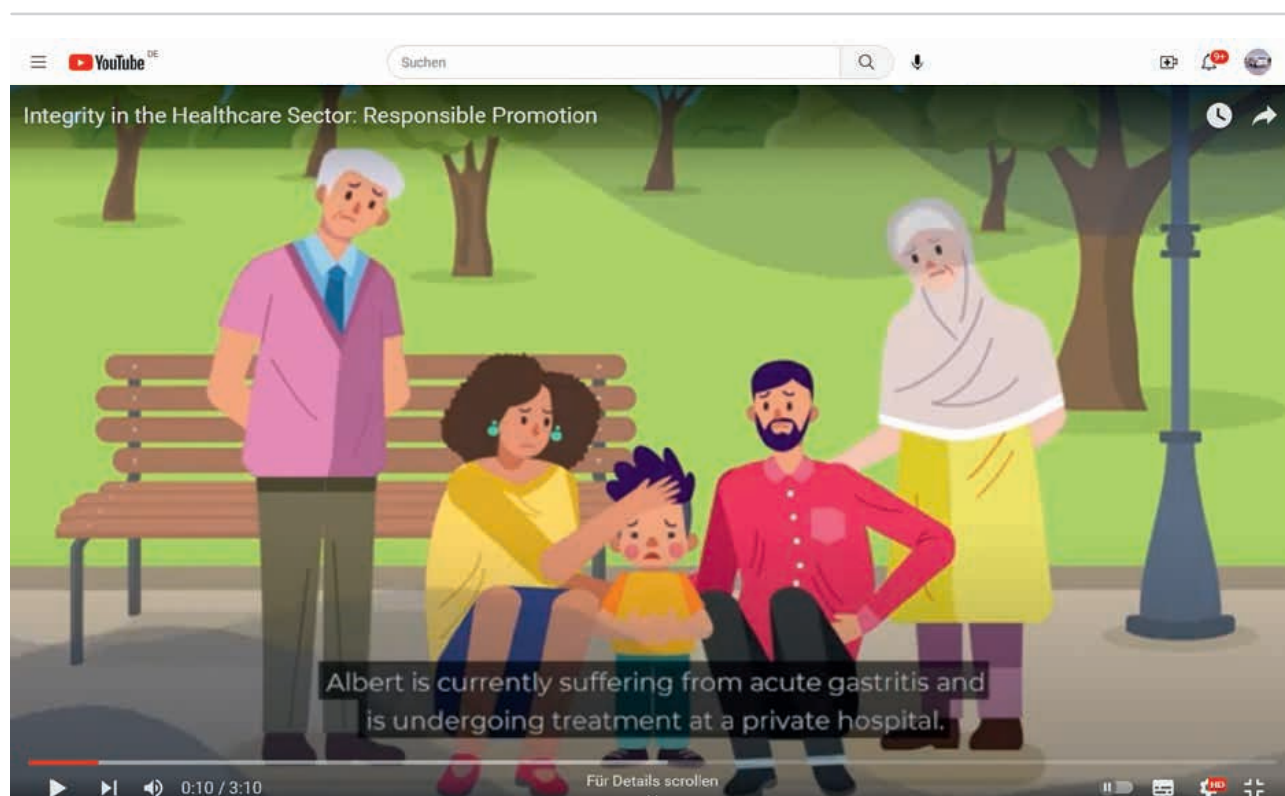
**I**n line with Sustainable Development Goal 3, the Indonesian government intends to improve the country's health care system with the aim of ensuring healthy lives for all and promoting well-being. However, there still is a long way to go to achieve this, with one important key barrier: corruption. Globally, at least seven per cent of all health care spending is lost to corruption. Given the generally high levels of corruption in Indonesia, the national figure is likely to be far higher. The results are fewer hospitals, doctors and nurses, lower-quality equipment and higher cost of care. The private sector plays a crucial role in Indonesian health-care provision. In 2017, for example, sixty percent of all Indonesian hospitals were

private – and the government is increasingly relying on private sector services. In this largely privatised system, corruption has far-reaching consequences for the health and well-being of Indonesians and the effectiveness of their health-care spending.

The anti-corruption videos introduce these issues and explain how the challenges can be addressed in a systemic manner. They are available on the Alliance for Integrity's YouTube channel in Bahasa Indonesia and English. ●



[Watch the videos](#)







## Why the health-care ecosystem needs strong and independent stakeholders



^ Teresa Cantú

The recent Covid-19 pandemic has shown that transparency and integrity in the healthcare sector are crucial to assure people's well-being worldwide. TERESA CANTÚ, director of the ethics commission of the Mexican Association of Pharmaceutical Research Industries AMIIF, explains how this can be achieved through collective action by all relevant stakeholders.



Mrs Cantú, could you briefly introduce your association AMIIF, its members and activities to our readers?

**TERESA CANTÚ:** Sure. AMIIF is a benchmark in the Mexican healthcare sector, an association comprising 60 companies, primarily global research and development biopharmaceutical companies. AMIIF itself generates 58,000 jobs directly in the country and promotes innovation, solid regulatory systems, and high-quality standards. We also consider intellectual property rights to be pillars of a solid health care system.



Within AMIIF, you have personally worked on various challenges related to integrity in Mexico's healthcare sector – what are the key challenges you face and how do you address them?

Interestingly, I found both challenges and opportunities. Firstly, independence in prescription must be guaranteed. The sort of activities regulated in our code of practice include knowledge exchange, clinical research, scholarships,

and product promotion. This also helps to prevent potential conflicts of interest in interaction with patients' organisations.

According to the code, all interactions have to be documented. The industry is not entitled to set conditions and this guarantees absolute respect for the independence of medical criteria. In 2022, AMIIF's members decided to establish a total ban on gifts and promotional material for medical prescriptions.

The second key challenge is digitalization. In Mexico, the pandemic paved the way for a variety of digital health solutions. Telemedicine, electronic prescription, and data protection are the more sensitive areas in this context, and they haven't been sufficiently regulated. In AMIIF, we created a working group of compliance officers that issued guidelines on this, all of which was based on international guidelines and directives.

Another important issue is continuous training. To be efficient and effective in understanding industry codes of ethics, a simple language with positive short messages and incentives for good behaviour is key. Especially, when interacting with other healthcare stakeholders such as patients and patients' organisations.



There is no innovation without ethical decisions. Last year we sponsored, with UNODC, the Coding 4 Integrity Hackathon in Brazil. Jointly with Interfarma, a sister association, I had the opportunity to mentor the participants and it was an enriching experience. Hopefully the prototypes will be implemented by many companies.



**In November 2022, AMIIF and several other parties signed the Consensus Framework of APEC. In a few words, what is this framework and what was the process of building it as a collective action?**

A group of experts in the health sector was brought together by the Alliance for Integrity to generate an initiative that would promote integrity within companies in the pharmaceutical and medical device industry and in their value chains, supply chains and related companies. This working group came up with the idea of establishing a Mexican Consensus Framework based on the Consensus Frameworks for Business Ethics of SMEs in APEC countries.

With the support of some of the experts from the initial group, Alliance for Integrity mapped the most relevant actors in the sector at the federal and local levels, gathered data, established key messages and analysed the motivations of each stakeholder. Presentations containing information and experience from around the world were shared to share the idea with stakeholders in academia and the health industry.

The Alianza Ética por la Salud prepared a document based on APEC principles including ESG standards. The actual ticket to play established by the parties, is having a code of conduct or code of ethics and a hotline. Following the international wave of consensus frameworks in the healthcare sector, various stakeholders from the healthcare ecosystem such as the development and research biopharmaceutical industry, medical device industry, over-the-counter industry, patients' organisations, private hospitals, and insurance companies, expressed their interest in joining a principle-based initiative to strengthen integrity in the Mexican healthcare sector and to provide the best possible care to their patients. Alliance for Integrity, AMIIF and the medical device industry, gathered some stakeholders from the healthcare ecosystem and this is how the creation of the Mexican Consensus Framework began.



**What were the main reasons for AMIIF to join and sign the Mexican Consensus Framework?**

Well, Co-creating the Mexican Consensus Framework was a natural step to reinforce integrity in the health sector. After raising the ethical standard in its code of practice, through the Consensus Framework, AMIIF and its members continue their purpose of promoting integrity within companies in the pharmaceutical industry and in their value chains, supply chains and related companies. The stronger the voices of the stakeholders in the healthcare ecosystem, the better and more accountable the sector will be, which ultimately translates into benefits for the patient and society.

The Mexican Healthcare Ecosystem is highly fragmented. Stakeholders sometimes don't know each other and there is an important imbalance concerning information among them. The Mexican Consensus Framework provides an excellent platform to work together with all stakeholders in the health environment under common ethical principles. building trust.



**Now that the Consensus Framework actually exists as a written commitment to integrity agreed upon by the most relevant actors in Mexico's healthcare sector, what are the next steps? What will the signing parties actually implement?**

The Mexican Consensus Framework has been recognized by APEC. That is a major step. As regards what happens next, Alliance for Integrity has established two working groups. One is responsible for explaining what the consensus frameworks are: specifically, how the Mexican consensus framework was created. This working group is going to develop a set of infographics to encourage other Latin American countries to develop their own consensus framework. The second working group will be analysing the Mexican healthcare ecosystem. They will study the institutions and highlight the difference between inefficiency and corruption. This differentiation will then enable the group to propose specific solutions to specific problems.

On top of this, the signatories are creating a third working group focused specifically on digital health – a solution that makes healthcare accessible to everybody. I would also like to highlight the fact that all working groups have committed themselves to proposing solutions with a gender perspective. ●



^ A villager uses a chainsaw to cut a felled tree into planks. Papua, Indonesia.

## Combating corruption in Indonesia's and Brazil's forestry industry

IT is hard to overstate the importance of forests for the planet, the climate, and for sustainable human life. Forests world-wide absorb up to 2.4 million metric tons of carbon each year, playing a crucial role in maintaining the global carbon budget. They are home to two-thirds of the earth's terrestrial species and support the livelihoods of billions of people, many of whom are disadvantaged or poorer populations in developing countries. Despite their importance, forests are decreasing rapidly: largely driven by the expansion of agriculture, over two billion hectares of forest have been lost since the 18th century. And the catastrophic process of deforestation is ongoing: approximately

10 million hectares of forest are lost every year, with corruption being a key enabler.

At a political level, corruption often hinders legislative efforts to combat corruption. Forest management is particularly vulnerable to large-scale corruption for the same reason for which forests are of such crucial social importance: people depending the most on healthy forests tend to be the poorest, most marginalized, most rural parts of the population – and so often lack the voice, access or resources to fight back against attempts to corrupt the political process.

What is more, corruption may be even more pernicious once legal constraints are in place. It is estimated that, in key



tropical countries producing timber, between 50 and 90 per cent of logging activity is illegal. Beyond the tragedy of deforestation itself, corruption in the forestry sector gives rise to broader damage and losses. According to INTERPOL estimates, the costs of corruption amount to 29 billion US dollars globally. Corruption also depresses the global market price of timber significantly, thereby often benefitting rich importing countries, hurting exporting countries, and limiting the capital and economic incentive for sustainable forest management. At the individual level, corruption in forestry often goes hand in hand with violations of land rights, particularly where indigenous communities are concerned.

Combating corruption in the forestry sector is therefore one of the key priorities of Alliance for Integrity. Here is a brief summary of its multi-stakeholder collective action approach to fostering integrity in the forestry sector in Brazil and Indonesia.

### Targeted measures against deforestation in Indonesia

Almost half of Indonesia's land mass is covered by forests. The South-East Asian nation boasts the world's third largest rain forest and is host to almost ten percent of the world's rain forest territory. The timber industry is a significant force in the country, and a major contributor to Indonesia's global exports. Perhaps even more importantly, agriculture, and especially palm oil production – which competes for the same land – is one of Indonesia's most important industries.

Taken together, careful, consistent and sustainable management of Indonesia's rain forests is essential for the world's climate, the country's economic development and preservation of hundreds of millions of people's livelihoods. Despite this global and national significance, Indonesia's



Training courses of the Alliance for Integrity aim at strengthening corruption prevention in the Indonesian forestry sector.

forests continue to suffer, and good management practices are being undermined by corruption. In one investigation, for instance, the Indonesian Anti-Corruption Agency (KPK) identified three million hectares of natural forests that were registered as protected forests while, in reality, they had already been cleared for palm oil plantations. More generally, corruption is undermining licensing regimes, voids protection schemes and often leads to the blatant disregard of land rights of indigenous communities.

As is often the case when corruption becomes the norm rather than the exception, even those companies with a real desire to act with integrity struggle to do so – faced as they are with competitive pressures, extortion by officials and lack of access to or knowledge of legal routes to receive licences, acquire land, etc.

Alliance for Integrity has joined forces with the GIZ-implemented project “Corruption Prevention in the Forestry Sector” to empower small and medium sized enterprises (SMEs) in Indonesia’s forestry sector to combat corruption and act with integrity. For this purpose, the partners have developed a novel integrity training programme for the forestry sector, following Alliance for Integrity’s established approach of a “From Companies to Companies”-format, in which experts from large companies with strong integrity track records conduct courses for SMEs.

In July 2022, this new forestry training programme has been piloted with a first cohort of more than 30 SMEs in Papua. In February 2023, a second cohort of 30 companies participated in similar training in Jakarta. Given the positive feedback from many participants, Alliance for Integrity is planning more integrity training workshops for SMEs in Indonesia’s forestry sector in the years to come.

### For the world’s climate: anti-corruption training programmes in Brazil

In summer 2021, Alliance for Integrity Brazil’s office started to develop corruption prevention training programmes for Brazil’s forestry industry. Three months later, and thanks to collaboration with the GIZ-led projects ‘Bioeconomy and Value Chains’, a DeveloPPP project with the Brazilian company Natura and Symrise of GIZ, a first course took place; the collaboration was based on their mutual objective, namely, to optimize corporate management and professionalize cooperatives and associations in Brazil.

Representatives of 29 organisations from different cooperatives and associations benefitted from the first anti-corruption programme in November 2021 in Belém in the State of Pará in the North-East of Brazil. Participants came from enterprises in small-scale agriculture, indigenous peo-



At the training course in Brazil, the representatives of different cooperatives, associations and SMEs exchanged experiences about the challenges they face daily in their businesses related to corruption.



ples, and traditional communities from different regions who work in agroforestry and agriculture in the Amazon. They exchanged the challenges they face related to integrity and corruption and were led through the “From Companies to Companies” (DEPE) training methodology by renowned compliance officers from the Alliance for Integrity network of facilitators who presented basic concepts of anti-corruption practice to mitigate risks and enable the identification of vulnerabilities.

Course participants worked in timber forest products and other sectors, such as oils, fruits, seeds and resins. The programme therefore helped to contribute to other related industries. The organisations present will use the tools pro-

vided by the workshop to improve their compliance standards and use them to access international markets and secure better conditions for public funding.

Improving the integrity standards of this supply chain also contributes to the maintenance of Brazilian forests. In the future, Alliance for Integrity wants to expand its activities, giving companies better integrity and compliance tools to support the implementation of the EU’s Forestry Due Diligence Regulation. ●



“This DEPE training, attended by small extractivists from Pará, was a real milestone for Alliance for Integrity as it acknowledged the extreme importance of the extractive sector for Brazil’s economy. Bringing good, easy-to-apply practices to these communities, and inviting them to exchange on the reality in which they live reflects the essence of the Alliance for Integrity as an enabler for SMEs. The training contributes effectively to fighting corruption along the entire supply chain by including SMEs – since large companies already adopt robust compliance programmes – allowing them not only to exchange ideas but also to apply them and contribute to a fairer and more equal country.”

**Marco Barreto**, Senior Manager for Ethics & Compliance, Natura & Co.

# Integrity Weeks in Latin America: a great opportunity to network, learn and drive the regional integrity agenda

Based on the success of the first-ever Regional Integrity Week in 2016 in Indonesia, the Alliance for Integrity organised similar regional events in other world regions. In Latin America, the rapid growth and expansion of the Alliance for Integrity has resulted in seven Regional Latin American Integrity Weeks to date.

**ENTITLED** a “Culture of Integrity for a Sustainable Economy: Compliance Agenda as a Peace Agenda” the latest, and largest, edition of the Latin America Regional Integrity Weeks took place in Quito, Ecuador in September 2022. Organised in cooperation with the GIZ project “Ecuador SinCero”, this seventh edition ensured continuity for the thematic axis: generating an authentic culture of integrity and its challenges, based on a perspective of ‘positive peace’ following the Sustainable Development Goal 16.

## The back-story: From national to regional networks

To ensure collective action between individuals and organisations, the Alliance for Integrity established national multistakeholder networks composed of actors committed to business integrity. These national networks were composed

of companies and business associations as well as other actors from civil society, academia, international organisations and representatives of the public sector to engage in public-private dialogues, identify solutions and proposals aimed at tackling corruption. They also developed practical solutions, shared knowledge and disseminated good practices regarding integrity in business to different audiences that focus on the core issues of corruption prevention.

Over time, it became clear that the diversity and richness of these national networks would benefit from a formal space allowing them to meet in a regular manner to network, inspire each other, and share experience and good practice. The Regional Integrity Weeks therefore aim to bring together all national networks with the main objective to address corruption as a complex, multi-causal, multi-level phenomenon that usually involves a public and a private part and needs to be tackled in a systemic manner.



Participants of the Regional Integrity Week Latin America 2022 in Quito, Ecuador



“The Regional Integrity Week 2022 was based on good practice and took an approach to promote integrity and collective action for the fight against corruption. It also looked at innovative elements and how to make an impact on the creation of peace, trust and social cohesion at regional level. As such, it set the tone for a new regional agenda on business integrity in Latin America.”

**Evangelina Gomez-Durañona**, Chair of the Advisory Group of the Alliance for Integrity in Ecuador and Executive Director of CERES

#### From Quito to Lima

The next Regional Integrity Week will be held from 23 to 27 October 2023 in Lima, Peru and will look at topics such as ESG (Environment, Social, Governance) as well as innovation, human rights, trust and democracy. The agenda includes a presentation of the initiatives developed with the support of the Peruvian Advisory Group of Alliance for Integrity and the GIZ project “Building Governance with Integrity”. The main Peruvian business associations – among them CONFIEP, the Lima Chamber of Commerce and the AHK German-Peruvian Chamber of Commerce – will present their good practice. Researchers as well as representatives of civil society organisations and companies are expected to attend the conference. ●

#### Key figures from the 7th Regional Integrity Week in Quito, Ecuador, in 2022

- Over 500 participants in total, 230 of which participated onsite in Quito
- 128 speakers
- Over 50 hours of content contributed to shaping the regional integrity agenda
- 33 co-host organisations
- 21 face-to-face sessions in Quito
- 12 parallel sessions
- 9 countries represented
- 3 publications and 2 triangular cooperation projects launched
- 25 million views across social media platforms, newspapers, web pages, notes and reports

## Standing together for business integrity in South Africa

**STATE SERVICES**, socio-economic development, investor confidence and job creation are heavily impacted by the level of corruption in South Africa. The endemic nature of corruption has been highlighted by the members of the multi-stakeholder partnership of the Transparency, Integrity and Accountability Programme (TIP), during a series of meetings in February 2023, marking the kick-start of the collaboration between TIP and the Alliance for Integrity.

All parties agreed that corruption is not only a public sector-problem in the country but that the private sector also has its fair share of responsibility. While most of the country's big corporations have been able to navigate this context, SMEs are particularly suffering due to the amount of red tape combined with corrupt practices, making it increasingly difficult to integrate into supply chains.

To support those businesses and build their capacity to address corruption, TIP has integrated the network of the



Alliance for Integrity to adopt, develop, and implement suitable formats and activities throughout the country. In addition to the “from companies to companies” training programme, focus will be on public-private dialogue formats with emphasis on public procurement as well as and the nexus of gender and anti-corruption. These activities and new partnerships represent further important steps in the fight against corruption in South Africa and, if successful, will be extended still further. ●

## Consolidating the network in Nigeria

**THE ALLIANCE FOR INTEGRITY'S** recent work in Nigeria has raised the network's profile in Africa: by further engaging potential partners in the country with the aim of building partnerships towards the formation of the Alliance for Integrity Nigeria and to contribute towards enhancing a competitive economic environment.

In November 2022 and April 2023, the Alliance for Integrity successfully conducted Train-the-Trainers session for compliance officers from companies in Nigeria, and local SMEs have started to receive training on business com-



pliance. Key partners, such as the Delegation of German Industry and Commerce in Nigeria (AHK), the Nigerian-German Chamber of Commerce (NGCC), and BASF are supporting these efforts to implement activities and grow and consolidate the local network. Plans include officially forming the Advisory Group in Nigeria and formalising working groups on capacity building, awareness raising and start-ups.

Start-up businesses represent one of the main areas of engagement for the Alliance for Integrity network in Nigeria. Although they play a crucial role in supply chains, they are highly affected by corruption. Estimates calculate the number of start-ups at 3,600 in 2022, while 61 per cent of them failed over the last decade. To support them, the Alliance for Integrity is currently developing a targeted compliance training programme to reflect the context of start-up businesses in Nigeria. Together with a local working group, pilot courses for selected start-ups are being conducted. ●



## Joint efforts for corruption prevention in the private sector

**THE UN GLOBAL COMPACT** is a call to companies to align their operations with ten universal principles in the areas of human rights, labour, environment and anti-corruption. With more than 22,000 participants in over 160 countries, it is the largest corporate sustainability initiative in the world.

The Alliance for Integrity collaborates closely with the UN Global Compact in preventing corruption in the private sector across the globe. For instance, it leads the efforts of

the Global Compact Network Germany, while the latter is a member of Alliance for Integrity's global Steering Committee.

In Argentina, Colombia and Ecuador, the Local Networks of the UN Global Compact are implementing partners of Alliance for Integrity's training "From Companies to Companies". On-going cooperation formats for driving Collective Action also exist in Brazil, India, Indonesia, Mexico, Paraguay and Uruguay. ●



"Corruption remains one of the greatest obstacles to the 2030 Agenda for Sustainable Development. It affects the economy, undermines democracy and the rule of law while fueling insecurity and neglect of human rights. With rising expectations from consumers, investors, governments and employees against a backdrop of the current poly crisis, anti-corruption and governance issues are increasingly at the forefront for business and finance alike. Through Collective Action, companies around the world can advance business integrity and help achieve a more transparent global economy."

Sanda Ojiambo, Assistant Secretary-General and CEO, UN Global Compact

## How the ECOWAS Commission's Integrity System and new anti-corruption training programme came into existence

Can for-profit companies and public institutions effectively inspire and support each other to promote integrity and implement good practice in anti-corruption? And if so: how?



**SINCE 2021**, the Alliance for Integrity has collaborated with the GIZ project for Institutional Support to the Commission of the Economic Community of West African States (ECOWAS). This collaboration, implemented with the financial support of the European Union (EU) and the German Federal Ministry for Economic Cooperation and Development (BMZ), was based on mutual inspiration, co-creation and open exchange between public and private sector organisations, and how they can learn from each other to promote integrity and embed ethical values in their institutions.

The Alliance for Integrity presented and shared its anti-corruption and compliance expertise in several workshops and bilateral exchanges with the Commission. This

Stakeholders from ECOWAS and Alliance for Integrity at the Code of Ethics retreat in January 2021 in Abidjan (Cote d'Ivoire)

exchange mainly supported the process of developing, establishing and maintaining an effective institutional integrity programme. One concrete output arising from this cooperation is the ECOWAS' new Code of Ethics and Professional Conduct, conceived and designed in close consultation with its employees. To develop the new code, the Commission was able to rely on the Alliance for Integrity's network expertise and build on good corporate practice in developing such policies and following content-related examples. Among other things this includes clear nonretaliation policies, how to provide effective protection when

reporting offences or unethical behaviour, what an anti-harassment policy looks like and clear guidelines on how to avoid conflicts of interest.

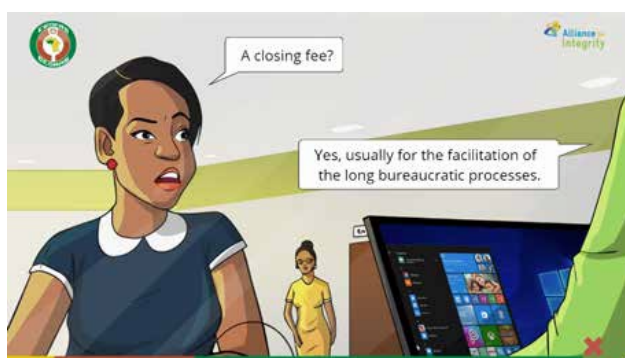
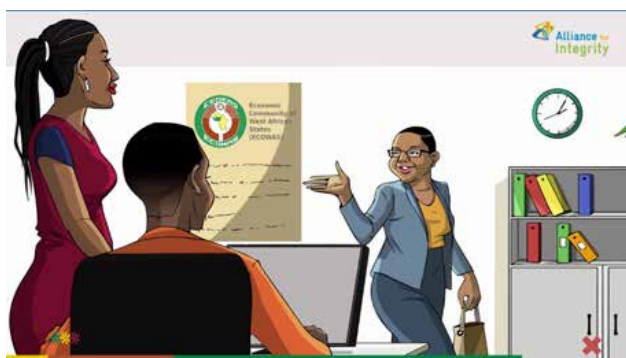
Specific discussions were also held on the role of gender regarding ethics within the Commission. Thematic exchanges provided valuable input on risks related to gender and corruption, and the resulting recommendations were incorporated into the new code. They also led to explicit definitions of gender-related forms of corruption and gender-related risks such as sextortion and the inclusion of sexual harassment in the code.

Furthermore, the corporate sector lessons supported the ECOWAS Commission's efforts to increase awareness and build capacity on ethics and integrity among its staff members. In addition to exchanges on the what and how of a comprehensive anti-corruption sensitization campaign, the Alliance for Integrity supported the development of training activities that were originally designed for the private sector and were now adapted to the ECOWAS Commission's needs and integrated in its growing training portfolio.

The new training material and activities include different scenario-based learning modules and were designed to train ECOWAS staff in a hybrid manner, using its well-established Training Centre in combination with an online format. The training also addresses relevant topics such as bribery and facilitation payments, gifts, entertainment and hospitality, collusion and bid rigging as well as conflicts of interest. Finally, the new programme has a special focus on helping ECOWAS Commission's staff to identify, prevent, mitigate and implement practical preventive measures against the particularly high risks of corruption at the interface between the public and private sector.

This all reflects positively on the question of whether for-profit companies and public institutions can inspire and support each other to promote integrity. ●

The virtual training for ECOWAS features a set of specific practical cases and offers concrete solutions to support ECOWAS staff and further increase integrity in the organisation.



## Developing capacity of SAIs with OLACEFS

**SUPREME AUDIT INSTITUTIONS** (SAIs) play an important role in preventing and fighting corruption in many countries around the globe. Their technical capabilities, access to data, public mandate and strong reputations make them key allies in the fight against corruption. Internationally, this role has been highlighted over the past decade, including with the UN Abu Dhabi declaration on enhancing collaboration between SAIs and anti-corruption bodies.

To combat corruption effectively, SAIs increasingly need to communicate effectively with the public and civil society, build networks of allies and supporters, and drive collective action. To tackle this challenge, the Organization of Latin American and Caribbean Supreme Audit Institutions (OLACEFS) has teamed up with Alliance for Integrity and the Regional GIZ project “Strengthening external control for the prevention and fight against corruption”.

Building on joint international seminars held in 2017 and a first Memorandum of Understanding between Alliance for Integrity and OLACEFS in 2020, the partners are now systematically collaborating on capacity building of SAIs in Latin America. Focus areas include communications outreach and network building, facilitation of a public dialogue process, gender and corruption, laboratories on SAI toolboxes for tackling corruption. So far, Alliance for Integrity has directly collaborated with SAIs in Chile, Mexico, Ecuador, Paraguay, Guatemala and Honduras. A second phase of the corruption risk laboratory is expected to start in 2023 and will include additional countries. ●



“The closer link of action and knowledge between OLACEFS and Alliance for Integrity impacts on a window of opportunities in the public and private sphere, in the understanding of the fight against corruption as a phenomenon that corrodes the social fabric and our democracy.”

Fabian Forestieri, Director of Institutional Relations of SAI Paraguay, during the Regional Conference of the Alliance for Integrity in Asunción (Paraguay) in 2021



## A shared strategic approach

**THE BASEL INSTITUTE ON GOVERNANCE** is an independent not-for-profit organisation dedicated to countering corruption and other financial crimes and to improving standards of governance. As a member of Alliance for Integrity's Steering Committee, the Institute is providing strategic guidance for Alliance for Integrity's activities in certain focus countries. Its thought leadership on collective action for preventing corruption has inspired many of the

Alliance's most successful approaches – and continues to do so. The organisations also partner closely in implementation and outreach projects, such as at an official B20 side event on infrastructure corruption in Indonesia or a panel discussion for compliance officers during the 2022 annual conference of the German Institute for Compliance (DICO). ●



“Working closely with other leading Collective Action organisations like the Alliance for Integrity helps amplify our shared goals, especially when it comes to increasing the visibility and uptake of Collective Action not just at the company but also at the country and international standard-setting level. We look forward to expanding our collaboration with the team in the coming months and years.”

Gretta Fenner, Managing Director of the Basel Institute on Governance

## Partnering for integrity

**WITH OVER 100 CHAPTERS** across the globe, Transparency International (TI) is a driving force in the fight against corruption – and one of Alliance for Integrity’s key civil society partners. We routinely collaborate at the global level – including through publications such as our Compliance Bulletins and the development of The IntegrityApp – but also work closely with TI chapters in many of our focus countries. This includes TI Germany as a member of the Alliance for Integrity’s Steering Committee, TI Ghana, which will implement selected AFIN activities from 2023 onwards, as well as chapters in Argentina, Brazil, Colombia, Ghana, Indonesia, Mexico and Uruguay. Across all these countries, combining Alliance for Integrity’s collective action approach and private sector network with Transparency International’s vast subject matter expertise, advocacy experience and stellar reputation continues to be a gamechanger for driving collective action for integrity. ●



“Driving integrity in business, through collective action initiatives involving multistakeholder coalitions, paves the

way for an ethical and sustainable present and future. By joining forces with Alliance for Integrity through our chapters across regions, we act as catalysts for change, transcending sectors and borders to create a unified force championing integrity, transparency, and accountability in business environments worldwide.”

**Delia Ferreira Rubio,**  
Chair of Transparency International

## Close cooperation in many countries

**UNODC** is an important partner of the Alliance for Integrity and a member of the Steering Committee. UNODC’s high-calibre expertise is incorporated into many of the Alliance for Integrity’s offerings. The findings from the UNODC publication “The time is now” on gender and anti-corruption inspire many exchange formats (Integrity Coffee, etc.), working groups and panels at international forums such as the UNGASS Conference in Egypt in 2021. In addition, UNODC and the Alliance for Integrity work together in several countries: In Colombia, for example, together with the UN Global Compact, they publish an annual publication on good practices of Colombian companies in the field of anti-corruption. In Mexico, UNODC is an active member of the Advisory Group of the Alliance for Integrity. ●



“Addressing corruption across sectors and borders requires collaborative action. Working with the Alliance for Integrity increases our collective impact

in supporting countries to build and enhance integrity in the private sector.”

**Brigitte Strobel-Shaw,** Chief of the Corruption and Economic Crime Branch, UNODC

# Publications

Information available in various languages at [www.allianceforintegrity.org](http://www.allianceforintegrity.org)



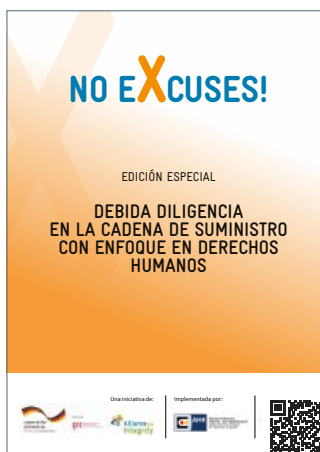
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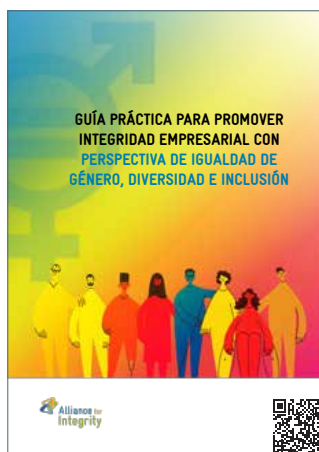
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