### A. INTRODUCTION

- Project management and reporting
- Project organization

### B. SIEMENS INTEGRITY INITIATIVE

- Status of the First Funding Round
- Status of the Second Funding Round
- Status of the Third Funding Round

### C. PROJECT PROFILES AND HIGHLIGHTS OF ACTIVITIES IN 2019

- C1. First Funding Round Projects
- C2. Second Funding Round Projects
- C3. Third Funding Round Projects

### D. ANNEX

- D1. Third Funding Round Press Release by Siemens on December 16, 2019
- D2. Additional Siemens Reports

---

**Note:**

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


Kindly note that the online version of this Annual Report 2019, available at [www.siemens.com/integrity-initiative/Report2019](http://www.siemens.com/integrity-initiative/Report2019), is complemented by numerous hyperlinks which provide a wealth of additional external information on the projects funded under the Siemens Integrity Initiative.
Once again, we can look back on an exciting and very eventful year. In the tenth year of implementation of the Siemens Integrity Initiative, which we designed and subsequently launched in 2009, we are delighted to report that, with the inclusion of the Third Funding Round, as of March 2, 2020 around USD 98.5 million has been allocated to 77 projects in more than 40 countries. This makes us one of the largest private sector initiatives aimed at fighting corruption and promoting fair markets.

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

In this context, it was particularly helpful that our Siemens Integrity Initiative Project Office, at the request of the World Bank, commissioned an independent evaluator, the Canadian Universalia Management Group, to conduct a Mid-term Review in 2017. The valuable analysis produced by this review and the recommendations derived from it, which we also published in our Annual Report 2017, helped us to further refine the design of the Third Funding Round and determine its focal themes.
The Third Funding Round in 2019 coincides with the planning of one of the most significant changes to the Siemens Group: the restructuring of our business activities around the world – with a current headcount of around 385,000 employees and a turnover of nearly 87 billion euros in 2019/2020 – enabling us to operate in a more focused manner in the individual markets.

This planning includes the spin-off of Siemens’ Gas and Power Division, which will become an independent, publicly listed company – Siemens Energy – by the end of 2020. As a result, the future Siemens brand will comprise Siemens AG as a focused industrial company together with Siemens Healthineers, which has already been carved out, and now the new company Siemens Energy.
However, what unites us all forever is the strength of our shared Siemens brand and the associated values – responsible, innovative and excellent – within a shared, robust ecosystem and our joint purpose: namely that, through our businesses and activities, we make a positive and sustainable overall contribution to shaping society and make real what matters.

And it is precisely here that Collective Action and the Siemens Integrity Initiative come into play: giving something back to society on a broader level and contributing to fairer and more transparent markets for all stakeholders.

10 years since the start of these activities is a long time and endurance is called for, but it has been and is still worth every single step. So many committed stakeholders have been mobilized at all levels during this time – whether globally or in individual countries and business sectors. What ultimately counts is that we do not give up when the going gets tough.

At this point we would like to thank our committed Integrity Partners throughout the world. Through their project work together with our stakeholders, they have driven forward the key anti-corruption topics both at the highest levels
of engagement and on the ground at institutional level. It is their commitment that has made real the project implementation where details and fulfillment of set goals and milestone matter.

You will find an overview of the most recent accomplishments of the Integrity Initiative in this Annual Report 2019, with an exciting and impressive summary of project activities and outcomes in Section C based on information provided by our Integrity Partners as of key date March 2, 2020.

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

Steering Committee of the Siemens Integrity Initiative:
Dr. Andreas Christian Hoffmann
General Counsel, Siemens AG
Martina Maier
Chief Compliance Officer, Siemens AG
Dr. Horst J. Kayser
Corporate Vice President and Chairman of the Siemens Portfolio Companies (POC), Siemens AG
A Word from the Siemens Integrity Initiative

Project Office

Dear Reader,

March 2020

“Serving society while doing successful and sustainable business is at the heart of Siemens’ strategy. It’s our company’s ultimate purpose. The 17 Sustainable Development Goals (SDGs) set out in the United Nations’ (UN) 2030 Agenda outline humanity’s consensus on what constitutes progress. They’re also our yardstick for measuring Siemens’ impact on the world.”

This strong commitment of our Siemens AG CEO Joe Kaeser and of the deputy CEO Dr. Roland Busch in the Siemens Sustainability Information 2019 supports our long-standing work in Collective Action which ensures practical implementation of the Sustainable Development Goal 16 “Peace, Justice and Strong Institutions”.

And it continues: “Making a positive difference in the world would be impossible without high standards of integrity and compliance. Among global companies, Siemens has been and will continue to be a world leader in this area.

Only clean business is Siemens business. This commitment also applies to the integrity of our accounting processes and related functions. Beyond the boundaries of our company, we’re committed to Collective Action, which is building alliances to fight corruption and promote fair competition together with numerous organizations all around the world. We’ll uphold our commitment to driving the Siemens Integrity Initiative with the Third Funding Round in 2020 and beyond. Furthermore, we’ll continue to support international and national organizations and initiatives with our long-standing experience and global network to combat corruption worldwide.”

As we look back on 10 years of implementation of the Siemens Integrity Initiative – established in 2009 on the basis of the settlements reached with the World Bank in 2009 and the European Investment Bank in 2013 and backed with funding well in excess of USD 100 million –
we at the Project Office are convinced that we have been able to make a significant private sector contribution to achieving the goals outlined above and will continue to do so in the future. The conclusion of the Funding Agreement phase for the Third Funding Round in 2019/2020 brings the overall commitment of funds to around USD 98.5 million, which are allocated to 77 projects in more than 40 countries.

The results of the independent Mid-term Review of the Siemens Integrity Initiative, conducted at the request of the World Bank by the Canadian Universalia Management Group in 2017, affirmed our strategic direction and helped us to further optimize the design of the Third Funding Round.

We naturally faced some tough decisions in selecting the projects of the Third Funding Round having received a total of more than 140 project proposals from around 50 countries. Naturally we had to consider various aspects such as the regional, global and thematic mix, follow-on projects from earlier funding rounds, and the ratio of large and small organizations in order to achieve a balanced portfolio.

It was therefore a key highlight that as of March 2, 2020, 22 new Funding Agreements were signed for the Third Funding Round of the Siemens Integrity Initiative with a volume of USD 25.2 million.

This was achieved after all projects went through a detailed, cross-functional due diligence in collaboration with our compliance experts in the relevant countries, Finance and Tax experts, and Siemens’ Legal department, submitted to the Siemens Steering Committee for approval, and after the World Bank’s non-veto and the European Investment Bank’s no objection decisions.

We published the first Funding Agreement results of the Third Funding Round in a press release on December 16, 2019. You can find this in Section D.1 and on our website www.siemens.com/integrity-initiative and further information about the status of the Third Funding Round in Section B of this Annual Report 2019.

Over the last decade, the Collective Action method has met with international recognition among international and regional organizations as well as government and private sector representatives. We are proud to say that, with around 77 projects worldwide, we have been able to make a valuable, demonstrable contribution to practical implementation as well as inspiring many stakeholders to support our cause.
This practical and real implementation thus reflects our determination to offer “more than just a paper”. This is also acknowledged in the Business 20, an official Engagement Group of the political G20. In 2020 we again have been accredited as a member of the B20 Task Force on Integrity & Compliance, and are delighted to be able to lend our professional support to the strategic principles of “developing action-oriented and impactful policy recommendations through an inclusive, collaborative and transparent approach and adopting highest professional standards” through our work in conjunction with our projects.

As reported, all 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. This year, we have therefore focused on our active projects from the Second and Third Funding Rounds.

Of the 24 Second Funding Round projects, two Final Reports were presented in our Annual Report 2017 followed by a further ten Final Reports in last year’s Annual Report 2018. These Final Reports cover the activities over the entire project period. In this year’s Annual Report 2019, another ten projects, as described in Section C, have submitted their Final Reports on the activities over the entire project period.

We would like to express our wholehearted gratitude to our Integrity Partners, without whose tireless commitment and multifaceted work on the ground it would not have been possible to put the projects into practice. We would also like to thank our Project Relationship Managers for their dedicated, meticulous support at the local level, and naturally our high-level Mentors for their local insight and guidance.
Finally, a very special word of gratitude and appreciation goes to our Steering Committee, which has received regular, detailed updates about the Integrity Initiative throughout 2019 and has continued to support us with valuable advice and supervision, helping us to think ahead with optimism and a clear direction even in turbulent times and to align our actions accordingly.

Sabine Zindera and Shawn Teixeira
For the Project Office of the Siemens Integrity Initiative

This Annual Report was approved by the Siemens Steering Committee on March 31, 2020 and submitted together with a comprehensive presentation to the World Bank Group in Washington on April 22, 2020 and to the European Investment Bank in Luxembourg on April 28, 2020

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

Sabine Zindera, Vice President, heads the Collective Action and External Affairs department in the Siemens Legal and Compliance Organization and is supported by Shawn Teixeira and Monika Besel, as well as the network of Siemens Business Leaders, Siemens Country CEOs, Compliance Officers, Controlling and Finance, Legal and Tax experts all around the world.
Under the terms of the agreement between Siemens and the World Bank, the World Bank has audit rights over the use of funds (USD 100 million dollars over 15 years beginning in 2009) and veto rights over Siemens’ selection of projects and organizations to be supported. Furthermore, the agreement between Siemens and the European Investment Bank (EUR 13.64 million over 5 years) gives the EIB the right to reject proposed projects.

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

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

The Project Office regularly updates the Siemens Steering Committee, the World Bank Group and the European Investment Bank on the status and progress of the Siemens Integrity Initiative.
Much of the information available to us is transparently accessible to the public and can be viewed on our dedicated web site www.siemens.com/integrity-initiative. The information provided relates in particular to the framework conditions for the First, Second and Third 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 and 2019.

Two editions stand out and merit further mention:

Our very first 2011 edition introduced to you the Siemens Collective Action program, and in Sections A and B of the report provided insight into the conceptualization, planning, project selection, award of funds and project implementation relating to the First Funding Round tranche of USD 37.7 million.

Our seventh 2017 edition signaled the halfway mark of the 15-year World Bank settlement period and featured a Summary Report of the external Mid-term Review of the Integrity Initiative in Section D. The Mid-term Review was independently conducted by the Canadian 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 additional allies to sign up to Collective Action and join us in our fight against corruption. The positive external and internal feedback received in response to our reports, and especially to our externally conducted Mid-term Review has strengthened our resolve to extend our program even further, enabling us to highlight more and more anti-corruption success stories across all countries and, in so doing, integrate additional stakeholders and activities.
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, Turkey, China, Germany, Argentina, Japan and Saudi Arabia.

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

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 Integrity Initiative Project Office and the Siemens Finance Department.

- 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 projects (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

**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

**PRM/PO calls upon Mentor when needed**
A. Introduction

Project organization

- The internal Siemens project management structure of the Initiative consists of several dedicated teams that provide overall supervision and guidance (such as the Steering Committee) and deal with daily operations of the Initiative (Siemens Project Office, Project Team and Project Relationship Managers).

- To make this Initiative a company-wide effort and ensure engagement and representation, all relevant business fields of Siemens have been integrated into the structure of the Initiative.

- The main operational contact for this Initiative is the Siemens Project Office in Munich and operates with four people globally, and is in addition supported by an extended Project Team from various Siemens departments (Legal and Compliance, Finance, Tax, Strategy, Communications and Compliance colleagues in all relevant countries).

- The Project Office is the main link to the World Bank Group with regard to the audit and veto rights as well as reporting obligations. It is also the main link to the European Investment Bank (EIB) with regard to their rights to reject projects proposed as well as reporting obligations.

- The work of the Project Office and Project Team is overseen by the Siemens Integrity Initiative Steering Committee, which consists of Dr. Andreas Christian Hoffmann, General Counsel, Siemens AG; Ms. Martina Maier, Chief Compliance Officer, Siemens AG; and Dr. Horst J. Kayser, Corporate Vice President, Chairman of the Siemens Portfolio Companies (POC), Siemens AG.

- As the World Bank Group has veto and audit rights, and the European Investment Bank has the right to reject proposed projects, they have set up a team of experts to liaise with Siemens regarding the Siemens Integrity Initiative, as shown in the chart.
Siemens Integrity Initiative project structure with settlement parties:

- **World Bank**
  - World Bank Working Group Siemens Integrity Initiative
    - Governance Global Practice (GGP)
    - Integrity Vice Presidency (INT)
    - Legal Vice Presidency (LEG)
    - External Communications (ECR)
  - ✓ Veto rights over the selection of projects
  - ✓ Audit right over the use of funds
  - ✓ Regular reporting on progress and work plans

- **Siemens**
  - Siemens Integrity Initiative Steering Committee
    - Dr. Andreas C. Hoffmann, General Counsel
    - Dr. Horst J. Kayser, Corporate Vice President, Chairman of the Siemens Portfolio Companies (POC)
    - Martina Maier, Chief Compliance Officer
  - Siemens Integrity Initiative Project Office
  - Siemens Integrity Initiative Project Team
    - Strategy
    - Communications
  - Siemens Managing Board
  - Regions and Divisions
  - Finance and Tax
  - Legal

- **European Investment Bank**
  - European Investment Bank Siemens Integrity Initiative
    - ✓ Right to reject the projects proposed
    - ✓ Regular reporting on progress and work plans
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.
In the First Funding Round, thirty-one projects from over twenty countries were selected to receive a total funding of up to USD 40 million.

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

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

These projects are marked in the table on page 26 and 28 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.


### Key data First Funding Round

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funds committed in the First Funding Round</td>
<td>USD 37.7 M</td>
</tr>
<tr>
<td>Disbursements in year 1 to year 8 (2010 – June 30, 2018) (release of provision)</td>
<td>USD 34.8 M</td>
</tr>
<tr>
<td>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</td>
<td>USD 0.18 M</td>
</tr>
<tr>
<td>Funds unspent</td>
<td>USD ~2.7 M</td>
</tr>
<tr>
<td>No further planned disbursements</td>
<td>USD 0.0 M</td>
</tr>
<tr>
<td>Number of projects</td>
<td>31</td>
</tr>
<tr>
<td>Thereof projects that have completed their activities</td>
<td>31</td>
</tr>
<tr>
<td>Thereof ongoing</td>
<td>0</td>
</tr>
<tr>
<td>Countries covered in the First Funding Round</td>
<td>22</td>
</tr>
</tbody>
</table>

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

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

www.siemens.com/integrity-initiative/Report2017
Status of the Second Funding Round

The Second Funding Round applies the same selection criteria and focus areas as the First Round. As the Second Round is also based on the settlement agreements with the World Bank Group and the European Investment Bank, the World Bank Group has audit rights over the use of funds (USD 100 million over a period of 15 years beginning in 2009) and veto rights over the selection of projects by Siemens. The agreement between Siemens and the European Investment Bank (EUR 13.64 million over five years) gives the EIB the right to reject the projects proposed.

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

The gradual announcement of the selected projects from the Second Funding Round started in fall 2014 and stretched until spring 2015. 24 projects were selected for funding in the Second Funding Round with a total committed capital of USD 35.554 million.

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

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

The final overviews of activities for the entire project period were reported on for 12 of the 24 projects in our Annual Report 2017 (2 projects) and Annual Report 2018 (10 projects) respectively. In this Annual Report 2019, final overviews of activities are reported on for a further 10 projects. These projects are marked in the table on page 30 and 32 and further information on the projects is available on www.siemens.com/integrity-initiative.

### Key data Second Funding Round

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funds committed in the Second Funding Round</td>
<td>USD 35.554 M</td>
</tr>
<tr>
<td>Disbursements in year 1 to year 6 (2015 to March 02, 2020) (release of provision)</td>
<td>USD 33.4 M</td>
</tr>
<tr>
<td>Funds currently unspent</td>
<td>USD ~ 2.2 M</td>
</tr>
<tr>
<td>Further planned disbursement in year 6 (2020)</td>
<td>USD 1.1 M</td>
</tr>
<tr>
<td>Number of projects</td>
<td>24</td>
</tr>
<tr>
<td>Thereof projects that have completed their activities</td>
<td>23</td>
</tr>
<tr>
<td>Thereof ongoing</td>
<td>1</td>
</tr>
<tr>
<td>Countries covered Second Funding Round</td>
<td>More than 20</td>
</tr>
</tbody>
</table>

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

1) The information provided in this table is based on approved Annual and Final Reports as at March 02, 2020

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

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

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

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

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

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

After receiving approval from the Siemens Steering Committee as well as the World Bank non-veto and the European Investment Bank no objection decisions for short-listed projects under consideration, around 30 applicant organizations were invited in November 2018 to submit Full Proposals by January 31, 2019.
Following a second detailed cross functional review and due diligence of all submitted Full Proposals, Siemens announced the first group of projects selected under the Third Funding Round in its Press Release on December 16, 2019.

All Third Funding Round funding agreements were signed as at March 2, 2020, ultimately adding to the Siemens Integrity Initiative portfolio 22 new projects from more than 40 countries with committed funding of up to USD 25.2 million.

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

Projects selected for funding under the Third Funding Round are listed in the table on page 34, and further information on the projects is available on www.siemens.com/integrity-initiative.

### Key data Third Funding Round

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funds committed in the Third Funding Round</td>
<td>USD 25.2 M</td>
</tr>
<tr>
<td>Disbursements in year 1 as at March 02, 2020 – release of provision</td>
<td>USD 3.8 M¹</td>
</tr>
<tr>
<td>Funds currently unspent</td>
<td>USD ~ 21.4 M</td>
</tr>
<tr>
<td>Further planned disbursement in year 1 (2020)</td>
<td>USD ~ 2.3 M</td>
</tr>
<tr>
<td>Number of projects</td>
<td>22</td>
</tr>
<tr>
<td>Countries covered Third Funding Round</td>
<td>More than 40</td>
</tr>
</tbody>
</table>

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

¹ The information provided in this table is based on approved Annual and Final Reports as at March 02, 2020
### List of projects funded under the First Funding Round:

<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basel Institute on Governance, Switzerland</td>
<td>Global</td>
<td>1.86 M – completed as of September 2015</td>
<td>3)</td>
</tr>
<tr>
<td>Beijing New Century Academy on Transnational Corporations, China</td>
<td>China</td>
<td>0.89 M – completed as of March 2014</td>
<td>4)</td>
</tr>
<tr>
<td>Central European University, Hungary in cooperation with Integrity Action, United Kingdom</td>
<td>Central and Eastern Europe</td>
<td>3.09 M – completed as of December 2015</td>
<td>3)</td>
</tr>
<tr>
<td>COCIR (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry), Belgium</td>
<td>Europe, Asia, Russia, South America</td>
<td>0.96 M – completed as of September 2014</td>
<td>3)</td>
</tr>
<tr>
<td>The Convention on Business Integrity, Nigeria</td>
<td>Nigeria</td>
<td>1.1 M – completed as of December 2014</td>
<td>3)</td>
</tr>
<tr>
<td>The Ethics Institute, South Africa</td>
<td>Angola, South Africa</td>
<td>1.5 M – completed as of September 2015 (Angola), September 2015 (South Africa)</td>
<td>2); completed as of September 2015</td>
</tr>
<tr>
<td>Federation of Korean Industries-International Management Institute in cooperation with Global Competitiveness Empowerment Forum, South Korea</td>
<td>South Korea</td>
<td>0.81 M – completed as of March 2014</td>
<td>4)</td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA in cooperation with the UN Global Compact and PRME (Principles for Responsible Management Education), USA</td>
<td>Global</td>
<td>1.48 M – completed as of January 2015</td>
<td>3)</td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA in cooperation with the UN Global Compact and its local networks</td>
<td>Global</td>
<td>2.87 M – completed as of January 2015</td>
<td>3)</td>
</tr>
<tr>
<td>Fundación Universidad de San Andrés (FUdeSA), Argentina</td>
<td>Argentina</td>
<td>0.73 M – completed as of September 2014</td>
<td>3)</td>
</tr>
<tr>
<td>Humboldt Viadrina School of Governance, Germany</td>
<td>Global</td>
<td>1.3 M – completed as of May 2014</td>
<td>4)</td>
</tr>
<tr>
<td>International Anti-Corruption Academy (IACA), Austria</td>
<td>Global</td>
<td>2.02 M – completed as of December 2015</td>
<td>2)</td>
</tr>
<tr>
<td>International Business Leaders Forum (IBLF), United Kingdom in cooperation with the School of Public Administration of Renmin University, China</td>
<td>Global</td>
<td>1.5 M – completed as of December 2013</td>
<td>5)</td>
</tr>
<tr>
<td>Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil</td>
<td>Global</td>
<td>3.11 M – completed as of June 2016</td>
<td>2)</td>
</tr>
<tr>
<td>Maala Business for Social Responsibility, Israel</td>
<td>Global</td>
<td>0.48 M – completed as of September 2015</td>
<td>2)</td>
</tr>
<tr>
<td>Makati Business Club, Philippines in cooperation with the European Chamber of Commerce Philippines</td>
<td>Philippines</td>
<td>1.04 M – completed as of March 2015</td>
<td>3)</td>
</tr>
<tr>
<td>Organisation for Economic Co-operation and Development (OECD), MENA-OECD Investment Programme, France</td>
<td>Global</td>
<td>0.75 M – completed as of September 2013</td>
<td>5)</td>
</tr>
</tbody>
</table>

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
<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank Group settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global</td>
<td>1.86 M</td>
<td>–</td>
<td>completed as of September 2015(^{1})</td>
</tr>
<tr>
<td>China</td>
<td>0.89 M</td>
<td>–</td>
<td>completed as of March 2014(^{4})</td>
</tr>
<tr>
<td>Central and Eastern Europe</td>
<td>3.09 M</td>
<td>–</td>
<td>completed as of December 2015(^{5})</td>
</tr>
<tr>
<td>Europe, Asia, Russia, South America</td>
<td>0.96 M</td>
<td>–</td>
<td>completed as of September 2014(^{3})</td>
</tr>
<tr>
<td>Nigeria</td>
<td>1.1 M</td>
<td>–</td>
<td>completed as of December 2014(^{5})</td>
</tr>
<tr>
<td>Angola, South Africa</td>
<td>1.5 M</td>
<td>–</td>
<td>completed as of September 2016 (Angola)(^{2}); completed as of September 2015 (South Africa)</td>
</tr>
<tr>
<td>South Korea</td>
<td>0.81 M</td>
<td>–</td>
<td>completed as of March 2014(^{4})</td>
</tr>
<tr>
<td>Global</td>
<td>1.48 M</td>
<td>–</td>
<td>completed as of January 2015(^{5})</td>
</tr>
<tr>
<td>Brazil, Egypt, India, Nigeria, South Africa</td>
<td>2.87 M</td>
<td>–</td>
<td>completed as of January 2015(^{5})</td>
</tr>
<tr>
<td>Argentina</td>
<td>0.73 M</td>
<td>–</td>
<td>completed as of September 2014(^{5})</td>
</tr>
<tr>
<td>Global</td>
<td>1.3 M</td>
<td>–</td>
<td>completed as of May 2014(^{4})</td>
</tr>
<tr>
<td>Global</td>
<td>2.02 M</td>
<td>–</td>
<td>completed as of December 2015(^{5})</td>
</tr>
<tr>
<td>China, Russia</td>
<td>1.5 M</td>
<td>–</td>
<td>completed as of December 2013(^{5})</td>
</tr>
<tr>
<td>Brazil</td>
<td>3.11 M</td>
<td>–</td>
<td>completed as of June 2016(^{2})</td>
</tr>
<tr>
<td>Israel</td>
<td>0.48 M</td>
<td>–</td>
<td>completed as of September 2015(^{5})</td>
</tr>
<tr>
<td>Philippines</td>
<td>1.04 M</td>
<td>–</td>
<td>completed as of March 2015(^{5})</td>
</tr>
<tr>
<td>Middle East and North Africa</td>
<td>0.75 M</td>
<td>–</td>
<td>completed as of September 2013(^{5})</td>
</tr>
</tbody>
</table>
### Integrity Partner

<table>
<thead>
<tr>
<th>Partner</th>
<th>Country</th>
<th>Funding Volume</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ořivení, Czech Republic in cooperation with Transparency International Slovakia and the Economics Institute of the Academy of Sciences of the Czech Republic</td>
<td>Czech Republic, Slovakia</td>
<td>0.6 M</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Partnership for Governance Reform – Kemitraan, Indonesia</td>
<td>Indonesia</td>
<td>1.5 M</td>
<td>completed as of December 2014</td>
</tr>
<tr>
<td>POLMED (The Polish Chamber of Commerce of Medical Devices), Poland</td>
<td>Poland</td>
<td>0.46 M</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>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</td>
<td>China</td>
<td>1.49 M</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Transparency International Bulgaria</td>
<td>Bulgaria</td>
<td>0.45 M</td>
<td>completed as of February 2014</td>
</tr>
<tr>
<td>Transparency International Italy</td>
<td>Italy</td>
<td>0.6 M</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Transparency International Mexico</td>
<td>Mexico</td>
<td>0.23 M</td>
<td>completed as of May 2014</td>
</tr>
<tr>
<td>Transparency International USA in cooperation with Social Accountability International, USA</td>
<td>USA, Global</td>
<td>0.66 M</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>United Nations Development Programme Regional Bureau for Arab States, USA</td>
<td>Arab States Region</td>
<td>1.78 M</td>
<td>completed as of December 2014</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – Incentives to Corporate Integrity</td>
<td>India, Mexico</td>
<td>1.12 M</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria – UNCAC Outreach and Communication</td>
<td>Global</td>
<td>0.75 M</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria – The 6P’s</td>
<td>India, Mexico</td>
<td>1.22 M</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>University of Cairo, Center for Economic and Financial Research and Studies (CEFRS), Egypt</td>
<td>Egypt</td>
<td>0.85 M</td>
<td>completed as of February 2017</td>
</tr>
<tr>
<td>Vietnam Chamber of Commerce and Industry (VCCI) in cooperation with the International Business Leaders Forum (IBLF), United Kingdom</td>
<td>Vietnam</td>
<td>0.5 M</td>
<td>completed as of September 2012</td>
</tr>
</tbody>
</table>

### Total funding volume in USD

- 37.7 M
- 0 M

---

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
<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Funding Volume under the World Bank Group settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech Republic, Slovakia</td>
<td>0.6 M</td>
<td>—</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Indonesia</td>
<td>1.5 M</td>
<td>—</td>
<td>completed as of December 2014</td>
</tr>
<tr>
<td>Poland</td>
<td>0.46 M</td>
<td>—</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>China</td>
<td>1.49 M</td>
<td>—</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Bulgaria</td>
<td>0.45 M</td>
<td>—</td>
<td>completed as of February 2014</td>
</tr>
<tr>
<td>Italy</td>
<td>0.6 M</td>
<td>—</td>
<td>completed as of March 2014</td>
</tr>
<tr>
<td>Mexico</td>
<td>0.23 M</td>
<td>—</td>
<td>completed as of May 2014</td>
</tr>
<tr>
<td>USA, Global</td>
<td>0.66 M</td>
<td>—</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>Arab States Region</td>
<td>1.78 M</td>
<td>—</td>
<td>completed as of December 2014</td>
</tr>
<tr>
<td>India, Mexico</td>
<td>1.12 M</td>
<td>—</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>Global</td>
<td>0.75 M</td>
<td>—</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>India, Mexico</td>
<td>1.22 M</td>
<td>—</td>
<td>completed as of September 2014</td>
</tr>
<tr>
<td>Egypt</td>
<td>0.85 M</td>
<td>—</td>
<td>completed as of February 2017</td>
</tr>
<tr>
<td>Vietnam</td>
<td>0.5 M</td>
<td>—</td>
<td>completed as of September 2012</td>
</tr>
<tr>
<td></td>
<td><strong>37.7 M</strong></td>
<td><strong>0 M</strong></td>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 37.7 M for the First Funding Round.
### List of projects funded under the Second Funding Round:

<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al Akhawayn University in Ifrane (AUI), Morocco</td>
<td>Morocco</td>
<td>0.55 M</td>
<td>completed as of May 2018</td>
<td></td>
</tr>
<tr>
<td>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</td>
<td>Global</td>
<td>4.00 M</td>
<td>completed as of December 2018</td>
<td></td>
</tr>
<tr>
<td>Beijing New Century Academy on Transnational Corporations (NATC), China</td>
<td>China</td>
<td>1.50 M</td>
<td>completed as of September 2017</td>
<td></td>
</tr>
<tr>
<td>Confederation of Indian Industry (CII), India</td>
<td>India</td>
<td>0.70 M</td>
<td>completed as of March 2019</td>
<td></td>
</tr>
<tr>
<td>Ethics and Reputation Society / Etik ve İtibar Derneği (TEID), Turkey</td>
<td>Turkey</td>
<td>1.76 M</td>
<td>completed as of November 2017</td>
<td></td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA, in cooperation with the Egyptian Junior Business Association, Egypt</td>
<td>Morocco</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Global Compact Network India (GCNI), India</td>
<td>India</td>
<td>0.73 M</td>
<td>completed as of March 2019</td>
<td></td>
</tr>
<tr>
<td>Global Compact Network Korea (GCNK), Korea, in cooperation with the Global Competitiveness Empowerment Forum (GCEF), South Korea</td>
<td>Republic of Korea (South Korea)</td>
<td>0.90 M</td>
<td>completed as of March 2018</td>
<td></td>
</tr>
<tr>
<td>International Anti-Corruption Academy (IACA), Austria</td>
<td>Global</td>
<td>4.98 M</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>MedTech Europe (formerly Eucomed), Belgium</td>
<td>Middle East and North Africa</td>
<td>0.85 M</td>
<td>completed as of May 2018</td>
<td></td>
</tr>
<tr>
<td>Organisation for Economic Co-operation and Development (OECD), France</td>
<td>Morocco</td>
<td>0.70 M</td>
<td>completed as of December 2018</td>
<td></td>
</tr>
<tr>
<td>Organisation for Economic Co-operation and Development (OECD), France</td>
<td>Russia</td>
<td>1.55 M</td>
<td>completed as of June 2018</td>
<td></td>
</tr>
<tr>
<td>Pan African Lawyers Union (PALU), Tanzania</td>
<td>Africa</td>
<td>0.93 M</td>
<td>completed as of September 2017</td>
<td></td>
</tr>
<tr>
<td>Pearl Initiative, United Arab Emirates</td>
<td>GCC countries (United Arab Emirates, Kingdom of Saudi Arabia, Bahrain, Qatar, Kuwait, Oman)</td>
<td>0.88 M</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>The Ethics Institute, South Africa, in cooperation with the Institute of Directors Mozambique, Mozambique (IoDMZ)</td>
<td>Mozambique</td>
<td></td>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>

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) Ongoing projects reporting on activities for Year 5 in Annual Report 2019 (2) = PEARL, IACA
5) Transfer from Eucomed to MedTech effective January 1, 2017
<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank Group settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Morocco</td>
<td>0.55 M</td>
<td>–</td>
<td>completed as of May 2018&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>Global</td>
<td>4.00 M</td>
<td>–</td>
<td>completed as of December 2018&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
<tr>
<td>China</td>
<td>1.50 M</td>
<td>–</td>
<td>completed as of September 2017&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
<tr>
<td>India</td>
<td>0.70 M</td>
<td>–</td>
<td>completed as of March 2019&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
<tr>
<td>Turkey</td>
<td>1.76 M</td>
<td>–</td>
<td>completed as of November 2017&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>Egypt</td>
<td>1.40 M</td>
<td>–</td>
<td>completed as of June 2018&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>India</td>
<td>0.73 M</td>
<td>–</td>
<td>completed as of March 2019&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
<tr>
<td>Republic of Korea (South Korea)</td>
<td>0.90 M</td>
<td>–</td>
<td>completed as of March 2018&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>Global</td>
<td>–</td>
<td>4.98 M</td>
<td>Ongoing&lt;sup&gt;4&lt;/sup&gt;</td>
</tr>
<tr>
<td>Middle East and North Africa</td>
<td>0.85 M</td>
<td>–</td>
<td>completed as of May 2018&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>Morocco</td>
<td>–</td>
<td>0.70 M</td>
<td>completed as of December 2018&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
<tr>
<td>Russia</td>
<td>1.55 M</td>
<td>–</td>
<td>completed as of June 2018&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>Africa</td>
<td>0.93 M</td>
<td>–</td>
<td>completed as of September 2017&lt;sup&gt;2&lt;/sup&gt;</td>
</tr>
<tr>
<td>GCC countries (United Arab Emirates, Kingdom of Saudi Arabia, Bahrain, Qatar, Kuwait, Oman)</td>
<td>0.88 M</td>
<td>–</td>
<td>Ongoing&lt;sup&gt;4&lt;/sup&gt;</td>
</tr>
<tr>
<td>Mozambique</td>
<td>0.55 M</td>
<td>–</td>
<td>completed as of September 2019&lt;sup&gt;3&lt;/sup&gt;</td>
</tr>
</tbody>
</table>
B. Siemens Integrity Initiative

**Integrity Partner**

<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Total Funding Volume in USD</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Ethics Institute, South Africa</td>
<td></td>
</tr>
<tr>
<td>The Polish Chamber of Commerce of Medical Devices (POLMED), Poland</td>
<td></td>
</tr>
<tr>
<td>Transparency International Secretariat (TI-S), Germany</td>
<td></td>
</tr>
<tr>
<td>Transparency International España (TI-España), Spain</td>
<td></td>
</tr>
<tr>
<td>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</td>
<td></td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria</td>
<td></td>
</tr>
<tr>
<td>United Nations Development Programme (UNDP), USA</td>
<td></td>
</tr>
<tr>
<td>United Nations Development Programme (UNDP), USA</td>
<td></td>
</tr>
<tr>
<td>Wirtschaftsuniversität WU, Vienna University of Economics and Business Administration, Austria</td>
<td></td>
</tr>
</tbody>
</table>

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 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) Ongoing projects reporting on activities for Year 5 in Annual Report 2019 (2) = PEARL, IACA
5) Transfer from Eucomed to MedTech effective January 1, 2017

32
<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank Group settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Africa</td>
<td>0.80 M</td>
<td>–</td>
<td>completed as of September 2019(^3)</td>
</tr>
<tr>
<td>Poland</td>
<td>0.65 M</td>
<td>–</td>
<td>completed as of September 2018(^2)</td>
</tr>
<tr>
<td>Global</td>
<td>3.06 M</td>
<td>–</td>
<td>completed as of September 2018(^2)</td>
</tr>
<tr>
<td>Spain</td>
<td>1.27 M</td>
<td>–</td>
<td>completed as of January 2019(^3)</td>
</tr>
<tr>
<td>Italy</td>
<td>1.12 M</td>
<td>–</td>
<td>completed as of September 2018(^2)</td>
</tr>
<tr>
<td>Colombia</td>
<td>1.20 M</td>
<td>–</td>
<td>completed as of January 2019(^3)</td>
</tr>
<tr>
<td>Arab Region including Egypt, Morocco and Tunisia</td>
<td>–</td>
<td>2.27 M</td>
<td>completed as of September 2019(^3)</td>
</tr>
<tr>
<td>Arab Region including Iraq and Libya</td>
<td>1.52 M</td>
<td>–</td>
<td>completed as of September 2019(^3)</td>
</tr>
<tr>
<td>Africa</td>
<td>1.70 M</td>
<td>–</td>
<td>completed as of March 2018(^2)</td>
</tr>
<tr>
<td></td>
<td><strong>27.62 M</strong></td>
<td><strong>7.95 M</strong></td>
<td></td>
</tr>
</tbody>
</table>

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 35.554 M for the Second Funding Round.
List of projects funded under the Third Funding Round:

<table>
<thead>
<tr>
<th>Integrity Partner</th>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basel Institute on Governance, Switzerland, in cooperation with the Organisation for Economic Co-operation and Development (OECD), France</td>
<td>Global</td>
<td>2.86 M</td>
<td>launched</td>
</tr>
<tr>
<td>Beijing New Century Academy on Transnational Corporations (NATC), China</td>
<td>China</td>
<td>1.50 M</td>
<td>launched</td>
</tr>
<tr>
<td>Business for Social Responsibility (BSR), USA, in cooperation with the Convention on Business Integrity, Nigeria</td>
<td>Nigeria</td>
<td>1.00 M</td>
<td>launched</td>
</tr>
<tr>
<td>East China Normal University (ECNU), China</td>
<td>China</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>East-West Center, USA</td>
<td>Indonesia</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>Etik ve İtibar Derneği (TEİD), Turkey</td>
<td>Turkey</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>Eurocham, (Chambre de Commerce Européenne en Côte d'Ivoire), Ivory Coast</td>
<td>Ivory Coast</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>Foundation for the Global Compact, USA</td>
<td>Global</td>
<td>1.70 M</td>
<td>launched</td>
</tr>
<tr>
<td>Fundaciòn Poder Ciudadano (Transparency International Argentina), Argentina</td>
<td>Argentina</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>Global Compact Network Korea (GCNK), Korea, in cooperation with the Korea Sustainability Investing Forum (KoSiF)</td>
<td>Korea, in cooperation with the Korea Sustainability Investing Forum (KoSiF)</td>
<td>0.80 M</td>
<td>launched</td>
</tr>
<tr>
<td>International Anti-Corruption Academy (IACA), Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kazakhstan Bar Association (KazBar), Kazakhstan</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Country of Implementation</td>
<td>Total Funding Volume under the World Bank Group settlement in USD</td>
<td>Total Funding Volume under the European Investment Bank settlement in USD</td>
<td>Project Status</td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------------------------------------------</td>
<td>-----------------------------------------------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Global</td>
<td>–</td>
<td>2.86 M</td>
<td>launched</td>
</tr>
<tr>
<td>China</td>
<td>–</td>
<td>1.50 M</td>
<td>launched</td>
</tr>
<tr>
<td>Nigeria</td>
<td>1.00 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>China</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Turkey</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Ivory Coast</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Global</td>
<td>1.70 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Argentina</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Korea</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Global</td>
<td>1.50 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Kazakhstan</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Organisation for Economic Co-operation and Development (OECD), France</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Ethics Institute, South Africa</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Ethics Institute, South Africa</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Polish Chamber of Commerce of Medical Devices (POLMED), Poland</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transparency International Bulgaria, Bulgaria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>United Nations Office on Drugs and Crime (UNODC), Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wirtschaftsuniversität Wien (WU), Vienna University of Economics and Business, Austria</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<p>| Total funding volume in USD |
| 17.70 M 7.50 M |</p>
<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Total Funding Volume under the World Bank Group settlement in USD</th>
<th>Total Funding Volume under the European Investment Bank settlement in USD</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional-Bosnia and Herzegovina, Croatia and Serbia</td>
<td>–</td>
<td>1.70 M</td>
<td>launched</td>
</tr>
<tr>
<td>Mozambique</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>South Africa</td>
<td>1.00 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Poland</td>
<td>–</td>
<td>0.69 M</td>
<td>launched</td>
</tr>
<tr>
<td>Bulgaria</td>
<td>–</td>
<td>0.75 M</td>
<td>launched</td>
</tr>
<tr>
<td>Colombia</td>
<td>1.10 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Global – with focus on Pakistan, Kenya, Mexico</td>
<td>1.00 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Myanmar</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Regional - Egypt, Iraq, Libya and UAE</td>
<td>2.40 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td>Regional - Nigeria, Ghana, Kenya, Rwanda, South Africa, Zambia, Uganda</td>
<td>0.80 M</td>
<td>–</td>
<td>launched</td>
</tr>
<tr>
<td><strong>Total funding volume in USD</strong></td>
<td><strong>17.70 M</strong></td>
<td><strong>7.50 M</strong></td>
<td></td>
</tr>
</tbody>
</table>

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 25.2 M for the Third Funding Round.
The chart illustrates the regional spread and balance of the First, Second and Third Funding portfolio.

Siemens Integrity Initiative covers all major growth regions and high-risk countries with 77 projects and a total committed funding of USD 98.5 M.

**Siemens Integrity Initiative**

- **Global Projects**
  - 27.5 M
  - 13 Projects which also include activities in many countries

**Americas**

- 9.5 M
  - 7 Projects, 3 sub-projects

**Region/Country of implementation (number of project proposals)**

- **First Funding Round**
- **Second Funding Round**
- **Third Funding Round**

Bubble size = Approximate value of funding

**Note:** Schematic illustration only. Due to rounding, numbers presented may not add up precisely to the totals provided. Status: March 2, 2020
Project profiles and highlights of activities in 2019

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

For ongoing projects under the Second Funding Round the descriptions of activities undertaken in this year (2019) were provided by the Integrity Partners in their respective Annual Progress Report 2019 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 2020

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

- Final Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Final Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds
- Payment and expense overview
- External evaluation of impact
All 31 Siemens Integrity Initiative First Funding Round projects were completed by March 3, 2017. Key activities over the entire project period were reported on in one of our previous Annual Reports and therefore no First Funding Round Projects are included in this Annual Report 2019.

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, Global Compact Network Korea (GCNK), MedTech Europe, 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.

Siemens Integrity Initiative Second Funding Round projects that were completed before 2019 and/or for which key activities over the entire project period were reported on in one of our previous Annual Reports are not included in this Annual Report 2019.

To obtain information on the twelve (12) fully completed projects please refer to the Annual Reports 2017 and 2018 of the Siemens Integrity Initiative.

The respective projects are: Al Akhawayn University in Ifrane (AUI), Beijing New Century Academy on Transnational Corporations (NATC), Etik ve Itibar Dernegi (TEID), Foundation for the Global Compact, Global Compact Network Korea (GCNK), MedTech Europe, Organisation for Economic Co-operation and Development (OECD) Russia project , Pan African Lawyers Union (PALU), The Polish Chamber of Commerce of Medical Devices (POLMED), Transparency International Secretariat (TI-S), Transparency International Italia (TI-It) and Wirtschaftsuniversität Wien (WU).

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

For all projects the Project Profiles in Section C were provided by the Integrity Partners and approved by them for external use.
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.
Second Funding Round Projects: Project Profiles and highlights of activities in 2019

For projects under the Second Funding Round the descriptions of activities undertaken in 2019 were provided by the Integrity Partners in their respective Annual Progress Report 2019 or Final Report as the case may be, and are approved by the relevant Integrity Partners for external use.

Of the twenty-four (24) Second Funding Round projects, twelve (12) have been fully completed and reported on in the Annual Reports of 2017 and 2018.

12 remaining projects are covered in this Section C2.
DESCRIPTION OF INTEGRITY PARTNER

The Basel Institute on Governance is an independent not-for-profit competence center working worldwide with the public and private sectors to counter corruption and other financial crimes and to improve the quality of governance.

Through its International Centre for Collective Action (ICCA), the Institute works with companies and other stakeholders to develop and facilitate anti-corruption Collective Action initiatives in a variety of industry sectors. The ICCA also supports research and analysis on Collective Action. In 2014, the B20 awarded the ICCA with the mandate, together with the UN Global Compact, to establish the B20 Collective Action Hub as a knowledge platform and advisory center on anti-corruption Collective Action in the G20 countries and beyond. The ICCA, together with OECD, further leads the global promotion and implementation of High Level Reporting Mechanisms (HLRMs).

Name of Integrity Partner:

Basel Institute on Governance in cooperation with the United Nations Global Compact (UNGC) and the Organisation for Economic Co-operation and Development (OECD)

PROJECT:

Scaling up the B20 Collective Action Hub

<table>
<thead>
<tr>
<th>COUNTRY OF IMPLEMENTATION</th>
<th>DURATION</th>
<th>USD (MILLION)</th>
<th>REGISTERED IN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global</td>
<td>3 years</td>
<td>4.00 M</td>
<td>Switzerland</td>
</tr>
</tbody>
</table>

In support of the mandate of the Basel Institute on Governance and the UN Global Compact to develop and maintain the B20 Collective Action Hub, this project aims to assist interested stakeholders in employing the Collective Action methodology to reduce corruption risks and to consistently and coherently apply anti-corruption compliance programs throughout their global operations. A three-pronged strategy is employed:

- The project will document existing initiatives on the B20 Hub website and analyze these to gain information about factors that may influence the effectiveness of Collective Action initiatives. The website will also enable moderated interactive discussions (e.g. webinars, blogs) to allow interested parties to take stock of current policy and research and discussions surrounding Collective Action.
- The project will continue to develop and provide guidance for new Collective Action initiatives, and expand the scope and remit of existing initiatives moderated by the B20 Hub. This also includes enhanced promotion of the High Level Reporting Mechanism (HLRM) in collaboration with the OECD.
- The project will address the dissemination of Collective Action research, best practices and initiatives globally by enhancing the capacity of selected UN Global Compact Local Networks to support Collective Action initiatives, with the aim of reaching substantive regional coverage.
The goal of the project is to improve the business environment by enabling companies to engage proactively and jointly tackle bribery and corruption by initiating, promoting and supporting Collective Action Initiatives

**PROJECT AT A GLANCE:**

**Key Activities Over the Entire Project Period (July 2015 – December 2018):**

**Promoting Collective Action Research and Peer-Learning**
- The Basel Institute presented on Collective Action at 41 international anti-corruption conferences and events and led a global peer learning process to analyze Collective Action success factors, resulting in various publications.
- There was a progressive increase of the use of the Collective Action Hub website and resources were further expanded.

**Promoting Collective Action in the Global Policy Arena**
- The Basel Institute provided a consistent voice promoting anti-corruption Collective Action through the B20 and other leading global and national policy forums.

**Engaging Companies in Collective Action**
- Four industry-specific Collective Action initiatives facilitated by the Basel Institute made progress and a growing number of other initiatives reached out for advice.

**High-Level Reporting Mechanism (HLRM)**
- The Basel Institute and OECD advanced the HLRM through technical advice to Argentina, Colombia, Panama, and Peru, supported the Ukraine Business Ombudsman Council, and published two comparative papers on the evolution and contributions of the HLRM.

**Promoting Collective Action through the UN Global Compact (UNGC)**
- UNGC enhanced Collective Action knowledge of 4 Global Compact Local Networks (GCLNs) in Brazil, Japan, Kenya and Nigeria.
- GCLNs engaged a total of 930 participants through 21 workshops raising awareness of Collective Action.
- GCLNs developed 4 Roadmap Reports and established a strategy to continue efforts towards Collective Action at local level.

**Impact**
- The Basel Institute and B20 Collective Action Hub are the global leader and resource on Collective Action, enabling companies to deploy this tool for clean business.
- Global policy endorsements of Collective Action are further raising its use.
- HLRMs improved transparency and fairness in tenders in Argentina and Colombia and will be adapted to new countries.
- A Collective Action initiative was launched in Japan following GCLN Japan’s Roadmap Report.
The abundant potential of the Indian domestic market, driven by its emerging middle class, cost competitiveness and large talent pool, continues to make the country one of the most preferred destinations for investments and businesses. Nevertheless, instances involving multibillion-dollar irregularities have tarnished India’s public image in the international business community.

A comprehensive framework is required to help curtail corruption at higher levels. Promotion and Adoption of Responsible Business Practices by Corporates in India will aid understanding of how corruption and unethical business practices are corroding not only the economy but also the corporate environment.

The project is aimed at increasing awareness of current anti-corruption laws and regulations and promoting healthy business practices that are sustainable and replicable. Also, increasing the scope of the effective implementation of existing legislations may prevent problems for the payer and businessmen.

Strong law enforcement and a zero-tolerance approach toward unethical business practices is the most effective way to combat corruption. Since the global environment is rapidly changing, it will only be a matter of time before Indian regulations align themselves with internationally acceptable ethical business practices and anti-corruption laws and practices.

Name of Integrity Partner:
Confederation of Indian Industry (CII)

**Description of Integrity Partner**

Confederation of Indian Industry (CII), founded over 123 years ago, is India’s premier business association and has played a proactive role in the country’s developmental process. CII is a non-government, not-for-profit, industry-led and industry-managed organization, playing a proactive role in India’s development process. CII charts change by working closely with Government on policy issues, interfacing with thought leaders, and enhancing efficiency, competitiveness and business opportunities for industry through a range of specialized services and strategic global linkages.

CII set up the Environmental Division in the year 1992, which was renamed CII-ITC Centre of Excellence for Sustainable Development (CESD) in 2006. CESD is a not-for-profit, industry-led institution that helps business become sustainable organizations. It is on a mission to catalyze innovative ideas and solutions, in India, and globally, to enable business, and its stakeholders, in sustainable value creation.
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (MARCH 2015 – MARCH 2019):

- More than 20,000 professionals were reached and awareness was raised on ethical business practices through 8 roadshows, 4 Knowledge Cafe sessions, 10 Annual Conferences, 21 Webinars and 10 Newsletters
- Academic programs on ethics and responsible business helped raise awareness among students
- Training programs on responsible business practices helped engage stakeholders on both the supply and demand side of corruption
- More than 400 member organizations signed the Confederation of Indian Industry Model Code of Conduct for Ethical Business Practices
- Policy advocacy with the Bureau of Indian Standards promoted the formulation of an India Guidance document annexure to the ISO 37001 Anti-Bribery Management Systems
- Policy Advocacy with the Ministry of Corporate Affairs and the Indian Institute of Corporate Affairs promoted incorporating ethics and responsible business practices into national guidelines
- Policy Advocacy with the Ministry of Environment, Forest and Climate Change led to the launch of the “Pro-Active and Responsive facilitation by Interactive, Virtuous and Environmental Single-window Hub” (PARIVESH) which includes an online and transparent environmental clearance system for approvals from Central or State Level Authorities

The goal of the project is to sensitize, capacitate and help large companies to adopt responsible business practices and influence their supply chains as well as involve local stakeholders and governmental agencies to create awareness.

PROJECT AT A GLANCE:

Impact

- The Bureau of Indian Standards has accepted ISO 37001 as a national Indian standard and action has been initiated for the formulation of a guidance document
- The Government has approved National Guidelines on Responsible Business Conduct which is available on the Ministry of Corporate Affairs’ website at www.mca.gov.in/Ministry/pdf/NationalGuideline_15032019.pdf
- The partnership with Niti Aayog will lead to the integration of various Sustainable Development Goals into corporate business models and the national action plan, including Goal 16.5 which aims to “substantially reduce corruption and bribery in all their forms”
The Indian business community practices a multitude of anti-corruption initiatives in silos. The Center of Excellence would encourage a shared focus among the business stakeholders in India and provide a platform for greater coordination, thereby increasing the reach and impact of business transparency initiatives.

Essentially, the Center aims to:

- Develop pragmatic approaches around UNGC Principle 10 to challenging business decisions
- Provide enabling platform to businesses, policy makers, civil society, industry associations, UN agencies and academia
- Improve organizational decision making through a stakeholder management framework that integrates transparency and integrity

The Center of Excellence will be developed on a collaborative model and develop new approaches and techniques by engaging a diverse range of stakeholders, focusing on both the supply and the demand side of corruption.

Name of Integrity Partner:
Global Compact Network India (GC Network India)

PROJECT:
Center of Excellence for Strengthening Transparency and Ethics in Business: Scaling Up the Collective Action Agenda in India

COUNTRY OF IMPLEMENTATION: India
DURATION: 3 years
USD (MILLION): 0.73 M
REGISTERED IN: India

Global Compact Network India is the Local Network of United Nations Global Compact (UNGC) operating in India.

The UNGC is a global policy and engagement platform for businesses that are committed to aligning their operations and strategies with the ‘ten universally accepted principles’ in the areas of human rights, labor, environment and anti-corruption.

At present, the Local Network in India ranks among the top three out of the 102 Global Compact Local Networks in the world, and has emerged as the largest corporate citizenship and social responsibility organization in the country with a pan-Indian membership.

Comprising 182 member organizations and 338 signatories, including some of the most prominent industries in the country, GCN India provides a forum to support the ‘ten principles’ of the UNGC and promote these among its various members in India. It also aims to build strong interconnected networks to foster sustainable and positive corporate citizenship within its own milieu.
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (MARCH 2015 – MARCH 2019):

- Development of the Centre of Excellence website with a comprehensive Knowledge portal hub of national and international anti-corruption laws, policies and regulations, publications, Governance tools, the White Paper on Procurement, and Governance Frameworks for Smart Cities and Public-Private Partnerships

- Establishment of collaborative and facilitative platforms for policy advocacy, stakeholder engagement and the promotion of Collective Action through Business Roundtables, Smart City workshops, collaborative partnerships with similarly mandated organizations, and knowledge partnerships with national and multi-national organizations such as the Global Compact Cities Program

- Provision of dynamic advisory services in areas of Governance and compliance under the Smart Cities Mission of the Government of India such as the singing of a memorandum of understanding with the Pune Smart City Development Corporation Limited and engagement through regular review, strategy, and training meetings and interventions, all supported by the development of IT-enabled governance and compliance management tools

- Organization of three Need Assessment Regional Smart Cities workshops in India which were region, issue and city specific: The first in Lucknow in January 2019 and in collaboration with the Regional Centre for Urban and Environmental Studies; the second in Delhi in January 2019 and in collaboration with Ministry of Housing and Urban Affairs; the third in Mumbai in March 2019 with various key stakeholder and consultants

- Diversification of activities by engaging with projects like Namma Auto for sustainability and with the National Institute of Urban Affairs for research, capacity building and dissemination of knowledge for the urban sector

Impact

- Seven out of eight recommendations on Public Procurement Policy were adopted by the Government of India

- Transparency in execution of the Pune Smart City project improved and the cities in which Global Compact India was engaged in saw more companies bid for projects, improved cash flow for projects, timely completion of projects and increased investments in the respective cities
The IACA is dedicated to overcoming current shortcomings in knowledge and practice in the field of anti-corruption and compliance. The organization intends to empower and enable professionals for the challenges of tomorrow.

The Academy provides a new, holistic and collective approach to anti-corruption education and research, delivers and facilitates anti-corruption training courses for practitioners from all sectors of society, and provides technical support and assistance to a wide variety of stakeholders. IACA became an international organization on March 8, 2011. To date, it comprises a constituency of 79 parties, including 75 UN member states and 4 intergovernmental organizations. In addition, IACA seeks broad partnerships with private sector institutions, international and non-governmental organizations, as well as civil society.

The IACA is dedicated to overcoming current shortcomings in knowledge and practice in the field of anti-corruption and compliance. The organization’s holistic and collective research and training programs for the private and public sectors as well as civil society strive to enhance the understanding of each other’s approaches, intentions, and methodologies, while also providing the opportunity to explore common problems from different angles with joint academic rigor.

Compliance, private sector anti-corruption programs, and especially Collective Action are relatively new areas in the fight against corruption. The “Professorship on Collective Action, Compliance and (Private Sector) Anti-Corruption” will contribute to meeting the demand for in-depth analysis in these fields. It will develop and offer an academic two-year Master’s degree program, seminars and conferences focusing on the needs of the private sector in order to promote fair market conditions.

Grants for students and participants from Least Developed Countries and Emerging Markets:
In accordance with the inter-regional approach of IACA, students and participants from all over the world should have the opportunity to study and work at the Academy. In order to be able to provide training to those participants who would otherwise not be able to afford it and enable them to attend courses, grants and tuition fees will be provided.
IACA’s “Professorship on Collective Action, Compliance and (Private Sector) Anti-Corruption” will research, lecture, train, and provide technical assistance in these fields in order to promote fair market conditions

KEY ACTIVITIES
(OCTOBER 2018 – SEPTEMBER 2019):

- The Professorship on Collective Action, Compliance and (Private Sector) Anti-Corruption (PCAC) team carried out several academic activities, consisting of lectures, presentations at international conferences and supervision, reaching an audience of around 600 professionals. These activities provided research findings and practical insights.

- Three modules of the International Master in Anti-Corruption Compliance and Collective Action (IMACC) 2017 class were implemented. Evaluation from students is highly positive with a positive impact in their organizations and home countries.

- The IMACC 2019 programme started on 1 October 2019. 14 students were admitted.

- Two seminars and two workshops were conducted for compliance professionals and increased their awareness of modern trends in anti-corruption compliance.

- The overview of anti-corruption compliance standards and guidelines as a practical tool for organizations and Collective Action initiatives was published.

- The project continued to provide scholarships to students from Least Developed Countries and Emerging Markets.

- Four articles of research fellows were published.

- The Regional Summer Academy South and East Asia took place in Seoul, Republic of Korea in late August early September 2019, and the Regional Summer Academy Latin America took place in São Paulo, Brazil in late September 2019. Both programmes contributed to further understanding and implementation of anti-corruption and compliance policies.

Impact

- Participants of IACA’s academic programmes and summer academies are using their newly acquired skills to prevent corruption, and to generate positive initiatives for clean business environments in their home countries.
To fight corruption in Morocco, government and business associations declared their will to implement obligations under the United Nations Convention against Corruption (UNCAC).

The project will assist government, business partners and civil society in Morocco in enabling change and promoting business integrity in selected sectors by:

- Building policy and institutional framework for promoting integrity
- Strengthening government processes by introducing anti-corruption measures in procurement
- Facilitating the development of Collective Action initiatives against corruption

The project will bring together senior government and business representatives to identify sources of and measures against integrity risks in selected sectors and to adhere to a policy statement committing both sides to designing and implementing integrity measures, including pilot Collective Action projects.

Capacity-building through training for Moroccan officials, will be key to implementing the commitments initially endorsed. This training will focus on public procurement.

Round tables will be organized to identify proposals for pilot Collective Action projects. Individual coaching, tailor-made advice and support from consultants will be provided.

The project will build political support for the implementation of practical business integrity measures and influence the practice of decision-makers in procurement in both the public and private sector. The gained practical experience will enable reform-oriented experts in government, the private sector and civil society to replicate this experience in other sectors.
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (APRIL 2015 – DECEMBER 2018):

- Political momentum was achieved with a high-level meeting held in July 2018 in Rabat and with over 120 participants in attendance. The Minister for Public Administration and the La Confédération Générale des Entreprises du Maroc (CGEM) reaffirmed the critical importance of fighting corruption for Morocco’s development, noted the King’s attention given to this critical issue and insisted on the need for further action. The CGEM expressed strong satisfaction for OECD’s support. The audience echoed speakers’ interventions and called for concrete actions as reflected in a number of press articles.

- The closing conference of December 2018 presented the project’s achievements, particularly the development of Collective Action. Around 70 participants, including high-level representatives from the Moroccan Government, the private sector and international experts, witnessed the unique engagement of Moroccan energy, health and transport companies in the official signing of the “Déclarations d’intentions”. This was widely praised in the Moroccan press. This Conference also provided the opportunity to discuss public procurement integrity standards, as well as the economic and legal impact of the OECD Anti-Corruption Convention.

- A series of training sessions and meetings were held on anti-corruption measures in procurement and the facilitation of Collective Action, with satisfactory feedback received from participants.

- Three studies have been produced throughout the Project: the OECD Baseline Sector Study, a Manual on integrity and public procurement, and a Manual on anti-corruption Collective Action with a focus on the Moroccan experience.

PROJECT AT A GLANCE:

The project aims to promote clean business and fair market conditions in Morocco through supporting an anti-corruption policy framework, Collective Action and integrity training in public procurement.

Impact

- The Government expressed its willingness to enhance knowledge with a longer-term view to moving closer to the OECD anti-bribery standards and ultimately adhere to the OECD Anti-Bribery Convention.

- The OECD Project was integrated into Programme 8 of the National Anti-Corruption Strategy.

- Signatories to the “Déclarations d’intentions” testify to their willingness to promote integrity in their respective sectors.

- The capacity of public procurement officials was enhanced to manage integrity risks that threaten the efficiency of the public procurement system which represents more than 15% of GDP.
The project aims to influence the behavior of business leaders, government representatives and students across the Gulf Region through education, and Collective Action. Knowledge sharing is a key means to meeting this objective, and the Pearl Initiative is building a local community that is sharing and promoting good integrity practices, while actively encouraging others to lead the way in the implementation of improved standards.

To facilitate higher levels of integrity and transparency in businesses in the Gulf Region, practical tools are being developed as part of the project to support companies, in benchmarking their policies against best practices, while also facilitating the implementation of higher levels of integrity and transparency.

The project has three key objectives:

- Develop a Gulf Region focused diagnostic tool to measure and benchmark integrity practices in businesses operating in the Gulf Region. The results are intended to be shared with the participating organizations to identify areas for improvement while the results of the benchmarking exercises are intended to contribute to a wider body of data surrounding integrity practices in the Gulf Region.
- Facilitate the creation of a Collective Action community, and enhance dialogue between the business community, civil society and government, highlighting and promoting the business benefits to aligning interests in implementing higher standards.
- Engage future business leaders by encouraging universities in the region to include the practical angle through respect to the implementation of integrity practices in their curricula and by actively reaching out to students with activities such as projects and case study competitions.

The Pearl Initiative is the only independent, not-for-profit, by-business for-business organization working across the Gulf Region of the Middle East to improve corporate accountability, governance and transparency.

With over 40 regional and international partners, the Pearl Initiative brings together business, government, and civil society decision-makers to share best business practices and to help maximize the economic opportunities available to companies within the region. The Pearl Initiative also supports Gulf-based university students to identify and embrace strong ethics as they embark on their careers.

Founded in 2010, the Pearl Initiative carries out its objectives through:

- Regional Insights, Case Studies and Research-based Reports
- Task Force Initiatives and Interactive Roundtable Forums
- University Collaborations to enhance the capabilities of future business leaders

**COUNTRY OF IMPLEMENTATION:** United Arab Emirates, Kingdom of Saudi Arabia, Bahrain, Qatar, Kuwait, Oman

**DURATION:** 3 years

**USD (MILLION):** 0.93 M

**REGISTERED IN:** United Arab Emirates
KEY ACTIVITIES
(OCTOBER 2018 – SEPTEMBER 2019):

• Strategic outreach and engagement with regional organisations in the Gulf to promote participation in the Gulf Integrity Indicator assessment
• Increased overall media coverage of the project and Gulf Integrity Indicator through dedicated print and online press releases, social media posts and a marketing sheet
• Participation in 4 high-level interventions to promote the Gulf Integrity Indicator tool with the Gulf business community regionally
• 3 roundtable events were convened in Abu Dhabi, Dubai, and Bahrain, with over 70 business professionals in attendance
• The Gulf Region Wide Student Case Study Competition Awards Ceremony was held at the Higher Colleges of Technology (HCT) in Dubai, UAE for the third Gulf Region Wide Student Case Study Competition which was completed in the fall semester of 2018
• 4 000 students across 40 universities developed case studies on 163 companies in the Gulf Region Wide Student Case Study Competition since project commencement
• 3 student lectures were held in Dubai, Kuwait City, and Riyadh

PROJECT AT A GLANCE:

The aim of the project is to incentivize and support business leaders (and future leaders) in the Gulf Region towards implementing more rigorous integrity practices, while recognizing the direct business benefits for doing so

Impact

• Participating organisations shared the assessment report and recommendations with their Boards to discuss ways in which integrity policies and procedures can be further developed to ensure better implementation within their respective organisations
• Across all programme offerings, including events, high-level interventions, and student engagement activities, this programme has taken concerted efforts to initiate conversations and disperse knowledge related to integrity best practices, with a particular emphasis on its practical implementation and rewarding outcomes
The project aims to reduce corruption and facilitate clean business and fair market conditions in Mozambique.

In an initial phase, the project focused on the provision of technical assistance in the implementation of corporate ethics standards within the private sector in Mozambique. Initial activities built upon and extend the scope of the good governance standards already in existence, for example, the Code of Corporate Governance and the Code of Ethics for Business.

Based on the anti-corruption training experience gained during the work carried out in South Africa, The Ethics Institute will create a similar local ethics, anti-corruption training and advisory capacity for the public sector, as well as the private sector in Mozambique. The capacity-building approach of The Ethics Institute vis-à-vis its partner organization IoDMZ in Mozambique will enhance the sustainability of this Initiative even once the project has come to an end.

Ultimately, a Collective Action approach is most suitable when addressing corruption problems which cannot be tackled by one party alone as there are always two or more parties involved when corrupt practices occur. This is why The Ethics Institute will engage with a number of companies who are concerned about cross-border corruption when entering the Mozambique market, as well as with companies deterred from conducting further business in Mozambique.
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2014 – SEPTEMBER 2019):

- A total of 3,610 business representatives engaged with TEI during the project tenure.
- The former first lady addressed 106 delegates as keynote speaker during the annual ethics awareness event in 2017.
- A total of 1,582 business representatives attended ethics awareness training sessions during the project tenure.
- A total of 536 key stakeholders were engaged via cross-border anti-corruption interventions, including workshops, training sessions and forums hosted in Eswatini, Mozambique and South Africa respectively.
- Ordem dos Contabilistas e Auditores de Moçambique (OCAM) permanently added ethics awareness modules based on TEI’s ethics training material as part of annual professional training for accountants and auditors in Mozambique.
- A total of 207 business representatives attended 2 consecutive conferences which were co-hosted with Associação de Comércio, Indústria e Serviços (ACIS) focusing on Ethics and Compliance followed by Anti-corruption Checks and Balances. Plenary speakers included Mozambique’s Chief Justice and the Presidente do Conselho Constitucional de Moçambique.
- TEI reviewed and provided commentary to the Confederation of Trade Associations (CTA) regarding their new Code of Ethics.
- TEI successfully capacitated 54 delegates during two four-day Ethics Officer Training Programmes.
- A total of 7 certified Ethics Officers were capacitated to provide business integrity interventions in Mozambique.

Impact:

- The inclusion of a compulsory ethics management module in nationwide professional training for accountants and auditors was instituted by OCAM.
- Engagement requests related to ethics and anti-corruption interventions by key Mozambican institutions increased.
C2.

Project Profiles and highlights of activities in 2019

Name of Integrity Partner:
The Ethics Institute (TEI)

Description of Integrity Partner

The Ethics Institute is a not-for-profit, public benefit organization, which has been active since August 2000. The vision of The Ethics Institute is to ‘build an ethically responsible society’ in South Africa and other African countries, such as Mozambique, within the scope of this project. The organization achieves its mission by forming partnerships with the public and private sectors, and serving as a resource through:

- Thought leadership when setting ethical standards
- Research in the field of organizational ethics management
- Assessment of organizations’ ethics programs
- Training of ethics skills, including certification of Ethics Officers
- Support and advisory services to clients
- Project management on ethics / anti-corruption for the public and private sectors

Project:

Collective Action for fighting corruption in Gauteng Province (South Africa)

<table>
<thead>
<tr>
<th>Country of Implementation</th>
<th>Duration</th>
<th>USD (Million)</th>
<th>Registered In</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Africa</td>
<td>5 years</td>
<td>0.80 M</td>
<td>South Africa</td>
</tr>
</tbody>
</table>

The project aims to address corruption in the Gauteng Province of South Africa in three ways:

Firstly, The Ethics Institute will provide ongoing thought leadership to the Gauteng Anti-Corruption Forum – a newly launched Collective Action anti-corruption initiative involving government, business, civil society and labor. Its purpose is to explore synergies to consolidate anti-corruption efforts across the various sectors, focusing on specific risk areas.

Secondly, The Ethics Institute will collaborate with nine municipalities in the province to strengthen their ethics and anti-corruption management capacity. This will include setting up necessary governance structures and assisting the municipalities during the first few years of implementation of their ethics management programs. Various projects will be undertaken, from the development of leadership involvement to the setting up of an ethics-based policy environment and the institutionalizing of ethics programs. A key outcome is the development of a technically competent and dedicated cadre of Ethics Officers to drive these programs forward.

Lastly, The Ethics Institute will create information and training resources to address “ethics and anti-corruption issues in supply chain management” in the South African procurement environment. The resources will be aimed at SME suppliers of large companies in South Africa.
The project aims to fight corruption in Gauteng Province by providing thought leadership to the existing provincial anti-corruption Collective Action initiative, capacitating municipalities to fight corruption, and developing an anti-corruption training platform for small and medium-sized enterprises (SMEs) in supply chains.

**KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2014 – SEPTEMBER 2019):**

- Government support for developing a national Code of Ethical Governance in Municipalities was obtained.
- TEI served on the Gauteng Anti-Corruption Working Group which led to the establishment of the Gauteng Ethics Advisory Council, the appointment of TEI’s CEO to the advisory council, and the development of a case study on the advisory council.
- The Gauteng Municipal Integrity Project (GMIP) was supported by the Premier’s Coordinating Forum and received the gold award in the Integrity Category at the 2018 Premier’s Service Excellence Awards.
- Memoranda of understanding with 9 Gauteng municipalities were established to strengthen their ethics management capacity.
- In 9 municipalities ethics champions and ethics officers were designated, Ethics Risk Assessments and Ethics Management Maturity Assessments were conducted, and ethics strategies were developed.
- The establishment of ethics committees were formalised in 6 municipalities.
- Sample ethics policies were developed and 13 policies in 8 municipalities were reviewed.
- 68 people were trained on the Ethics Officer Certification Programme, with 28 of these being certified.
- 35 trained Ethics Trainers have independently trained more than 2 000 municipal employees.
- An animated online Ethically Aware Supplier Induction (EASI) programme aimed at training and accrediting SMEs was developed and piloted through a blended learning event.

**Impact:**

- The Gauteng Ethics Advisory Council has improved independent oversight of ethical matters, and has raised the prominence of ethical governance in the province.
- The Gauteng Municipal Integrity Project has led to structured ethics programmes becoming institutionalised in Gauteng’s municipalities.
- The Ethically Aware Supplier Induction Programme provides a useful training resource for training SMEs in partnership with the Coalition for Ethical Operations.
The project aims to prevent corruption and create fair market conditions in Spain by improving corporate governance in the private sector and enhancing transparency in public services and procurement. The expected impact of this project is an improvement in the quality of the corporate governance system. Throughout implementation, the project will look at:

- Improving corporate governance in target companies, through the design and implementation of a Compliance and Ethics Program, including a model report, based on the obligations and recommendations set out in Spanish and international legislation and best practices
- Promoting integrity in public contracting through ‘integrity pacts’ as a way to prevent corruption and increase transparency in public procurement, starting with a pilot project relating to certain public tenders
- Fostering transparency in the delivery and management of contracted public services through the promotion and monitoring of the new Transparency Law

C2.

Project Profiles and highlights of activities in 2019

Name of Integrity Partner: Transparency International España (TI-España)

PROJECT:
Implementing and evaluating corporate integrity policies in the Spanish private sector: A holistic approach

COUNTRY OF IMPLEMENTATION: Spain
DURATION: 4 years
USD (MILLION): 1.27 M
REGISTERED IN: Spain

DESCRIPTION OF INTEGRITY PARTNER

Transparency International España is the Spanish national chapter of the global Transparency International movement of non-governmental organizations devoted to combating corruption. The movement brings civil society, private sector and governments together and forms a global coalition against corruption.

The work of Transparency International España is in line with the overall Transparency International strategy and is based on the assumption that transparency constitutes a major goal of modern society. It is a powerful tool for fighting both political and corporate corruption and thereby also inherently linked to the ‘Right to know’ of citizens in Spain.

Transparency International España is an organization committed to promoting and increasing the level of information and openness of information of the various Spanish public institutions, fighting all types of corruption, generating knowledge and promoting good practices in the public and private sectors.
The project aims to improve corporate governance in the private sector and enhance transparency in public services and procurement, to prevent corruption and create fair market conditions.

**KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JANUARY 2015 – JANUARY 2019):**

**Publications and Tools**
- A Practical Guide for Self-Assessment and Reporting on Compliance, Good Corporate Governance and Corruption Prevention with an online tool of the Guide developed by the Spanish National Commission on Markets and Competition (CNMC)
- A position paper and report on Good Practices on Compliance, Good Governance, Corruption Prevention
- 2 reports on The Transparency Law and large listed companies in Spain (2017, 2018), an infographic and an online open data-based tool for company searches as required by Law 19/2013
- 2 position paper translations on Integrity Pacts and a guide on the Implementation of Integrity Pacts

**Courses and Training**
- More than 200 professionals and public authorities were trained in 3 editions of TI Spain’s 9-month Postgraduate Diploma on Business Integrity, Transparency and Good Governance
- Workshops on Good Governance and Transparency for Companies and training on Integrity Pacts for public officials and companies were held in Madrid, Barcelona, Valencia, Bilbao and Toledo

**Integrity Pacts**
- 4 public tenders from Madrid City, Valencia and Castilla-La Mancha regional governments were monitored by independent experts

**Alliances and Collaboration**
- 23 large companies participated in TI Spain’s Business Integrity Forum which has now been sustainably institutionalized
- Partnerships were established with institutions such as the CNMC, the Council for Transparency and Good Government, the Spanish Federation on Municipalities and Provinces, and the Observatory on Public Procurement
- A follow-up implementation of the Practical Guide standards was conducted with Abertis Autopistas España

**Outreach and events**
- Over 1,000 people were reached through TI Spain social events, social networks and website communications on integridad.org.es, www.expertointegridad.org.es and transparencia.org.es
- More than 250 attendees and international speakers attended a two-day end-of-project International Congress in November 2018

**Impact**
- Several companies are improving their integrity policies and practices by using TI instruments such as the Practical Guide for Self-Assessment and Reporting on Compliance, Good Corporate Governance and Corruption Prevention
- Public institutions involved in Integrity Pacts gave positive feedback about their experience and other institutions are interested in using Integrity Pacts for clean and transparent public procurement
- TI Spain has become a prominent reference for anti-corruption work and a service provider for business sector integrity training; many compliance and ethics professionals, executives, lawyers, auditors, public authorities and other professionals have been trained in the TI Spain’s 9-month Postgraduate Diploma on Business Integrity, Transparency and Good Governance
The project will support non-governmental parties, including businesses, in Egypt, Morocco and Tunisia to participate in formulating and monitoring national anti-corruption reforms by providing them with specialized training programs and specific tools to:

• Advance concrete action to reduce corruption risks in healthcare and customs

• Integrate Collective Action concepts and practices into programs of national anti-corruption authorities

The objective is to facilitate the generation of actionable knowledge and the transfer of new skills that will help stakeholders to foster innovative anti-corruption solutions.

Ultimately, the impact would be increased levels of transparency and accountability in the two targeted sectors and enhanced effectiveness of anti-corruption authorities. As such, the project will strengthen the capacity of 60 non-governmental stakeholders in Egypt, Morocco and Tunisia to disseminate information and monitor anti-corruption in healthcare and customs by June 2018 and support the development of related actionable regional declarations, enabling these to be incorporated in the national action plans of at least two of the three project countries by March 2019. It will also seek to integrate Collective Action tools in programs of national anti-corruption authorities in at least two of the three project countries by December 2018.

NAME OF INTEGRITY PARTNER:

United Nations Development Programme (UNDP)

PROJECT:

Anti-Corruption and Integrity in the Arab Countries - Phase II - Egypt, Morocco and Tunisia

COUNTRY OF IMPLEMENTATION: Arab Region including Egypt, Morocco, Tunisia

DURATION: 3 years

USD (MILLION): 2.27 M

REGISTERED IN: International Organization, USA
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JULY 2015 – SEPTEMBER 2019):

• Development of innovative guidance and trainings materials on anti-corruption in the health and customs sectors

• Development of region-specific guidance and training materials on Collective Action for integrity dedicated for the use of anti-corruption authorities

• Establishment of inclusive regional and country platforms to deploy those materials

• Organization of 18 training events, 6 national workshops and 7 regional expert group meetings and conferences reaching more than 200 beneficiaries

• Provision of technical assistance to enable the design, endorsement and implementation of related sector-specific action plans in health and customs and collective action initiatives promoting partnerships between anti-corruption authorities and society

• More than 15 country missions and high-level meetings to support the integration of the capacities enhanced by the project in their respective national institutional arrangements with the purpose of sustaining and scaling them up beyond the project’s life

IMPACT

• New anti-corruption policies shifted focus to risk-based sectoral work that is nuanced and more responsive to concrete problems that businesses and individual citizens face in their day-to-day transactions

• Reforms adopted increased transparency and accountability in the health sector in a way that is conducive to efficiency, competitiveness and doing business

• New institutionalized avenues for collaboration with non-governmental actors, including youth, offer incentives for a cleaner business environment
The project will support non-governmental parties, including businesses, in Iraq and Libya to participate in formulating and monitoring national anti-corruption reforms by providing them with specialized training programs and specific tools to:
• Advance concrete action to reduce corruption risks in healthcare and customs
• Integrate Collective Action concepts and practices into programs of national anti-corruption authorities

The objective is to facilitate the generation of actionable knowledge and the transfer of new skills that will help stakeholders to foster innovative anti-corruption solutions. Ultimately, the impact would be increased levels of transparency and accountability in the two targeted sectors and enhanced effectiveness of anti-corruption authorities. As such, the project will strengthen the capacity of 40 non-governmental stakeholders in Iraq and Libya to disseminate information and monitor anti-corruption in healthcare and customs by June 2018 and support the development of related actionable regional declarations, enabling these to be incorporated in the national action plans of at least one of the two project countries by March 2019. It will also seek to integrate Collective Action tools in programs of national anti-corruption authorities in at least one of the two project countries by December 2018.
KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JULY 2015 – SEPTEMBER 2019):

- Development of innovative guidance and trainings materials on anti-corruption in the health and customs sectors and on Collective Action for integrity dedicated for the use of anti-corruption authorities
- Establishment of inclusive regional and country platforms to deploy those materials
- Organization of 12 training events, 2 national workshops and 7 regional expert group meetings and conferences reaching more than 200 beneficiaries
- Provision of technical assistance to enable the design, endorsement and implementation of related sector-specific action plans in health and customs and Collective Action initiatives promoting partnerships between anti-corruption authorities and society
- More than 6 country missions and high-level meetings to support the integration of the capacities enhanced by the project in their respective national institutional arrangements with the purpose of sustaining and scaling them up beyond the project’s life

Impact

- Major reform proposals in Iraq on integrity commission, access to information and development of a new national anti-corruption strategy focus on risk-based sectoral work
- New customs reform vision adopted to increase transparency and accountability
- Major investigations and dismissals for heads of health and customs sector and senior officials
- New institutionalized avenues for collaboration with non-governmental actors, including youth, offer incentives for a cleaner business environment
The project is enhancing public and private sector dialogue and knowledge sharing, with a view to strengthening the development and implementation of corruption prevention, criminalization and enforcement measures in line with the United Nations Convention against Corruption (UNCAC).

The project is also strengthening the legal framework for the prevention of and fight against corruption in Colombia, with particular emphasis on corporate liability and corruption in the private sector. Finally, the project is empowering companies to identify processes susceptible to corruption and implement actions to protect themselves from corruption.

This is achieved by:

- Improving public-private sector dialogue and introducing a more coordinated approach to anti-corruption efforts in Colombia through establishing a working group consisting of public and private sector stakeholders as an ongoing forum for anti-corruption issues
- Strengthening the legal regime relating to private sector corruption by providing input from relevant private and public sector stakeholders to the new legislation on corporate liability and supporting its implementation
- Holding capacity building workshops for stakeholders from the public and private sectors, based on concrete cases of corruption
- Establishing a network of trainers who work with Small and Medium Enterprises (SMEs) to promote the use of the tools developed by the project and the UN Global Compact (UNGC) in Colombia

- The Project was officially launched and mentioned by Colombia’s former President on December 9, 2015
- Working groups of 37 public-private sector representatives were established in coordination with the UN Global Compact (UNGC)
- An expert committee of national and international experts reviewed the national anti-corruption legal framework, including Law 1778/16 on corporate liability, and made 43 recommendations regarding Colombia’s corporate liability regime. The government adopted 23 of them via an External Directive100-000003/16 of the Superintendence of companies
- In workshops held in 15 cities of Colombia, more than 1,840 participants (compliance officers, prosecutors, auditors, private sector executives and public servants) were trained on Law 1778/16 and topics such as compliance programmes, transparency and integrity, ethical dilemmas and corruption risk assessment
- To strengthen the compliance officers’ network fostered by the project, a website was created with relevant anti-corruption tools, dilemmas, case studies, an opinions section and updates on project implementation
- A nation-wide network of around 166 business trainers was established to promote anti-corruption policies within companies and supply chains
- A Strategy for Small and Medium Enterprises (SMEs) was developed to build SMEs’ capacity to identify corruption, implement UNGC Principle 10 and prepare progress communications (COPs). The Strategy was launched at a public event with over 60 SME representatives, and was discussed at 3 round-table events and 2 workshops attended by over 100 SME representatives

Impact

- Private sector actors in Colombia gained increased awareness of anti-corruption laws and standards, a better understanding of their key role in preventing and fighting corruption, and a deeper knowledge of how to implement tools for managing corruption risks
- SMEs gained enhanced insight and capacity to support the fight against corruption through preparing UNGC Communications on Progress (COPs) and adhering to UNGC principle 10
22 projects from more than 40 countries were selected for funding in the Third Funding Round and will receive up to USD 25.2 million in funding.

As of March 2, 2020, all 22 projects were launched with staggered implementation of activities between October 2019 and February 2020. Naturally, no report on key activities is included in this Annual Report 2019.

Instead, project profiles which include summaries of planned project activities and a description of Integrity Partner and Project Partner organizations are presented for each project in this Section C3.

All project profiles were provided by the Integrity Partners in their respective Funding Agreement checklists and are approved by the relevant Integrity Partners for external use.
This project implemented by the Basel Institute on Governance and the Organisation for Economic Co-operation and Development aims to embed Collective Action in compliance by developing a global norm, bolstering its application, and innovating Collective Action to address demand-side bribery and human rights synergies through three objectives.

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

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

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

**PROJECT SUMMARY**

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

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

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

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

**PROJECT AT A GLANCE:**

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

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

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

DESCRIPTION OF INTEGRITY PARTNER

BSR (Business for Social Responsibility) is the secretariat and lead facilitator of the Maritime Anti-Corruption Network (MACN). BSR is a global non-profit organization that works with its network of more than 250 member companies to build a just and sustainable world.

MACN is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large. Established in 2011, MACN is comprised of companies within the main sectors of the maritime industry. With over 130 companies from the maritime industry represented, MACN members own or manage over 8 000 ships and operate more than 25 percent of the total global tonnage in the maritime industry. Since its inception, MACN has become one of the preeminent examples of an industry led Collective Action network.

The Convention on Business Integrity (CBi) was established in 1997 with the mission of promoting ethical business practices, transparency and fair competition in the private and public sectors in Nigeria. MACN has successfully worked with CBI since 2012.

PROJECT AT A GLANCE:

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

East China Normal University

<table>
<thead>
<tr>
<th>PROJECT SUMMARY</th>
</tr>
</thead>
<tbody>
<tr>
<td>COUNTRY OF IMPLEMENTATION: China</td>
</tr>
<tr>
<td>DURATION: 3 years</td>
</tr>
<tr>
<td>USD (MILLION): 0.80 M</td>
</tr>
<tr>
<td>REGISTERED IN: China</td>
</tr>
</tbody>
</table>

PROJET AT A GLANCE:

The project will address the lack of higher education for compliance professionals and promote Collective Action Initiatives in the healthcare sector to raise skills and competence of compliance professionals, improve compliance standards and reduce corruption.
This project addresses three of the most pressing issues in the ongoing efforts to combat endemic corruption in Indonesia:

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

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

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

The project’s three objectives will respond directly to the Indonesian need for support in a broad range of anti-corruption activities.
Name of Integrity Partner:
Etik ve İtibar Derneği – TEID

PROJECT SUMMARY

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

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

1. provide practical solutions that transform companies’ intent into impact by leveraging behavioral and institutional dimensions of integrity to therefore be in better accord with the extended enterprise integrity risk management priorities of Multi-National Companies (MNCs)

2. develop Collective Action to disseminate and incentivize standardized sustainable and responsible business conduct by building alliances against corruption

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

DESCRIPTION OF INTEGRITY PARTNER

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

TEID has over 145 corporate members with a total yearly income exceeding 15% of Turkey’s GDP, employing more than 250,000 persons.

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

PROJECT AT A GLANCE:

To level the playing field by increasing the extended enterprise risk management capabilities of multi-national corporations (MNCs) and local conglomerates by building alliances against corruption.
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.
Name of Integrity Partner:
Foundation for the Global Compact

PROJECT SUMMARY

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.
C3.

C3. Project Profiles

Name of Integrity Partner:
Fundación Poder Ciudadano

DESCRIPTION OF INTEGRITY PARTNER

Fundación Poder Ciudadano, 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 SUMMARY

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

i) 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

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

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

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

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

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

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

The GCNK specializes in developing cooperative partnership among various stakeholders, and one of the key activities of GCNK is to gather, shape and develop collective voices of private and public sector organizations for further collaborative dialogue to advance corporate responsibility in the areas of human rights, labor, environment and anti-corruption.

The Korea Sustainability Investing Forum (KoSIF) is a powerhouse of legislation in Environment Social Governance (ESG) investment where its activities involve altering behaviors of the government, public entities and corporates. KoSIF also serves as an information disclosure authority of CDP in Korea.

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

Kazakhstan Bar Association in cooperation with the Legal Policy Research Centre

Project Summary

The Project activities are aimed at achieving 2 objectives:

1. Creating an enabling favorable legal environment and implementing international anti-corruption obligations by encouraging the Government to incorporate international anti-corruption standards into the laws of Kazakhstan by amending certain provisions of its anti-corruption legislation

2. Promoting international anti-corruption standards and clean business practices in corporate and academic circles by bringing draft amendments before the Government to introduce additional legislative requirements for companies to develop, adopt and implement anti-corruption standards and internal control, ethics and compliance systems

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

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

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

Project at a Glance:

The project goal is to reduce the level of corruption in Kazakhstan by implementing a systematic, structured and effective policy of improving business integrity and developing corporate governance according to OECD standards.
The project intends to support the creation of a level-playing field and fair market conditions in three pilot countries from the Adriatic Region (Bosnia and Herzegovina, Croatia and Serbia) in order to enhance competitiveness and integrity in a sustainable and inclusive way. It aims to gather government officials, business representatives, civil society and academia to form a “Collective Action” to address country-specific drawbacks by applying international standards, by:

- Raising awareness about OECD standards and good practices of anti-corruption, integrity and fair competition for competitiveness with governments, business and civil society
- Building capacity and foster the implementation of concrete OECD recommendations with regard to the transparency and efficiency of anti-corruption and competition authorities
- Promoting the latest knowledge on international standards and practices in the area of anti-corruption and integrity for competitiveness in academic curricula

Help create fair market conditions in the Adriatic Region by promoting OECD standards via a Collective Action community, by supporting the design and implementation of actionable policy recommendations
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.
Based on TEI’s experience with local government, it was established that ethical challenges at municipal level will not be solved without an intervention on the ethics of political leadership. TEI and relevant national government structures conceptualised an intervention for developing a national code of ethical governance in municipalities. The code should be the outcome of a structured national dialogue and consultation, should have broad societal legitimacy, and should give practical guidance on the ethical intricacies faced by political and administrative leaders in municipalities.

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

The third objective aims to build capacity in the Gauteng Provincial Government to support municipalities’ ethics initiatives. The development of an ethics management monitoring and reporting tool will assist ethics officers structure interventions and improve reporting to oversight structures. This will ensure external oversight of ethics remains a drive of improved governance.
The project with its objectives and activities is the result of POLMED’s experience in the market and its observation of the healthcare system and participants needs.

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

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

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

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

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

To create fair market conditions and reduced susceptibility to corruption among the Polish healthcare system participants by providing education on new planned anticorruption legislation as well as guidelines already implemented by the Healthcare sector.
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.
UN Office on Drugs and Crime (UNODC)

PROJECT SUMMARY

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 Colombian Network and the Secretary of Transparency of the Presidency.

Building on that, the new project will promote a culture of integrity and a better understanding of corruption in public procurement. It will focus on two industries vulnerable to corruption: energy and healthcare.

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

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

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

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

PROJECT AT A GLANCE:

To promote a culture of lawfulness in public procurement in the energy and healthcare sectors in Colombia as a mechanism to prevent and fight corruption.
The project will establish and implement an effective integrity education programme that fosters ethical decision-making in the private sector and empowers employees to serve as “ethics ambassadors” in companies.

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

The project will increase ethical commitment in the private sector by involving business managers in localizing education materials for universities and implementing on-the-job ethics courses that fit the work environments of industries vulnerable to corruption (e.g. law firm, banks). It utilizes bottom-up and top-down approaches for the highest impact. Significantly, the project will establish a link between university education and practical training, ensuring that ethics education is an ongoing process continuing from the formation to the career stage. Impact studies aimed at monitoring, evaluating and learning (MEL) will be carried out periodically to ensure goal attainment.

The project will be implemented in Pakistan, Kenya and Mexico, and will inform a global audience of educators and practitioners connected through UNODC’s worldwide networks.
Reducing opportunities for corruption and creating a culture of integrity by enhancing public-private dialogue and improving the legal framework against corruption.

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

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

To address the defined gaps, this project will promote the adoption of anti-corruption legislation; the development and adoption of codes and guidelines in the private sector; as well as the development of a culture of integrity in businesses in Myanmar.
Reducing corruption by strengthening anti-corruption frameworks, public-private sector dialogue, and private sector capacity to enhance integrity.

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

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

The project will assist six Arab countries (Egypt, Iraq, Libya, United Arab Emirates and two additional countries to be selected during the project implementation) to introduce legislative improvements to combatting corruption in the private sector; improve communication between the public and private sectors by providing a common venue for further interaction, dialogue and knowledge sharing; and provide guidance to companies and Small and Medium Enterprises (SMEs) to develop their anti-corruption code of ethics and compliance programmes.
The project aims to change the dynamics of the interaction between business and tax administrations and to deepen the cooperation between tax authorities and other law enforcement agencies in countering tax evasion and other financial crimes.

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

1. Identifying and mobilizing stakeholders in national tax administrations and private sectors and setting out a research agenda

2. Drafting model national tax legislation and international tax agreements with an aim of strengthening country specific anti-avoidance rules, improving the effectiveness of the tax administrations to get access to information and fostering better cooperation between tax authorities and Multi-National Enterprises (MNE’s)

3. Creating a network of “ambassadors” of key institutions in Africa who will be able to disseminate and promote the outcomes from the project
Annex –
Third Funding Round Press Release by Siemens on December 16, 2019
Siemens Integrity Initiative

Siemens again provides funds to support fight against corruption

- Siemens announces projects to be supported in the Third Funding Round
- Up to US$ 30 million in funding to be awarded
- Siemens Integrity Initiative’s funding volume exceeds US$ 100 million

As part of the Siemens Integrity Initiative, which has a funding volume of more than US$ 100 million, Siemens AG has named new projects to receive funding in order to promote corruption-free markets.

Support is being provided to projects that are committed to joining forces to fight corruption under the "Collective Action" banner. Collective Action is attracting more and more committed and well-connected supporters around the world and is playing a key part in ensuring clean business.

The new project partners will receive between US$ 800,000 and US$ 2.9 million in funding. As a result, initiatives will receive funding of up to US$ 30 million in total over a period of three to five years. More than 140 highly regarded non-profit organizations from about 50 countries have applied for funding.

The Siemens Integrity Initiative is part of the July 2009 settlement between Siemens and the World Bank and the March 2013 settlement between Siemens and the European Investment Bank (EIB).

“The current funding round continues the successful work from the first two rounds, in which 55 projects have already been funded with a volume in excess of US$ 70 million. It reflects key findings from the mid-term review conducted at the request of the World Bank with the independent Canadian evaluator Universalia Management Group. We have been impressed by the large number of applications and the quality of the interesting project proposals received from many different countries. We are delighted to be able to present another portfolio of projects for promoting fair competition and fighting corruption – a portfolio that is well balanced in terms of topics and regions,” said Sabine Zindera, head of the initiative and Vice President Legal and Compliance at Siemens.

The application and selection criteria were set out transparently at www.siemens.com/integrity-initiative and published in a press release. An interdisciplinary team of experts from different regions conducted a careful due diligence exercise before making the final selection.

Funding will go to international initiatives and organizations such as:
- the United Nations Global Compact (UNGC)
- the United Nations Office on Drugs and Crime (UNODC)
- the Organisation for Economic Co-Operation and Development (OECD).

These international initiatives and organizations will cover various countries and regions.

In addition, funding will be provided to local organizations such as:
- the Basel Institute on Governance, Switzerland
- the Beijing New Century Academy on Transnational Corporations (NATC), China
- the Ethics Institute with a focus on South Africa and Mozambique, South Africa
- the Eurocham, Ivory Coast
- the Polmed Association, Poland
- the TEID Ethics & Reputation Society, Turkey
- the Bulgarian Chapter of Transparency International, Bulgaria
- the Vienna University of Economics and Business with a focus on tax law, Austria.

Both the balance of the range topics covered and the regional distribution of funding were considered when selecting projects. To further diversify the portfolio, the Third Funding Round has focused on projects with activities in the Adriatic region, Angola, Argentina, Brazil, China, Colombia, Egypt, India, Indonesia, Iraq, Iran, Ivory Coast, Kenya, Korea, Libya, Morocco, Mozambique, Myanmar, Nigeria, Pakistan, Russia, Saudi Arabia, Spain, South Africa, Syria, Tunisia, Turkey, Ukraine and the United Arab Emirates.
Annex –
Third Funding Round Press Release
by Siemens on December 16, 2019

Siemens AG

Press Release

As part of the settlement between Siemens and the World Bank, the World Bank has the right to audit the use of US$ 100 million in funding over a period of 15 years, beginning in 2009. It can also use its veto right over Siemens’ selection of projects and organizations receiving funds. As part of the agreement between Siemens and the European Investment Bank (€13.64 million over five years, beginning in 2013), the EIB has the right to review and provide a “no-objection” to the projects proposed.

The First Funding Round, which committed a sum of around US$ 37.7 million, was launched in December 2009, followed by the Second Round with US$ 35.554 million in March 2013.

In the period extending into 2020, Siemens AG will be announcing further projects selected in the Third Funding Round. These projects will also be published at www.siemens.com/integrity-initiative. In addition to the Annual Reports for the First and Second Funding Rounds, this website also provides access to the independent 2017 mid-term review and to the profiles of all promoted projects and to further information about the selection process.

Further information about the Siemens Integrity Initiative can be found at www.siemens.com/integrity-initiative

This press release is available at sie.ag/34byFjp

Reference number: PR201912115733EN
Siemens AG is a global technology powerhouse that has stood for engineering excellence, innovation, quality, reliability and internationality for more than 170 years. The company is active around the globe, focusing on the areas of power generation and distribution, intelligent infrastructure for buildings and distributed energy systems, and automation and digitalization in the process and manufacturing industries. Through the separately managed company Siemens Mobility, a leading supplier of smart mobility solutions for rail and road transport, Siemens is shaping the world market for passenger and freight services. Due to its majority stakes in the publicly listed companies Siemens Healthineers AG and Siemens Gamesa Renewable Energy, Siemens is also a world-leading supplier of medical technology and digital healthcare services as well as environmentally friendly solutions for onshore and offshore wind power generation. In fiscal 2019, which ended on September 30, 2019, Siemens generated revenue of €86.8 billion and net income of €5.6 billion. At the end of September 2019, the company had around 385,000 employees worldwide. Further information is available on the Internet at www.siemens.com.
Annex – Additional Siemens Reports

Annual Report 2019

Siemens has published the Annual Report for the fiscal year 2019. It provides detailed information about the business development of the company, its earnings, assets, and finances.
Sustainability Information 2019 as addendum to the Siemens Annual Report

Improved governance is one of the goals for sustainable development, and a key to success is the fight against corruption.

The Sustainability Information 2019 as addendum to the Siemens Annual Report describes the strategy, organization, initiatives and goals for ensuring sustainability.

Guided by the GRI G4 reporting guidelines it sums up our performance with regard to the 10 principles of the United Nations Global Compact and serves as our annual progress report on implementing the United Nations CEO Water Mandate.
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 this field in its comprehensive Annual Report at the end of the fiscal year.

This Siemens Integrity Initiative Annual Report 2019 has been compiled to the best of our knowledge and includes information that has been submitted to the Siemens Integrity Initiative Project Office through March 02, 2020.

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.

Copyright Notice:
© Siemens AG 2020, all rights reserved, without prior written consent of Siemens AG, Legal and Compliance, LC CO RFC CA, it is in particular, but not limited to, prohibited to modify, copy, reproduce, republish, upload, post, transmit or distribute in any way any material, including graphics of this Annual Report 2019.

Siemens AG
Legal and Compliance
LC CO RFC CA
Werner-von-Siemens-Str. 1
80333 Munich
Germany
Email: office.integrityinitiative@siemens.com

About Siemens
Siemens AG (Berlin and Munich) is a global technology powerhouse that has stood for engineering excellence, innovation, quality, reliability and internationality for more than 170 years. The company is active around the globe, focusing on the areas of power generation and distribution, intelligent infrastructure for buildings and distributed energy systems, and automation and digitalization in the process and manufacturing industries. Through the separately managed company Siemens Mobility, a leading supplier of smart mobility solutions for rail and road transport, Siemens is shaping the world market for passenger and freight services. Due to its majority stakes in the publicly listed companies Siemens Healthineers AG and Siemens Gamesa Renewable Energy, Siemens is also a world-leading supplier of medical technology and digital healthcare services as well as environmentally friendly solutions for onshore and offshore wind power generation. In fiscal 2019, which ended on September 30, 2019, Siemens generated revenue of €86.8 billion and net income of €5.6 billion. At the end of September 2019, the company had around 385,000 employees worldwide. Further information is available on the Internet at www.siemens.com

Read more about Siemens at www.siemens.com/about-siemens