

Collective Action Conference 2018: Evolution to Revolution

Conference Highlights | 14–15 November 2018

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1 Overview

There was not quite a revolution in Basel on 14–15 November 2018, but there was plenty of lively discussion during the panel sessions and on the margins of the Basel Institute's 3rd International Collective Action Conference.

Over 200 participants from 40 countries across five continents were present, including representatives from 95 businesses of all shapes and sizes, government and public sector officials, key members of international organisations and financial institutions, lawyers and law enforcement experts, academics and civil society activists. All came together to share their wide-ranging experience in using Collective Action to tackle corruption and prevent bribery.

Some themes came up again and again: that there is a strong business case for Collective Action against corruption; that Collective Action is helping to solve issues in challenging regional contexts; that more and more companies, law enforcement agencies, international organisations and civil society representatives are willing to engage.

Which is good, because we need all players around the table to achieve sustainable change, improve business integrity and support development worldwide.

The following highlights give a brief insight into the presentations and panels. If you have any comments or would like more information, please feel free to contact the Collective Action team via the details on the last page.

The Basel Institute is grateful to the conference funder, Siemens Integrity Initiative, and to the sponsors, KPMG and Hughes, Hubbard & Reed, for making this valuable event possible.



2 Wednesday 14 November

2.1 Welcoming remarks

Speaker: **Professor Mark Pieth**, *President of the Board, Basel Institute*

Mark Pieth described a dramatic change in attitudes towards corruption over the last 20 years, particularly in the private sector in response to stricter sanctions.

But corruption naturally has not gone away, he said, so we need more imaginative tools. Key among these

is Collective Action, a concept that has expanded to include a wide variety of industry standards, partnerships, multi-stakeholder groups and more.

Our task now is to take stock and identify what works and where the remaining challenges lie. There may be no single perfect answer, but there are many promising movements in this conference that we can learn from.

The challenge is well summarised in the title of the conference – we need to move towards some revolutionary ideas and actions and build on what has evolved over the last 20 years.



2.2 Private sector and law enforcement: constructive engagement to counter corruption – “take 2”

Moderator: **Jennifer Arlen**, *Professor of Law, New York University ([NYU Compliance & Enforcement blog](#))*.

Panellists: **Ephraim Wernick**, *Assistant Chief, FCPA Unit, Criminal Division, Fraud Section, U.S. Department of Justice*; **Emmanuel Farhat**, *Senior International Affairs Officer, Agence Française Anticorruption*; **Tina Søreide**, *Professor of Law and Economics, Norwegian School of Economics ('Recommendation 6 Network')*;



Kevin Abikoff, Partner, Deputy Chair, Hughes, Hubbard & Reed; **Steve Zimmermann**, Senior Adviser to the Governance Global Practice Group, World Bank; **Giorgio Melega**, Chief Legal Officer, Tenova (Techint Group)

This “take 2” session picked up the issue of corporate self-reporting and the private sector’s entreaty to reduce multi-jurisdiction enforcement that had been debated at the previous conference in 2016. The panel reviewed recent developments in this area and noted the evolution of cooperation between the private and public sectors in many countries, with France taking a place on the panel for the first time and the US explaining how things had evolved in the last two years.

A key question was how businesses can be incentivised to self-report suspicions of bribery or corrupt behaviour by employees. Self-reporting, it was said, is a business decision and the benefits must outweigh the costs because “it is contrary to human nature to self-report”.

It was argued that clear policies are needed to create the trust needed for a company to self-report, such as reduced penalties and an automatic Deferred Prosecution Agreement (DPA) in the US or similar such mechanisms in other countries. But it was clearly counterargued that companies should not be able to shirk their responsibilities or use pre-trial settlements to avoid the sanctions they deserve. In addition, focusing purely on incentives and liability for business ignores the largest cases, where the benefits of self-reporting could never outweigh the costs.



Panel members remarked that collaboration and information-sharing across multiple jurisdictions has greatly increased in recent years. Examples include the coordinated resolution of a case involving the bank Société Générale, the HSBC case in France, Brazil’s multi-country settlement involving the Odebrecht case and many more.

The [Principles for the Implementation and Use of Non-Trial Resolutions of Foreign Bribery Cases](#), developed in response to Recommendation 6 of the March 2017 OECD report “On Combating Corruption and Fostering Integrity”, could help clarify some of these issues. The aim is for these principles, which were drawn up as part of a Collective Action, to be adopted by the OECD. Panellists agreed that if the Recommendation 6 work is picked up by the OECD when reviewing its anti-corruption guidance documents in 2019, this could help drive further refinements and coordination of law enforcement efforts.

The Collective Action approach to this issue was welcomed by all because it was noted that “it’s all about incentives for ethical behaviour” and “it is hard to enforce your way out of corruption”.

2.3 Quo Vadis Collective Action?

Moderator: **Gemma Aiolfi**, *Head of Compliance, Corporate Governance and Collective Action, Basel Institute*

Panellists: **Lisa Miller**, *Head, Integrity Compliance Unit, World Bank*; **Giorgio Melega**, *Chief Legal Officer, Tenova (Techint Group)*; **Hugh Bigwood**, *Chief Compliance Officer, Rio Tinto*; **Hentie Dirker**, *Chief Integrity Officer, SNC-Lavalin*; **Robin Hodess**, *Director, Governance Transparency, The B Team*



Collective Action has matured significantly and is continuing to evolve, but can we discern a clear direction and why isn't it always as successful as we might hope?

During the course of the panel, various developments and trends that may motivate businesses to engage in Collective Action were discussed, including:

- the recognition that companies must go “above and beyond” mandatory regulations and engage with their suppliers, peers and customers to bring them along in developing realistic bribery prevention in their operations;
- demonstrating engagement by building relationships, sharing best practices and networking with peers from an integrity perspective;
- for reputational reasons in response to increasing pressure from consumers, suppliers, investors, activists and the media;
- to increase efficiency, for example in standardising compliance requirements and due diligence processes for suppliers;
- because when everyone works together it levels the playing field;
- because you can achieve more as a team than as an individual.

Despite the clear incentives, panellists agreed that it remains challenging to “engage all stakeholders”, build trust among competitors and identify the right issues to tackle.

The panel discussed evolutions in compliance programmes, noting that pieces of paper and tick-box certifications have zero impact on behaviour if companies do not understand why compliance is in their own interest. Integrity compliance expectations need to be clearly communicated through the entire supply chain and customers.

As well as business, it was noted that participation by citizen groups is growing and the “new norm” is PPPP: Public-Private-*People* Partnerships. In addition, the focus is widening from formal Initiatives to informal activity that drives Collective Action and better ways of doing business.

2.4 Interview with Erik Fyrwald, CEO Syngenta

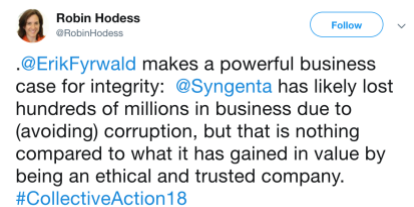
*Interviewer: **Gretta Fenner**, Managing Director, Basel Institute*

“Ethics, safety and compliance are core to our business,” said Erik Fyrwald, CEO of agriculture company Syngenta. “We rate our leaders not just on their results but how they achieved them.” Areas of specific concern include payments to officials to speed up bureaucratic processes, payments to customers and suppliers, and counterfeits.



The company does not participate in tenders where it anticipates corruption will be a problem. “The hundreds of millions we’ve lost in specific tenders is nothing compared to what we’ve gained by standing up for what we believe in,” said Mr Fyrwald. Doing business with integrity is crucial, because “if we lose the trust of our customers, employees and governments then we don’t have anything”.

Preventive measures include training in the company’s Code of Ethics for each of the 28,000 employees, salary arrangements that minimise incentives to bribe and special packaging to distinguish Syngenta products from counterfeits. Collective Action with other industry players is another important activity because there “seems to be a recognition among all players that we do a lot of good for the world but we get a lot of criticism and need to communicate better about the facts”.



Mr Fyrwald talked about Syngenta’s 2017 acquisition by ChemChina and the huge strides that China has taken in recent years in safety, quality, environmental performance and ethics. The acquisition proves that a Swiss company can be Chinese-owned yet remain Swiss and international following global standards.

2.5 From Islands of Integrity to Integrity Pacts – and back again?

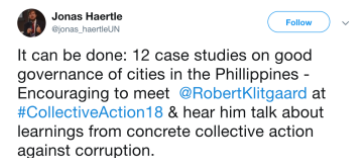
Moderator: **Claudia Baez Camargo**, Head of Governance Research, Basel Institute

Panellists: **Robert Klitgaard**, Professor, Claremont Graduate University, USA; **Heather Marquette**, Professor, Birmingham University, UK; **Daniel Bühr**, Partner, LALIVE; **Esteban Arribas Reyes**, Senior Researcher, Transparency International Spain; **Claire Martin**, Project Leader - Public Accountability, Transparency International



Integrity Pacts are an early example of Collective Action, dating back to the mid-1990s. There have been a few revolutions since then in how they have been deployed and how the original model is again finding favour in the EU. This session gave a range of examples from different regions and contexts and with differing experiences.

The discussion demonstrated how enclaves of anti-corruption success can be found and fostered even in highly corrupt environments. Professor Klitgaard described the results of a [study](#) conducted in the Philippines where Collective Action is used to provide a [scorecard](#) to drive improvements in public governance. Professor Marquette discussed the [results of another study](#) analysing two ‘positive outlier’ cases, namely in Uganda’s health sector and South Africa’s police, and the underlying processes and policies responsible for bribery reduction in those cases.



The panellists’ presentations illustrated that such enclaves can come about in a variety of ways and look very different according to the context. This provided food for thought about the multiple ways in which seemingly unsolvable problems of corruption may be addressed through Collective Action.

Topics that came to the forefront included:

- The role of leadership;
- The importance of international standards, including e-procurement;
- The need to begin with a clearly specified issue area and goals for the Collective Action;
- How such enclaves of anti-corruption success might be scaled up and spillover effects promoted;

- The need to stay alert to unintended consequences of anti-corruption practice.

2.6 Breakout 1: Collective Action in e-government, blockchain and digital solutions

Discussion leader: **Candice Welsh**, *Chief, Implementation Support, UNODC*

Speakers: **Anastasia Mazurok**, *Monitoring and Evaluation Expert, Transparency International Ukraine*; **Beauty Narteh**, *Executive Secretary, Anti-Corruption Coalition, Ghana*

The fourth industrial revolution is based on the myriad and fast-moving technological developments that are influencing how business is conducted around the world. Some of the fastest changes are happening in countries that are “leap-frogging” to the latest developments. This session picked up this development and explored examples from Ukraine and Ghana in implementing e-procurement services that:

- put government services online;
- reduce face-to-face interactions and the opportunity for corruption to arise;
- increase overall access to information;
- allow the public and private sector to contribute to public decision-making.

An example from Ghana was given, involving a project using blockchain to document and formalise land titles in a challenging customary law context.

2.7 Breakout 2: Behavioural ethics and Collective Action: new ideas to incentivise stakeholders?

Discussion leader: **Isabel Cane**, *Project Lead, World Economic Forum Partnering Against Corruption Initiative*

Speakers: **Claudia Baez Camargo**, *Head of Governance Research, Basel Institute*; **Mary Katherine Brink**, *Vice President, Chief Compliance Officer, Philip Morris International*; **Vera Cherepanova**, *Founder, Studio Etica*

Compliance risks becoming stale very quickly. The drive to instill ethics and integrity in the workforce from the top to the bottom is therefore ever more challenging. This session explored what’s behind the trend to deploy techniques developed in the field of economics into compliance programs

through behavioural nudges. The discussions explored the “human factor” of corruption and the ethical, moral and socio-cultural factors involved in decision-making.

Insights from behavioural ethics are increasingly being considered in anti-corruption measures and systems. Participants discussed how we should “look beyond” formal institutional and organisational structures and incentives. Instead, the specific contexts in which people make decisions, including values, social norms and informal agendas that may be driving decisions and behaviours need to be better understood. In a corporate setting this could mean looking at who the real decision-makers are in a key function, how they interact with their internal colleagues and how they interact with suppliers or partners. Identifying the thought leaders who exercise authority over key decision-makers can be a first step towards developing behavioural changes.

Suggested ways forward are to:

- raise awareness of behavioural ethics;
- provide trainings around why people tend to behave unethically;
- provoke dialogue about the role and significance of behavioural ethics;
- further research aimed at addressing behavioural pitfalls of conventional anti-corruption and compliance measures;
- further research to inform innovative anti-corruption behavioural interventions that harness social factors.

This is a new and developing area for compliance and could benefit from further research and collaboration: Collective Action could play a role here.

2.8 Breakout 3: Certification in Collective Action: pros and cons

Discussion leader: **Virna J. Di Palma**, *Senior Director, Global Strategy & Communications TRACE International*

Speakers: **Armin Toifl**, *Austrian Standards Expert on ISO 37001, ISO 19000*; **Tetiana Kheruvimova**, *Investigator, Business Ombudsman Council, Ukraine*; **Dennis Wolf**, *Chief Compliance Officer, KBA*

Can certification offer certainty? Is it a tool to strengthen the potential impact of Collective Action, counteract the free rider issue and protect an Initiative’s reputation? These questions were debated in the context of companies increasingly looking to protect their reputation and manage their corruption risk through more streamlined processes.

Participants discussed how certification can help to level the playing field and, if recognised by financial institutions, facilitate access to funding. However, for certification to be useful in the context of Collective Action, it needs to reflect the realities and specific risks of the industry or country in which the Initiative operates. One of the main criticisms of certification is the pass and fail approach: it tries to paint a black-and-white picture in a world that is full of grey areas.

Certification as a Collective Action Initiative differs from regular certification in that it often adds a layer of peer review. Companies are also supported in developing their compliance programme as they prepare for the certification process.

Two Collective Action initiatives involving certification were discussed: the [Ukrainian Network of Integrity and Compliance](#) (UNIC) and the [Banknote Ethics Initiative](#) (BnEI).

2.9 Converging risk management: human rights and corruption in the SDGs and Collective Action

Moderator: **Mirna Adjami**, Project Manager, Basel Institute

Panellists: **Enrique Rueda**, Chief Compliance Officer, Nestlé; **Shabnam Siddiqui**, Director, Centre of Excellence for Governance, Ethics and Transparency, UN Global Compact Network, India; **Elaine Ryan**, Senior Analyst on Anti-Corruption and Human Rights, Raoul Wallenberg Institute



Compliance is evolving and expanding to cover a broad range of issues, from human rights and risk management to the Sustainable Development Goals (SDGs) and anti-corruption measures. But does everyone understand that fighting corruption is fundamental to mitigating risks around human rights and achieving the SDGs?

Elaine Ryan described two 2018 reports from the Raoul Wallenberg Institute on the nexus between human rights and anti-corruption. The [first](#) summarises practical ways that human rights and anti-corruption practitioners can better collaborate. The [second](#) is a survey of how international institutions have addressed the connection between corruption and human rights to date. There has been a slow development of



soft-law standards, increasing pressure on companies to respect human rights. A human rights-based approach to anti-corruption calls for greater awareness and action on fighting corruption, with a view to improving human rights otherwise undermined by corruption.

Enrique Rueda discussed how Nestlé’s compliance function has evolved in recent years, the company’s responsibility to respect human rights in its supply chain and its motivation to respond to investor and consumer demands to improve performance and reporting in this area. Nestlé’s risk committee ensures the company’s compliance with anti-corruption as well as human rights standards, because “corruption is not an excuse for companies to avoid improving human rights”. Nestlé views Collective Action with other corporate leaders as essential to address human rights and corruption challenges in the supply chain and raise standards for all.

Shabnam Siddiqui gave a [presentation](#) about the importance of integrating the United Nations Global Compact Principle 10 on anti-corruption in the Global Goals agenda. She described a project by the Centre of Excellence for Governance, Ethics, and Transparency (CEGET) within the UN Global Compact India. The project promotes Collective Action between the private sector and government (SDGs 16 and 17) in the development of smart cities (SDGs 11 and 15). To this end, CEGET has developed a framework for the governance of smart cities, a public-private partnerships handbook and other risk assessment tools to fight corruption and promote integrity for sustainable development.

2.10 Demonstration of AI Integrity tool

Demonstrators: **Darren Edge**, *Microsoft* and **Steve Zimmermann**, *Senior Adviser Governance, Global Practice Group, World Bank*

How can artificial intelligence (AI) and data help to counter corruption?

Darren Edge of Microsoft described how the World Bank and Microsoft are researching ways to combine big data analysis and AI to identify and predict potential corruption issues in public procurement.

More information on the [World Bank blog](#).



2.11 Demonstration of Basel Open Intelligence tool

Demonstrator: **Peter Huppertz**, *Team Leader IT and eLearning, Basel Institute*

Peter Huppertz demonstrated a new tool that can help companies and others when conducting due diligence searches. The tool searches names in multiple languages and against 270 keywords relating to corruption and other financial crimes. If you would like more information or a demonstration of the tool, see the [Basel Institute website](#) or contact Peter: peter.huppertz@baselgovernance.org.



One member of the audience commented: “While the Open Intelligence tool was being presented by Peter I just went onto my test account right now, and I found something about one of my board members that I didn’t know before. This tool really works!”

3 Thursday 15 November

3.1 Compliance and Collective Action in emerging markets

Moderator: **Michael Silverman**, *Special Counsel, Hughes, Hubbard & Reed*

Panellists: **Guan Fu**, *General Manager, Legal & Compliance, China Communications Construction Company International*; **Shikhar Jain**, *Principal Counsellor, Confederation of Indian Industries*; **Soji Apampa**, *CEO, Convention on Business Integrity*; **Liu Yuyang**, *Beijing New-Century Academy on Transnational Corporations, China*; **Steve Zimmermann**, *Senior Adviser to the Governance Global Practice Group, World Bank*



Collective Action-driven evolutions in compliance and anti-corruption efforts in challenging regional contexts, with specific insights into China, India and Nigeria were showcased in this session.

“Survival and growth are what drive people”, said Soji Apampa, as he told the story of founding the Convention on Business Integrity in Nigeria at a time when anti-corruption activism was seen as anti-government. By getting together, individual businesses saw how they could benefit from the credibility of the group and gain easier access to finance, markets and know-how. The global financial crisis opened a window of opportunity to introduce a Corporate Governance Ratings for companies on the Nigerian stock exchange, one of the Convention’s key activities and now a self-financing service.



India’s increasing use of technology in all aspects of business and public services is driving institutional developments in the area of governance and transparency in India (see [Confederation of Indian Industries](#) presentation). In China, the “tone from the top” applies to the government as well as business leaders. That is why the Beijing New-Century Academy on Transnational Corporations is supporting the Chinese government by developing a formal Compliance Management Guide for State Owned Enterprises and a Compliance Management Guide for Enterprises Operating Overseas (see [presentation](#)).

Participants also learned of some of the World Bank’s efforts to introduce rules and standards focused on changing behaviour so that credibility becomes the norm. Examples of creative solutions in this area include:

- the use of technology to predict and prevent corruption risks;
- collaborative social accountability, such as a “textbook count” project in the Philippines;
- setting standards for the transparency, accessibility and usability of information in public procurement projects;
- global Collective Action, whereby high-level principles trickle down to local communities.

3.2 High Level Reporting Mechanisms: reflections on progress

Moderator: **Nicola Bonucci**, *Director for Legal Affairs, OECD*

Panellists: **Algirdas Šemeta**, *Business Ombudsman, Ukraine*; **Erica Pedrucci**, *Director, Centre for Anticorruption Studies, University San Andrés, Argentina*



Nicola Bonucci gave a short introduction to the [High Level Reporting Mechanism \(HLRM\)](#), a mechanism developed by the Basel Institute, OECD and Transparency International to meet private sector demands for a fast, independent mechanism to address bribe solicitation by public officials.

It was successfully implemented in [Colombia](#) in 2015 and has been expanded this year to apply to procurement related to the development of Bogotá's first metro line. [Argentina](#) is the most recent new country to pilot the HLRM this year in an important public-private partnership tender run by the National Highways Authority. Representatives of the Argentine private sector have expressed that the HLRM, along with other government anti-corruption initiatives, contributed to their perception that this tender had been carried out in a fair and transparent manner and a positive development towards clean business.

In Ukraine, the [Business Ombudsman Council](#) functions as an independent and trusted intermediary for businesses to contact when they encounter corruption-related issues with any authority. Since May 2015, the office has received almost 5,000 complaints from businesses and closed more than 3,000 investigations. 93 percent of case-specific recommendations have been implemented by state authorities and feedback from businesses has been 95 percent positive. Significant systemic improvements have been also been made in response to reports on topics like access to electricity, foreign trade and construction.

Various factors have contributed to the success of the Ukrainian initiative, including:

- political independence;
- neutrality and willingness to listen to both sides;
- constructive recommendations to address problems;
- professionalism of staff and the ability to present arguments clearly to state authorities;
- the full backing of the OECD and IMF;
- high-level political support from the President and Prime Minister.

Regarding funding and long-term sustainability, care must be taken to ensure the mechanism's continued independence.

For more information, see the report "[High Level Reporting Mechanisms: A comparative analysis](#)" (also available in [Spanish](#)).

3.3 Collective Action: are there success factors? Lessons from Integrity Partner workshops

Moderator: **Gemma Aiolfi**, *Head of Compliance & Collective Action, Basel Institute*

Panellists: **Maria Gabriela Eiras de Almeida**, *UN Global Compact Network, Brazil*; **Suran Lee**, *Manager, UN Global Compact Network Korea*; **Deon Roussow**, *CEO, Ethics Institute South Africa*; **Qusay Salama**, *Project Director, Integrity Network Initiative, Egyptian Junior Business Association*; **Susanne Friedrich**, *Director, Alliance for Integrity*

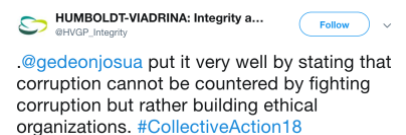


This session explored strategies for creating sustainable and successful Collective Action initiatives, drawing on [insights from Integrity Partner workshops](#) in Basel and Aswan. The importance of clearly mapping the issues, stakeholders and risks were emphasised in the [presentation](#). Context is all when it comes to Collective Action. Key lessons learned revolve around:

- building trust;
- sharing a common goal despite different underlying reasons for engaging;
- active engagement by stakeholders;
- being realistic about capacity and resources;
- flexibility and adapting to changes.

The panellists provided examples of Collective Action initiatives that have developed with support from the Siemens Integrity Initiative in [Brazil](#), [South Korea](#), [Mauritius](#), and [Egypt](#), and a presentation of the work of the [Alliance for Integrity](#).

These examples supported these lessons learned and highlighted the importance of concrete and practical activities based on stakeholders' specific needs. It was emphasised that incentives, working methods and learning tools need to be adapted to each context and be flexible when the context changes. And in all case, sustainable Collective Action Initiatives themselves need clear governance structures and transparent decision-making.



3.4 Evolution to Revolution – what does the future hold for Collective Action?

Speaker: **Gretta Fenner**, *Managing Director, Basel Institute*

Collective Action is clearly evolving, said Gretta Fenner in her closing remarks, and we see growing impact, variety and engagement at each conference.

Now we need revolution, including stronger involvement from law enforcement, recognition of Collective Action in global guidelines and acknowledgement that Collective Action can help businesses flourish and foster development.



Fenner emphasised that a revolution in Collective Action will need funding to bolster the great efforts of the Siemens Integrity Initiative. It will also need us all to collaborate and share experiences and resources more freely. In other words, we must act collectively to support Collective Action, setting an example for other stakeholders.

Whatever direction Collective Action takes you, she added, the Basel Institute and its International Centre for Collective Action are here to support, advise, connect and promote. In turn, if you support what we do, please spread the word.

3.5 Official launch of the Tainted Assets Initiative

Moderator: **Karina Litvack**, *Non-Executive Director*

Panellists: **Nicola Bonucci**, *Director for Legal Affairs, OECD*; **Jason Hungerford**, *Partner, Mayer Brown*; **Nathaniel Edmonds**, *Partner, Paul Hastings*; **Christopher Wright**, *Chief Compliance Officer, LafargeHolcim*; **Toby Duthie**, *Founding Partner, Forensic Risk Alliance*; **Robin Hodess**, *Director Governance, Transparency, B Team*



The official launch of the Tainted Assets Initiative marks the formation of the Project’s secretariat at the Basel Institute.

With the support of the OECD Secretariat, this multi-stakeholder initiative aims to develop a practical resolution mechanism to enable companies and countries to address historic “taint”, such as a legacy of corruption, in assets they hold or wish to acquire or dispose of.

For more information, see the [Basel Institute website](#).

4 Acknowledgements

With grateful thanks to the following organisations, who made this conference possible.

Funder



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5 About the International Centre for Collective Action

The Basel Institute on Governance launched the International Centre for Collective Action (ICCA) in 2012. It builds on the Basel Institute's decade-long track record of support to and research into Collective Action initiatives against corruption. The ICCA serves to formalise and further strengthen the impact of this engagement.

The purpose of the ICCA is to assist companies and other concerned stakeholders in enhancing their ability to reduce the risk of corruption through Collective Action.

Highlights so far include:

- Founding and current Member of the Board of the World Economic Forum Partnering Against Corruption Initiative (PACI).
- Founding and current member of the Wolfsberg Group on Money Laundering.
- Founder and facilitator of several sectoral Collective Action initiatives, including in the defence, logistics and transport, art trade, finance, and transport & energy sectors.
- Development of the High Level Reporting Mechanism, in collaboration with the OECD and Transparency International.
- Facilitation of a high-level Collective Action anti-corruption initiative in Ukraine.

The ICCA is partially funded through a grant by the [Siemens Integrity Initiative \(SII\)](#) and through Basel Institute core funding. Additional funding comes from members of sectoral Collective Action initiatives moderated by the ICCA and sponsorship from global companies actively engaged in anti-corruption Collective Action.

Institutional partners of the ICCA include:

- International Anti-Corruption Academy
- Organisation for Economic Cooperation and Development
- TRACE
- Transparency International
- World Economic Forum
- Universidad de San Andrés, Argentina.

B20 Collective Action Hub

The B20 Collective Action Hub is a platform that:

- facilitates Collective Action initiatives;
- builds knowledge;
- informs;
- facilitates policy dialogue and peer learning.

In 2013, the B20 mandated the ICCA to develop and maintain this hub, in partnership with the UN Global Compact and the ICCA's institutional partners. The hub marks a significant development in the international efforts to combat corruption. It offers tools and a forum for businesses to take concrete steps to jointly step up against corruption and strengthen good business practice. It also offers a space for businesses and governments to collaborate in this endeavour.

www.collective-action.com

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