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Siemens
Integrity Initiative
Annual Report 2024

siemens.com/integrity-initiative

Content

Note:

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

The Siemens Integrity Initiative Annual Report 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024 can be found here:

www.siemens.com/integrity-initiative/Report2011
www.siemens.com/integrity-initiative/Report2012
www.siemens.com/integrity-initiative/Report2013
www.siemens.com/integrity-initiative/Report2014
www.siemens.com/integrity-initiative/Report2015
www.siemens.com/integrity-initiative/Report2016
www.siemens.com/integrity-initiative/Report2017
www.siemens.com/integrity-initiative/Report2018
www.siemens.com/integrity-initiative/Report2019
www.siemens.com/integrity-initiative/Report2020
www.siemens.com/integrity-initiative/Report2021
www.siemens.com/integrity-initiative/Report2022
www.siemens.com/integrity-initiative/Report2023
www.siemens.com/integrity-initiative/Report2024

Kindly note that the online version of this Annual Report 2024, available at www.siemens.com/integrity-initiative/Report2024, (the link will be activated later this year) is complemented by numerous hyperlinks which provide a wealth of additional external information on the projects funded under the Siemens Integrity Initiative.

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

Steering Committee

Dear Reader,

May 2025

We are delighted to present to you this Annual Report 2024 which sets out the most recent accomplishments of the Siemens Integrity Initiative with impressive summaries of project activities and outcomes in Section C, based on information provided by our Integrity Partners as of March 3, 2025.

On July 2, 2009, the World Bank Group announced a comprehensive Settlement with Siemens. As part of the Settlement, Siemens agreed to cooperate in changing industry practices, to clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption. Subsequently, Siemens conceptualized and set up the Siemens Integrity Initiative to support projects and organizations in the fight against corruption and fraud with funding of USD 100 million over 15 years.

This funding was supplemented on March 15, 2013 by a separate Settlement with the European Investment Bank (EIB) worth EUR 13,64 million over 5 years.

As of June 2024, the full amount of both Settlements was committed to 85 Projects in over 50 countries over three Funding Rounds and the Golden Stretch, and all funds were disbursed to our Project Partners in accordance with the agreed Funding Agreements, Budgets, and Workplans, thereby fulfilling the Settlement cash-out obligations.

We are convinced that the active portfolio of funded projects is well placed to advance Collective Action and Education and Training into the future.

The dedication and professionalism of our Integrity Partners around the world has demanded careful multi-stakeholder engagement, patience and perseverance in the face of unexpected challenges and obstacles, making the many reported achievements in the fight against corruption truly impressive. 11 remaining active projects will complete their scheduled activities by June 2025, and we have engaged the "Universalia Management Group" to perform an independent "End of Settlement Review" to assess the overall contribution of the Siemens Integrity Initiative to the fight against corruption in over 15 years. The results will be included in the Annual Report 2025 planned for publication in June 2026.

Collective Action is our shared fight against corruption in promoting responsible business conduct and integrity by creating alliances, strengthening the rule of law, strengthening voluntary standards, creating incentives for good performers, developing curricula, building capacity and establishing platforms for dialog and knowledge sharing.

Our commitment to Collective Action and the Siemens Integrity Initiative remains unequivocal. Collective Action is:

- anchored in our Business Conduct Guidelines as part of our values and commitment to responsible and ethical business conduct, and as our strategic response to compliance risks in numerous markets,
- included in our Legal and Compliance strategic priorities for 2025,
- fully aligned with the Siemens growth and sustainability ambitions.

The following sentiments expressed in the Sustainability Report 2024 by Dr. Roland Busch, our President and Chief Executive Officer of Siemens AG, and Judith Wiese, our Chief People and Sustainability Officer (CPSO), Member of the Managing Board of Siemens AG and Labor Director are noteworthy:

“We continue to face a time of urgent global challenges. A worsening climate crisis, rising temperatures, severe natural disasters, escalating energy costs, inflation and geopolitical conflicts – threatening both people and the planet.”

Furthermore: “Our broader environmental, social, and governance (ESG) ambitions are outlined in our DEGREE sustainability framework – a 360° approach that enables us to adapt to evolving market dynamics, societal expectations, and regulatory standards. Our six fields of action – Decarbonization, Ethics, Governance, Resource Efficiency, Equity, and Employability – guide our responsible business practices.”

Key figures

327,000 Employees	**€ 76 billion** Revenue for continuing operations	**15.5 %** Adjusted EBITA margin for the Industrial Businesses	**€ 9.0 billion** Net income

Source: Siemens Sustainability Report 2024

Looking back on 2024 and turning to the future, additionally: "Despite this progress, we need to go further. And we can only do that by embracing transparency, aiming higher, and working together – with customers, partners, suppliers, and the broader ecosystem."

In recognition of the significant contribution made by the Siemens Integrity Initiative to the global fight against corruption, we are pleased to support the new Evolve Funding Round proposed by the Project Office, which has also been approved by the Managing Board as an integral contribution to the Siemens DEGREE sustainability framework.

We welcome Julianne Altieri as the Head of the new International Financial Institutions & Collective Action department and congratulate Shawn Teixeira on his new role as Head of the Siemens Integrity Initiative. We wish Julianne and Shawn all the best in driving Collective Action forward and in launching the new Evolve Funding Round to create fair, level, and clean market conditions for all participants, for sustainable growth, and for the ultimate benefit of society at large, especially now with the many global challenges that we face.

In conclusion we draw on these words by Dr. Roland Busch, President and Chief Executive Officer of Siemens AG, taken from the Siemens AG Sustainability Report 2024:

"We help our customers and partners around the world to become more competitive, resilient, and sustainable. In all our interactions, and without exceptions, we always act ethically, legally, and with the highest integrity."

Steering Committee of the Siemens Integrity Initiative:

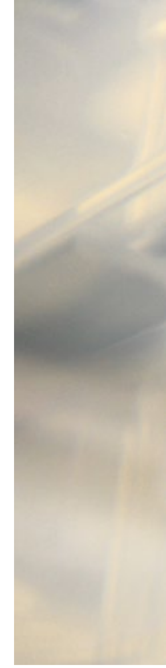
Dr. Andreas Christian Hoffmann
General Counsel, Siemens AG

Hanno Kunkel
Chief Compliance Officer, Siemens AG

Dr. Horst J. Kayser,
Chairman Siemens Portfolio Companies (POC), Siemens AG

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

Project Office



Dear Reader,

May 2025

2024 was another significant milestone year for the Siemens Integrity Initiative.

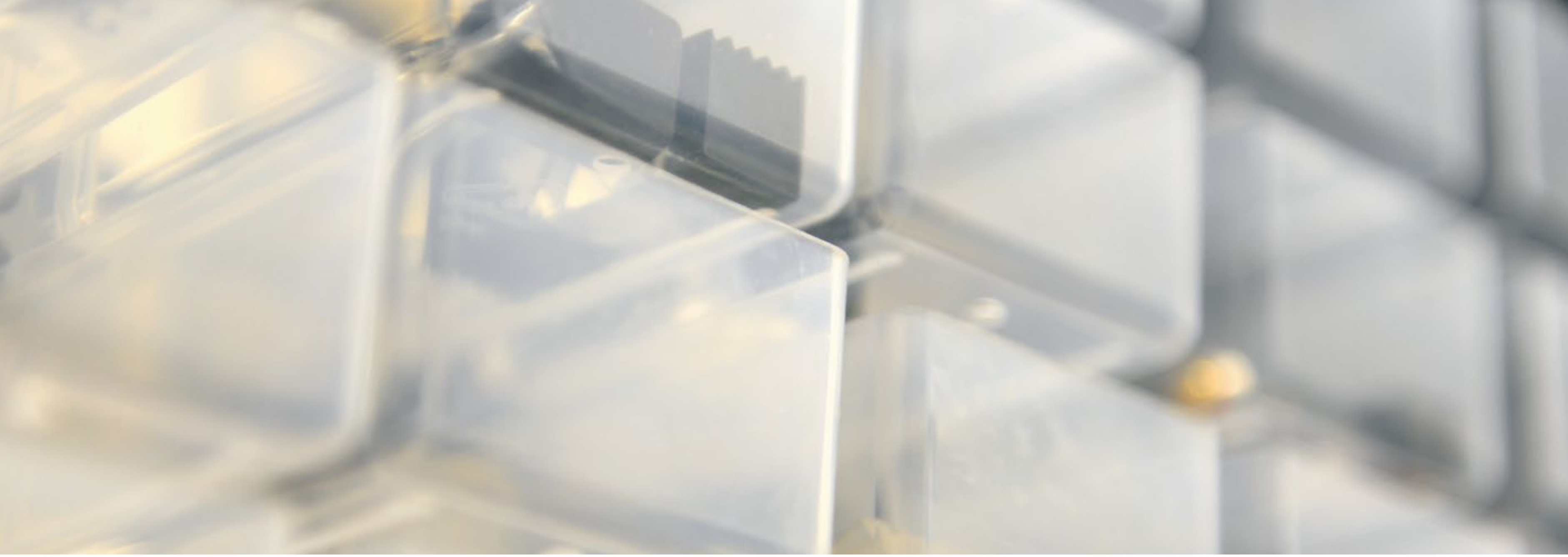
All funds were disbursed to Project Partners in accordance with the respective Funding Agreements and in fulfillment of the settlements with the World Bank and the European Investment Bank, as mentioned in our press release dated June 28, 2024. (See Section D1.)

In June 2024 the Project Office bid Sabine Zindera farewell as she started a new personal chapter. Instrumental in setting up the Siemens Integrity Initiative in 2009, Sabine's passion in and dedication to driving Collective Action on the global agenda is highly valued and will be well remembered.

In July 2024, the Collective Action and External Affairs team merged with International Financial Institutions to form a new International Financial Institutions & Collective Action department under the leadership of Julianne Altieri.

Shawn Teixeira assumed the role of Head of the Siemens Integrity Initiative in the same month.

We actively participated in global events like the 2024 OECD Global Anti-Corruption & Integrity Forum in Paris which celebrated the 25th Anniversary of the OECD Anti-Bribery convention, as well as the 5th International Anti-Corruption Collective Action Conference in Basel, Switzerland and the International Anti-Corruption Conference, in Vilnius, Lithuania.



A notable highlight in September 2024 was our contribution to and participation in the United Nations Global Compact celebration of the 20th Anniversary of Principle Ten on Anti-Corruption in New York, bringing together leaders from business, Government, civil society, and international organizations dedicated to upholding the highest standards of anti-corruption practices.

Hanno Kunkel joined the Steering Committee of the Siemens Integrity Initiative in October 2024 as the new Chief Compliance Officer, and Annette Kraus took on new responsibility as Head of Social & Industrial Relations and P&O Germany.

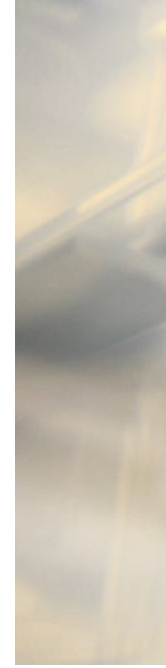
The Project Office worked intensively on the conceptualization and preparation of a visionary concept aimed at sustaining the fight against corruption through the Siemens Integrity Initiative with continued focus on Collective Action and Education and Training.

We are truly encouraged and delighted that the Managing Board and Siemens Steering Committee have approved our proposed concept for the new voluntary funding under the Evolve Funding Round of the Siemens Integrity Initiative.

In alignment with the Siemens Steering Committee, the Project Office in April 2025 invited short-listed Third Funding Round and Golden Stretch candidates to submit Full Proposals for funding under the Evolve Funding Round. More information on the final selection of projects will be made available on our website in fall 2025.

Together with our Integrity Partners, we were delighted to continue our engagement in the strategic principles of the Brazilian B20 Presidency in 2024 under the banner of “Inclusive Growth for a Sustainable Future”, and we look forward to further engagement in the Integrity and Compliance Task Force under the South African B20 Presidency in 2025.

The Siemens Integrity Initiative remains an essential driver for Collective Action globally and is firmly anchored in our corporate values and Business Conduct Guidelines as a key strategic response to significant compliance risks in numerous markets in which we operate. Through Collective Action and the Siemens Integrity Initiative we aim to create fair, level, and clean market conditions for all participants.



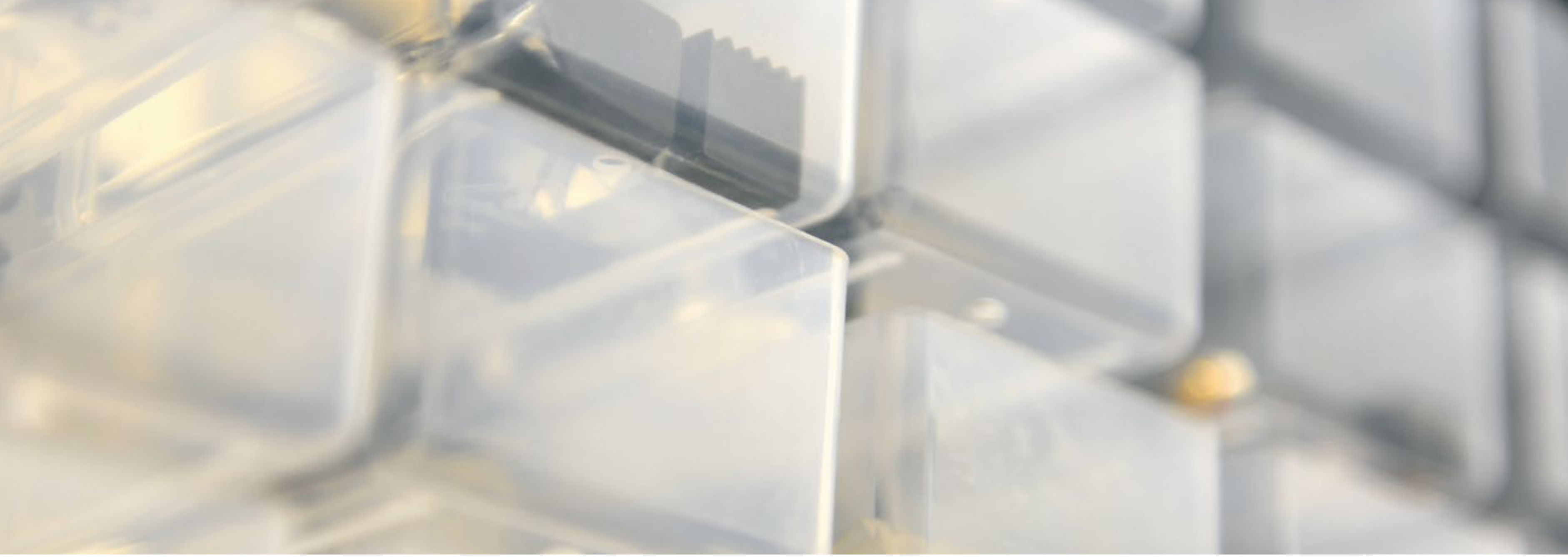
This commitment to Collective Action is well captured in the Sustainability Report 2024:

"Operating with integrity and in compliance with laws and regulation is fundamental to stakeholder trust and our company's continued success. Siemens' business and compliance environment is complex. Siemens and its roughly 327,000 employees operate in multiple countries around the world. Our customers in both the private and public sectors serve a vast array of industries. Our global business operations are governed by numerous national legal systems and take place in a variety of political, social, and cultural settings that are constantly changing.

The way that Siemens and our partners – which include suppliers, intermediaries, resellers, and consortium partners – do business impact the markets and societies where we operate. Unethical and unlawful conduct such as corruption, cartel arrangements, and money laundering can distort competition, hinder economic development, and threaten human rights and democracy.

As a global player, Siemens is responsible for setting an example in its own operations and in collaboration with its stakeholders. Through Collective Action together with stakeholders from politics, business, and society, we build alliances against corruption and thus support establishing the conditions for fair competition"

Throughout the year, activities in 19 Third Funding Round and Golden Stretch projects were intensified to drive maximum outcome and results. 8 projects completed their scheduled activities by September 2024, with 11 projects to complete project activities by June 2025.



Further information on the status of Third Funding Round and Golden Stretch projects is available in Section C3. and Section C4. of this Annual Report 2024.

These impressive project results and outcomes further enhance the Siemens Integrity Initiative's successful and substantial private sector contribution to the global fight against corruption, as already evidenced by the independent Mid-term Review published in our Annual Report 2017.

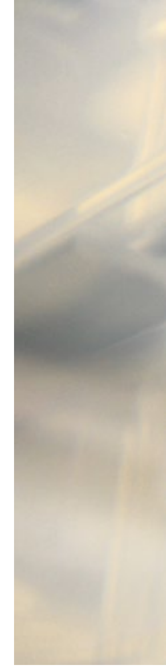
The Project Office met with the Universalia Management group in Munich in November 2024 to kick off the End-of-Settlement evaluation which will build on the 2017 Mid-Term Review and further assess the Siemens Integrity Initiative's overall contribution to the fight against corruption over more than 15 years. The evaluation results are expected to be published in our next Annual Report 2025 in summer 2026.

The success of the Siemens Integrity Initiative firmly rests on the tireless and collective effort of so many. We would like to express our sincere thanks and gratitude to:

- our valued Integrity Partners for their dedication, commitment and hard work in implementing the agreed activities and for the positive results and outcomes
- the World Bank Group and the European Investment Bank for their constructive and collaborative engagement over the past 15 years
- the members of our Steering Committee, who have always supported us with valuable advice and guidance
- the Siemens Managing Board for their approval of our new Evolve Funding Round concept
- Annette Kraus for her consistent support of Collective Action over the years
- Karin Gebhard for her engagement and support
- our Project Relationship Managers for their insight and "eyes and ears" support at local level
- our in-county CEOs and mentors for their guidance and local expertise, and
- our functional experts in Finance, Legal and Tax for their meaningful and professional support

A Word from the Siemens Integrity Initiative Steering Committee

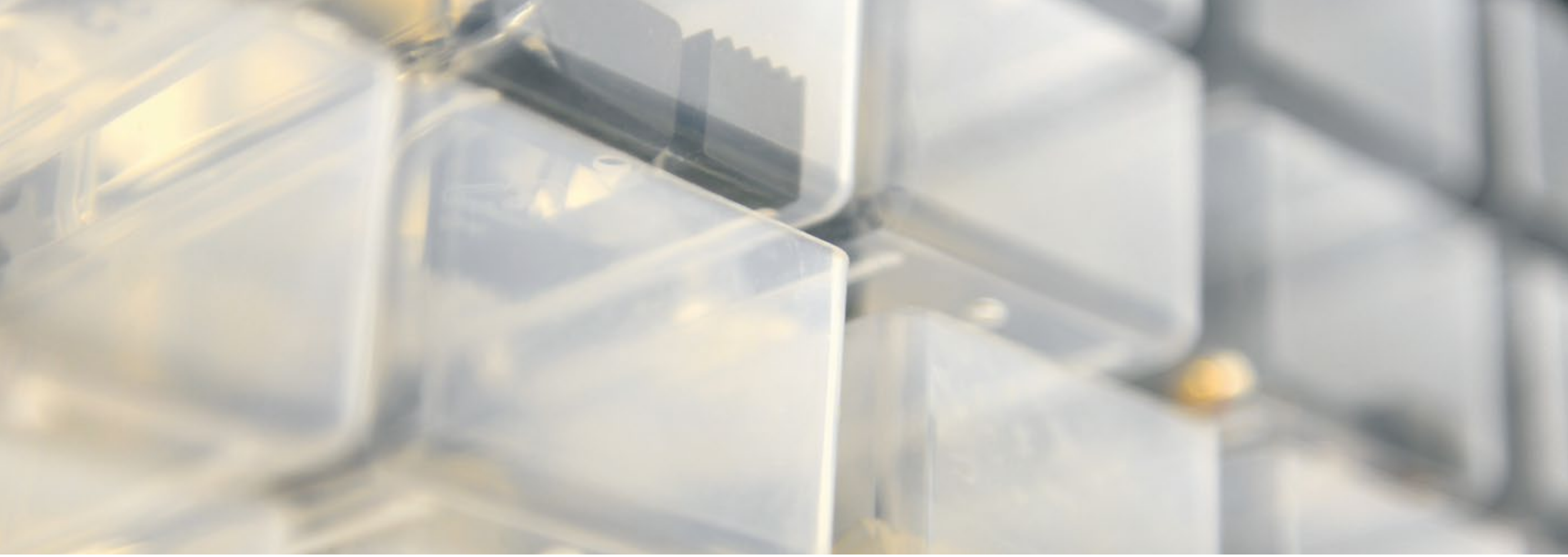
A Word from the Siemens Integrity Initiative Project Office



We firmly believe that we can amplify meaningful impact through Collective Action, and we very much look forward to taking the Siemens Integrity Initiative into the future through our new Evolve Funding Round.

Shawn Teixeira and Julianne Altieri
For the Project Office of the Siemens Integrity Initiative

This Annual Report was approved by the Siemens Steering Committee on May 22, 2025 and submitted together with a comprehensive presentation to the World Bank Group in Washington on May 27, 2025 and to the European Investment Bank in Luxembourg in May / June, 2025.



Since July 1, 2024 Collective Action and External Affairs was merged with International Financial Institutions.

Julianne Altieri is Head of the new merged department International Financial Institutions & Collective Action.

Shawn Teixeira is Head of the Siemens Integrity Initiative, supported by Monika Besel and Karin Gebhard, and a global network of Siemens Business Leaders, Siemens Country CEOs, Compliance Officers, Global Business Services, Legal and Tax experts.

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

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

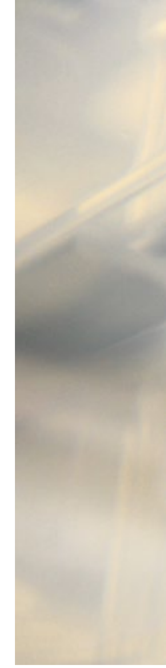
The Siemens Integrity Initiative is managed by a global project organization with in-country presence and support where relevant and is subject to project management rules as detailed in Section A. of this report.

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

As of March 3, 2025, around USD 120 million is committed to 85 projects in more than 50 countries over all Funding Rounds.

A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office



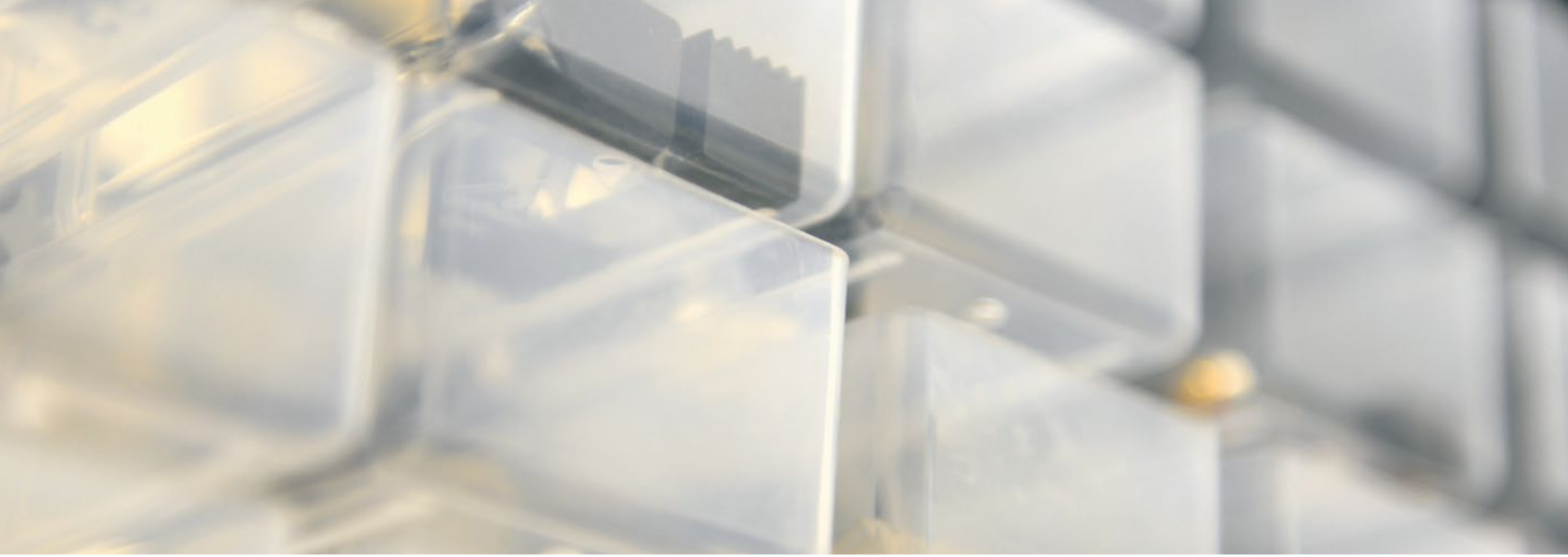
Much of the information available to us is transparently accessible to the public and can be viewed on our dedicated web site www.siemens.com/integrity-initiative.

The information provided relates in particular to the framework conditions for the First, Second, Third and Golden Stretch Funding Rounds, the application and selection process for the projects, brief profiles and the funds earmarked for the individual projects, and unabridged versions of the Siemens Integrity Initiative Annual Reports for 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024.

Two editions stand out and merit further mention:

Our very first 2011 edition introduces the Siemens Collective Action program, with Sections A and B of the report providing insight into the conceptualization, planning, project selection, award of funds and project implementation for the First Funding Round tranche of USD 37,7 million.

Our seventh 2017 edition signaled the halfway mark of the 15-year World Bank settlement period and featured a Summary Report of the external Mid-term Review of the Integrity Initiative in Section D. The Mid-term Review was independently conducted by the Canadian Universalia Management Group who found



there to be “strong evidence” that projects have “achieved their intended short-term results” and have made “significant contributions to change within their respective contexts”.

We hope that this will encourage more allies to join the fight against corruption through Collective Action. The positive external and internal feedback to our reports and our externally conducted Mid-term Review has strengthened our resolve to extend our program even further, enabling us to highlight more anti-corruption success stories across all countries.

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

The Final Report of activities over the entire project period for all 24 Second Funding Round projects were presented in previous Annual Report editions. 2 Final Reports were presented in our Annual Report 2017, 10 Final Reports in Annual Report 2018, 10 Final Reports in Annual Report 2019 and 2 Final Reports in Annual Report 2020.

This year we again focus on active projects from the Third and Golden Stretch Funding Rounds.

Of the 22 Third Funding Round projects, 17 projects have completed their activities. 3 Final Reports of activities over the entire project period were presented in Annual Report 2022, 8 Final Reports in Annual Report 2023, and 6 Final Reports are included in this Annual Report 2024.

5 projects remain active with implementation of activities still in progress.

Of the 8 Golden Stretch Funding Round projects that started their implementation phase in July 2021, 2 projects have completed their activities and are reported on in this Annual Report 2024.

6 projects remain active with the implementation of activities still in progress as described in this report.

A.

Introduction

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

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

The Siemens Integrity Initiative aims to:

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

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

Moving beyond the boundaries of our company, Collective Action continues as a priority in Siemens Legal and Compliance. This is evidenced by our long-standing involvement in the ICC Commission on Corporate Responsibility and Anti-corruption, the Pact Against Corruption Initiative (PACI) of the World Economic Forum and, since 2011, our active involvement in the G20/B20 Task Force on Anti-corruption and the drafting and implementation support of B20 Recommendations drawn up in France, Mexico, Russia, Australia, Türkiye, China, Germany, Argentina, Japan, Saudi Arabia, Italy, Indonesia, India Brazil, and now in 2025, South Africa.

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

Project management and reporting

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

Roles and responsibilities of Project Relationship Managers and Mentors:

Siemens Integrity Initiative Project Office (PO)

Ensures coherence among portfolio of projects

Project Relationship Manager (PRM)

Monitoring role
- Approval of Progress of project (reporting)
- Approval of external communication with Corporate Communications and with relevant departments
- Project Steering Committee Meetings

Support role
- First contact point for Integrity Partner
- Create success stories
- Knowledge sharing
- Participation in project activities

PRM / PO calls upon Mentor when needed

Mentor for local / global projects

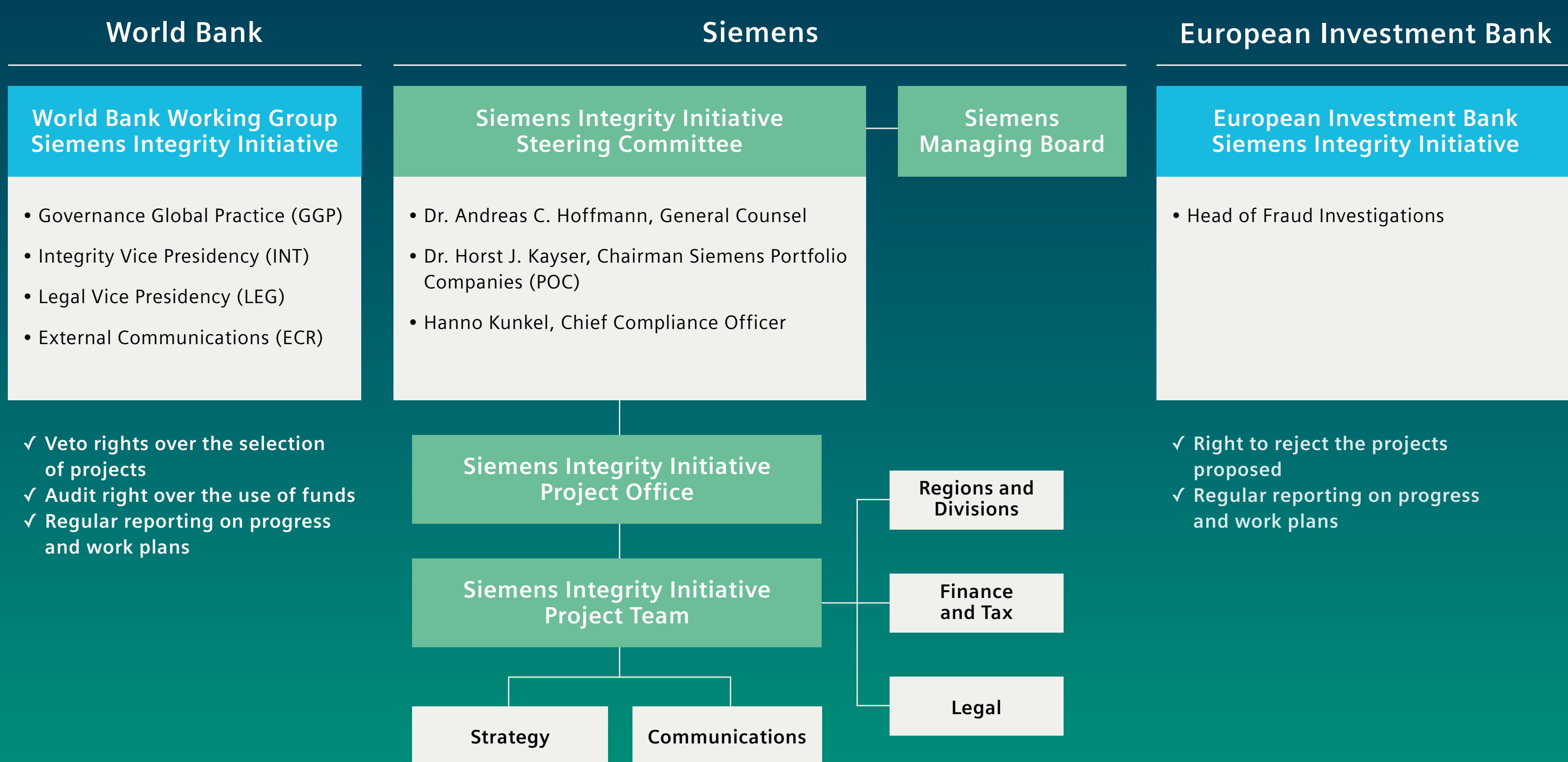
Support role
- Representation at local high-level events / Project Steering Committee Meetings (only from time to time, and if needed)
- High-level communication activities (use success stories)

Link to Project Office
- Project Office calls upon mentor when needed
- Provide high-level support in resolving of issues/challenges
- Represent project at global high-level events

Project organization

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

Siemens Integrity Initiative project structure with settlement parties:



B.

Siemens Integrity Initiative

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

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

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

B.

Status of the First Funding Round

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

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

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

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

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

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

www.siemens.com/integrity-initiative/Report2011

www.siemens.com/integrity-initiative/Report2012

www.siemens.com/integrity-initiative/Report2013

www.siemens.com/integrity-initiative/Report2014

www.siemens.com/integrity-initiative/Report2015

www.siemens.com/integrity-initiative/Report2016

www.siemens.com/integrity-initiative/Report2017

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

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

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

Status of the Second Funding Round

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

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

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

The selection was made on a competitive basis in two stages (initial Expression of Interest phase and the later Full Proposal phase) with a focus on project applications that demonstrate a clear impact on the business environment and results in sectors and countries where Siemens is present. Projects that already submitted an Expression of Interest for the First Funding Round as well as projects that have already been funded were eligible to submit another proposal in the Second Funding Round.

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

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

Key data Second Funding Round	
Funds committed in the Second Funding Round	USD 35,554 M
Disbursements in year 1 to year 9 (2015 to March 02, 2023) (release of provision)	USD 33,92 M[1)]
Funds unspent	USD ~ 1,6 M
No further planned disbursements	USD 0,0 M
Number of projects	24
Thereof projects that have completed their activities	24
Thereof ongoing	0
Countries covered in the Second Funding Round	More than 20

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

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

Status of the Third Funding Round

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

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

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

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

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

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

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

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

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

In November 2023, committed funds increased from USD 25,2 million to **USD 25,4 million** following Add-on Funding awarded to the POLMED Third Funding Round project out of accumulated unspent funds coming from various Second and Third Funding Round Integrity Initiative projects that had already completed their respective project activities projects under the European Investment Bank settlement.

As agreed with the Siemens Steering Committee, the World Bank and the European Investment Bank respectively, the Siemens Integrity Initiative Project Office invited select active projects on a discretionary basis to submit a Supplement to the Full Proposal (Annex 1) aimed at intensifying, broadening and maximizing project activities and results in line with the project specific goals and objectives.

After the Project Office conducted a comprehensive review of the Supplement to the Full Proposal (Annex 1) which was supported by an updated Work Plan (Annex 2) and an updated Budget (Annex 3), the Add-on Funding was awarded and regulated under an addendum to the Funding Agreement.

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

The final overview of activities for 6 projects covering the entire project period are included in Section C3. of this Annual Report 2024. These projects are marked in the table on page 38.

Key data Third Funding Round		
Funds committed[1] in the Third Funding Round	USD	25,4 M
Disbursements in year 1 to year 5 (October 1, 2019 to March 1, 2024) (release of provision)	USD	24,8 M[2]
Funds unspent as of March 1, 2024	USD	~ 0,6 M
No further planned disbursements	USD	0,0 M
Number of projects	22	
Thereof projects that have completed their activities	17	
Thereof ongoing	5	
Countries covered in the Third Funding Round	More than 40	

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

[1] Committed funds increased from USD 25,2 M to USD 25,4 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

[2] The information provided in this table is based on approved Final Reports and Funding Agreement Addenda 1 and/or 2 where applicable as of March 1, 2024

Status of the Golden Stretch Funding Round

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

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

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

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

The public announcement of results was made in the Siemens corporate press release on **July 7, 2021**, which is available in Section D. of the Annual Report 2021.

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

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

In November 2023, committed funds increased from USD 20,5 million to **USD 21,2 million** following Add-on Funding awarded to the IACA and UNODC Golden Stretch projects out of accumulated unspent funds coming from various Second and Third Funding Round Integrity Initiative projects that had already completed their respective project activities under the World Bank settlement.

As agreed with the Siemens Steering Committee, the World Bank and the European Investment Bank respectively, the Siemens Integrity Initiative Project Office invited select active projects on a discretionary basis to submit a Supplement to the Full Proposal (Annex 1) aimed at intensifying, broadening and maximizing project activities and results in line with the project specific goals and objectives.

After the Project Office conducted a comprehensive review of the Supplement to the Full Proposal (Annex 1) which was supported by an updated Work Plan (Annex 2) and an updated Budget (Annex 3), the Add-on Funding was awarded and regulated under an addendum to the Funding Agreement.

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

The final overview of activities for 2 projects covering the entire project period are included in Section C3. of this Annual Report 2024. These projects are marked in the table on page 42.

Key data Golden Stretch Funding Round		
Funds committed[1] in the Golden Stretch Funding Round	USD	21,2 M
Disbursements in year 1 to year 4 (July 1, 2021 to March 1, 2024) (release of provision)	USD	21,2 M[2]
Disbursement for End of Settlement Review of the Siemens Integrity Initiative performed by Universalia Management Group (June 1, 2024)	USD	0,5 M
Funds unspent as of June 1, 2024	USD	0,0 M
No further planned disbursements	USD	0,0 M
Number of projects	8	
Thereof projects that have completed their activities	2	
Thereof ongoing	6	
Countries covered in all Funding Rounds	More than 50	

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

[1] Committed funds increased from USD 20,5 M to USD 21,2 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

[2] The information provided in this table is based on approved Final Reports and Funding Agreement Addenda 1 and/or 2 where applicable as of March 1, 2024

B.

List of projects funded under the First Funding Round:

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

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

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

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

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

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

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

= Total number of all summaries 31

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

B.

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

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

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

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

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

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

= Total number of all summaries 31

Integrity Partner
Organisation for Economic Co-operation and Development (OECD), MENA-OECD Investment Programme, France
Oživení, Czech Republic in cooperation with Transparency International Slovakia and the Economics Institute of the Academy of Sciences of the Czech Republic
Partnership for Governance Reform – Kemitraan, Indonesia
POLMED (The Polish Chamber of Commerce of Medical Devices), Poland
Sequa gGmbH, Germany in cooperation with German Agency for International Cooperation (GIZ), Chengdu General Chamber of Commerce (Province of Sichuan), China, and Hunan Provincial Chamber, China
Transparency International Bulgaria
Transparency International Italy
Transparency International Mexico
Transparency International USA in cooperation with Social Accountability International, USA
United Nations Development Programme Regional Bureau for Arab States, USA
United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – Incentives to Corporate Integrity
United Nations Office on Drugs and Crime (UNODC), Austria – UNCAC Outreach and Communication
United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – The 6P's
University of Cairo, Center for Economic and Financial Research and Studies (CEFRS), Egypt
Vietnam Chamber of Commerce and Industry (VCCI) in cooperation with the International Business Leaders Forum (IBLF), United Kingdom
Total funding volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Middle East and North Africa	0,75 M	-	completed as of September 2013[5)]
	Czech Republic, Slovakia	0,6 M	-	completed as of March 2014[4)]
	Indonesia	1,5 M	-	completed as of December 2014[4)]
	Poland	0,46 M	-	completed as of September 2014[4)]
	China	1,49 M	-	completed as of March 2014[4)]
	Bulgaria	0,45 M	-	completed as of February 2014[4)]
	Italy	0,6 M	-	completed as of March 2014[4)]
	Mexico	0,23 M	-	completed as of May 2014[4)]
	USA, Global	0,66 M	-	completed as of September 2014[4)]
	Arab States Region	1,78 M	-	completed as of December 2014[3)]
	India, Mexico	1,12 M	-	completed as of September 2014[4)]
	Global	0,75 M	-	completed as of September 2014[4)]
	India, Mexico	1,22 M	-	completed as of September 2014[4)]
	Egypt	0,85 M	-	completed as of February 2017[1)]
	Vietnam	0,5 M	-	completed as of September 2012[6)]
		37,7 M	0 M	

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

B.

List of projects funded under the Second Funding Round:

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

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

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

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

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

[5] Transfer from Eucomed to MedTech effective January 1, 2017

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

B.

Integrity Partner
The Ethics Institute, South Africa
The Polish Chamber of Commerce of Medical Devices (POLMED), Poland
Transparency International Secretariat (TI-S), Germany
Transparency International España (TI-España), Spain
Transparency International Italia (TI-It), Italy, in cooperation with the Centro Ricerche e Studi su Sicurezza e Criminalità (RiSSC), Fondazione Centro Studi Investimenti Sociali (CENSIS), Istituto per la Promozione dell'Etica in Sanità (ISPE-Sanità), Italy
United Nations Office on Drugs and Crime (UNODC), Austria
United Nations Development Programme (UNDP), USA
United Nations Development Programme (UNDP), USA
Wirtschaftsuniversität WU, Vienna University of Economics and Business Administration, Austria
Total Funding Volume in USD

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

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

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

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

[5] Transfer from Eucomed to MedTech effective January 1, 2017

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

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

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

[2] Mutual Agreement for Termination with East West Centre (EWC) reached on August 11, 2022 after new strategic directions of EWC are no longer a perfect match with the objectives of the Project. Summary of Project Activities for entire project period reported in Annual Report 2022 (1) = EWC

[3] Summary of Project Activities for entire project period reported in Annual Report 2022 (2) = GCN Korea and NATC

[4] Summary of Project Activities for entire project period reported in Annual Report 2023 (8) = ECNU, TEID, KazBar, MACN, OECD, UNODC Global, UNODC Myanmar, WU Wien

[5] Committed funds increased from USD 0,69 M to USD 0,89 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

[6] Summary of Project Activities for entire project period reported in Annual Report 2024 (6) = Eurocham, Fundación Poder Ciudadano, IACA, The Ethics Institute (Mozambique), The Ethics Institute (South Africa), TI Bulgaria

List of projects funded under the Third Funding Round:

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

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	-	2,86 M	activities in progress
	China	-	1,50 M	completed as of September 2022[3)]
	China	0,80 M	-	completed as of September 2023[4)]
	Indonesia	0,80 M	-	completed as of July 2022[2)]
	Türkiye	0,80 M	-	completed as of March 2023[4)]
	Ivory Coast	0,80 M	-	completed as of September 2024[6)]
	Global	1,70 M	-	activities in progress
	Argentina	0,80 M	-	completed as of September 2024[6)]
	Korea	0,80 M	-	completed as of September 2022[3)]
	Global	1,50 M	-	completed as of September 2024[6)]
	Kazakhstan	0,80 M	-	completed as of August 2023[4)]
	Nigeria	1,00 M	-	completed as of September 2023[4)]

B.

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

[2] Mutual Agreement for Termination with East West Centre (EWC) reached on August 11, 2022 after new strategic directions of EWC are no longer a perfect match with the objectives of the Project. Summary of Project Activities for entire project period reported in Annual Report 2022 (1) = EWC

[3] Summary of Project Activities for entire project period reported in Annual Report 2022 (2) = GCN Korea and NATC

[4] Summary of Project Activities for entire project period reported in Annual Report 2023 (8) = ECNU, TEID, KazBar, MACN, OECD, UNODC Global, UNODC Myanmar, WU Wien

[5] Committed funds increased from USD 0,69 M to USD 0,89 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

[6] Summary of Project Activities for entire project period reported in Annual Report 2024 (6) = Eurocham, Fundación Poder Ciudadano, IACA, The Ethics Institute (Mozambique), The Ethics Institute (South Africa), TI Bulgaria

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

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Regional – Bosnia and Herzegovina, Croatia and Serbia	-	1,70 M	completed as of December 2022[4)]
	Mozambique	0,80 M	-	completed as of September 2024[6)]
	South Africa	1,00 M	-	completed as of September 2024[6)]
	Poland	-	0,89 M [5)]	activities in progress
	Bulgaria	-	0,75 M	completed as of September 2024[6)]
	Colombia	1,10 M	-	activities in progress
	Global – with focus on Kenya, Mexico, Pakistan	1,00 M	-	completed as of September 2023[4)]
	Myanmar	0,80 M	-	completed as of September 2023[4)]
	Regional – Egypt, Iraq, Libya and UAE	2,40 M	-	activities in progress
	Regional – Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia	0,80 M	-	completed as of September 2023[4)]
		17,70 M	**7,70 M**	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 25,4 M for the Third Funding Round.

B.

List of projects funded under the Golden Stretch Funding Round

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

[1] Committed funds increased from USD 2,00 M to USD 2,17 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

[2] Committed funds increased from USD 4,00 M to USD 4,50 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

[3] Summary of Project Activities for entire project period reported in Annual Report 2024
(2) = MACN, WU Wien

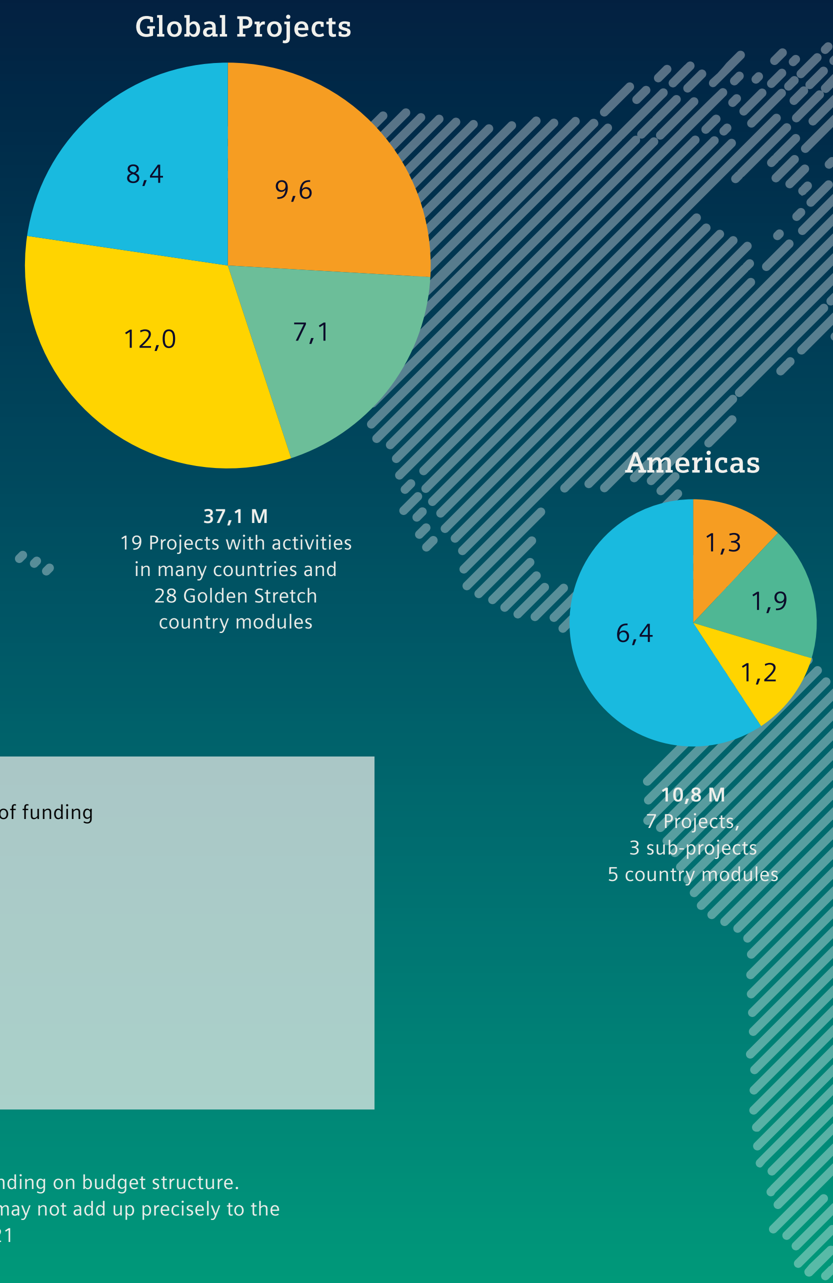
Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
Global	3,50 M	-	activities in progress
Global – with focus on Bangladesh, Brazil, Egypt, India, Indonesia, Kenya, Malaysia, Mexico, Thailand, and Ukraine	4,00 M	-	activities in progress
Global	2,17 M[1)]	-	activities in progress
Regional – Bangladesh, India and Pakistan	2,00 M	-	completed as of September 2024[3)]
Global – with focus on Algeria, Croatia, Saudi Arabia, Serbia, South Africa, Uzbekistan	3,00 M	-	activities in progress
Global – with focus on Argentina, Romania, and Spain	1,00 M	-	activities in progress
Global – with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan	4,50 M[2)]	-	activities in progress
Regional – Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia and selected Belt and Road Initiative countries	1,00 M	-	completed as of December 2024[3)]
	21,17 M	**-**	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 21,17 M for the Golden Stretch Funding Round.

B.

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

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



Bubble size = Approximate value of funding

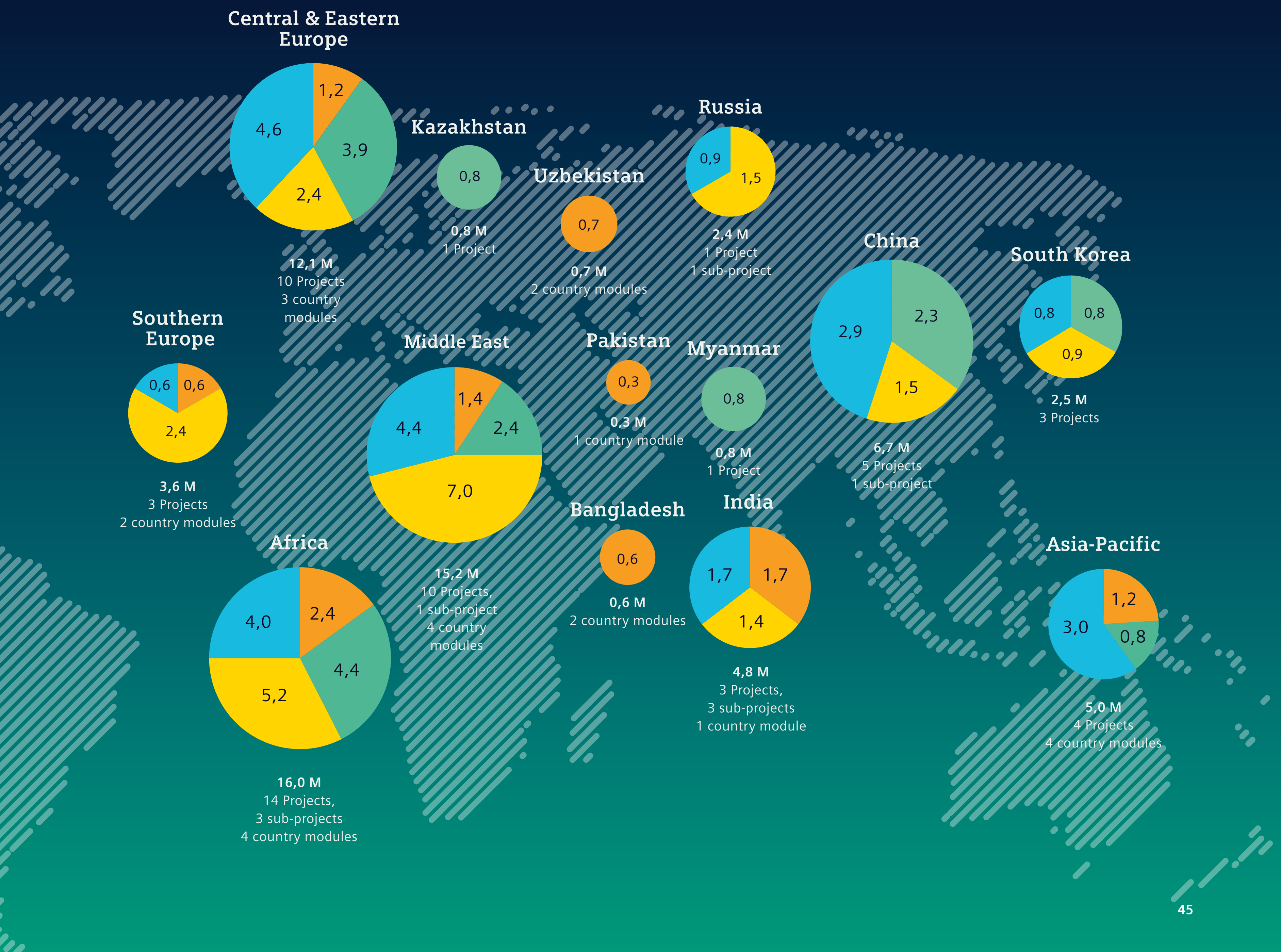
First Funding Round

Second Funding Round

Third Funding Round

Golden Stretch Funding Round

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



Central & Eastern Europe
1,2
3,9
2,4
4,6
12,1 M
10 Projects
3 country modules
Kazakhstan
0,8
0,8 M
1 Project
Uzbekistan
0,7
0,7 M
2 country modules
Russia
0,9
1,5
2,4 M
1 Project
1 sub-project
China
2,9
2,3
1,5
6,7 M
5 Projects
1 sub-project
South Korea
0,8
0,8
0,9
2,5 M
3 Projects
Southern Europe
0,6
0,6
2,4
3,6 M
3 Projects
2 country modules
Middle East
1,4
2,4
7,0
4,4
15,2 M
10 Projects,
1 sub-project
4 country modules
Pakistan
0,3
0,3 M
1 country module
Myanmar
0,8
0,8 M
1 Project
Bangladesh
0,6
0,6 M
2 country modules
India
1,7
1,7
1,4
4,8 M
3 Projects,
3 sub-projects
1 country module
Africa
4,0
2,4
4,4
5,2
16,0 M
14 Projects,
3 sub-projects
4 country modules
Asia-Pacific
1,2
0,8
3,0
5,0 M
4 Projects
4 country modules

C.

Project Profiles and highlights of activities in 2024

Project profiles and highlights of activities in 2024

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

For ongoing projects under the Third Funding Round and Golden Stretch Funding Round the descriptions of activities undertaken in this year (2024) were provided by the Integrity Partners in their respective Annual Progress Report 2024 and approved by the relevant Integrity Partners for external use.

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

- Annual Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Annual Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds
- Updated Work Plan and Updated Budget for 2024 where relevant

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

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

- Payment and expense overview
- External evaluation of impact

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

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

The respective projects are: Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC) I, Central European University (CEU), COCIR, Convention on Business Integrity (CBI), Federation of Korean Industries-International Management Institute (FKI-IMI), Foundation for the Global Compact (UN PRME), Foundation for the Global Compact (UNGC / 5 countries), Fundación Universidad de San Andrés (FUdeSA), Humboldt Viadrina School of Governance, International Anti-Corruption Academy (IACA), Austria, International Business Leaders Forum (IBLF), Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil, Maala Business for Social Responsibility, Israel, Makati Business Club (MBC), Organisation for Economic Co-operation and Development (OECD) – MENA, Oživení, Partnership for Governance Reform (PGR) – Kemitraan, The Polish Chamber of Commerce of Medical Devices (Polmed) I, Sequa, Transparency International Bulgaria, Transparency International Italy, The Ethics Institute, South Africa, Transparency International Mexico, Transparency International USA, United Nations Development Programme (UNDP), University of Cairo, three UNODC I projects, and VCCI.

C.

Project Profiles and highlights of activities in 2024

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

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

The respective projects are: Al Akhawayn University in Ifrane (AUI), Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC), Confederation of Indian Industry (CII), Etik ve Itibar Dernegi (TEID), Foundation for the Global Compact, Global Compact Network India (GCNI), Global Compact Network Korea (GCNK), International Anti-Corruption Academy (IACA), MedTech Europe, Organisation for Economic Co-operation and Development (OECD) Morocco project, Organisation for Economic Co-operation and Development (OECD) Russia project, Pan African Lawyers Union (PALU), Pearl Initiative (PEARL), The Ethics Institute (TEI) Mozambique project, The Ethics Institute (TEI) South Africa project, The Polish Chamber of Commerce of Medical Devices (POLMED), Transparency International Secretariat (TI-S), Transparency International España (TI-España), Transparency International Italia (TI-It), United Nations Office on Drugs and Crime (UNODC), United Nations Development Programme (UNDP) Egypt, Morocco and Tunisia project,

United Nations Development Programme (UNDP) Iraq and Libya project and Wirtschaftsuniversität Wien (WU Wien).

17 Siemens Integrity Initiative **Third Funding Round** projects have completed their activities by March 3, 2025.

Information on key activities over the entire project period for **11** projects were already reported in the Annual Report 2022 (3 projects) and Annual report 2023 (8 Projects). The respective projects are the Beijing New Century Academy on Transnational Corporations (NATC), the East China Normal University (ECNU), the East-West Center (EWC), Etik ve İtibar Derneği (TEID), the Global Compact Network Korea (GCNK), the Kazakhstan Bar Association (KazBar), the Maritime Anti-Corruption Network (MACN), the Organisation for Economic Co-operation and Development (OECD), the United Nations Office on Drugs and Crime (UNODC) Global Integrity Education, the United Nations Office on Drugs and Crime (UNODC) Myanmar and Wirtschaftsuniversität Wien (WU Wien).

In this Annual Report 2024, information on key activities over the entire project period for **6** projects is included, namely, Eurocham (Chambre de Commerce Européenne en Côte d'Ivoire), Fundación Poder Ciudadano (Transparency International Argentina), International Anti-Corruption Academy (IACA), The Ethics Institute (Mozambique), The Ethics Institute (South Africa) and Transparency International Bulgaria.

2 Siemens Integrity Initiative **Golden Stretch Funding Round** projects have completed their activities by March 3, 2025.

In this Annual Report 2024, information on key activities over the entire project period for the **2** projects is included, namely, the Maritime Anti-Corruption Network (MACN) and Wirtschaftsuniversität Wien (WU).

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

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

C1.

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

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

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

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

C2.

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

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

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

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

C3.

Third Funding Round Projects: Project Profiles and highlights of activities in 2024

For the projects under the Third Funding Round the descriptions of activities undertaken in 2024 were provided by the Integrity Partners in their respective Annual or Final Progress Report 2024 and are approved by the relevant Integrity Partners for external use.

Of the 22 Third Funding Round projects, 17 projects have completed their activities, of which 3 completed projects were reported on in Annual Report 2022, 8 completed projects were reported on in Annual Report 2023, and 6 completed projects are reported on in this Annual Report 2024.

5 projects remain active with implementation of activities still in progress.

Name of Integrity Partner:

Basel Institute on Governance

in cooperation with the Organisation for Economic Co-operation and Development

DESCRIPTION OF INTEGRITY PARTNER

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

- The Private Sector team takes a dual approach to engaging and strengthening the private-sector response to corruption risks in business transactions by advancing anti-corruption Collective Action and through advice and technical assistance to private corporations and state-owned enterprises. It hosts the **B20 Collective Action Hub**
- The International Centre for Asset Recovery (ICAR) at the Institute works with countries around the world to strengthen their capacities to recover illicit assets
- The Green Corruption programme is a multi-disciplinary initiative that targets environmental degradation using anti-corruption and governance tools
- The Prevention, Research and Innovation (formerly Public Governance) team connects corruption research with anti-corruption practice

PROJECT:

Positioning Collective Action as a Compliance Norm

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

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

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

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

Third, the project will generate innovation in anti-corruption Collective Action in two areas. To generate knowledge and build trust in Collective Action as a tool to combat bribery, and by leveraging synergies between corruption prevention and human rights protection to achieve efficiencies in compliance practices.

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- Collective Action was showcased to foster ethical business environments in a panel session at the inaugural Private Sector Forum on the margins of the 10th Conference of the States Parties to the UN Convention against Corruption (CoSP). A CoSP Resolution was subsequently agreed, dedicated to the private sector and opening opportunities for Collective Action
- The organization acted as Network Partner to the B20 Brazil Integrity & Compliance Task Force and successfully promoted Collective Action as a key Task Force recommendation. A new KPI will track countries' adoption of approaches and initiatives, based on data in the B20 Collective Action Hub – itself selected as a B20 legacy project
- With the OECD, Collective Action was promoted at a conference for African countries hosted by the Moroccan Anti-Corruption Authority and UNODC. The subsequently adopted Rabat Declaration emphasises the role of the private sector in addressing corruption
- Awareness of Collective Action's role in tackling global challenges was raised at the first Annual Good Governance Community Meeting of the World Economic Forum
- Awareness of Collective Action was expanded to judges and prosecutors at a training programme of the French Anti-Corruption Agency and National School for the Judiciary
- A roundtable discussion was hosted with compliance officers on how companies can better address the dual risks of human rights breaches and corruption, together with Professor Anita Ramasastry

Impact

Promoted Collective Action as a norm through global forums and outreach, leading to several high-profile policy endorsements.

Strengthened networks and collaboration among Collective Action organizations, particularly in Asia-Pacific, Eastern Europe, and Africa, creating a community of practice.

Expanded the information and research on Collective Action through the B20 Hub, social media, and communications, growing the LinkedIn following by 80% and sustaining interest in the community.

Increased companies' understanding of addressing the dual risks of human rights breaches and corruption through sustained engagement.

C3.

DESCRIPTION OF INTEGRITY PARTNER

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

The main activities of Eurocham aim at the following objectives:

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

Name of Integrity Partner:

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

PROJECT:

African Certification of Corporate Governance

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

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

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2024):

- The primary achievement during the final year of the project was successfully supporting over 60 SMEs on anti-corruption matters. This began with organizing a second round of audits for all program structures, followed by an assessment of the implementation of measures identified during the first audit
- This effort culminated in a certification ceremony where 39 out of 60 participating SMEs were certified after successfully implementing the planned measures, while another 16 have adopted two governance measures and continue to work on improving them
- The ceremony was attended by the Ministry of Good Governance and several media outlets, and received television coverage, highlighting the success of the African Certification of Corporate Governance (ACCG) program
- Another key activity was the execution of 4 planned workshops throughout the year, held from March 14 to September 30. These workshops allowed businesses to connect with more economic partners interested in collaborating with companies committed to fighting corruption and promoting good governance
- Finally, the creation of the anti-corruption and good governance certification, which gained significant visibility in both public and private sectors, was another important outcome of these efforts
- Eurocham also received several requests to share more information about the ACCG program, one of which led to discussions about publishing a white paper on the topic, an option Eurocham is still considering

Impact

The program has certified 39 companies, which have adopted rigorous anti-corruption practices along with strengthened good governance rules. Over 80% of surveyed companies were satisfied with the program which has improved their credibility and competitiveness. Growing interest from the public and private sector in replicating the model shows its potential to fight corruption, promote good governance, and foster a more competitive and cleaner market.

DESCRIPTION OF INTEGRITY PARTNER

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

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

Name of Integrity Partner:

Foundation for the Global Compact

PROJECT:

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

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

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

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

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

1. development of an Anti-Corruption Collective Action Playbook for Global Compact Local Network(s) (GCLN) to mainstream the understanding and uptake of Collective Action
2. global launch and roll-out of the Playbook to enable Local Networks in understanding and using the Collective Action methodology to identify and address corruption issues
3. support select GCLNs in their Collective Action initiatives. Underlying this approach will be an overarching goal of facilitating public-private cooperation on Collective Action through policy dialogue and engagement with governments and non-business stakeholders

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- The Call-to-Action from Business to Governments was presented at the 10th session of the Conference of the States Parties (CoSP10) to the UN Convention against Corruption (UNCAC). Anti-Corruption Collective Action (ACCA) was advocated globally, including through a new communication strategy, a new website, a Country Network Hub, webinars based on the ACCA Playbook attended by over 5 250 participants from 125 countries, and in-situ workshops in Argentina, Colombia, Kenya, Paraguay, Türkiye, and Uruguay
- **GCO Brazil** cemented its leadership in the region by training participants from 7 Latin American countries on Collective Action. The "Deep Down You Already Know It!" campaign featuring 8 videos was launched, along with an online training for companies' supply chains. A White Paper from the Policy Dialogues was published, addressing lobbying, whistleblowing and asset recovery, reaching over 370 readers
- **GCN Kenya** maintained a strong partnership with the Anti-Corruption (AC) Commission through 3 engagements to finalize the Model Procedures under the Anti-Bribery Act. The Business Integrity Conference was hosted and the AC Working Group was reinvigorated to assess the implementation of the business Code of Ethics. Kenyan companies participated in the Conference of East Africa to Fast-Track UNCAC Implementation
- **GCN India** completed a risk assessment of the health system with policy recommendations presented to the Ministry of Health and Family Welfare. The Best Practice Compendium on Anti-Corruption for Healthcare was strategically issued. These efforts combined with multiple awareness raising events, resulted in 10 healthcare, law and academic organizations committing to integrate ACCA in their strategies and internal training
- **GCN Ukraine** successfully completed the project. A summary of activities will be presented in the final Annual Report 2025

Impact

In response to the Call-to-Action, the CoSP Resolution 10/12 committed 190 countries to the adoption of incentives for the prevention of corruption in the private sector.

As a result of enhanced dialogue between businesses and governments at the UNCAC Platform for Eastern Africa, ten African countries endorsed a Roadmap of concrete actions to tackle corruption by leveraging ACCA.

The ACCA on Agribusiness of **GCN Brazil** increased its membership by 400%. The impact achieved in creating more transparent market conditions in this sector, was recognized by the Basel Institute on Governance's Outstanding Achievement Award.

The Ukraine Business Compact by GCN Ukraine, rallied over 750 businesses globally, spanning 52 countries and 21 major economic sectors, with a market capitalization of over USD 5,2 trillion, to commit to cleaner business practices toward a reconstruction free of corruption.

C3.

Name of Integrity Partner:

Fundación Poder Ciudadano

DESCRIPTION OF INTEGRITY PARTNER

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

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

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

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

PROJECT:

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

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Argentina	3.5 years	0,80 M	Argentina

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

We propose

1) to raise awareness about the importance of integrity as a condition for improving the competitiveness of SMEs and public companies in the energy sector in Argentina

2) to strengthen SMEs and public companies, through the incorporation and elevation of compliance standards; and

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JANUARY 2020 – SEPTEMBER 2024):

- Over the years, the project team hosted 8 events and 4 roundtables, bringing together more than 660 representatives from the public and private sector, civil society, academia, and subject matter experts. These gatherings facilitated discussions on promoting integrity within the energy sector and its value chain
- The project developed and shared valuable information and recommendations through its website, a central hub for resources, tools, and training. Additionally, 10 publications were produced, including a diagnosis of integrity policies in small and medium-sized enterprises (SMEs) and state-owned enterprises (SOEs), policy papers with recommendations, a strategic positioning document, and toolkits for implementing Integrity Programs in SMEs and SOEs
- To foster a network for consultation and knowledge-sharing, the project trained over 380 individuals, including representatives from 93 SMEs and 10 SOEs across 10 Argentine provinces. This was achieved through 13 Introductory Synchronous Training sessions, a virtual course, and 9 thematic webinars
- Furthermore, the project team held meetings with 131 key actors across 10 provinces of Argentina to raise awareness, encourage participation, and gather feedback
- Strategic alliances were built with 56 business associations, companies, civil society organizations, universities, and government offices
- Lastly, the project promoted and discussed policies to improve SMEs participation in public procurement. This was accomplished through over 30 meetings with the Executive and Legislative branches at national and subnational levels, as well as private multi-stakeholder roundtables in three provinces of Argentina

Impact

The project has had a transformative impact on integrity in Argentina's energy sector. By engaging SMEs and state-owned enterprises, the project equipped organizations with knowledge, skills, and tools to prevent corruption.

Reaching 10 provinces, the project fostered critical multi-stakeholder dialogues and established robust networks to address sector risks. This laid the groundwork for collective solutions that are contributing to a fairer, more transparent energy market.

Notably, the project created a unique platform that strengthens integrity practices and facilitates ongoing multi-stakeholder engagement. This hub has become vital for stakeholders to identify and address corruption challenges, driving positive change towards a cleaner business environment.

DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 77 State Parties and 4 international organizations.

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

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

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society. The Academy currently offers four master's degree programmes, various capacity-building trainings, and technical assistance. IACA also creates platforms for dialogue and networking on anti-corruption issues.

Name of Integrity Partner:

International Anti-Corruption Academy

PROJECT:

"GEAR UP" to fight corruption

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global	5 years	1,50 M	Austria

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

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

World class practitioners and academics will be involved.

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (FEBRUARY 2020 – SEPTEMBER 2024):

- 53 merit-based scholarships were awarded to highly qualified candidates from Least Developed Countries (LDCs) and Emerging Markets (EMs) since 2020, exceeding the target of 43. These scholarships enabled participants to enroll in IACA's flagship master's programmes, MACS, IMACC, and MACD, equipping anti-corruption practitioners with specialized skills
- Of the scholarship recipients, 40 have successfully graduated with academic excellence, becoming "agents of change" who promote fair markets, foster collaboration, and contribute to the IACA alumni network
- An additional 156 scholarships were awarded for professionals to attend the International Anti-Corruption Summer Academy and Executive Diploma in Anti-Corruption and Diplomacy programs
- With focus on Africa, the 3rd Regional Alumni Conference took place in Nairobi, Kenya, from 6 to 10 May 2024. This flagship event brought together experts and 31 alumni from 11 African countries. 10 participants received travel grants for outstanding submissions on Collective Action
- The 9th Regional Summer Academy returned to Africa after seven years and was held from 10 to 17 November 2023 in Nairobi. The program hosted 48 anti-corruption professionals from 15 African nations, engaging them in lectures and sessions on topics like urban corruption and transparency in extractive industries. This combined academic insights with practical tools to combat corruption

Impact

The IMACC, MACS, and MACD programs enhanced participants' skills in anti-corruption and diplomacy, resulting in at least 8 initiatives such as policy reforms, compliance practices, and Collective Action projects.

Monitoring reports show that participants of the Summer Academy and Executive Diploma programs implemented 12 initiatives, using their new skills to prevent corruption and foster clean business environments.

The 3rd Regional Alumni Conference deepened participants' understanding of Collective Action, with 7 initiatives highlighting tangible outcomes in the conference publication and showcasing the project's impact on promoting Collective Action.

The 9th Regional Summer Academy empowered participants to combat corruption across Africa, strengthening individual and systemic capacities and resulting in multiple actionable initiatives for clean business practices. Testimonials affirmed its practical value and its role in fostering long-term collaboration through IACA's alumni network.

Name of Integrity Partner:

The Ethics Institute (TEI)

DESCRIPTION OF INTEGRITY PARTNER

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

Vision:
Building an ethically responsible society.

Mission:
Enabling and supporting the cultivation of ethical organisations.

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

PROJECT:

Collective Action to advance business integrity in Mozambique

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Mozambique	5 years	0,80 M	South Africa

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

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2024):

The Coalition for Organisational Integrity (COI) has significantly advanced ethics management and organizational integrity in Mozambique. Key achievements include:

- Serving over 145 companies through ethics related engagements by hosting master-classes and best practice sharing sessions and recording a total reach of 1 504 participants
- Accrediting 437 Small Medium Enterprises (SMEs) and suppliers as ethically aware through the Ethically Aware Supplier Induction (EASI) programme
- Certifying 36 ethics officers and launching a Portuguese Ethics Officer Certification Programme with required resources
- Publishing 6 Portuguese resources, including Manual de Liderança Ética, Manual de Cultura Ética, Manual de Códigos de Ética, Manual do Embaixador de Ética, Manual do Risco Ético, and Institucionalização do Manual de Ética
- Conducting 173 ethics interventions reaching over 7 051 project beneficiaries
- Launching and maintaining the COI website and social media platforms for the project duration
- Advancing Mozambique's ethical leadership by developing certified ethics officers, ethics ambassadors, and trainers while promoting ethics through training initiatives
- Strengthened governance through training for Boards of Directors and professional associations, reaching 136 delegates
- Active contributions to global ethics events such as the Basel Institute on Governance and Business Ethics Network of Africa conferences

Impact

During the past five years, the project has demonstrated significant progress towards an integrity driven and "cleaner" business environment in Mozambique.

Political leadership has taken a strong stand against corruption, while Collective Action initiatives have certified ethics practitioners and trained suppliers through the EASI programme. An impact study confirms behavioural and relational improvements.

Ethics management capacity is enhanced through new Portuguese-language resources, and widespread participation in dialogues and training sessions reflect an increased demand for ethical governance.

Public rejection of unethical practices is rising, and organisations are now advertising vacancies for Ethics Officer roles, showcasing a shift towards accountability and integrity.

C3.

DESCRIPTION OF INTEGRITY PARTNER

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

Vision:
Building an ethically responsible society.

Mission:
Enabling and supporting the cultivation of ethical organisations.

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

Name of Integrity Partner:

The Ethics Institute (TEI)

PROJECT:

Combating municipal and procurement corruption in South Africa

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

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

The second objective is the implementation of an Ethically Aware Supplier Induction (EASI) training and accreditation programme that will allow small-and-medium enterprises (SMEs) to be accredited as 'Ethically Aware Suppliers'. The aim is to create a network of large organisations that are committed to utilising ethically aware suppliers, and a network of trainers who will continue to train suppliers in their organisations resulting in a culture of ethical business and co-accountability escalating across all procurement relationships.

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2024):

In the Local Government Ethical Leadership Initiative (LGELI):

- A partnership was established between government and civil society to implement the LGELI project. An Advisory Committee of societal leaders, as well as a working group of project partners drives the project
- After a consultative process with more than 2 000 stakeholders in all 9 provinces, the Code for Ethical Leadership in Local Government was launched by the Minister for Cooperative Governance
- The Code has been incorporated in government training programmes for municipal councillors and officials
- 180 trainers have been trained in 9 provinces to further roll out awareness of the Code

In the Ethically Aware Supplier Induction (EASI) programme:

- More than 80 organisations were engaged to train their suppliers
- 15 organisations enrolled their suppliers
- 204 SMEs were accredited as ethically aware suppliers
- 53 trainers were accredited
- 41 supply chain management officials from 9 municipalities completed the programme

Through the Gauteng Municipal Integrity Project:

- A partnership was established with the Gauteng Provincial Government (GPG) to build ethics advisory capacity to support municipalities
- 17 officials were capacitated through training, mentoring and co-engagements
- The Gauteng Municipal Ethics Officer Forum was established by the GPG, marking the sustainable transition of the project
- The Ethics Monitoring and Reporting Tool was developed to assist with standardisation in reporting

Impact

LGELI has become government's official ethical leadership project. It is formally supported by Ministry of Co-operative Governance and is built into their work plans. The adoption of the Code by municipalities has commenced.

More than 200 SMEs have been accredited as ethically aware, and at least one organisation is training a further 100 suppliers, indicating a move towards sustainability.

The Gauteng Municipal Ethics Officer Forum is running independently, building integrity management in Gauteng's municipalities.

DESCRIPTION OF INTEGRITY PARTNER

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

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

Name of Integrity Partner:

The Polish Chamber of Commerce of Medical Devices (POLMED)

PROJECT:

MedKompas III

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Poland	**4 years**	**0,89 M[1]**	**Poland**

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

The MedKompas III project is highly innovative in respect of its size and impact on the healthcare system. It foresees numerous trainings on anti-corruption law and ethical standards of cooperation with 1 420 participants, several public debates, many anti-corruption system implementations where each implementation will have an impact on around 700 individuals employed in a given hospital.

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

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

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

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

[1] Committed funds increased from USD 0,69 M to USD 0,89 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- 19 training sessions on anti-corruption and ethics were held for hospital employees across the country
- 523 healthcare employees including hospital directors, hospital management, doctors and nursing staff participated in the 19 training sessions. In the feedback provided by the trained employees, 68% indicated a higher awareness of corruption risks and a personal change in behavior that would make them less susceptible to corruption
- 37 hospitals are in scope for anti-corruption system implementation. The implementation status is as follows:
  - 14 completed as previously reported in Warszawski WSD, Zamość, Opole, Wołomin, Otwock, Bydgoszcz, Złotów, Olsztyn, Kraków, Gliwice, Warszawa NIO, Białystok, Wrocław and Poznań
  - 6 completed in this reporting period in Krasnystaw, Goleniów, Rzeszów - Kliniczny Szpital Wojewódzki No 2, Jarosław, Pisz, Przemyśl - Wojewódzka Staja Pogotowia Ratunkowego, with 4 610 employees and healthcare professionals now governed by internal anti-corruption procedures
  - 17 in progress in Brzeziny, Pszczyna, Puławy, Kutno, Wrocław, Krapkowice, Rzeszów- Wojewódzka Stacja Pogotowia Ratunkowego, Rzeszów - Podkarpackie Centrum Medyczne, Krosno, Tarnobrzeg, Przemyśl; Rzeszów – Wojewódzki Ośrodek Medycyny Pracy, Rzeszów - Wojewódzki Zespół Specjalistyczny, Rzeszów – Wojewódzki Ośrodek Terapii Uzależnień, Żurawica, Rzeszów – Uniwersytecki Szpital Kliniczny in F. Chopina, and Stalowa Wola

Impact

Project activities have included educating personnel on compliance issues and implementing anti-corruption systems within hospitals. This work has now reached the office of one of Poland’s voivodships which is a founding and supervisory body for hospitals in its region.

This indicates that the project's efforts are recognized as addressing critical needs in the healthcare sector and have engaged individuals who have a direct impact on hospital policies and the implementation of changes.

Furthermore, the growing number of hospitals with trained staff and established anti-corruption measures serves as a robust foundation to safeguard the healthcare sector against corruption.

Name of Integrity Partner:

Transparency International (TI) Bulgaria

DESCRIPTION OF INTEGRITY PARTNER

Transparency International (TI) – Bulgaria, being part of Transparency International – the global coalition against corruption, is a non-profit organization working on promotion of integrity and fighting corruption in Bulgaria for more than 25 years.

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

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

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

PROJECT:

Setting the Ground for Business Integrity in Bulgaria

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

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

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

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – JULY 2024):

- A sectoral analyses was conducted, 3 sectoral business integrity standards were developed in the healthcare, industry and energy sectors respectively with 3 versions for SMEs. These were made widely available on project and business associations' websites and platforms
- The advocacy campaign reached over 15 chambers of commerce and business associations, 8 of which joined the established Business Integrity Club and proactively promoted the integrity standards to their members
- The project mapped key companies and advocated for them to adopt the standards. This resulted in 10 companies across the industry, healthcare and energy sectors adopting the standards and implementing whistleblower protection. 2 companies from the financial sector, the Bulgarian Development Bank and Asset Insurance, were also attracted to implement integrity standards
- A communication and media campaign was launched to raise awareness on business integrity, including a final event organized jointly with the Ministry of Economy and Industry showcasing a successful Collective Action approach towards business integrity for sustainable development
- As a result of TI Bulgaria's active participation in the drafting of the National Anti-Corruption Strategy adopted by the government, business integrity standards were included. The project advocated for incorporating integrity into other strategies and influenced regulations
- Over 60 young leaders completed the Business Integrity course at Sofia University, expanding knowledge and leadership in business ethics

Impact

The project contributed significantly to Bulgaria's economic and political landscape by directly addressing national concerns around corruption, transparency, and ethical business.

By collaborating with business associations and companies to adopt integrity standards, the project influenced the legal framework in areas such as the National Anticorruption Strategy, the Whistle Blower Protection Act and lobbying.

Partnerships were fostered with public institutions and academia, thereby bridging critical gaps in the governance frameworks and enabling collaborative efforts to promote clean business.

This comprehensive approach has created avenues for meaningful change and Collective Action to combat corruption and strengthen the overall business environment in Bulgaria.

C3.

DESCRIPTION OF INTEGRITY PARTNER

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

The important and complementary mandates of UNODC are:

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

Name of Integrity Partner:

UN Office on Drugs and Crime (UNODC)

PROJECT:

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

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

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

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

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

In particular, the project will review existing legislation and public policy to identify corruption risks and typologies and provide recommendations on improving public procurement in Colombia. Beneficial ownership will be addressed in this context.

The project will also promote the signing and implementation of Collective Action pacts involving representatives from the public sector, energy and health care industries, guilds, small and medium-sized enterprises (SMEs), as well as civil society organizations (CSOs).

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

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

United Nations
Office on Drugs and Crime

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- A new partnership was established with 2 leading actors of the healthcare sector, contributing to the potential formalization of a Collective Action pact and positioning the project with the most relevant authorities
- The 3rd edition of the publication on anti-corruption good practices was launched as part of the 9th Regional Business Integrity Week of Alliance for Integrity in Santiago, Chile
- The project's achievements and activities were shared with global and regional audiences through UNODC's participation in international events, contributing to the positioning of integrity efforts in the country and positive outcomes
- 2 training sessions focused on identifying and evaluation corruption risks were held with compliance officers and business representatives from the healthcare sector
- 3 workshops on reporting channels and whistle-blower protection were held with compliance officers and business representatives from the healthcare and energy sectors, contributing to an improved set of tools available for the participating companies
- 7 workshops on anti-corruption compliance programmes were developed in collaboration with business representatives from the healthcare and energy sectors, contributing to the improvement of integrity standards and to the fulfilment of regulatory obligations
- 6 sessions of the Network of Compliance Officers and the "On the level" working group were facilitated, each with approximately 70 participants. The compliance officers received training on anti-corruption and were encouraged to share good practices from their companies

Impact

Higher integrity standards were reached and promoted by leading representatives of the healthcare and energy sectors, thanks to their enhanced capacities regarding anti-corruption and compliance.

Regional and global audiences were reached, motivating interest from new local and international stakeholders and generating new scenarios for the exchange of best practices on business integrity.

Widespread knowledge of the latest tools and approaches to prevent and counter corruption has helped to promote fairer market conditions.

C3.

DESCRIPTION OF INTEGRITY PARTNER

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

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

PROJECT:

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

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

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

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

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

The project will assist six Arab countries (Egypt, Iraq, Libya, Morocco, Sudan and United Arab Emirates) to introduce legislative improvements to combating corruption in the private sector; improve communication between the public and private sectors by providing a common venue for further interaction, dialogue and knowledge-sharing; and provide guidance to companies and small and medium enterprises (SMEs) to develop their anti-corruption code of ethics and compliance programmes.

United Nations
Office on Drugs and Crime

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- 46 companies in Egypt, Libya and UAE have received capacity-building trainings on the UNODC corruption risk assessment tool and compliance programmes
- 8 companies started to develop their internal compliance programmes with the project's support
- In total, 620 participants representing different government entities and SMEs from MENA and non-MENA countries, with a focus on the six project countries, have participated in capacity-building activities on preventing corruption and enhancing integrity measures or in public/private dialogue events
- As recommended in the mid-term evaluation with regards to expanding regional exchanges and peer learning events, 4 global and regional dialogue events were organized with participants from private and public institutions in MENA and non-MENA countries, including small and medium-sized enterprises (SMEs)
- The project provided public-private platforms where public and private sector representatives discussed the topics of concern in combating corruption and enhancing integrity. Dialogue results and findings fed into tailored activities and reflect on the workplan
- The project started supporting insurance companies in Libya and Morocco to understand and mitigate corruption risks

Impact

Enhanced partnerships and dialogue between the public and private sectors on combating corruption.

Supported the projects' beneficiary countries to improve the anti-corruption framework for business integrity through policy recommendations.

Increased insurance sector's knowledge in Libya and Morocco about the UNODC corruption risk assessment tool and compliance programmes.

Increased the knowledge and skills of SMEs to assess, report and mitigate corruption.

C4.

Golden Stretch Funding Round Projects: Project Profiles and highlights of activities in 2024

For the projects under the Golden Stretch Funding Round the descriptions of activities undertaken in 2024 for all 8 projects were provided by the Integrity Partners in their respective Annual or Final Progress Report 2024 and are approved by the relevant Integrity Partners for external use.

Of the 8 Golden Stretch Funding Round projects, 2 projects have completed their activities and are reported on in this Annual Report 2024.

6 projects remain active with implementation of activities still in progress.

Name of Integrity Partner:

Basel Institute on Governance

DESCRIPTION OF INTEGRITY PARTNER

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

- The Private Sector team takes a dual approach to engaging and strengthening the private-sector response to corruption risks in business transactions by advancing anti-corruption Collective Action and through advice and technical assistance to private corporations and state-owned enterprises. It hosts the **B20 Collective Action Hub**
- The International Centre for Asset Recovery (ICAR) at the Institute works with countries around the world to strengthen their capacities to recover illicit assets
- The Green Corruption programme is a multi-disciplinary initiative that targets environmental degradation using anti-corruption and governance tools
- The Prevention, Research and Innovation (formerly Public Governance) team connects corruption research with anti-corruption practice

PROJECT:

Towards new horizons for Collective Action

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

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

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

The project will multiply strategic efforts to embed Collective Action as a norm and bring it into new sectors, including through initiatives that combine anti-corruption and related sustainable development goals. The supporting marketing strategy includes a global index, conferences and annual awards. The B20 Collective Action Hub will aim to achieve long-term sustainability as the global go-to centre on Collective Action. Online courses and a virtual help desk will provide a space for all interested parties to gain and share advice, skills and knowledge on Collective Action.

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- The 5th International Collective Action Conference was hosted with keynote presentations from global anti-corruption leaders, five panel sessions, three interactive breakout sessions, 18 exhibitors, and numerous side meetings. Around 200 participants from the private sector, government, civil society and academia were engaged to advance efforts in putting business integrity on the global agenda
- The Conference was followed by a webinar on Leveraging Collective Action and business integrity tools, which offered a platform for the global Collective Action community to continue discussions that were sparked at the in-person event
- The 2024 Gretta Fenner Outstanding Achievement in Collective Action Award was presented in memory of the Basel Institute's late Managing Director, who did so much to promote anti-corruption Collective Action and other multi-stakeholder coalitions, as well as the 2024 Inspirational Newcomer Award
- An interactive Collective Action eLearning course was launched with the aim of equipping learners with the practical skills needed to conceptualise, establish, and implement initiatives in diverse settings
- 3 new organisations for our flagship mentoring programme were selected, focusing on participants in Colombia and Peru who can benefit from our Spanish language mentoring support. Our full cohort of mentees has now developed into a Collective Action 'community of practice'
- A Policy Brief on catalysing the private sector for disaster response and resilience was published, which raises awareness of the critical role the private sector can play in co-designing and delivering ethical responses to natural disasters and other humanitarian emergencies

Impact

Continued and substantial contributions were made towards the normalisation of Collective Action for improving business integrity, preventing corruption, and achieving the Sustainable Development Goals, through a broad programme of work and external engagement, including:

- Hosting the flagship global Collective Action Conference and Awards
- Developing a 'community of practice' through our international mentoring programme for civil society and other non-profit organisations
- Launching an interactive Collective Action eLearning course
- Promoting Collective Action at multiple international events and in written publications

C4.

Name of Integrity Partner:

Foundation for the Global Compact

DESCRIPTION OF INTEGRITY PARTNER

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

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

PROJECT:

Advancing Collective Action Against Corruption through Global Compact Local Networks

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Bangladesh, Brazil, Egypt[1], India, Indonesia, Kenya, Malaysia, Mexico[2], Thailand, and Ukraine[3]	3 years	4,00 M	USA

[1] replaces Japan [2] replaces Argentina
[3] replaces Italy

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- The Anti-Corruption Collective Action (ACCA) was promoted at the highest-level. The first-ever Private Sector Forum during the Conference of the States Parties (CoSP) featured ACCA key discussions. ACCA was also a highlight at the 20th Anniversary of Principle Ten event, where the winners of the ACCA Global Contest were announced from 24 participating countries
- The UN Global Compact contributed to the reestablishment of the B20 Integrity & Compliance Task Force, and supported the drafting of G20 policy recommendations on ACCA and business integrity incentives
- The Resource Guide on State Measures for Strengthening Business Integrity with a chapter on the development of incentives through Collective Action was issued and a partnership with the United Nations Office for Project Services (UNOPS) was established in Ukraine to promote procurement integrity
- Engagement with the private sector was heightened, with new Working Groups formed in Indonesia and Thailand, and new C-Suite members in Bangladesh, Brazil and Kenya. Anti-corruption commitments were signed in Brazil, Indonesia and Mexico, and national events celebrating the 'International Anti-Corruption Day' attracted over 700 participants in Bangladesh, Brazil, Mexico and Ukraine
- Evidence-based decision-making was fostered through private sector integrity surveys in Bangladesh and Egypt. Leveraging technology, innovative solutions emerged such as a self-assessment tool for companies (Mexico) and a microsite for SMEs to understand the requirements of national regulations (Kenya)
- Capacity building efforts based on the Playbook on Anti-Corruption Collective Action grew in Bangladesh, Brazil and Egypt, extending to 13 provinces in Indonesia, Malaysia and Mexico. Case studies were used in Bangladesh, Kenya, Indonesia, Malaysia and Thailand to target local challenges. Tailored SMEs trainings were launched in India and further promoted in Malaysia and Ukraine, becoming mandatory in four companies, reaching over 76 000 employees

Impact

By facilitating enhanced dialogue and collaboration between businesses and governments through the first-ever Private Sector Forum at the Conference of the States Parties (CoSP), the project has laid the foundation for more effective public-private partnerships to combat corruption.

The project's support has catalyzed a tripling of country networks engaged in Anti-Corruption Collective Action (ACCA) initiatives, demonstrating growing momentum.

The project's impact has been internationally recognized, with two Awards received for successful ACCA implementation in Brazil, as well as the establishment of a growing Ukraine Business Compact.

Youth for Integrity in the Bangladesh project has inspired student-led voices against corruption, leading to positive changes.

C4.

Name of Integrity Partner:

International Anti-Corruption Academy

DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 77 State Parties and 4 international organizations.

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

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

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society. The Academy currently offers four master's degree programmes, various capacity-building trainings, and technical assistance. IACA also creates platforms for dialogue and networking on anti-corruption issues.

PROJECT:

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

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Least Developed Countries and Emerging Markets	3 years	2,17 M[1]	Austria

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

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

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

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

[1] Committed funds increased from USD 2,00 M to USD 2,17 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- The 2023 Anti-Corruption Collective Action Certificate programme saw 11 participants successfully completing their training and implementing Collective Action projects over an 8-month period. This resulted in tangible outcomes in their respective countries
- In March 2024, the 2024 class of the Anti-Corruption Collective Action Certificate programme began activities with 12 students completing the modular stage and initiating projects in various fields
- The International Anti-Corruption Summer Academy 2024 was held from 8 to 14 June 2024. The programme engaged 63 professionals from 27 countries, including 12 highly qualified participants from Least Developed Countries and Emerging Markets who attended as scholarship recipients
- The Master in Anti-Corruption (MACS), International Master in Anti-Corruption Compliance and Collective Action (IMACC), and Master in Anti-Corruption and Diplomacy (MACD) 2023 programmes were initiated, supporting 22 professionals from Least Developed Countries and Emerging Markets
- 4 scholarship holders from the MACD 2022 programme successfully finalized their course work and defended their master's theses in June 2024. 5 scholarship recipients from the MACS and IMACC 2022 programmes completed their research, submitted their final theses to IACA, and are preparing for their defense scheduled for November 2024. They will all graduate in December 2024
- The IMACC 2024 class, beginning in October 2024, will award 1 scholarship to a candidate from a Least Developed Country or Emerging Market
- The post-conference publication from the Regional Alumni Conference Latin America was published and disseminated to over 5 000 IACA alumni

Impact

IACA's master's programmes equip students with comprehensive anti-corruption knowledge and practical skills, empowering them as anti-corruption professionals.

IACA's 2024 Summer Academy enabled participants to transform workplace practices and implement anti-corruption strategies in their countries.

The 2023 Anti-Corruption Collective Action Certificate programme saw participants successfully implement Collective Action initiatives, achieving tangible outcomes. 8 out of 11 participants reported notable successes, such as fostering public-private collaboration, enhancing inter-institutional cooperation, strengthening whistleblower protection, and building private sector capacity to combat corruption.

Name of Integrity Partner:

Maritime Anti-Corruption Network (MACN)

DESCRIPTION OF INTEGRITY PARTNER

The **Maritime Anti-Corruption Network** (MACN) is a global business network committed to the vision of a maritime industry free from corruption – one that fosters fair trade for the benefit of society at large. Founded in 2011, MACN comprises companies across all major sectors of the maritime industry.

Today, it includes over 220 global member companies. Since its inception, MACN has won multiple awards, and is considered to be one of the pre-eminent examples of collective action to tackle corruption, driving real progress in the fight against corruption across global trade routes.

PROJECT:

MACN Regional Expansion: Collective Action Against Maritime Corruption

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

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

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

Through this project, MACN will launch the same type of activities in India, and further localize capacity to drive Collective Action by the local maritime value chain and NGOs. MACN will partner with the United Nations Global Compact in Pakistan, Bangladesh, and India, to establish local Collective Action alliances in each country and deploy MACN's Collective Action tools and methodology.

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JULY 2021 – SEPTEMBER 2024):

- 9 major events were convened in the South Asia region, attracting over 1 000 participants from across the maritime industry. In 2024, key activities included the MACN Pakistan National Maritime Conference and the MACN Bangladesh Report Launch
- Advisory committees were established in Pakistan, Bangladesh, and India, with members drawn from key national industry associations. This enables these associations to serve as Collective Action hubs in the future. In India, the government also has a seat on the Advisory Committee, creating a public-private partnership that maximizes national ownership and supports the initiative's long-term sustainability
- The governments of all 3 countries were engaged as key stakeholders in the Collective Action initiatives
- The India HelpDesk received a total of 1 853 Pre-Arrival Notices, covering 63 MACN member companies and 36 export-import ports, including all 12 major ports
- A total of 35 maritime corruption demands were reported to the HelpDesk, all of which were resolved within 5 hours with a 100% success rate. The latest updates and activities, including those after project finalization, can be found on the MACN India Dashboard
- A new post-departure feedback mechanism for captains using the HelpDesk was introduced. Through this mechanism, 112 feedback emails were received, expressing gratitude to MACN India for the support provided and noting a noticeable increase in integrity in Indian ports

Impact

The project has successfully integrated Collective Action initiatives into the maritime sectors of India, Pakistan, and Bangladesh.

It has established platforms for the private sector to work with governments and address the root causes of corruption in the maritime industry. This has enhanced awareness and strengthened compliance capabilities among companies to reject corrupt demands.

MACN's HelpDesk model has proven highly effective, intervening in 100% of escalated corruption cases and providing real-time support to empower companies.

The project has laid a stronger foundation for sustainable governance improvements in the maritime sector across the 3 countries.

DESCRIPTION OF INTEGRITY PARTNER

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

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

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

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

Name of Integrity Partner:

Organisation for Economic Co-operation and Development

PROJECT:

Fair Market Conditions for Competitiveness in six OECD partner countries

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

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

Algeria

- Final Collective Action roundtable in Algiers formalized commitments and defined ownership for implementation
- Workshop in Oran promoted OECD business integrity standards for integration of anti-corruption topics in university

Croatia

- Draft manuals developed for creating online knowledge platforms and legal anti-corruption clinics in universities
- Academic workshops and trainings with the Competition Agency raised awareness and capacities
- Online campaign pursued to increase visibility and engagement

Saudi Arabia

- Green light received from authorities, and implementation initiated
- Kick-off event held in Riyadh with the anti-corruption agency NAZAHA, ensuring stakeholder buy-in
- Lecture delivered at Riyadh-Imam Mohammad Ibn Saud Islamic University on anti-corruption in curricula
- Surveys collected for business integrity study

Serbia

- Draft manuals developed for creating online knowledge platforms and legal anti-corruption clinics in universities
- Academic workshops and trainings with the Competition Agency raised awareness and capacities
- Online campaign pursued to increase visibility and engagement

South Africa

- Draft report prepared with recommendations for closer cooperation with South African State-Owned Enterprises (SOEs)
- Draft toolkit developed on good practices for SOE governance

Uzbekistan

- Third Collective Action Community meeting held focusing on SOE governance and competition policy
- Workshop conducted, building capacity on competitive neutrality and SOE governance

Impact

During the fourth project year and building on the stakeholder mobilisation, the team substantially strengthened stakeholder capacity in numerous workshops and training sessions along with targeted OECD expert events. Several thematic workstreams were launched in which tailored country analysis and advice is incrementally being developed.

DESCRIPTION OF INTEGRITY PARTNER

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

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

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

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

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

Name of Integrity Partner:

Transparency International e.V.

PROJECT:

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

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

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

1. Reframe and strengthen the Integrity Pact as a global anti-corruption standard by developing an updated global narrative. This will ease its understanding among broader audiences and provide a clear reference for consistent adoption while leaving space for national adaptation.
2. Widen the number of policy and business leaders who promote the application and implementation of the Integrity Pact as an anti-corruption standard through global advocacy.
3. Embed the Integrity Pact standard in key contracting projects or regulation in three countries.

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- Carried out training on Integrity Pact implementation for European Union authorities managing European Union funds across 15 European Union countries. Transparency International Secretariat was also awarded a grant by the European Union Commission to set up an "Integrity Pact Helpdesk" to provide technical assistance to European Union countries in the application of Integrity Pacts until mid-2027
- Carried out training on Integrity Pact implementation for public officials and civil society in Kosovo in support of the piloting of Integrity Pacts in two municipalities, with Transparency International Kosovo acting as monitor
- Transparency International Argentina participated in consultations on a draft law on Public Works, which includes the Integrity Pacts as mandatory for strategic infrastructure projects, and organised 3 regional multi-stakeholder roundtables, in which participant recognised and endorsed implementation of Integrity Pacts
- Transparency International Romania started the implementation of an Integrity Pact to monitor a project for the provision of naval transport services in the Danube Delta Region. In addition, Transparency International Romania provided technical assistance to authorities who have included implementation of Integrity Pacts across 12 European Union funded operational programs
- Transparency International Spain started working with the anti-fraud agency of Andalusia, who has committed to include the Integrity Pacts in its upcoming operational strategy and support the implementation of at least 6 initiatives among monitored entities

Impact

Further developed the revamped narrative for the Integrity Pact as a global standard in line with feedback from a wide community of experts and the most recent trends in good governance and business integrity in public procurement.

Widened support for implementation of Integrity Pacts across countries and regions, with concrete commitments and new initiatives by national and local governments in Europe.

Made further progress towards the incorporation of Integrity Pacts in public procurement projects and regulations in Argentina, Spain, and Romania.

Name of Integrity Partner:

United Nations Office on Drugs and Crime (UNODC)

DESCRIPTION OF INTEGRITY PARTNER

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

The important and complementary mandates of UNODC are:

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

PROJECT:

Global Action for Business Integrity

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan, Ukraine and 1 global outreach component	3 years	4,50 M[1]	Austria

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

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

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

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

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

[1] Committed funds increased from USD 4,00 M to USD 4,50 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

United Nations
Office on Drugs and Crime

PROJECT AT A GLANCE:

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

KEY ACTIVITIES (OCTOBER 2023 – SEPTEMBER 2024):

- The revised publication A Resource Guide on State Measures for Strengthening Business Integrity was launched in cooperation with partners
- In Brazil, meetings were held to disseminate the policy paper on lobbying regulation and to address the need for anti-corruption reform. A new 3-step training approach for SMEs was also conducted, strengthening the impact of business integrity training
- In Colombia, 8 workshops were held in 4 cities, reaching 102 representatives from academia and civil society to strengthen their anti-corruption capacity
- In Egypt, 27 lecturers from 9 private and public universities were trained to teach anti-corruption modules. 6 training programmes were also organized across the country for university students and assistant professors on anti-corruption in the private sector
- In Malaysia, 2 round-table discussions were carried out to disseminate findings and collect feedback on the proposed inclusion of integrity pacts in the Public Procurement Bill
- In Ethiopia, stakeholder consultation sessions were held to develop and refine a policy paper, improving dialogue among the public and the private sector, civil society, and academia
- In Ukraine, a training and workshop on integrity in public procurement were held, and a draft code of conduct for companies was prepared
- In Uzbekistan, a session on enhancing corruption-proofing was held, a corruption risk study for the Business Ombudsman Office was supported, and the training guide was updated to reflect legislative changes

Impact

Enhanced public and private sector understanding of liability of legal persons, and public procurement and bidding regulations, leading to operational changes in Brazil's and Malaysia's legal frameworks on business integrity.

Strengthened cooperation between the public and the private sector, civil society and academia to develop recommendations, action plans and educational materials to foster anti-corruption and a culture of integrity in Egypt, Ethiopia, and Pakistan.

C4.

DESCRIPTION OF INTEGRITY PARTNER

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

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

Name of Integrity Partner:

Wirtschaftsuniversität Wien (Vienna University of Economics and Business)

PROJECT:

Good governance in a digital and open trading environment

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

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

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

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

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

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

PROJECT AT A GLANCE:

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

KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JULY 2021 – DECEMBER 2024):

- 4 annual conferences and over 30 Focus Group meetings were held, engaging nearly 1 000 representatives from 35 African countries, the World Bank (WB), the United Nations Office on Drugs and Crime (UNODC), the United Nations Conference on Trade and Development (UNCTAD), the African Tax Administration Forum (ATAF), the African Tax Institute (ATI), the Tax Justice Network Africa (TJNA), business and academia. In addition, 2 Summer Schools in partnership with ATI and TJNA were convened in Pretoria, to provide technical support to Civil Society Organisations
- The Focus Group on leveraging new technologies to counter Illicit Financial Flows, such as Artificial Intelligence, Blockchain, Machine Learning, Data Analytics, and Cloud computing, met regularly bringing together 200 officials from tax authorities, Financial Intelligence Units and other law enforcement agencies
- The Focus Group on Unexplained Wealth Orders held joint events with the Stolen Asset Recovery Initiative (StAR) to examine recent developments in Mauritius, Kazakhstan, Kenya, Zimbabwe, Australia, Canada, the United Kingdom and the European Union leading to a joint "Unexplained Wealth Orders" publication by WB, StAR and Wirtschaftsuniversität Wien Global Tax Policy Center (WU GTPC)
- Ongoing discussions explored ways for tax and Financial Intelligence Unit authorities to improve access to Beneficial Ownership information, as well as to contribute to the ongoing debate on the African Continental Free Trade Agreement
- Several events were organised with the African Tax Administration Forum (ATAF) to input into the ongoing debate on the African wide free trade agreement
- A recurring theme throughout these discussions was the need for better interagency cooperation and much of the dialogue in the Focus Group was based upon the joint WU GTPC and WB "Taxing Crime" publication
- Recent activities have focused on developing partnerships with organisations like ATAF, WB, UNODC, TJNA, ATI, and UNCTAD that are well placed to take forward the project building upon the outcomes achieved over 3 Funding Rounds of the Siemens Integrity Initiative since 2015

Impact

Notably, participating countries have engaged in a more constructive dialogue, raising political awareness of how Illicit Financial Flows erode government revenue and undermine citizen confidence ("Taxing Crime" publication).

The project has amplified the voice of civil society organizations in the political debate on these critical issues.

Furthermore, it has highlighted the need for tax, trade and investment communities to engage in the debate of the implementation of the New African Continent Free Trade Agreement.

Governments now recognize that new technologies and innovative initiatives will play a key role in countering Illicit Financial Flows (Unexplained Wealth Order publication).

D1.

Annex – Disbursement Press Release

Press

Munich, June 28, 2024

Siemens successfully disbursed all World Bank and European Investment Bank related settlement funds under the Siemens Integrity Initiative

- **Funding of 85 projects in more than 50 countries**
- **19 projects carry on their great implementation work to summer 2025**

Almost 15 years ago, on July 2, 2009, the World Bank Group announced a comprehensive settlement with Siemens. As part of the settlement, Siemens agreed to cooperate to change industry practices, clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption. As a consequence, Siemens conceptualized and set up the Siemens Integrity Initiative to support projects and organizations fighting corruption and fraud with funding worth USD 100 million over the next 15 years. This funding was supplemented on March 15, 2013 by a separate settlement with the European Investment Bank (EIB), worth EUR 13,64 million over five years.

As of May 2, 2024, the full amount of both settlements has been committed to 85 projects in over 50 countries across all Funding Rounds and Siemens has disbursed all funds to Project Partners in accordance with the agreed Funding Agreements, Budgets, and Workplans outlined in the Settlement agreements.
19 Projects, thereof 3 EIB Settlement Projects, will continue the scheduled implementation of activities until no later than summer 2025.

SIEMENS

"It is a great privilege to have conceptualized and supported the Siemens Integrity Initiative from the very beginning", says Sabine Zindera, Head of the Siemens Integrity Initiative and Vice President in Legal and Compliance at Siemens.
"The results of our 85 projects in more than 50 countries to promote fair competition and fight corruption through Collective Action and Training are impressive. I am very grateful for the cooperation in my international and cross-functional team and the great support from our Steering Committee and the guidance received from the World Bank and European Investment Bank Team."

All Funding Rounds since 2009 were announced via Press Releases and supported by additional information including application and selection criteria published at siemens.com/integrity-initiative.

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

Projects were selected with a view to achieving a balanced portfolio of topics and a wide regional distribution of funding such as in the Adriatic Region, Algeria, Argentina, Bangladesh, Brazil, Colombia, Egypt, Ethiopia, Ghana, India, Indonesia, Italy, Japan, Kenya, Nigeria, Malaysia, Pakistan, Romania, Rwanda, Saudi Arabia, South Africa, Spain, Thailand, Uganda, Uzbekistan and Zambia.

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

D1.

Annex –
Disbursement Press Release

Press release

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

Since 2009 bi-annual formal meetings and discussions provided structured updates on the status and progress of the Siemens Integrity Initiative. These updates were based on the approval of the Siemens Steering Committee and fulfilled the requirement of presenting our Annual Report to the World Bank and the European Investment Bank as part of the settlements.

All Annual Reports of the Siemens Integrity Initiative, information about the funding rounds, the selection process, the detailed profiles of the projects selected and the independent 2017 Mid-term Review of the Initiative are available at www.siemens.com/collective-action.

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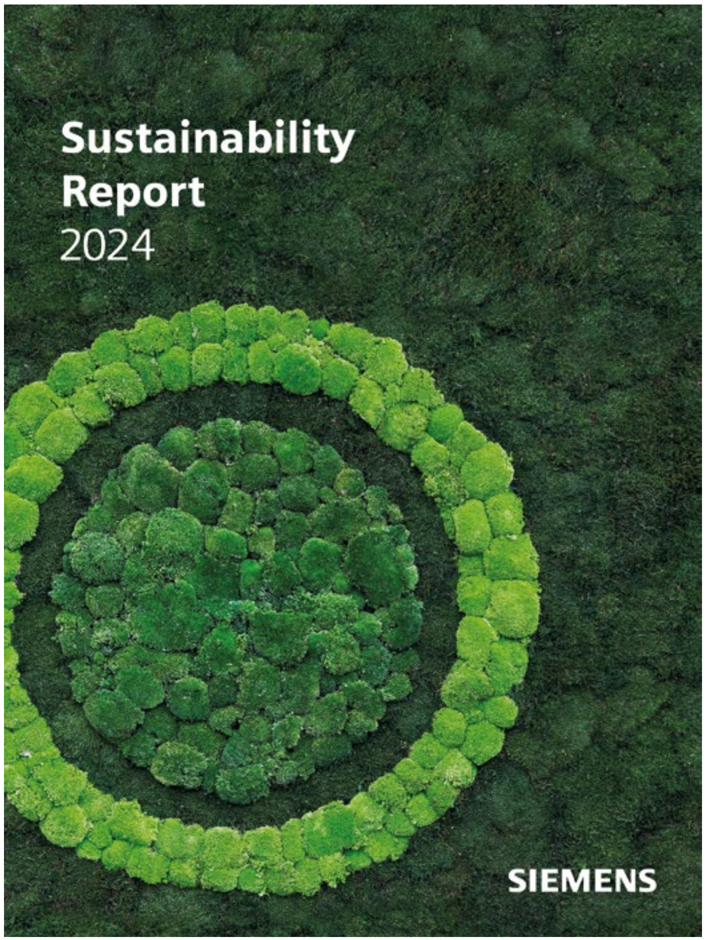
Siemens AG (Berlin and Munich) is a leading technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. By combining the real and the digital worlds, Siemens empowers its customers to transform their industries and markets, helping them to transform the everyday for billions of people. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In fiscal 2023, which ended on September 30, 2023, the Siemens Group generated revenue of €77.8 billion and net income of €8.5 billion. As of September 30, 2023, the company employed around 320,000 people worldwide. Further information is available on the Internet at www.siemens.com.

D2.

Annex – Additional Siemens Reports

Siemens Report for fiscal 2024

Siemens has published the Siemens Report for the fiscal year 2024. It provides detailed information about the business development of the company, its earnings, assets, and finances.



Siemens Sustainability Report 2024

The Sustainability Report 2024 provides a wealth of information about Siemens and its activities and includes:

1. Siemens at a glance and our DEGREE framework
2. Our sustainability management
3. Governance
4. Environment
5. Social
6. Our sustainability indicators
7. Annex

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

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

This Siemens Integrity Initiative Annual Report 2024 has been compiled to the best of our knowledge and includes information that has been submitted to the Siemens Integrity Initiative Project Office through March 3, 2025.

Information provided in Section C is created and approved for external use by each Integrity Partner. This document contains links to other websites. Siemens is not responsible for the privacy practices or the content of other websites or information provided by its Partners.

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About Siemens
Siemens AG (Berlin and Munich) is a leading technology company focused on industry, infrastructure, mobility, and healthcare. The company's purpose is to create technology to transform the everyday, for everyone. By combining the real and the digital worlds, Siemens empowers customers to accelerate their digital and sustainability transformations, making factories more efficient, cities more livable, and transportation more sustainable. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a leading global medical technology provider pioneering breakthroughs in healthcare. For everyone. Everywhere. Sustainably. In fiscal 2024, which ended on September 30, 2024, the Siemens Group generated revenue of €75.9 billion and net income of €9.0 billion. As of September 30, 2024, the company employed around 312,000 people worldwide on the basis of continuing operations.

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