

## **Annual Report** 2013





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### **Foreword**

The Institute in its 10-year history has become a mature and widely recognized institution, known for professionalism, independence and innovation, with a significant impact on improving governance and fighting financial crime globally. We are proud to present to you our annual report 2013, and with this a glimpse into what has again been a busy and highly rewarding operational year.

Since 2012/13, the Basel Institute has successfully expanded and further increased the impact of its work in the area of asset recovery, while gradually strengthening and institutionalizing the three other areas of expertise in which the Institute excels, namely governance research, Collective Action and compliance advisory services. In all four areas of work, we have been recognized among the leading centers of expertise and are proud to work with a range of partners from academia, international organisations, governments and not-for-profit organisations on cutting edge research and technical assistance.

Notwithstanding, we are far from where we would like to be and - let's be honest - fighting corruption and improving good governance is not an easy job. However, we are seeing gradual improvements. More and more countries approach us with the sincere wish to put an end to impunity for large-scale corruption by recovering stolen assets. Countries are also keen to ensure that when stolen assets are returned, they are used in a meaningful way and managed with a high degree of transparency and participation. We have seen small and bigger breakthroughs in a number of the asset recovery cases we accompany, and look forward to bringing these to a successful conclusion in the coming years.

Another very encouraging development is the increasing openness of companies to work together, and jointly engage constructively with governments. We are starting to see a change in discourse, away from mutual accusations to genuine willingness to collaborate. Finally, it is fascinating to watch, and contribute to, the gradual closing of the gap between practice and theory, whereby we observe a growing uptake of academic work by practitioners, and input from practitioners into academic work.

We are grateful for the hard work, dedication and great enthusiasm of our colleagues, as they are the driving force behind our success. We also recognize with sincere thanks the contributions from our core donors and project sponsors, who have, this year again, supported us generously and enabled us to operate without being distracted by financial worries. We look forward to working with all of you in the coming years, striving for less corruption and better governance for the sake of improving the lives of people in our partner countries.

### PROF MARK PIETH PRESIDENT OF THE BASEL INSTITUTE ON GOVERNANCE



**GRETTA FENNER ZINKERNAGEL**MANAGING DIRECTOR
BASEL INSTITUTE ON GOVERNANCE



## 2013: 10-year anniversary

"We have the capacity, the expertise, the influence and most importantly, the will to beat corruption."

- Hon. Justice Barry O'Keefe († 2014) (former Supreme Court of New South Wales Judge and lifelong corruption fighter)

In 2013 the Basel Institute on Governance looked back at its first ten years of operations with pride and joy for the results achieved, and with continued enthusiasm and new ideas for our future work. The establishment of the Basel Institute in 2003, with its initial focus on governance research and the promotion of anti-corruption industry standards, coincided with the adoption of the United Nations Convention against Corruption (UNCAC). The Convention instilled new energy for global efforts to tackle corruption and promote good governance, and gave impetus to important topics, first and foremost the recovery of stolen assets. Thus, less than three years into our existence, in mid-2006, the Basel Institute's operations were significantly expanded through the establishment of the International Centre of Asset Recovery (ICAR). Funded by the Governments of Liechtenstein, Switzerland and the United Kingdom, ICAR has quickly emerged as a leader in the field of asset recovery and is recognised as such by partner countries and the international community.

Then, in 2012, recognising the continued importance to include the private sector in efforts to counter corruption and engage it in favour of fair and transparent national and international business practices, the Basel Institute institutionalised its long-standing engagement for anti-corruption industry standards by establishing the International Centre for Collective Action (ICCA). Recognised by the B20 as the world's leading centre of excellence in this area, the ICCA today assists companies and other concerned stakeholders in enhancing their ability to create feasible and collective solutions to mitigate the risk of corruption affecting their businesses and/or industries. Anti-corruption Collective Action

initiatives today include industry standards, multi-stake-holder initiatives, and public-private partnerships. In addition to the active facilitation of such initiatives, the ICCA also pursues research into enabling mechanisms for Collective Action and makes this knowledge available through the B20 Collective Action Hub's website (http://www.collective-action.com). This new resource centre benefits from significant seed funding from the Siemens Integrity Initiative and the support from a prominent group of institutional partners, including the International Anti-Corruption Academy (IACA), the Organisation for Economic Cooperation and Development (OECD), TRACE, Transparency International, the Universidad de San Andrés and the World Economic Forum, as well as our new partnership with the UN Global Compact.

In support of the work of these two specialised centres, and committed to a comprehensive and inclusive approach to combating corruption, the Basel Institute throughout its first ten years of operations has further pursued two strands of work in the area of corruption prevention. On the one hand, the Institute's Public Governance Division conducts a range of applied research and technical assistance projects on governance and governance failures, the role of non-state actors in standard setting and social accountability mechanisms. On the other hand, the Institute is often asked to support companies and other large organisations, such as notably FIFA in 2012-13, in their efforts to strengthen their internal capacity to prevent and detect corruption.

Finally, in 2013, the Basel Institute further reinforced its academic ties, formalising an agreement with the University of Basel to become one of only four "Associated Institutes" to the University of Basel. The Basel Institute thereby benefits greatly from collaboration with researchers from a range of relevant departments, and contributes to the University's own work programme through lectures, joint publications and research projects.

As the Institute embarks on its second decade of operations it eminently does so possessing a commendable standing in the international arena of global players, with a visible track record of achievements in countering corruption. Today, the Basel Institute manages an international team of around 30 experts from 15 different nationalities. With the engagement of this diverse team, representing a mix of practitioners and academics in law, economics, political and social sciences, the Basel Institute in the past ten years has worked in over 50 countries across the globe in support of the international community's on-going commitment to bring down corruption.

The road towards these achievements has been exciting and gratifying, and we are immensely grateful to all our partners

who have helped us along the way. As we look at the years ahead, we will continue to pursue our ambitious goal of combating corruption by further expanding our activities, continuously professionalising our services and extending our outreach, working with governments, companies, NGOs, academic institutions and international organisations to have a comprehensive and sustainable impact.

In the meantime, we are pleased to share with you in the following annual report a summary of our key operational achievements in 2013 and a taste of what lies ahead in 2014 and beyond.











# Working with the public sector

### to build capacities to prevent corruption and enforce punitive measures

But: What is public governance? What is asset recovery?

Public governance is the exercise of public authority by state governments aimed at generating rules and regulations and delivering services to a community of citizens. Capable and accountable governments set goals, enact policies to pursue these goals, and oversee the use of public funds and the behaviour of public officials. Governments thereby create an environment where there is little incentive for corrupt and fraudulent practises.

Asset recovery is a punitive and restorative measure that takes place once such a favourable public administrative environment crumbles, allowing corruption to occur and, when actions become necessary, to reverse the effects of said corruption. More specifically, asset recovery is the proactive and dedicated process of tracing, freezing, confiscating and returning to the respective country of origin funds that have been stolen through corruption or other illegal means. The process is legally and politically complex and consequently also lengthy, requiring a combination of technical skills and involving multiple jurisdictions.

Good governance represents an advantageous and conducive environment for preventing corruption. The recovery of stolen assets is both a preventative action, in that it diminishes the incentives to engage in corrupt practices, and an enforcing action for countering corruption once it has occurred. In the conduct of our operations we consistently promote and implement a combination of such measures focusing both on prevention and enforcement since we strongly believe that an integrated approach is best suited to effectively tackle the challenges of corruption.

# International Centre for Asset Recovery

Since its inception in 2006, ICAR has continually increased its assistance to developing and transition countries and implemented this assistance through a two-pillar strategic approach. At the operational field level, it assists partner countries in handling concrete and complex international corruption and/or money laundering cases, delivers national and regional training programmes, offers e-learning and provides networking opportunities for ICAR alumni. At the policy level, ICAR actively participates in the global policy dialogue with a view to shaping and influencing practices and policies related to asset recovery, both internationally and nationally.

Remaining a "niche-boutique institution" operating in the field of asset recovery, ICAR in 2013 carried out a number of high-impact projects in different parts of the globe. Main highlights included a significant expansion of case work in East Africa and South America, the delivery of a 1-year train-the-trainer programme in financial investigation and asset recovery in Egypt, the start of two long-term policy programmes on methods for returning stolen assets and the development of "Guidelines for the Efficient Recovery of Stolen Assets", and the publication of a new book on asset recovery, "Trends in Asset Recovery".

With its team of highly experienced practitioners from a range of legal backgrounds, ICAR remains well positioned to cater to growing demands for assistance. In all areas of work, ICAR has developed and maintained a solid and constant reputation for professionalism and high-standard expertise. Much of this acknowledged achievement to date would not have been possible without the funding support from the Principality of Liechtenstein, the Swiss Agency for Development Cooperation (SDC) and the United Kingdom Department for International Development (DFID). It is most welcome that this core group of donors, after 7 years of on-going support, in 2013 has agreed to continue funding the activities of ICAR. This continuous financial support is also the basis for the implementation of ICAR's new Business Plan 2014-2016 (http://www.baselgovernance.org/ fileadmin/docs/icar/ICAR\_Business\_Plan\_2014-16.pdf), which was developed in the course of 2013.

## Building capacity through training

ICAR's unique hands-on, country-focused and needs-driven training programmes in financial investigation, mutual legal assistance and asset recovery have become an unequivocal trademark product, unparalleled by any other organisation. In 2013, ICAR delivered a total of 6 such interactive and participant-based training programmes to audiences from 10 countries in Africa, the MENA region and Eastern Europe. This included, at country level, Botswana, Egypt, Indonesia and Romania and, at the regional level, Egypt, Iraq, Libya, Morocco, Tunisia, South Sudan and Yemen. In total, ICAR trained more than 300 professionals, from law enforcement agencies, from anti-corruption agencies, Financial Intelligence Units (FIUs), investigative bodies, prosecutorial authorities and members of the judiciary.

In Egypt, the training programme was carried out as a trainthe-trainer sequence consisting of 7 training sessions delivered in intervals of 1-3 months. Through this programme alone ICAR trained 128 Egyptian investigators and prosecutors, out of which 2 fully qualified trainers are now able to carry out similar trainings, independently of ICAR, either in Egypt or elsewhere. These two new local trainers were subsequently engaged as trainers in the delivery of an ICAR regional training programme for MENA region countries which was again, like in 2012, conducted jointly with the International Institute of Higher Studies in Criminal Sciences (ISISC) in Syracuse, Italy. Such train-the-trainer programmes have great potential for ensuring sustainability, as trainers are able to further disseminate ICAR training programmes to new investigators and prosecutors over the coming years; and, on the other hand, potentially they can thereby also bring about a South-South capacity building effect, as seen in the case of the regional programme in Syracuse. In the same vein, ICAR's regional training interventions are seen as a particularly valuable activity, most notably because their delivery strengthens regional and international coordination and cooperation and enables peer learning.

## What makes ICAR's training unique, and why should a partner country choose ICAR's training services?

Over the past few years, ICAR has developed and employed a unique hands-on learning methodology for its training programmes on detecting and investigating financial crime, such as corruption and money laundering, and identifying, tracing and recovering stolen assets. It is not an "off the shelf" product. Rather, it is customised to the specific needs of a country and adapted to its legal and institutional context. Such specification is achieved by closely liasing with relevant national authorities and working onsite in the concerned country, including during the preparatory stages of a training programme.

The purpose of this sui generis approach is to build the technical skills of trainees in handling concrete cases within the constraints of their own legal system and proceedings. The centrepiece of the financial investigation and asset recovery training programme remains a practical, computer-based and interactive exercise simulating a complex investigation involving elements of corruption, money laundering and asset recovery, that replicates the real work as closely as possible within a class room setting.

This practical exercise is interspersed with occasional presentations by ICAR trainers and followed by in-room discussions with a view to providing additional theoretical guidance and practical advice for application both in the class-room training exercise and thereafter in the participants' daily work.

The two training sessions delivered in Indonesia at the end of 2013 represented the start of a new one-year multi-phase training programme in financial investigation and asset recovery for the Indonesian Corruption Eradication Commission (KPK). In the context of this training programme funded by USAID, ICAR began developing a series of new training modules, in part jointly with the International Anti-Corruption Resource Centre (IACRC). Keeping in line with ICAR's training methodology that uses practical case scenarios as a key training tool, these new modules look at financial investigation and asset recovery in specific sectors, such as public procurement, mega construction projects, the oil & gas industry and forestry, and on financial investigation of assets hidden through complex corporate vehicles. These new training modules can be delivered henceforward to other countries or in a regional context, as always in a tailor-made fashion to reflect the laws, institutions and needs of the concerned countries.

### Recovering stolen assets through case work assistance

By the end of 2013, ICAR was assisting 10 countries from East Africa, the MENA region, Central and South East Asia as well as South America in handling a growing number of complex international corruption and money laundering cases. The cooperation with very engaged counterparts in the concerned requesting countries, and the ready support from law enforcement and foreign missions of our donor countries and other requested states provided favourable momentum in 2013 to considerably move forward on some of these cases.

ICAR's key operational principle for case work assistance remains the ownership of the cases by the respective agency and country that has requested ICAR's services. As a fundamental principle of all our operations, ICAR's goal with case work is to see the asset recovery practitioners of our

partner countries become self-sufficient, technically well-equipped and self-assured in tracing and recovering assets, independently of any guidance and support from ICAR. As a second guiding principle to optimise the efficiency of our case work assistance ICAR, when and as possible, seeks to commence its engagement in case work as early as possible in the life of a case, as initial strategic considerations have a critical impact on the probable success.

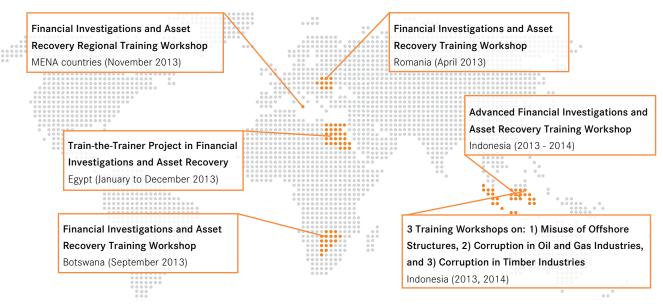
Based on these principles, our assistance may include, inter alia, the provision of tactical investigative, prosecutorial and intelligence gathering advice and support in the compilation of requests for mutual legal assistance for evidence, restraint or confiscation.

## Influencing global policy on asset recovery

International policy makers' interest in the recovery of stolen assets, as a core component of the global fight against corruption, continues to grow rapidly. Although a relatively small player in terms of size, ICAR utilised this global trend to gain more and more ground in leveraging and influencing global policy on asset recovery.

This ability to play an ever greater role in the asset recovery policy dialogue is derived from ICAR's own inherent operational growth and associated expertise. Since the start of its operations, ICAR has been able to attract specialists who come with extensive practical experience and solid academic track records in asset recovery, and who together represent a wide geographic spectrum of nationalities from both requesting and requested countries. Respected as an effective technical operator in the field of asset recovery, and with its status as an apolitical and independent institution, ICAR has thus gained much credibility in relevant international forums and become a partner of choice for governments and international organisations alike in debating and shaping pertinent policy issues on asset recovery.

Three topics were in the focus of our 2013 global policy agenda, with work on these topics likely to continue in 2014 and beyond. First, ICAR in 2013 partnered with the Swiss Federal Department of Foreign Affairs (FDFA) and the World



ICAR training activities in 2013

Bank/UNODC Stolen Asset Recovery Initiative (StAR) to initiate a practitioners' dialogue with a view to developing practical guidelines for the efficient recovery of stolen assets. These guidelines aim to facilitate the implementation of international standards and domestic legislation in a more efficient manner, focusing in particular on the need for close cooperation and communication between requesting and requested states. Extensive initial consultations took place throughout 2013, which culminated in the adoption of the Nigeria-US resolution on "facilitating international cooperation in asset recovery" at the UN Conference of States Parties to the UNCAC in Panama City (November 2013), through which the international community expressed official support for the initiative.

Second, ICAR in 2013 dedicated considerable resources to advance the international policy debate on methods and modalities for returning confiscated assets. To kick off this process, ICAR in cooperation with the Swiss FDFA hosted a two-day international experts workshop on "Returning Stolen Assets" in Küsnacht (Zürich) during 24-25 October 2013. This workshop was attended by some 35 policy makers from requesting and requested countries who shared and discussed past practices of repatriating stolen assets. On the basis of this workshop, ICAR subsequently developed a policy paper on the topic to serve as a preliminary informative expert document for practitioners in asset recovery.

Third, in the context of the G8 Arab Forum on Asset Recovery (AFAR) and at the request of the United Kingdom, which chaired the G8 during 2013, ICAR led the work on the development of the "Guide to the Role of Civil Society in Asset Recovery", which has since been formally launched and is available on a dedicated website at http://cso.assetrecovery.org/. This work has benefited greatly from previous research and workshops by the Basel Institute and ICAR, notably on the role of non-state actors in standard setting and the role of non-state actors in asset recovery.

ICAR's continued strategic approach is to focus on a small number of global policy topics where it has strong and unique expertise, or, due to ICAR's apolitical nature, can offer a particularly safe and credible platform for dialogue. ICAR will continue to implement such policy projects in consultation or in partnership with relevant local, regional and international partners, notably the United Nations Office for Drugs and Crime (UNODC), the StAR Initiative or regionally with the G8 AFAR, the Organisation for the Security and Cooperation of Europe (OSCE) or the European Parliament, amongst others.

### Legal and domestic policy work

ICAR's legal and policy work at domestic level builds on its field experience where it is exposed to practical challenges faced by asset recovery practitioners in implementing legislation and working within certain domestic institutional frameworks, as well as its work in the global policy sphere. In the past, its engagement in this area consisted to a great extent in supporting countries to conduct UNCAC compliance and gap analyses. The methodology developed by the Basel Institute at the time and approved by UNODC has served as a valuable supplement to the official UNCAC review mechanism. In the meantime, ICAR has shifted its focus to more targeted types of reviews, focusing notably on national asset recovery strategies and processes, the establishment and functioning of dedicated asset recovery and asset management units, and related legislation and institutions. In these areas ICAR provides extensive legal and practical analysis on legislation and institutional capacity building, benchmarking domestic institutional and legal arrangements against international best practice and legal standards.

This type of legal analysis and review work of ICAR is for the most part complementary to its training and case work. The purpose of such engagement is to support partner countries in further strengthening their legal and institutional frameworks with the ultimate aim to improve their operational effectiveness. In 2013, such projects included the following, to highlight just a few:

• Support to East Timor in reviewing its money laundering investigations processes and laws, in the context of

USAID's FOTI Timor Leste programme, and funded by SearchPros Solutions

- Legal advisory services in support of an EU technical assistance programme on the topic of "Cocaine Route: Anti-Money Laundering activities in West Africa (Ghana, Nigeria, Senegal) and Cape Verde", at the request of and with funding support from the Fundacion Internacional para Iberoamerica de Administracion y Politicas Publicas (FIAPP)
- Legal and technical advice input into the Swiss State Secretariat for Economic Affairs (SECO)'s preparation of a project document and credit proposal for SECO's project with South Africa's Financial Intelligence Centre (FIC)
- Review of Ukraine's AML and other anti-corruption related legislation with a view to providing recommendations for improvement, at the request of and funded by the Organised Crime Observatory (Switzerland)
- Review of, and provision of technical advice towards the legal framework and operating guidelines for lawful interception in Bhutan, at the request of and funded by the SDC
- Study on strengthening the constitutional role of the Bhutan Anti-Corruption Commission (ACC), funded by the ACC of Bhutan

### Using IT to recover stolen assets

ICAR continues to house a team of IT specialists who develop and implement tailor-made IT tools for facilitating the management and implementation of asset recovery processes. This set up remains a unique structural and organisational feature of ICAR, enabling it to create and deliver services and programmes with additional elements of sophistication through the integration of specialised IT components. Our IT products are either offered as stand-alone products or incorporated into or combined with the delivery of other ICAR services, including its training programmes.

In 2013, ICAR developed a new e-learning training module for its Asset Recovery Campus on "Source and application of funds", featuring a new learning environment that further enhances the interactive nature of the training. Furthermore, some of ICAR's existing e-learning modules were successfully incorporated in the delivery of asset recovery related training programmes, for example at an Asia-Pacific Economic Cooperation (APEC) Workshop on the use of financial flow tracking techniques and investigative intelligence for effective conviction and asset recovery (June 2013). By the end of 2013, the Campus registered some 600 users.

ICAR also launched the second edition of the Basel AML Index in 2013, attracting a growing number of users for both the public and the fee-based Expert Edition. 2013 was also marked by a rapid increase in the use of the Index by private sector clients from the financial sector as well as other sectors. This country risk-ranking tool serves to assist in analysing country risks regarding money laundering and terrorism financing.

Finally, ICAR during the first half of 2013 continued to professionalise the Asset Recovery Intelligence System (ARIS). ARIS is a web-based software tool that assists analysts and investigators with screening persons and companies that appear in Suspicious Activity Reports or are otherwise subject to suspicions or preliminary investigations. By using semantic technologies, the tool searches the public Internet, commercial news sources and Politically Exposed Persons databases for traces of corruption linked to entities under scrutiny. ARIS also links into commercial news archives, which provide information on news articles that are no longer publicly available on the Internet. Essential to the tool is a keyword taxonomy that is tailored specifically to the field of corruption and money laundering. By mid 2013, the tool was installed in the FIUs of 15 countries in Europe and Asia. The pilot phase of ARIS came to an end in 2013 and future efforts will seek to partner with external organisations for the implementation of the productive version.

## Division for Public Governance

## Boosting capacities to prevent corruption

The Basel Institute firmly believes that a combination of prevention and enforcement measures is essential to effectively tackle the multitude of challenges exposed by corruption. Similarly, the Institute is also convinced that any persuasive assistance in these areas is best developed and provided through hands-on technical support that is simultaneously reinforced with compelling research into underlying governance failures and the impact thereof on public institutions' capacities to prevent and combat corruption. In line with these operational and strategic principles, experts of the Division for Public Governance implemented a strong programme of work in 2013, carrying out both technical assistance programmes for corruption prevention as well as research for strengthening governance reform.

In the context of technical assistance to partner countries, the Basel Institute's field operations in Indonesia stood out. With a grant from the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), the Basel Institute carried out a 10-month vocational capacity building programme for Indonesia' Corruption Eradication Commission (KPK). The aim of the programme was to strengthen KPK's capacity to monitor prevention activities and to develop and implement a multimedia approach to advocacy and education. The Institute's team worked closely with KPK on setting up the radio department to create and launch the "Kanal KPK" with a view to expanding communication channels with relevant stakeholders and enabling direct exchange of information and dialogue. The Institute's support included strategic planning, on-the-job training, defining key messages and programme schedules, as well as continuous on-site technical guidance. Commenting on the initiative, KPK Commissioner Bambang Widojojanto said at the launch of Kanal KPK that the radio-streaming service would serve as an excellent new and additional channel for speaking about corruption to the general public in all of Indonesia. With the official launch of the radio station, the project was successfully completed in September 2013.

The Basel Institute furthermore completed a technical assistance project for the WHO, which it had begun in 2012. In this context, it supported the WHO with the development of a systematic method to assess and ultimately devise actionable plans for strengthening governance health systems worldwide. A follow-up assignment in 2014 will focus on using this assessment methodology to analyse three countries of the WHO European Region.

Another type of technical assistance in the area of corruption prevention that we are regularly asked to provide is focused on legal and organisational reforms to enhance state performance for delivering public services, on implementing policies for preventing corruption, and on strengthening relevant legislation. In particular we apply our in-house expertise in supporting affected countries in assessing their structural and legislative gaps, benchmarking these against international standards, and recommending remedies and facilitating their implementation. One such project in 2013 was the assessment of the 2008-2013 National Anti-Corruption Strategy of Bhutan, including the drafting of the new Anti-Corruption and Integrity Strategy 2013-2017 for Bhutan. Much like in our other areas of expertise, where the Institute is active, our support to such countries inherently depends on the actual political will of these countries to change the status quo of their governing trends and patterns. Without such national determination, projects bear little fruit and impact remains limited at best.



During an international workshop on corruption research

## Combining research with practice to reinforce governance

A unique operational feature of the Basel Institute is its capacity to engage in-house experts to conduct academic research and to engage these same experts to feed this collated research into practical assistance on the ground. The aim is to support developing countries in their intentions to strengthen governance structures, laws and institutions for preventing corruption, and to improve their respective accountability and integrity in the public sector.

In the context of its research activities, the Basel Institute applies a unique political-economy research methodology referred to as "power and influence analysis." The tool is used to identify drivers and incentives for enhancing governance systems. Thus far, the Institute's research team has applied the methodology with a focus on governance of health systems. However, the tool can easily be applied to other corruption-affected contexts. In light of its ease in transferability, the interest in this tool has greatly risen in 2013, both from partner institutions and partner countries. For example, the Institute's research team in 2013 collaborated with the Institute on Nursing of the University of Basel in support of an SDC-funded project aimed at strengthening the nursing sector in Bosnia-Herzegovina. In 2014, the same research methodology will be adapted to support ICAR's decision-making processes for country level operations.

Another focus of the Public Governance team's research work relates to the effectiveness of social accountability mechanisms to prevent corruption. This research has started in the context of the Institute's participation in the EU multi-centre research programme, ANTICORRP, and incorporates two specific case studies in Tanzania and Mexico. Research in support of this EU programme will continue in 2014. Building on this body of work, the Public Governance team in 2013 established a collaboration with UNDP to analyse the effectiveness of social accountability for preventing corruption in selected on-site case studies in Ghana, Papua New Guinea, the Philippines and Serbia. Notably, the case studies analysed the potential of community-based

participatory approaches for strengthening anti-corruption efforts. In 2014 and beyond the team will work at further developing the resarch approach to facilitate the assessment of the effectiveness of business driven anti-corruption collective action initiatives (see section on ICCA on page 19ff).

## International training on corruption research



The Basel Institute in 2013 developed a new curriculum for a 2-3 day training workshop on quantitative and qualitative research methods on corruption and their application. This training agenda is designed to provide professionals with conceptual and methodological tools to undertake corruption research applicable to a wide variety of topics, contexts and aims. The Institute's pilot workshop was delivered as part of the IACA's Master Programme on Anti-Corruption Studies in the summer of 2013 and will henceforth be offered on a regular basis at the University of Basel.

The participants of the pilot training at the IACA Master Programme represented an international group of some 30 professionals. These new trainings are explicitly designed in such a manner that they are easily delivered to a mixed audience of academics and practitioners from governmental and non-governmental institutions, as well as representatives from the private sector. This blended setting enriches the nature of these workshops as the diversity of participants contributes to lively and compelling discussions given the participants' respective varied backgrounds and experiences in anti-corruption work.

If you are interested in learning more about these new workshops, please contact Head of Public Governance & Research, Ms Claudia Baez-Camargo at: claudia. baez-camargo@baselgovernance.org

## A new perspective: Good governance in the iconographic tradition

by Thomas Christ, Member of the Board

The Basel Institute on Governance has defended its mission to strengthen governance in the public and private spheres for over ten years. As a research and advisory institution, it has dealt with the worldwide issues of corruption, money laundering and recovery of money from dictators. It implements this work in close partnership with similar non-profit organizations, ethics committees, government ministries, partners from the private sector and the media.

Against this background the question arises whether the activities of the Basel Institute belong to a tradition of rationally justifiable good governance concerns or have only gained importance as a new academic development in a free, modern constitutional state. While the question is mostly discussed from the point of view of legal history and legal philosophy, the history of art presents many striking parallels to the activities of the Basel Institute.

An explicit discussion of the idea of good governance in Western European culture will examine the rich visual programmes created during the Renaissance. With the emancipation of jurisdiction from the feudal and clerical laws, town halls and court buildings that housed civil institutions in early middle-class Europe became visual vehicles of meaning. In addition to the well-known representations of the Last Judgment, especially north of the Alps, a large number of representations of justice were created which, in an impressive and obvious way, are concerned with the problematic reality of corruption and independent jurisdiction. The choice of subjects is not confined to the well-known stories from the Old Testament but is also inspired by pre-Christian narratives. The interest in spreading the idea of good governance is deliberately separated from the biblical narrative model and transferred to a context that is universal and secular. Thus the interested observer, particularly of the works of art in German and Dutch government buildings, will there discover series of paintings that illustrate this. This is also the case in the Basel Town Hall with the presentations depicting the 'Venality of Justitia', the 'Judgment of Cambyses', the 'Discovered Deception', 'Herod appearing before Hyrcanus', the 'Calumny of Apelles', but also 'Moses and Aaron', 'Susanna's Innocence', 'Josaphat admonishing the Judges' and of course 'Solomon's Judgment'.

Naturally these representations of justice – let us call them good governance picture cycles – have a preeminently admonitory character. How these visual programmes were interpreted by public officials in the centuries after their creation, in other words the judges at the court or the government representatives in the painted town halls, and how successful those admonitions were cannot be seen from the visual motifs. The thematic parallels to the Basel Institute do not lie in that admonition but rather in the secularized reflection of the abuse of rights and power with which the political and economic growth of the free towns was now suddenly transferred to their citizens' area of responsibility, or at least their area of interest.

The inscriptions on the paintings, which have survived all the restoration work over the centuries, also prove that these Basel representations of governance are not solely wall decorations for public buildings. For example, in the 'Calumny of Apelles' by Hans Bock of 1611, the inscription originally translated by Jacob Burckhardt (into German) reads as follows: "I am the judge whom you can see on the tribunal, the well-known King Ptolemy who, misled by distrust and ignorance, through dishonest slander ... long ago foolishly convicted Apelles, an innocent man. When the truth finally emerged, it was too late. I discovered my mistake and atoned

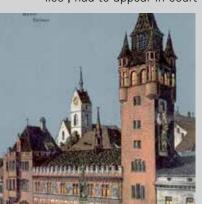




1 The Judgment of Cambyses, Gerard David, 1498

for it." And in an instructive admonition the king continues: "Having learned from my example, you and every other judge shall not only strain your ears but particularly your common sense, and carefully examine the cause of both parties."

The story of Cambyses from chapter 21 in the Fifth Book of the Tales from Herodotus sounds quite dramatic. Sisamnes, one of the judges of the Persian king Cambyses, has been bribed into passing a false sentence, whereupon the king has him killed and flayed. At this point, the history in the Basel series of pictures could actually have reached its instructive conclusion, but it is also reported that the judge's chair had been covered with Sisamnes' skin and his son Otanes had then been appointed judge instead of his father. In this cruel story the skin of the guilty father becomes a constant painful reminder to the son of what might befall him, or a guarantee of infallibility for the office of judge. Probably the best-known representation of this scene is by Gerard David. He created his two panels from 1489 to 1499 for the Lay Assessors' Chamber (also known as the Gothic Chamber) of the Town Hall of Bruges<sup>1</sup>. The culpable judges of these historical picture cycles of governance - and this is essential in this connection - should tremble in fear not only of divine but also secular punishment. That also applies to the leader Hyrcanus who had allowed himself to be intimidated by the tyrant Herod. The painting in the Basel Town Hall reproduces the narrative of the Jewish historian Josephus Flavius according to which Herod, as the 'governor of Galilee', had to appear in court for putting down a revolt and



2 Town Hall Basel



3 Allegory of Venality, Hans Bock

for unlawfully executing Jewish citizens. In the same way as a warlord, Herod appears in court with his bodyguards, which not only frightens the judges but also the leader of the Maccabees. Only one person, Sameas, is said to have stood up and appealed to the judges' consciences with following words: "I don't hold it against Herod in any way if he is more concerned with his advantage than with the observation of the laws, but I do hold it against you and Hyrcanus who allow him to take that position." This visual message is probably more significant than the somewhat visionary continuation of the story. Sameas prophesies that the guilty judges will be executed by Herod at a later point in time, but one of the judges, Hyrcanus, allows Herod to escape without punishment. Herod in actual fact carries on the business of government and has the leader and the faint-hearted judges put to death.

The most astonishing but also the least well known and rarely described representation of the theme of governance in the Basel Town Hall<sup>2</sup> is undoubtedly the 'Allegory of Venality' by Hans Bock<sup>3</sup>. The picture, nearly four meters high, is discovered immediately to the left of the entrance to the Executive Council Hall. An obviously biased Justitia stands in the center of the picture, a broken sword lies before her and the law books, reduced to insignificance, can be seen at her feet. With her eyes closed she leans towards a bearded man on the right who has filled one pan of her scales with gold and jewellery. He, the rich old man, kneels down and thanks her for the favor he has paid for. She holds other bribes, a gold chain and a gold jug in her left hand. In narrative symmetry, on the left of Justitia stands a poor youth who has nothing material to offer and can rely neither on the symbolic power of the sword of justice nor on the law books treated with contempt. Along the upper edge of the picture an inscription of 1608 is recognized that can be interpreted as an early creed or a traditional slogan of the idea of governance:

lustitiae titulo vexatur egenus et insons legibus at malus munera pondus habent. (The poor and innocent person is tormented in the name of justice, for gifts weigh more heavily than laws.)

## Working with the private sector

to strengthen business ethics and corporate governance, and promote Collective Action

But: What is business ethics and corporate governance?
What is Collective Action?

Corporate governance is the system by which companies are directed and controlled. It involves regulatory and market mechanisms, the roles and relationships between a company's management, its board, its shareholders and other stakeholders, as well as the goals for which the corporation is governed. Nowadays, much of the contemporary interest in corporate governance is concerned with the mitigation of risks, for example, in relation to bribery and corruption. This is our interest as well, and hence we see business ethics and anti-bribery compliance as a prevention instrument to protect companies against legal, reputation and business risks that are associated with bribery, money laundering and other financial crimes.

Collective Action reflects a conviction that no single actor, state or non-state, can effectively prevent and respond to corruption acting alone. Collective Action occurs when participants in a market or market segment agree to jointly tackle the problems of corruption that affect them all. Collective Action can be global or local. It can be limited to the private sector or it can involve companies in collaboration with governments, civil society and even international organisations.

In line with this dual perspective, we engage with our partners in the private sector through compliance advisory services and the facilitation of Collective Action initiatives, because we strongly believe that corruption prevention is both a company-specific and a collective responsibility.

# International Centre for Collective Action

## Acting collectively to resist bribery

As an independent body, and building on our decade-long track record in supporting industry initiatives against corruption, the Basel Institute is ideally placed to take a leading role in the promotion of anti-corruption Collective Action. The aim of this work is to support companies to devise applicable collective solutions to mitigate the risk of corruption affecting their business, industry or sector. Such initiatives can take a variety of forms, and may include industry standards, integrity agreements, multi-stakeholder initiatives or public-private partnerships. The Basel Institute's work in this domain is implemented by the International Centre for Collective Action (ICCA) established in 2012, in the framework of a longer-term project for "Promoting Global Industry Standards", funded by the Siemens Integrity Initiative.

In 2013, a series of noticeable developments took place, which show that the Institute is increasingly successful in breaking down barriers between concerned and likeminded stakeholders and to engage them jointly in action against corruption:

Notably, in July 2013 the ICCA won a competitive tender to develop and maintain the B20 Collective Action Hub, in partnership with the United Nations Global Compact. New and old in-house resources were immediately allocated to advance the pilot project and already in January 2014 the new website for the B20 Collective Action Hub, www.collective-action.com, was officially launched. This website is the first of its kind and today represents the official information platform for the B20 Collective Action Hub. It serves as a comprehensive, interactive online database and resource centre for all information on Collective Action to combat corruption, including examples of existing Collective Action initiatives and practical tools and other knowledge products to support Collective Action. The ICCA / B20 Hub has also been active in creating and facilitating new Collective Action initiatives for example in the Energy and Transport sector, which was announced publicly in June 2014, and with a similar initiative emerging in a heavy industry sector.

Another Collective Action initiative actively supported by the ICCA, jointly with the OECD, is the world's first High Level Reporting Mechanism (HLRM), formally inaugurated in April 2013 in Colombia by President Juan Manuel Santos. The HLRM as piloted in Colombia is an innovative early warning system allowing companies to report concerns about potential gaps in procurement arrangements that may lead to corruption. A similar programme has been conceptualised in Ukraine at the request of the European Bank for Reconstruction and Development (EBRD), with a view to addressing unfair business practices and bribery and thereby improving the overall business climate and prospects for foreign investment. Referred to as the "Business Ombudsman Institution", the implementation of this project was delayed due to the political upheavals in Ukraine in late 2013/early 2014, though eventually launched in the second quarter of 2014.

The Basel Institute also dedicated considerable resources to strengthening institutional support for the ICCA. The OECD and the World Economic Forum (WEF) joined the IACA, TRACE, Transparency International and the Universidad de San Andrés as founding institutional partners of the ICCA. Together this group acts as the Steering Committee of the ICCA. In addition, the Institute joined the B20 Task Force on Transparency & Anti-Corruption during the year of the Russian chair of the G20 and since then has been actively participating in the Task Force's work streams on Collective Action and on corruption prevention in public procurement.

Finally, with the aim to secure on-going funding support for the Institute's activities under the ICCA beyond 2015, when current project funding runs out, the Institute, at the invitation of Siemens and in response to one of its Expressions of Interest (presented in 2013) has, at time of writing this report, submitted a full project proposal for "Scaling up anti-corruption Collective Action: B20 Hub on Anti-Corruption Collective Action." The proposal was submitted together with the Institute's project partners, the UN Global Compact and the OECD.

Through the work of the ICCA and its partner institutions and companies, the Institute remains committed to supporting companies in seeking collective remedies for bribery solicitation. Reaching this goal remains an ambitious task, not least because reluctance of companies to work together and develop trust in a collective solution, and worries about loosing individual market strength and competitive advantages, sometimes continue to drive the general operating dynamics of concerned stakeholders. Much work still has to be invested into strongly arguing for Collective Action as a good business case for affected institutions to jointly create a way out of their bribery prisoners' dilemma.











# Division for Corporate Governance and Compliance

## Guiding the private sector on governance

Through the Division for Corporate Governance and Compliance, the Basel Institute engages with stakeholders from the private sector and other organisations with a view to supporting efforts to strengthen business ethics and corporate governance, thereby again recognising the importance of an integrated approach to the fight against corruption, which involves both public and private partners.

The Corporate Governance and Compliance Division in 2013 continued to act as the Secretariat of the Independent Governance Committee (IGC), which since 2011, under the leadership of Professor Mark Pieth, has been responsible for advising FIFA on governance reform. During the course of this mandate the IGC, which represents a group of renowned governance experts and football stakeholders, submitted recommendations for reforms relating to greater transparency, financial controls, accountability and ethical conduct at FIFA. Several of the IGC's proposals have been implemented and since led to first tangible results; others will be voted on at the next FIFA Congress in 2014. The IGC formally concluded its mandate in early 2014, with the publication of the last of a total of three reports that describe reform progress and remaining issues.

Ethics and governance in sports was also the topic of an expert opinion on sports fraud and good governance in Switzerland, published in 2013 at the request of the Swiss Federal Office of Sport.

To act as compliance advisor, monitor, or crisis manager remains the Institute's most popular service for private sector clients. In this capacity, the Institute supports companies in the development and implementation of internal control systems, corporate programmes and policies to comply with standards and laws on bribery, money laundering, financial crimes and financial accounting. They review and benchmark existing programmes, company specific risk analysis, policy writing and process implementation. As crisis manager, the Institute assists companies with managing an imminent crisis, in particular dealing with incidents of suspicion or

revelation of non-compliance. Our experts identify system gaps that may have caused the incidents to occur, devise remedial strategies, as well as provide advice in the definition of adequate media and law enforcement responses. In the role of monitor, they furthermore, if requested, accompany, assess and review an organisation's efforts to develop or reform their internal control systems to prevent and detect a broad range of financial crimes, and report on the adequacy of these efforts to the concerned authority as well as the company.

Since its beginnings in 2003, the Institute has built up a solid track record for these services. In 2013, we noticed a considerable increase of interest for this type of support from small- and medium-size companies (SMEs). As any company, SMEs require compliance programmes that are tailored to their particular risk levels. However, advice in this area has to take into account the often considerable resource and internal capacity constraints of such smaller companies. Beyond this work with SMEs the Division also continued to act as a voluntary compliance monitor for a leading international services group and started a number of short- and long-term advisory mandates for other multinational companies.

Using our experience in accompanying companies in the challenging task of devising and implementing internal compliance programmes in sometimes challenging markets, we also engage with key international standard setters to contribute to the global policy dialogue on these matters. By way of example, the Institute, in late 2013, joined the Advisory Board of the OECD's Thematic Study on Business Integrity in Eastern Europe and Central Asia.

Since mid-2013, the Division for Corporate Governance and Compliance is headed by Ms Gemma Aiolfi, replacing Mr Damian Heller who left the Institute in January 2013. Gemma Aiolfi, who also leads the Institute's work on Collective Action, had already previously worked for the Institute during its founding years, and the Institute is delighted to see her return at a stage of remarkable expansion of the Institute. Gemma brings a wealth of experience from senior compliance functions in different sectors.

## General information

## Knowledge products

The Basel Institute was engaged in a number of publication projects with a view to contributing to the creation and dissemination of research and practice-based knowledge in anti-corruption and good governance. Key knowledge products in 2013 included:

### Books and book contributions

Fenner Zinkernagel, G., Ch. Monteith, P. Gomes Pereira (eds.), *Emerging Trends in Asset Recovery* (Peter Lang Verlag, Bern, 2013).

#### Commissioned studies

Gomes Pereira, P., A. Dornbierer, Enhancing the investigation capacities of the Romanian authorities to confiscate and recover proceeds of crime, under the Swiss-Romanian Co-operation Programme, 2013.

Fenner Zinkernagel, G., R. Ivory, B. Horowitz, Y. Nursubina, *Design and Enforcement of Voluntary Anti-Corruption Agreements in the Private Sector*, commissioned by the G20 Anti-Corruption Working Group and prepared on behalf of the B20 Task Force, May 2013.

Fenner Zinkernagel, G., P. Gomes Pereira, Study on Measures to Safeguard the Constitutional Role of the Anti-Corruption Commission (ACC) of Bhutan, under the project "Delinking the ACC from the Royal Civil Service Commission (RCSC)", July 2013.

### Working papers

Baez-Camargo, Dr. C., E. Jacobs, *Social Accountability* and its Conceptual Challenges: An analytical framework (Basel Institute on Governance, 2013).

Monteith, Ch., A. Dornbierer, *Tracking and Tracing Stolen Assets in Foreign Jurisdictions* (Basel Institute on Governance, 2013).













## Team and Foundation Board

### Team

Gemma Aiolfi, Head of Compliance and Corporate Governance / Collective Action, Swiss and British *new* Phyllis Atkinson, Head of Training ICAR, South African Kodjo Attisso, Asset Recovery Specialist ICAR, Togolese Claudia Baez Camargo, Head of Governance Research, Mexican

**Andrew Dornbierer**, Legal Researcher ICAR, Australian and Swiss

**Gretta Fenner Zinkernagel**, Managing Director / Director ICAR, Swiss

Brigitte Hochuli, Finance Officer, Swiss

**Peter Huppertz**, Senior E-learning & Web Specialist ICAR, German

**Selvan Lehmann**, AML/CFT Specialist and Project Manager Basel AML Index ICAR, German and Indian **Simon Marsh**, Senior Investigation Specialist ICAR, British new

**Charles Monteith**, Head of Legal and Case Consultancy ICAR. British

V. William Nero, Programme Officer ICCA, American *new* Lukas Nick, Senior IT Specialist ICAR, Swiss *new* Federico Paesano, Senior Financial Investigation Specialist ICAR, Italian

**Pedro Gomes Pereira**, Senior Asset Recovery Specialist ICAR, Brazilian and Portuguese

Andrea Poelling, Head of Operations, Swiss and German Nina Schild, Events & Publication Coordinator, Swiss Oscar Solorzano, Asset Recovery Specialist ICAR, Peruvian and Swiss

**Franziska Stahl**, Research Fellow and PhD candidate, German *new* 

Alexander Wildbolz, IT Supporter, Swiss Matthias Wilde, Administration/Project Support, Swiss Laura Wirz, Administrative Assistant, Swiss and Italian Lejla Zvizdic, Research Fellow ICAR, Bosnian *new* 

### Long-term consultants

Alan Bacarese, Sr Asset Recovery Consultant, British Elena Hounta, Sr Consultant (FIU Specialist), Greek *new* Tom Lasich, Sr Asset Recovery Consultant, American Rudolf Wyss, Sr Asset Recovery Consultant, Swiss

### Departed staff and temporary staff

Véronique Bornand Kaspar Fischer Sergio Gemperle Damian Heller Radha Ivory Diala Khamra Carolyn Moser Siri Schubert

### **Foundation Board**

Prof Dr Mark Pieth, President
Prof Dr Anne Peters, Vice President
Dr Marco Balmelli
Dr Hans-Peter Bauer
Dr Thomas Christ
Prof Dr Till Förster
Prof Dr Lukas Handschin
Prof Dr Anton Schnyder
Christoph Tschumi new

### **Partners**

### **Funding**

In 2013, the Basel Institute again regularly partnered with a range of public and private institutions to carry out its mission and mandated projects. These partnerships are fundamental to the success and credibility of our programmes around the world, and we are thus indebted to all those who partnered with the Institute in 2013 and generously shared their expertise and experience. We look forward to working with them again in 2014 and beyond, and to collectively remaining on like-minded tracks for tackling the myriad of challenges faced by corruption.

In 2013, the Basel Institute had on-going Memoranda of Understanding or other official partnership agreements with the following institutions:

IACA, Interpol, the National Anti-Corruption Commission of Thailand (NACC), the OECD, TRACE, Transparency International, the UN Interregional Crime and Justice Research Institute (UNICRI), the University of Basel, the University of San Andrés Argentina, the UN Global Compact, UNO-DC, the World Economic Forum (WEF) and the World Anti-Corruption Forum.

The Basel Institute also remains a member of a number of international forums, including the Global Forum on Law, Justice and Development, the Wolfsberg Group and the World Economic Forum Partnering Against Corruption Initiative (PACI). Other organisations with which the Institute has partnered in the context of specific projects included the Council of Europe, the Egmont Group, GIZ, the International Institute of Higher Studies in Criminal Sciences (ISISC), the U4 Anti-Corruption Resource Center, UNDP, the UNODC/ World Bank StAR Initiative, and USAID.



































The Basel Institute is an independent not-for-profit organisation registered in Basel, Switzerland, with an annual budget of approximately CHF 4 million.

On the one hand, these financial resources are provided through core contributions from partner institutions, earmarked to support the programme of work of ICAR and the ICCA. ICAR's core donors include the Governments of Liechtenstein, Switzerland (SDC) and the United Kingdom (DFID). The ICCA receives seed funding from the Siemens Integrity Initiative.

On the other hand, the Basel Institute generates income from advisory services and receives projectrelated funding from development partners. Funds generated through these means make up about 35% of the Institute's total annual budget.

Surplus assets generated from advisory services or project-related funding is used to fund research activities as well as technical assistance programmes to developing countries.

We would like to express our sincere appreciation to our core donors, as well as to our project funders and other contributors, who in 2013 again generously supported the Institute's various projects and activities around the globe.





### Financial statement

### Balance

Total liabilities	2'188'540.64	3'594'930.84
Total foundation capital	477'420.26	449'806.67
Profits and losses	27'613.59	176'680.66
Foundation capital	449'806.67	273'126.01
Total restricted fund	1'329'756.52	1'447'603.26
Spent/unspent restricted assets	-117'846.74	348'550.47
Restricted assets	1'447'603.26	1'099'052.79
Funds and capital		
Total current liabilities	381'363.86	1'697'520.91
Accrued liabilities	114'578.28	1'498'360.74
Payables	266'785.58	199'160.17
Liabilities (in CHF)		
Total assets	2'188'540.64	3'594'930.84
Total fixed assets	27'410.90	34'944.27
Financial assets	27'410.90	27'357.70
Office furniture and equipment	0.00	7'586.57
Total current assets	2'161'129. <i>7</i> 4	3'559'986.57
Accrued income	267'500.88	196'075.49
Receivables	498'515.26	416'434.22
Liquid assets	1'395'113.60	2'947'476.86
Assets (in CHF)	2013	2012

### Statement of operations

Profit and losses	27'613.59	176'680.66
Spent/unspent restricted assets	117'846.74	-348'550.47
Total expenditures	-4'517'272.39	-3'427'912.59
Extraordinary expenditure	-32'417.68	
Financial expenditure		-4'592.58
Administrative expenditure	-872'155.59	-895'995.19
Direct project expenditure	-3'612'699.12	-2'527'324.82
Expenditures (in CHF)		
Total income	4'427'039.24	3'953'143.72
Extraordinary income		53'153.78
Financial income	10'121.45	
Income from advices rendered to third parties	2'115'736.54	1'816'536.95
Contributions	2'301'181.25	2'083'452.99
Income (in CHF)	2013	2012

### Glossary

AFAR G8 Arab Forum on Asset Recovery

APEC Asia-Pacific Economic Cooperation

ARIS Asset Recovery Intelligence System

DFID Department for International Development of the United Kingdom

EBRD European Bank for Reconstruction and Development

FDFA Swiss Federal Department of Foreign Affairs

FIFA Fédération International de Football Association

FIU Financial Intelligence Unit

GIZ Deutsche Gesellschaft für Internationale Zusammenarbeit

HLRM High Level Reporting Mechanism

IACA International Anti-Corruption Academy

IACRC International Anti-Corruption Resource Centre

ICAR International Centre for Asset Recovery
ICCA International Centre for Collective Action
IGC Independent Governance Committee (FIFA)

IMF International Monetary Fund

ISISC International Institute of Higher Studies in Criminal Sciences
OECD Organisation for Economic Cooperation and Development
OSCE Organisation for the Security and Cooperation of Europe

KPK Corruption Eradication Commission of Indonesia

MENA Middle East and North Africa

PACI World Economic Form Partnering Against Corruption Initiative

SDC Swiss Agency for Development and Cooperation

SECO Swiss State Secretariat for Economic Affairs

StAR World Bank/UNODC Stolen Asset Recovery Initiative

UNCAC United Nations Convention against Corruption

UNDP United Nations Development Programme

UNICRI United Nations Interregional Crime and Justice Research Institute

UNODC United Nations Office for Drugs and Crime

WEF World Economic Forum

### **Notes**





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