

A photograph of a large crowd of people, with many hands raised in the air. The hands are in various positions, some open, some pointing, and one prominent fist is raised in the foreground. The background is blurred, showing more people and what appears to be an outdoor setting with some lights.

# LEADERS' ANTI-CORRUPTION MANIFESTO

Anti-Corruption Summit:  
London 2016

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# Leaders' Anti-Corruption Manifesto

Anti-Corruption Summit: London 2016

[www.anticorruption-manifesto.org](http://www.anticorruption-manifesto.org)  
#anticorruption

The civil society and business partners behind the Leaders' Anti-Corruption Manifesto are:



# Preface

Most anti-corruption summits fail. And the words of failure sound very similar to the words of success, in the communiqués and press conferences that follow. In this Manifesto, we are publishing words that mean something. They have been gathered from individuals and institutions around the world, from business and civil society who desperately want this summit to be a success. They represent a plea to the Heads of Government who will gather in London on 12 May 2016, to change the world we live in.

Change needs to happen. As time goes by, it becomes more and more evident that corruption inflicts devastating damage on societies and economies, a cost served on ordinary people and the businesses that underpin economic development. Governments have the power to change that, but not all governments want to. That is the power of this summit. It is a collection of governments that have been gathered together, as a community that claim to want change.

The contributors in the pages that follow give compelling reasons about why the Heads of Government coming to this summit should act now. Reducing levels of corruption creates a better investment climate for business, restores trust in governments and provides security, prosperity and justice for citizens: what's not to like?

I congratulate the UK Prime Minister on having the vision and ambition to convene a summit on what is possibly the world's most enduring political and economic challenge. I join the other contributors in hoping that he and his fellow Heads of Government find the courage to enact the change that people and businesses so badly need.

- Robert Barrington  
Executive Director – Transparency International UK

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## 1. For a better tomorrow, we must extinguish corruption today

Prof. Bolaji Owasanoye, Executive Secretary <sup>1</sup>

Presidential Advisory Committee Against Corruption (PACAC Nigeria)



Corruption has negatively redefined our nation. It has facilitated crimes such as insurgency, kidnapping, pipeline vandalism, cattle rustling, human trafficking, drug peddling and egregious economic and financial crimes.

Failure of leadership, a weak judiciary, weak democratic institutions, safe havens for money laundering in developed countries, unfavourable conditions for asset recovery and widespread impunity have all contributed to widespread corruption.

Nigeria joins the international community to say 'enough'. Today's children and youth deserve a better tomorrow. A safe, stable and prosperous future is and should rightly be the vision of every nation.

Stolen and illegally transferred assets – through inflated contracts, disgorged profits, evaded tax, overpriced imports, under-priced exports – belonging to poor developing countries and traced to the vaults of financial institutions in rich developed countries must be returned to the real victims of corruption.

The global citizen must see the restoration of integrity in public life as a personal struggle. Leaders must help citizens connect with and condemn the negative effects of corruption. To do so, there must be access to information within and between states, a free press and protection for whistle-blowers.

The international dimension of the struggle demands that the walls of safe havens for corruption must be pulled down. Global leaders and the international community should no longer watch as financial institutions innovate to promote corruption and illicit financial flows from the poor to the rich.

Stolen and illegally transferred assets – through inflated contracts, disgorged profits, evaded tax, overpriced imports, under-priced exports – belonging to poor developing countries traced to the vaults of financial institutions in rich developed countries must be returned without delay to the real victims of corruption. Citizens in rich and poor countries must voice their outrage to corruption and the abuse of public trust for private gain and be empowered and allowed to do so.

We stand with the international community and commit to open society, rule of law and democratic values.

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<sup>1</sup> PACAC (Nigeria) was established in 2015 as part of the President's strategy to combat corruption in Nigeria. Its mandate includes promoting reform agenda in anti-corruption, advising on the prosecution of the war against corruption and implementation of reforms in criminal justice system.

## 2. A call to arms to tackle the scourge of corruption

John Veihmeyer, Chairman, KPMG International <sup>2</sup>

@KPMG



As a business leader, I take a very simplistic view of corruption. It is morally and legally wrong and economically damaging. Responsible business and civil society are united in these views.

However, delivering lasting change on this agenda requires far greater commitment, co-operation and follow-up actions from governments and the business community than we have ever seen before. What is clear to me is that pressure is intensifying among business leaders and civil society to eliminate corruption.

No single group, whether it be governments, business or civil society acting alone can hope to meaningfully tackle the scourge of corruption. But concerted action by all of these groups, working to a clear agenda with an agreed timetable and action plan, can deliver on our commitment to 'Tackle Corruption Together'.

This London Summit is a critical opportunity to turn commitment into action. We must ensure there is a shared understanding that bribery and corruption are unethical and unacceptable and translate this into robust and consistent action. We should focus on increasing transparency as a means of holding governments, officials and business to account. Where laws are deficient, they should be strengthened, and the laws already in place around the world to deal with corruption should be rigorously enforced.

Consistent with our values and our Global Code of Conduct, KPMG International has implemented an extensive anti-bribery and corruption program. This includes having in place detailed policies, as well as training, compliance procedures and an international whistle blowing hotline.

No single group, whether it be governments, business or civil society acting alone can hope to meaningfully tackle the scourge of corruption. But concerted action by all of these groups, working to a clear agenda with an agreed timetable and action plan, can deliver on our commitment to 'Tackle Corruption Together'.

I hope this Summit will be looked back on as the moment when we collectively translated our outrage at the damaging effects of corruption on society and the economy, into actions that make corruption ever more unrewarding and dangerous for those who engage in it.

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<sup>2</sup> With more than 35 years of experience at KPMG advising some of the world's leading companies, John Veihmeyer brings an influential and sought-after voice to business and financial issues, including ethical leadership, diversity, financial reporting, audit quality, risk, governance and education.  
[home.kpmg.com](http://home.kpmg.com)

### 3. We need action, not statements

Gretta Fenner, Managing Director, Basel Institute on Governance <sup>3</sup>



There's truly no need to discuss why corruption is bad and wrong. Although the topic has only risen to global prominence some twenty-five years ago, we have since extensively observed and described its dramatic consequences on people's welfare, on economic development, and on political stability and peace.

Wherever we see people suffering – whether they are dying from a fire in a garment factory, from terror attacks or from lack of access to health; whether they seek solutions in radicalization or drugs because of lack of opportunity and education; whether they are displaced because of environmental changes – corruption is too often part of, if not the primary cause for this despair. We know what it takes to eradicate corruption. Conventions have been signed, guidelines, good practices and principles have been endorsed, studies on corruption and anti-corruption are abundant. Why are we not seeing any progress? Because we have too many statements and not enough action. Because we have words, but real leadership is lacking.

End impunity by genuinely enabling law enforcement and the judiciary to prosecute large-scale financial crime and recover stolen assets, by ensuring that these agencies are able to operate free from any political or other undue influence; and ensuring that foreign, trade and business considerations never trump over anti-corruption measures.

Prevent corruption and provide a level playing field by implementing full transparency in government and business activities, without hiding behind the excuses of national or corporate security; and decisively enabling governments and business stakeholders to act collectively, without prejudice to political or business considerations.

Empower and support citizens by ensuring freedom of opinion and speech so that journalists and citizens can fully exercise their decisive role in revealing and reporting on corruption; and protecting individuals and organisations so that they may act decisively against corruption without fear of personal or institutional repercussions.

Wherever we see people suffering – whether they are dying from a fire in a garment factory, from terror attacks or from lack of access to health; whether they seek solutions in radicalization or drugs because of lack of opportunity and education; whether they are displaced because of environmental changes – corruption is too often part of, if not the primary cause for this despair.

On our end, the Basel Institute on Governance will continue to work with law enforcement around the world to effectively investigate and prosecute corruption, and to foster effective international collaboration to make sure national boundaries no longer protect the corrupt. And we will continue to bring together governments, businesses and citizens when they are willing to genuinely work together and overcome entrenched mistrust. In all this, our focus will be on intelligent and meaningful action.

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<sup>3</sup> Gretta is the Managing Director of the Basel Institute on Governance, an international not-for-profit organization that works with public and private sectors to counter corruption and improve governance. It is home to the International Centre for Asset Recovery and the B20 Collective Action Hub - [www.baselgovernance.org](http://www.baselgovernance.org)

#### 4. Let's celebrate and protect those who stand up to corruption

Bob Collymore, CEO, Safaricom Limited <sup>4</sup>

@BobCollymore



The world needs all of us in positions of power to stand up against corruption in all its forms.

Business leaders can take steps to help root it out of their operations and value chains. Political leaders need to clamp down on corruption in all its forms through processes that can help prevent it, and invest in detection and enforcement.

We should celebrate those that stand up against corruption, including the whistle-blowers who risk their livelihoods, and sometimes their lives, to stop wrongdoing. Whistle-blowers help us all make things better – people are the best early detection method we have – and when problems are pointed out early they are more likely to be able to be fixed.

We need to incentivise people to speak up and raise problems as citizens or employees. When they speak up, they need to be celebrated and protected.

Governments can do a lot to improve whistle-blower protections and we can all act to celebrate and protect whistle-blowers.

We need to incentivise people to speak up and raise problems as citizens or employees.

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<sup>4</sup> Robert (Bob) Collymore is the CEO of Safaricom Limited, a leading communications company in Africa and pioneer of the M-PESA mobile payment system. Safaricom is globally recognized for its commitment to environmental, sustainability and anti-corruption issues and Bob is also a B Team Leader.

## 5. The Panama Papers and the mandate of our age

Akaash Maharaj, CEO, Global Organization of Parliamentarians Against Corruption (GOPAC) <sup>5</sup>

@AkaashMaharaj



The Global Organization of Parliamentarians Against Corruption (GOPAC) is a worldwide alliance of legislators who have come together to combat corruption, strengthen democracies, and uphold the rule of law.

Our legislators come from different cultures, speak different languages, profess different faiths, pursue different political philosophies, and have been on opposite sides of wars. But we are united by a common conviction: that corruption is now the single greatest threat to the development of societies, to the security of nations, and to the rights of all mankind.

There is a better world within our grasp: a world without hunger, without thirst, without needless disease; and corruption is stealing that world from us.

By its nature, corruption breeds in the dark and withers under the glare of public scrutiny. As a result, we believe that the single most powerful means of combatting corruption is easy to describe, though politically difficult to embrace: universal, publicly-accessible registries of beneficial ownership. Such registries ensure that the true owners of assets are known to public institutions, media, and citizens. They thwart the ability of the corrupt to hide their illicit wealth and the evidence of their crimes behind a veil of corporate anonymity.

Corruption now kills more people than war and famine combined. Defeating it is the mandate of our age.

GOPAC commends the decision by the British government to create such a national registry. Given the City of London's central role in global finance, we cannot overstate the importance of this decision, nor do we underestimate the political courage that was required to take it. It will make the world a better place. However, the "Panama Papers" have starkly revealed that Britain's Overseas Territories and Crown Dependencies have become the venues of choice for the ilk of anonymous corporations that shelter the proceeds of corruption, tax evasion, organised crime and terrorist financing.

GOPAC, therefore, urges the United Kingdom to employ its diplomatic influence where it is sufficient, and its powers to legislate for those jurisdictions where it is necessary, to ensure that its Overseas Territories and Crown Dependencies establish public-accessible registries of beneficial ownership, without delay.

Corruption now kills more people than war and famine combined. Defeating it is the mandate of our age.

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<sup>5</sup>Akaash Maharaj is CEO of the Global Organization of Parliamentarians Against Corruption (GOPAC). He directs GOPAC's work on international prosecution of Crimes Against Humanity, its efforts on institution building in fragile states, and its efforts on reconciliation in post-conflict states.  
<http://gopacnetwork.org/>

## 6. Time to rid the world of anonymous companies with global beneficial ownership

Dr Mo Ibrahim, Founder, Mo Ibrahim Foundation <sup>6</sup>

@Mo\_IbrahimFdn



Recent revelations from the Panama Papers have shown what we already knew: that anonymous shell companies are being used to evade sanctions, and hide corrupt monies. We know that these anonymous shell companies are the get-away car for corruption and crime, that they are used to finance terrorism and that they rob countries of finances needed for their sustainable development.

Transparency of beneficial ownership not only helps prevent corruption, and stymies crime and terrorist financing, it is also good for business. It can help increase competitiveness in markets, can reduce risk by allowing companies, workers, citizens and governments to know who they are doing business with, and it can allow companies to manage their financial exposure, and countries to ensure financial stability.

Businesses need and want access to quality, reliable information about who owns and controls companies that they source from or partner with.

The problem of anonymous companies is one that has a solution: for governments around the world to all implement beneficial ownership transparency so that no company can be set up without disclosing who owns or controls it.

The problem of anonymous companies is one that has a solution: for governments around the world to all implement beneficial ownership transparency so that no company can be set up without disclosing who owns or controls it. This system will work best if it is global and harmonised.

I welcome efforts to create a Global Register of Beneficial Ownership so that any interested business or person can eventually be able to find who owns or controls a company they are interested in. For governments, this global register can also be an easy solution for how to implement beneficial ownership.

At the London Summit, I hope to see governments making commitments to take action to implement beneficial ownership transparency. More importantly, after the Summit, I expect to see timely and effective action so that we can continue to rid the world of anonymous shell companies.

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<sup>6</sup> Dr. Mo Ibrahim is the founder of Celtel International, one of Africa's leading mobile telephone companies and a B Team Leader. He established the Mo Ibrahim Foundation in 2006 to support good governance and great leadership on the African continent, and is a global leader in the fight against corruption.

## 7. Successful tackling of corruption requires governments to take the lead and set the right tone

Dr. Bandid Nijathaworn, Secretary General of Thailand's Private Sector Collective Action Coalition against Corruption (CAC) and President & CEO of the Thai Institute of Directors <sup>7</sup>



Corruption poses a serious impediment to a country's progress and development. The problem is global and, in many cases, systemic. For this reason, to successfully tackle corruption necessarily requires collective efforts, aimed at changing the behaviour of the parties concerned, specifically the ways business and government services are done to make them more open, clean and law-abiding.

A fight against corruption, however, cannot be won without strong commitment and determination on the part of the government to take the lead and set example from the top. Through policy and enforcement, the government can create incentives that shape a change in behaviour of all parties, while leading it with its own behaviour through stronger law enforcement and public sector reform.

At the global level, inter-government cooperation can help established to ensure a reasonably level playing field to support fair business competition, to monitor and curb the flows of illicit money and to facilitate asset recovery and return of stolen money. This will send a strong signal that corruption would not be tolerated world-wide.

A fight against corruption cannot be won without strong commitment and determination on the part of the Government to take the lead and set example from the top.

To fight against corruption, we therefore suggest that the Governments take the lead and set a strong tone from the top in such actions as follow:

For Government to Business (G2B) transactions: Governments must do business or have financial transaction only with companies that operate a clean business policy. This includes having in place a clear board level policy on anti-corruption and strong compliance procedures.

For services that governments provide to the Citizen (G2C) such as the issuance of IDs, licenses, permits, passports, fines, land title deeds: To adopt full transparency on such processes with a clear timeline with respect to getting the services done, the documents required, and the fee involved. Any deviation from the specified timeline and conditions is subject to scrutiny for corruption by law.

On Government to Government (G2G) transactions, except for national security concern, these must be transparent on par with G2B transactions with regards to the procurement process. Such transparency will ensure that G2G transaction has an adequate level of check and balance and openness that renders the benefits of its usage.

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<sup>7</sup> Dr. Bandid Nijathaworn is the President and CEO of the Thai Institute of Directors and Secretary General of the CAC. He was ranked 47th in the 2014 list of 100 most influential people in business ethics by Ethisphere. <http://www.thai-cac.com/en>

## 8. Once in a generation opportunity to tackle corruption

Simon Taylor, Founding Director, Global Witness <sup>8</sup>

@global\_witness



Many of the world's worst human rights abuses are driven by the exploitation of natural resources and corruption in the global political and economic system. Global Witness is campaigning to end this. Through our investigations we consistently come up against the same problems. Whether its timber, diamonds, oil or mineral deals, those with suspect money to hide need a bank that won't ask awkward questions; a lawyer to help them find loopholes and skirt laws; and a legal smokescreen so they can get it out of the country it came from.

These services are all readily available in the world's biggest international financial centres, such as Singapore, London or New York and in the global tax havens and secrecy jurisdictions. It's very easy to set up layers of shell companies and trusts to cover your tracks. Banks too often fail to do the proper checks on suspect clients or funds, and regulators don't punish them for these failures. Without this kind of complicity from the international system, crime and corruption of this kind would be much harder to get away with. When citizens get so fed up with the state-looting they pour out onto the streets in protest and governments are quick to freeze assets, resulting in an existential crisis that negatively impacts on everybody.

We're calling for international public registries of the real owners of companies, visa bans for corrupt politicians, better regulation of banks and lawyers and strict enforcement of anti-money laundering laws and effective judicial process with the political will to go after all the players in the most appropriate jurisdiction.

But headlines about expensive private homes, huge bank accounts and glamorous double lives of newly fallen dictators in Western hotspots point to a more fundamental problem. If the corruption is so obvious, what is the money doing there in the first place? We want this to change.

We want a world in which business is done in the open and for the greater good. To achieve this, international systems which make corruption and money laundering possible need to change. We're calling for international public registries of the real owners of companies, visa bans for corrupt politicians, better regulation of banks and lawyers and strict enforcement of anti-money laundering laws and effective judicial process with the political will to go after all the players in the most appropriate jurisdiction.

The Summit provides world leaders with a once in a generation opportunity to commit and start to take real action to combat corruption.

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<sup>8</sup> "Simon Taylor, Founding Director Global Witness. Global Witness carries out hard-hitting investigations to expose environmental and human rights abuses that are driven by the exploitation of natural resources and corruption in the global political and economic system. We campaign to change this. We are independent, not-for-profit, and work with partners around the world in our fight for justice.  
<https://www.globalwitness.org/en/>

## 9. The use of technology to combat corruption

David Craig, President, Financial & Risk, Thomson Reuters <sup>9</sup>



Sunlight is said to be the best of disinfectants; electric light the most efficient policeman.

The accomplished US jurist Louis Brandeis said this a century ago. Today he might have added that data, used properly, can illuminate even the darkest corners of society. At Thomson Reuters our commitment is to use our resources wherever we can to shine that light and to expose those corrupt practices which continue to infect global commerce.

We champion the use of data to combat corruption. We help companies to analyse their supply chains to assess the risks associated with every link. We help financial institutions perform vital Know Your Customer checks and analyse sanctions lists, and we help investors discover the ultimate beneficial owners of a company – the people behind the people who hold the shares.

Thomson Reuters is committed to working with governments, businesses and civil society to cut corruption out of global commerce. Society demands this as a priority. Technology gives us the opportunity.

We are working with organizations committed to combating slavery in supply chains to build a single information and intelligence platform which enables its users to spot the patterns in the data – to reveal links which might otherwise remain concealed, and to identify perpetrators who might otherwise continue to escape detection. It will turn some of the qualitative data gathered by campaigners in the field into hard, quantitative and searchable data.

And in Liberia, ranked by the World Bank as one of the world's most difficult countries for property registration, we are working with authorities to help citizens take control of their land rights through technology and improving information. This is a critical time for leaders – an opportunity to ensure that technological advances are leveraged to create a more transparent world.

Thomson Reuters is committed to working with governments, businesses and civil society to cut corruption out of global commerce. Society demands this as a priority. Technology gives us the opportunity.

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<sup>9</sup> David Craig, President, Financial & Risk. Thomson Reuters provides professionals with the intelligence, technology and human expertise they need to find trusted answers. We enable professionals in the financial and risk, legal, tax and accounting, intellectual property and science and media markets to make the decisions that matter most, all powered by the world's most trusted news organization.  
<http://thomsonreuters.com/en.html>

## 10. Anti-corruption starts at home: to tackle global economic crime, the UK needs to look to its backyard

Catherine McKinnell MP and Nigel Mills MP, Co-Chairs, All-Party Parliamentary Group on Anti-Corruption, UK <sup>10</sup>

@appganticorrupt



When Prime Minister David Cameron identified that “corruption is one of the greatest enemies of progress in our time” last year, we agreed. Corruption destabilises key government institutions, increases inequality, adds significantly to the cost of doing business, and even funds terror.

But ending global economic crime demands that the UK gets its own backyard in order: this means extending transparency to our Overseas Territories and equipping our law enforcement agencies with the tools they need to prosecute and deter the money laundering and corruption that is taking place in British jurisdictions.

In 2015 Transparency International’s Corruption Perception Index ranked the UK inside the top ten countries with the lowest perception of public sector corruption. For this accolade to remain meaningful, the Summit must deliver credible policy commitments which tackle how the UK facilitates global economic crime

Recently, the UK’s National Crime Agency estimated that tens to hundreds of billions of pounds in corrupt or illicit finance could be flowing through the City of London every year, with funds laundered by myriad professional enablers. In 2011, a World Bank study found that the UK’s Overseas Territories are the second most popular locations for the corrupt to establish secret companies. Closer to home, research from Transparency International UK revealed that over 36,000 London properties are owned by offshore companies, and that from 2004 to 2014 £180m worth of London property was brought under investigation as the proceeds of international corruption by UK law enforcement agencies.

The statistics paint a troubling picture in which London is a safe haven for the proceeds of crime, the British Overseas Territories routinely offer secrecy to criminal enterprises, and the UK’s financial sector is beset by a vast quantity of suspicious transactions. This is why as a cross-party group of Parliamentarians, we welcome the UK government’s leadership in introducing a public register of beneficial ownership. But more has to be done. We support – in the strongest possible terms – the Prime Minister’s call for the British Overseas Territories and Crown Dependencies to follow suit and create public registers of company ownership as soon as possible.

It is also why we urge the government to strengthen UK law enforcement’s ability to hold companies to account for wrongdoing, by making it a criminal offence if they fail to prevent all forms of economic crime, not just tax evasion as is currently proposed. In 2015 Transparency International’s Corruption Perception Index ranked the UK inside the top ten countries with the lowest perception of public sector corruption. For this accolade to remain meaningful, the Summit must deliver credible policy commitments which tackle how the UK facilitates global economic crime.

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<sup>10</sup> Catherine McKinnell MP is the co-Chair and co-founder of the All-Party Parliamentary Group on Anti-Corruption. She was first elected as the Labour Member of Parliament for Newcastle upon Tyne North in May 2010 and has served in a number of frontbench roles, including as a Shadow Treasury Minister and, most recently, as Shadow Attorney General. Before becoming an MP, Catherine practiced law.

Nigel Mills MP is the co-Chair of the All-Party Parliamentary Group on Anti-Corruption. Nigel is the Conservative Member of Parliament for Amber Valley and was first elected to the House of Commons in 2010, before which he worked as an international tax adviser.

## 11. Time to get the UK house in order

Tim Hughes, Coordinator, UK Open Government Network <sup>11</sup>

@OpenGovUK



Corruption distorts decision making and resource allocation in the interests of a few, harming the fabric of society, and destroying trust between citizens and institutions. Openness is critical to uncovering and tackling corruption, in government, companies and civil society. The UK Open Government Network (OGN) is a coalition of active citizens and civil society organisations working to make government and other powerful institutions work better for people through enhanced transparency, participation and accountability. The OGN works in partnership with government to agree the UK's Open Government Partnership commitments, challenging and holding it to account for its ambition and delivery.

The Panama Papers have illustrated the scale of the global corruption scourge and the UK's complicity within it. The Anti-Corruption Summit and UK's 2016-18 OGP National Action Plan present both an opportunity and obligation for the UK to get its own house in order.

First, extend beneficial ownership transparency. Corruption and criminal activity thrives under conditions of secrecy. Investments in the UK can hide the proceeds of illegal activity such as money laundering, bribery and embezzlement. The government should ensure that all companies that own property or participate in delivering government contracts disclose who controls and benefits from their business decisions as open data.

The Anti-Corruption Summit and UK's 2016-18 OGP National Action Plan present both an opportunity and obligation for the UK to get its own house in order.

Second, increase lobbying transparency. Despite recent reforms, there is still very little transparency about the scale and nature of lobbying activities in the UK and little incentive to prevent corrupting behaviour by lobbyists. The government should reform the statutory register of lobbyists so that it provides meaningful information about the scale and nature of lobbying in the UK.

Third, open up government contracting. Contracting is an increasingly important means of delivering public services, and a lack of openness means there is insufficient accountability for public funds and increased risk of corruption. The government should fully implement the Open Contracting Partnership's Global Principles and Data Standard across government and extend Freedom of Information to all public contractors.

Finally, make multinational tax transparent. There is significant public concern about the use of low tax jurisdictions by multinational companies to shift profits and reduce global tax bills. The government should make UK-registered companies that operate beyond the UK publish their taxes, profits and other key economic data for each country where they do business.

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<sup>11</sup> "Tim Hughes is coordinator of the UK Open Government Network - a coalition of active citizens and civil society organisations working to make government and other powerful institutions work better for people through enhanced transparency, participation and accountability.  
[www.opengovernment.org.uk](http://www.opengovernment.org.uk)"

## 12. A global response to a global problem

Reverend Suzanne Membe Matale, General Secretary of the Council of Churches in Zambia, Council of Churches in Zambia <sup>12</sup>



Corruption isn't just about the individuals that benefit; the crooked politicians, the officials that look the other way, the businessman that offers bribes or the lawyer that provides the cover. Corruption isn't just about the individuals that suffer; the teacher that goes unpaid, the small businesswoman that loses out on a contract, the worker crushed in the collapse of a sub-standard building or the child that dies from hunger.

These are certainly important stories and they need to be exposed. Corruption harms African countries and robs our people of their livelihoods and dignity. It is estimated that over 30% of African wealth is held offshore while over \$50 Billion is estimated to leave Africa illicitly every year.

But the real story, exposed so dramatically by the Panama Papers, is the story of the system that enables all of this to happen. A system for which we are all responsible, and yet most of us do nothing about.

Of course African countries have a responsibility to improve our governance systems to make them transparent and accountable to the people and citizens have the responsibility to hold their governments to account. But the problem needs to be seen for what it really is - a global system of corruption, designed and maintained by the wealthy and the powerful to serve their interests. This means we need to consider solutions that are genuinely global in nature. The common factors are the same wherever corruption takes place, a lack of transparency, weak rules and captured states.

The common factors are the same wherever corruption takes place, a lack of transparency, weak rules and captured states.

As a member of the Independent Commission for Reform of International Corporate Taxation (ICRICT) I have called for the systems through which tax evasion takes place to be made far more transparent. This includes a requirement for states to create public, central registers of the beneficial owners of all companies, and assurances that the positive moves towards Automatic Exchange of Information will benefit all countries (not just those with the capacity to generate the information). We also want to see far more transparency in the relationship between companies and governments.

I hope this conference will lead to genuine actions in countries like my own, to enable citizens to hold their leaders, officials and governments to account. But I also expect that it will lead to real action in countries unlike my own; countries that proudly boast about their role in international finance.

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<sup>12</sup> Rev. Suzanne Matale is the General Secretary of the Council of Churches in Zambia, a tax justice activist and a member of the Independent Commission for the Reform of International Corporate Taxation (ICRICT), a group of global leaders promoting reform of the international corporate taxation system.

## 13. Sustainable change through anti-corruption collective action

Gemma Aiolfi, Head International Centre for Collective Action, B20 Collective Action Hub, Basel Institute on Governance <sup>13</sup>



There is no silver bullet against corruption: As the UN Convention Against Corruption notes, “A comprehensive and multidisciplinary approach is required to prevent and combat corruption effectively.”

But what could such approaches entail in practice? In some countries, markets and or industries, bribery is an entrenched and systemic problem that is difficult for any single group to address effectively. In other words, the combined efforts of the public and private sector, civil society and citizens are needed, and all are essential in contributing to a concerted approach.

Anti-Corruption Collective Action offers stakeholders different methods to tackle and prevent corruption as it affects them, with the common goal of reducing the waste of scarce resource, cutting costs for business and ensuring that essential services reach those that need them without the added tariff of a bribe.

The time has now come for corporates, governments and other stakeholders to seize the opportunities that Collective Action offers; engaging in constructive dialogue with peers, competitors, other sectors and stakeholders, and together with neutral facilitators develop pragmatic solutions to address the corruption challenges that often appear to be insurmountable.

The time has now come for corporates, governments and other stakeholders to seize the opportunities that Collective Action offers; engaging in constructive dialogue with peers, competitors, other sectors and stakeholders, and together with neutral facilitators develop pragmatic solutions to address the corruption challenges that often appear to be insurmountable. The results can help to level the playing field for business, make an effective and sustained difference to citizens' lives and ensure that governments properly spend scarce resources.

One example of Collective Action is the High Level Reporting Mechanism pioneered by the OECD and the Basel Institute on Governance to address the concerns of businesses that are faced with demands for bribes or otherwise subject to arbitrary and unfair treatment by the public authorities. This mechanism provides an alternative and complementary approach to law enforcement, with the focus on practical solutions that are business oriented, legal, economic and transparent.

Governments, the private sector and all members of society are encouraged to pledge their support to engage in such Collective Action initiatives, create the conditions to enable such platforms to flourish and to consider the possibilities afforded by such approaches including the High Level Reporting Mechanism.

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<sup>13</sup> Gemma Aiolfi, Head International Centre for Collective Action , B20 Collective Action Hub. The centre facilitates Collective Action initiatives; builds knowledge; and enables policy dialogue and peer learning. We support practical ways to tackle corruption and strengthen good business through joint collaboration.  
[www.collective-action.org](http://www.collective-action.org)

## 14. A call for collective action

Sam Eastwood, Head of Business Ethics and Anti-Corruption,  
Norton Rose Fulbright <sup>14</sup>



Collective Action is gaining attention as a powerful tool for businesses, NGOs and policymakers to fight corruption together.

The Summit provides a valuable opportunity for Government Leaders actively to promote Collective Action, which directly addresses two key themes of the London Anti-Corruption Summit's agenda, namely: the need collaboratively to improve the standards of various international anti-corruption efforts; and the need to engage stakeholders within society to promote these efforts.

Collective Action is a process of cooperation amongst various stakeholders, including businesses, governments and civil society. Fighting corruption collectively increases the impact and credibility of individual action. Common forms of anti-corruption Collective Action include anti-corruption declarations; integrity pacts; principle-based initiatives; and certifying business coalitions.

Collective Action is gaining attention as a powerful tool for businesses, NGOs and policymakers to fight corruption together.

Businesses recognise that there are certain corruption issues which cannot be tackled alone. Collective Action provides opportunities for businesses, the public sector, and civil society to empower themselves through collaboration to develop new initiatives to tackle these systemic corruption issues. For example, in a tender process, Collective Action commitments like integrity pacts promote increased prospects of fair selection. For all stakeholders concerned, Collective Action contributes to enhanced public reputation and credibility.

At an international level, Collective Action can be used as a tool to help ensure the consistent and fair enforcement of regulations. National legislation and international conventions are further supplemented and bolstered by engaged industry stakeholders. If approached correctly, Collective Action can fill lacunae in legislation or augment inadequate local law.

Collective Action efforts can be fostered internationally with renewed engagement from interested stakeholders (including most notably national governments) at a national and international level and increased publicity of the success of significant projects already underway, like initiatives within the extractive, shipping and energy industries. Leaders should use the Summit as a key platform to support Collective Action and create opportunities for Collective Action initiatives. Furthermore, Government Leaders should recognise and promote Collective Action as a collaborative and innovative tool to address systemic and deep-rooted corruption.

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<sup>14</sup> Sam Eastwood is the head of the global Business Ethics and Anti-Corruption practice at Norton Rose Fulbright. Sam advises major corporations on anti-corruption issues in connection with companies' internal compliance policies and procedures, international business transactions and internal corporate investigations.  
<http://www.nortonrosefulbright.com/uk/our-services/business-ethics-and-anti-corruption/>

## 15. Shining a brighter light on corruption around the world

Loretta Minghella OBE, Chief Executive, Christian Aid <sup>15</sup>

@christian\_aid



Corruption has many faces. In my career I have seen the horror of corruption and other financial wrongdoing in the faces of the poorest people in the world. I have also seen it wearing smart suits in the City of London. Corruption may be local or facilitated by global networks of individuals, companies and secrecy jurisdictions - as the recent 'Panama papers' revealed.

Corruption has a disproportionate impact on the poorest people, who pay the cost in dignity and wellbeing, as money bleeds away from essential services like health and education. The UN estimates that corruption, bribery, theft and tax evasion drain developing countries of US\$1.26 trillion each year, close to the amount needed to finance the newly agreed Sustainable Development Goals.

Global problems need solutions on a similar scale - but where to begin? Greater transparency weakens the international architecture of corruption which enables officials, crime lords and tax dodgers to operate outside their societies' rules and laws.

I ask world leaders to produce an action plan to finally end the secret ownership of companies around the world.

Securing transparency cannot be left to governments alone. Too often politicians and businesses only act when exposés such as the Panama Papers alert the public to the uses and abuses of secrecy. Transparency harnesses the power of civil society to safeguard the public interest in bringing wrongdoers to book.

The UK has recently introduced a public register of companies' true owners but, crucially, it has chosen not to insist on the same transparency in its Overseas Territories, which are among the most financially secretive places in the world. This is a shocking failure to harness the power of transparency. Private access to the data for law enforcement won't be enough. Connections will be missed. The money trail will go cold. And which law enforcement officers will risk investigations against their own bosses or government ministers?

This Summit must match the scale of the problem. Countries including the UK must commit to public registers of beneficial owners of companies in every jurisdiction they control. Unless Governments show a willingness to take at least this preliminary step, their commitment to tackling corruption must be in serious doubt.

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<sup>15</sup> Loretta Minghella is Chief Executive of Christian Aid, which works in 40 countries to help in tackling the root causes of poverty such as corruption. It works with civil society organisations around the world to hold the powerful to account. [www.christianaid.org.uk](http://www.christianaid.org.uk).

## 16. Private sector action in tackling corruption

Nick Hirons, Senior Vice President, Global Ethics and Compliance,  
GlaxoSmithKline <sup>16</sup>

@GSK



GSK welcomes the London Anti-Corruption Summit and the principles of zero tolerance to corruption embraced by legislation globally.

Tackling corruption, through adoption and consistent enforcement of appropriate standards can benefit international trade, emerging economies, communities and individuals. The Summit can provide a valuable spur for government action in addressing unacceptable practices, inadequate anti-corruption laws in their jurisdictions and endemic corruption that means valuable private investment in certain countries – often the most impoverished in the world – is lost.

Tackling corruption, however, is not solely the responsibility of governments. All players – including companies – must challenge themselves to look beyond simply operating within the law as a sufficient commitment to addressing corruption. In this respect, the Summit provides an ideal opportunity to focus on industry's role in avoiding high risk practices and on innovation in business practices to reduce potential exposure to corruption.

We recognise and are addressing concerns about pharmaceutical companies' sales incentives schemes and the extent to which the way companies provide information and education to healthcare professionals

GSK has a zero tolerance approach to bribery and corruption. We are committed to setting the right standards, to encouraging the reporting of misconduct through internal reporting and to taking firm action if we fall short of these standards. We recognise and are addressing concerns about pharmaceutical companies' sales incentives schemes and the extent to which the way companies provide information and education to healthcare professionals (HCPs) may be perceived as creating a conflict of interest.

We have taken decisive steps to change the way we interact with HCPs and enhance our transparency in our engagement. These include being the first pharmaceutical company to decouple sales incentives from individual sales targets; our sales professionals are instead incentivised based on their technical knowledge and the quality of service they deliver to HCPs to improve patient care. We have also stopped paying HCPs to speak on our behalf about our prescription medicines and vaccines. We are, instead, leveraging new digital, personal and real-time applications to improve delivery of information to HCPs by our own medical experts on a peer-to-peer basis. In this way, we are looking to remove any perceived conflicts of interest associated with external speaker fees, while also reducing opportunities for corrupt payments.

There is scope elsewhere to make similar changes to traditional business practices. GSK therefore urges Governments attending the London Summit to challenge the private sector to explore how innovations in their business practices can contribute to reducing the potential for corruption.

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<sup>16</sup> Nick Hirons, Senior Vice President, Global Ethics and Compliance. GSK is a science-led global healthcare company, head quartered in the UK and operating in over 150 markets, with a mission to help people do more, feel better and live longer. <http://www.gsk.com>

## 17. It's time for serious action against corruption, and workers can help

Sharan Burrow, General Secretary, International Trade Union Congress (ITUC) <sup>17</sup>

@SharanBurrow



Democratic rights and freedoms can only be protected by the rule of law.

When political leaders and wealthy individuals believe it's ok to avoid the taxes that offer hope and support social protection – unemployment security, health, education, child care, aged care and many other public services – this corrupts our societies and makes us all vulnerable.

And when global supply chains rely on the exploitation of too many people with insecure low paid and often unsafe work to secure profits, it corrupts our economies.

Corruption, exploitation, inequality, environmental destruction - the only answer is transparency and the rule of law.

When secrecy robs workers of their rightful compensation and hide abuses of workers' rights, or denies governments the finances to build inclusive communities, then it's time for serious action. In the face of corruption, exploitation, inequality, environmental destruction - the answer is transparency and the rule of law.

Workers can help. They are often the first to spot problems and help resolve them.

Companies and governments must encourage and protect whistle-blowers.

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<sup>17</sup> Sharan Burrow was elected General Secretary of the International Trade Union Confederation (ITUC) in 2010. The ITUC is the world's peak labour union body and represents 176 million workers in 162 countries and territories and has 328 national affiliates.

## 18. Without open contracting, governments cannot eradicate corruption

Gavin Hayman, Executive Director, Open Contracting Partnership <sup>18</sup>

@opencontracting



Government leaders should pledge to transform the global economy with openness, fairness and transparency. This cannot happen without open contracting. Trillions of dollars flow through public contracts globally, making public procurement and government contracting the most vulnerable sector to corruption. Too often secrecy in public contracting weakens government, stifles business competition, and robs citizens of essential goods, services and infrastructure. The risks are too big to ignore.

Open contracting is the antidote. Better disclosure through open data and increased civic and business engagement can transform government dealmaking, saving time and money, breathing new life into stagnant markets, and empowering citizens to hold politicians and companies to account.

Open public contracting creates a level-playing field for companies and creates opportunities for new, often marginalised businesses. Open data on contracts provides powerful analytics to shape more informed decisions and choose the best solution for a given task. When business and citizens can track and engage meaningfully in the contracting process, higher quality goods, services and infrastructure result.

We are calling on government leaders attending the Anti-Corruption Summit to take three steps. First, make public contracts open by default, putting an unambiguous public disclosure clause in all government contracts. Second, to publish timely, machine-readable, and reusable procurement data — start by disclosing existing procurement information and scale up to cover the entire contracting process, including planning, tender, award, contract and performance. Third, governments should innovate by working with businesses and civil society to identify problems and create better, smarter processes.

Better disclosure through open data and increased engagement with business and civil society can transform government deal making.

From Slovakia to Mexico, governments adopting open contracting already see improvements in the quality of public procurement. In Ukraine, for example, the government, businesses and civil society came together to build a new world-class and fully transparent procurement system based around the Open Contracting Data Standard, saving of over 13% on over \$250 million in public contracts whilst business competition increased almost 50%. In South Korea, the time taken to process bids dropped from 30 hours to just two after introducing a new open e-procurement system.

The Open Contracting Partnership is collaborating with champions in over 10 countries who are taking steps to ensure public money is well spent. We run a global open data helpdesk to support publishers and users of contracting data in over 30 countries. There has never been a better time to commit to open contracting, and to start reaping the rewards of a more transparent, fair system for all.

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<sup>18</sup> Gavin Hayman is Executive Director of the Open Contracting Partnership, a silo-busting initiative connecting governments, businesses, and civil society to open up and monitor public contracting through disclosure, data and engagement. <http://www.open-contracting.org>

## 19. Corruption undermines the global fight against poverty, let's remember our commitments to leave no one behind

Ben Jackson, Chief Executive, Bond <sup>19</sup>

@bondngo



In 2015, global leaders came together to agree the Sustainable Development Goals, an ambitious agenda to guide efforts to reduce poverty and promote accountability and sustainability over the next 15 years. The Goals include many important commitments, including to eradicate extreme poverty by 2030. However, the commitments to meet the SDGs could be significantly undermined if global leaders fail to address the prevailing corrupt systems and practices that serve to widen the gap between rich and poor.

If we want the new Sustainable Development Goals to be successful, global leaders must use the Anti-Corruption Summit as an opportunity to commit to tackle corruption in all its forms, looking at the financial, political and legal systems that govern our world.

Goal 16 is specifically focused on ensuring peace, stability, and effective governance, underlining the rule of law as an important conduit for sustainable development. This goal will only be achieved if the need for transparency and accountability is embraced by leaders who recognise that corruption hurts those within their populations who are the most vulnerable and undermines social cohesion and stability.

The current global tax system is a good example of a system that facilitates corrupt practices which allow wealthy individuals and corporates to profit whilst those around them suffer. It deprives poor countries of the revenue they need to invest in vital services such as healthcare and education needed to meet the ambition of the SDGs. It makes the lives of those living in poverty more difficult and often more dangerous, because money is being diverted from the essential services they rely on. People lose faith when their governments seem less concerned with their welfare and, rather, primarily accountable to the privileged and powerful.

We have made great strides in the fight against poverty and sustainable development, let's not let corruption hold us back.

Civil society organisations across the world are already working together to hold governments to account for implementing national and global policies that make corruption and unfair financial systems untenable. But they need support from high-level decision makers and global institutions to do so. I hope the Anti-Corruption Summit will see global leaders step up to that challenge and commit to the reform of broken systems that are undermining the move towards a more equal world. We have made great strides in the fight against poverty and sustainable development, let's not let corruption hold us back.

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<sup>19</sup> Ben Jackson, Bond Chief Executive. Bond is the UK membership body for organisations working in international development. We have over 450 members ranging from large agencies with a world-wide presence to smaller, specialist organisations, united by a common goal to eradicate global poverty.  
<https://www.bond.org.uk/>

## 20. Oil and mining transparency laws must include trading

Daniel Kaufmann, President and CEO, Natural Resource Governance Institute <sup>20</sup>

@NRGIInstitute



Key commodity trading hubs including Switzerland, the United Kingdom and the United States should close a major transparency gap by extending their natural resource payment transparency regulations to include the trading of oil, gas and minerals in order to reduce corruption.

An open and accountable natural resource sector is essential to tacking corruption. Much has been done in recent years including the establishment of the Extractive Industries Transparency Initiative (EITI) and new regulations requiring payment transparency in the sector. But there is much more to do. The London Anti-Corruption Summit should promote the adoption of several specific measures to address corruption risks in the oil, gas and mining sectors. They include requiring beneficial ownership disclosure, full disclosure of assets by politicians and high ranking officials, and full open contracting and procurement in the sector.

When governments and state-owned enterprises sell natural resources, these revenues should benefit all citizens. In many oil producing countries, the national oil company sells oil to international commodity traders. Payments from these oil sales trading transactions can be the largest source of revenue for a country and yet are largely opaque. For instance, total sales by the national oil companies of Africa's ten largest oil producing countries from 2011 to 2013, totalled \$254 billion, amounting to over one-half their combined government revenues.

Key commodity trading hubs including Switzerland, the United Kingdom and the United States should close a major transparency gap by extending natural resource payment transparency regulations to include the trading of oil, gas and minerals in order to reduce corruption.

Corruption can occur in the selection of the buying companies, in setting terms of the sales, and when secrecy around commodity sales allows governments to misappropriate the proceeds. Transparency is particularly needed in today's world of low commodity prices, as trading companies engage in highly profitable deals with cash-strapped producer countries.

International action by home country governments is urgently needed to make oil, gas and mineral trading more transparent and accountable. The EITI recently included trading into its standard, but EITI is voluntary and does not include key countries. The new mandatory payment disclosure laws in the EU, Canada and the US have so far neglected trading-related payments, despite their huge size.

Switzerland, the world's largest trading hub, will introduce oil, gas and mining sector transparency legislation later this year. It has agreed to include trading-related payments in its law but only if there is international action. The London Anti-Corruption Summit can be the moment when this international action emerges, if major trading hubs including the United Kingdom, Switzerland, the United States and Singapore commit to including trading transparency in their law

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<sup>20</sup> Daniel Kaufmann is president/CEO of the Natural Resource Governance Institute. He is an economist and an expert in corruption. Kaufmann is a member of EITI's board, a non-resident fellow at the Brookings Institution, and has held several senior positions at the World Bank.

## 21. Time to extend oil, gas and mining payment transparency regulations to trading

Elisa Peter, Executive Director, Publish What You Pay International Secretariat <sup>21</sup>

@ElisaPeter



Governments participating in the London Anti-Corruption Summit should build on international progress in implementing a mandatory global transparency standard for oil, gas and mining by agreeing to seek ways to extend natural resources transparency requirements to trading.

When governments and state-owned enterprises sell natural resources, the resulting revenues should benefit citizens. In most oil producing countries, the state receives a share of production, which is typically then sold by the national oil company. Such sales are often the largest benefit that a government receives for the commercial development of its oil, gas or minerals. Total sales by national oil companies of Africa's ten largest oil producing countries from 2011 to 2013, for example, totalled \$254 billion, equal to 56% of their combined government revenues.

Corruption has been found to occur in commodity sale transactions themselves, and secrecy in commodity sales lets governments hide how much revenue they receive. Civil society has exposed the link between commodity traders and politically exposed persons (PEPs) and the lack of due diligence in the sector. Falling oil prices have led to highly profitable deals for traders with cash-strapped producer countries.

International action by governments is urgently needed to end this major remaining area of opacity in the natural resources sector by making oil, gas and mineral trading more transparent and accountable. The Africa Progress Panel, chaired by former UN Secretary-General Kofi Annan and including former Extractive Industries Transparency Initiative (EITI) International Chair Peter Eigen, has called for the inclusion of commodity trading within the scope of mandatory transparency reporting regimes, and the International Monetary Fund has recognised the importance of trading-related payments.

Governments participating in the London Anti-Corruption Summit should build on international progress in implementing a global mandatory transparency standard for oil, gas and mining by agreeing to seek ways to extend natural resources transparency requirements to trading.

Companies engaged in oil, gas and minerals commodity trading are not currently required to publicly report their trade-related payments to government entities under US, Norwegian, EU or Canadian country- and project-level extractive sector reporting regulations, although disclosure of trading-related payments by country and by individual buying company is now required under EITI. Legislation requiring country-by-country disclosure of extractives-related trading payments to governments by companies incorporated or publicly listed in the UK, the USA and Switzerland alone would capture well over half the world's oil, gas and mineral trading, including 80% of oil trading.

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<sup>21</sup> Elisa Peter is Executive Director of Publish What You Pay (PWYP) and was previously senior political adviser to The Elders. PWYP is a global coalition of civil society organisations united in their call for an open and accountable extractive sector: [www.publishwhatyoupay.org](http://www.publishwhatyoupay.org)

## 22. Time to Deliver on Trusts

Adrian Lovett, Deputy Chief Executive (Interim), ONE Campaign <sup>22</sup>

@adrianlovett



Developing countries lose a trillion dollars each year as a result of illicit financial flows. Some of this money is hidden in a range of financial vehicles which allow the real, or “beneficial”, owners to hide their identities. While increasingly governments accept the case for introducing public registers to show the beneficial owners of companies, there has been significantly less progress on trusts. The Anti-Corruption Summit should be a moment for governments to outline their commitment to transparency around trust ownership too.

When European governments considered this issue in 2014/15 during the negotiations for the EU's 4th Anti-Money Laundering Directive, they agreed to capture beneficial ownership information for a subset of trusts that engage with tax systems. However, the public will have no access to this information and it is unclear what proportion of trusts will be captured by this requirement. And outside of the EU, governments have been very quiet on this agenda.

As the host of the Anti-Corruption Summit, Prime Minister David Cameron has shown strong leadership; he must now lead again and commit to a public register to capture the beneficial owners of trusts, both in the UK and in the British Overseas Territories and Crown Dependencies.

So long as trusts act as a loophole that criminals and other corrupt individuals can exploit to hide their identities, the beneficial ownership agenda will be half-baked at best. Indeed, the progress towards public registers to capture the beneficial ownership of companies would be undermined by the lack of ambition on trusts. It can be the case that companies are owned by trusts and people seeking to hide their identities can simply switch from setting up anonymous shell companies to setting up trusts and similarly opaque financial instruments. Governments attending the Anti-Corruption Summit should act together and outline their commitment to the principle that public registers of companies should be matched by similar public registers of trusts and other financial instruments. Governments should also outline a clear action plan for delivering specifically on public registers of trusts.

As the host of the Anti-Corruption Summit, Prime Minister David Cameron has shown strong leadership. He must now lead again and commit to a public register to capture the beneficial owners of trusts, both in the UK and in the British Overseas Territories and Crown Dependencies. Only this level of action will ensure that the UK maintains its leadership in the global fight against corruption.

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<sup>22</sup> Adrian Lovett currently serves as ONE's Deputy Chief Executive (Interim), taking a cross-organizational role during a period of leadership transition in ONE. He joined ONE in August 2011 as its Europe Executive Director, leading the organization's work to influence governments and build popular support across Europe for the fight against extreme poverty.

## 23. Applying Behavioural Insights to the fight against corruption

Dr David Halpern, Chief Executive, The Behavioural Insights Team <sup>23</sup>



The evidence base of “What Works” in reducing corruption remains limited. Few interventions have used field experiments to establish impact. Fewer still have drawn on the growing body of knowledge from the behavioural sciences to attempt to shift the dial.

Popular and policy accounts of ‘corruption’ can often misread why people ‘cheat’, and what might reduce this cheating. When viewing corruption by others, we often assume that it is driven by self-interest and done by inherently bad people. It’s seen as a ‘wicked problem’, with interlocking causes that make it very hard to address. This leads to corrupt practices forming a stable equilibrium, such that any one intervention by a political leader, the judiciary, or an honest citizen will often fail.

However, the psychology of corruption tells a very different story. Corruption and honesty can be motivated by social pressure, by a desire to be self-consistent, and by mental ‘moral licencing’ (e.g. “my salary does not reflect the value of my work. I deserve more money) among others. Many times the protagonists of these behaviours gradually slide into habits, without thinking of them as wrongdoings. Policy prescriptions that misread psychological aspects can not only fail, but can actually make the problem worse.

Tackling corruption requires a better understanding of: human decision making and what influences it; the psychology of honesty; the role of technology as an enabler of new behaviours; and the prevalent social capital – the pattern of social networks, obligations and trust in a region, including aspects of social trust that have formed over decades and centuries.

Whilst not an easy challenge to solve, tackling corruption requires a better understanding of: human decision making and what influences it; the psychology of honesty; the role of technology as an enabler of new behaviours; and the prevalent social capital – the pattern of social networks, obligations and trust in a region, including aspects of social trust that have formed over decades and centuries.

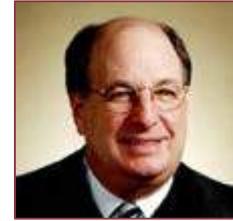
As part of the summit deliverables, the Behavioural Insights Team will be partnering with the HM Government and overseas administrations to explore how insights from the behavioural sciences can be applied to a range of contexts, testing if it is possible to encourage honesty and impartiality, and catalysing the emergence of new, positive social norms.

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<sup>23</sup> David Halpern is the Chief Executive of the Behavioural Insights Team. He has led the team since its inception in 2010. Prior to that, David was the founding Director of the Institute for Government and between 2001 and 2007 was the Chief Analyst at the Prime Minister’s Strategy Unit. David was also appointed as the What Works National Advisor in July 2013. He supports the What Works Network and leads efforts to improve the use of evidence across government. Before entering government, David held tenure at Cambridge and posts at Oxford and Harvard. He has written several books and papers on areas relating to behavioural insights and wellbeing, including Social Capital (2005), the Hidden Wealth of Nations (2010), Inside the Nudge Unit (2015) and co-author of the MINDSPACE report.

## 24. An International Anti-Corruption Court for Grand Corruption

Honorable Mark L. Wolf, Senior United States District Judge; Chair,  
Integrity Initiatives International, Integrity Initiatives International <sup>24</sup>



Grand Corruption – the abuse of public office for private profit by a nation's leaders – is not a victimless crime. As Prime Minister David Cameron has explained, corrupt governments syphon off resources that should be devoted to the health and education of their citizens; generate migrants drowning in the Mediterranean; and convert their citizens into constituents for terrorists. Indignation at grand corruption is destabilizing many nations and, in the process, creating grave dangers for international peace and security.

As Secretary of State John Kerry asserted, "the quality of governance is no longer just a domestic concern". Yet, as Prime Minister Cameron noted, "when it comes to tackling corruption, the international community has looked the other way for far too long."

Laws exist to combat grand corruption. 178 nations are parties to the United Nations Convention Against Corruption ("UNCAC"). Each has the laws UNCAC requires criminalizing extortion, bribery, and money laundering, and an international legal obligation to enforce those laws against their corrupt leaders. Yet grand corruption flourishes in many countries because corrupt leaders control the administration of justice.

It is time to recognize that the consequences of grand corruption require the creation of an International Anti-Corruption Court.

To deter and diminish grand corruption, it is essential that the statutes required by UNCAC be enforced. Greater transparency of beneficial ownership is necessary. Improved international cooperation in investigating the flow of the fruits of grand corruption is important. However, transparency and the acquisition of evidence are not ends in themselves. There must be an impartial court in which corrupt leaders can be held accountable.

In 2014, I called for the creation of an International Anti-Corruption Court ("IACC"), similar to, but separate from, the International Criminal Court ("ICC"). Like the ICC, the IACC would operate on the principle of complementarity, meaning only officials from countries unable or unwilling to punish grand corruption would be subject to prosecution. Since 2014, the IACC has received support from the United Nations High Commissioner for Human Rights, Transparency International, Human Rights Watch, Global Witness, Global Parliamentarians Against Corruption, and leading international prosecutors. It is also supported by courageous young people from many countries. Integrity Initiatives International was recently formed to campaign for the creation of the IACC and related measures.

In 2002, the evils of genocide and other intolerable human rights abuses led to the creation of the ICC. It is time to recognize that the comparable consequences of grand corruption require the creation of the IACC.

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<sup>24</sup> Mark L. Wolf is a Senior United States District Judge and the Chair of Integrity Initiatives International ("III"). III advocates for the creation of an International Anti-Corruption Court and related measures, and is forging a network of young people dedicated to combating corruption. <http://www.iaccnow.org>

## 25. Tackling Corruption Across the Commonwealth

Mr Oliver Everett, CEO; Commonwealth Enterprise and Investment Council <sup>25</sup>



With a combined GDP of more than US\$10 trillion and a population of 2.3 billion, the Commonwealth is recognised by Governments across the world as being integral to global trade and investment. However, businesses and therefore inter-Commonwealth trade suffer not only from the reality of corruption but also the perception that some member countries are too 'high risk'. This perception, and fear of unintended criminality, prevents UK businesses from taking full advantage of the opportunities in emerging markets and hinders the development of emerging markets.

CWEIC is committed to improving the business environment in Commonwealth countries to encourage investment and development. CWEIC firmly believes that an effective plan to combat corruption at a business level should be designed and informed by business. As an organisation working with Government, civil society and corporates across the Commonwealth and based in London, CWEIC is well placed to convene anti-corruption experts, businesses and Government representatives to provide the practical expertise which will enable and galvanise the anti-corruption agenda.

The private sector is integral to increasing economic growth in developing countries and should be seen as part of the solution rather than part of the problem.

CWEIC encourages civil society and Governments to support the business community in their anti-corruption endeavours and provide a level-playing field for inward investment. The private sector is integral to increasing economic growth in developing countries and should be seen as part of the solution rather than part of the problem.

At the Tackling Corruption Together Conference in May 2016, the Commonwealth Enterprise and Investment Council will be launching a Commonwealth Anti-Corruption Network aiming to provide a framework of practical advice, guidance and services to businesses throughout the Commonwealth on how to meet their anti-corruption obligations.

Investor perceptions and experiences need to be changed. Businesses across the Commonwealth should be encouraged to build on the momentum of the Tackling Corruption Together Conference in May and make a positive impact on the Anti-Corruption Agenda.

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<sup>25</sup> Mr Oliver Everett is CEO of the Commonwealth Enterprise and Investment Council, a membership organisation which works to promote trade and investment by facilitating engagement between Government and the private sector throughout the Commonwealth.

## 26. Citizens deserve procurement that delivers the services and infrastructure they need

Dr Ngozi Okonjo-Iweala Senior Advisor, Lazard; Chair Elect of GAVI;  
B Team Leader <sup>26</sup>



Globally, governments purchase goods and services from the private sector at a rate of around US\$9.5 trillion a year. These goods and services are central to governments being able to deliver on their core obligations to citizens: to build schools, health clinics, roads and bridges; to deliver critical social services such as access to clean water; to have the technology to open up government to citizens; to provide access to energy for citizens and business. It is also one of the most significant areas of corruption-risk. Enforcement data from the OECD Anti-Bribery Convention shows that 57% of bribes were paid in order to secure public contracts. This process can rob citizens of their national resources, but also has led to more disastrous consequences: collapsing schools, fake medicine and medical equipment that killed patients.

Preventing corruption in public procurement is central to achieving the sustainable development goals, and there is a promising way to do so: open contracting.

Preventing corruption in public procurement is central to achieving the sustainable development goals, and there is a promising way to do so: open contracting.

Governments at the London Summit should commit to making public procurement open by default. This would mean encouraging full public disclosure of information across the entire process of government deal-making; from planning, to tender, to award, to the contract itself, through implementation to project closure. Governments should share this information as open data, by using the Open Contracting Data Standard, and open up the process to ensure business and civic engagement at appropriate points along the public procurement cycle. This will encourage fairness and help the public monitor the use of their funds.

Countries, provinces and cities have started to try open contracting and the results speak for themselves: better services, at lower costs, delivered more efficiently, with more competitive markets, and greater access for smaller and medium enterprises.

Governments can show not only their strong position against corruption, but also their real commitment to achieving the sustainable development goals by committing to making public procurement open by default at the London Summit.

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## 27. Ending impunity

José Ugaz, Chair, Transparency International

The global coalition against corruption <sup>27</sup>

@anticorruption



Every year the world is estimated to lose as much as US\$1 trillion to corruption, equivalent to the GDP of Mexico. But corruption is not just a matter of economics. It is a moral issue. Corruption kills. It affects people's health, denies them access to water and education, and undermines good governance and democracy.

Today, at least, corruption is no longer a word whispered behind closed doors, the way it was 23 years ago when Transparency International was established. Today it is almost impossible to open a newspaper without reading about a grand corruption scandal, be it on oil giant Petrobras in the Panama Papers, Brazil, President of Equatorial Guinea Teodoro Obiang or the former Ukrainian President Viktor Yanukovich. This may sound depressing, but the fact that corruption is so omnipresent in the news is also a sign of progress. It shows that brave investigative journalists and anti-corruption activists around the world are uncovering corrupt networks. It also shows that people have had enough.

With strong political will and some courageous prosecutors, we are also seeing some headway in prosecuting the corrupt. People previously considered untouchable by law enforcement agencies are now in jail, facing the consequences of their crimes, such as former Guatemalan President Otto Pérez Molina and the Brazilian businessman Marcelo Odebrecht. But there is still too much impunity for corruption out there.

We need international cooperation to fight corruption. Leaders need to work together to achieve change.

Grand corruption is usually a transnational crime. The corrupt can move stolen public funds often with a single keystroke to countries where they open secret companies or buy expensive properties and luxury goods. At Transparency International, we always say that no one person is powerful enough to fight corruption alone; you need people across the public, private and civil society sectors working together. In this ever-more connected world, the same holds true for countries: no one country can do it alone. We need international cooperation to fight corruption. Leaders need to work together to achieve change.

This is the true for investigations and prosecutions but also in the area of legislation. To prevent the grand corrupt from being able to hide their money in secrecy jurisdictions we urgently need all countries to require much higher levels of transparency around so we know who owns and controls companies registered in their territories. And we need to sanction the professionals in the middle – the lawyers, the estate agents, the bankers and the accountants – who do what it takes allow this to happen. We want to see behavioural and systemic change in the next ten years, and we want victims of corruption to be recognised, justice served and the corrupt held to account. It is time the corrupt faced the consequences for their crimes.

Together we can make that happen

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<sup>27</sup> José Ugaz was elected chair of Transparency International, a global coalition against corruption with more than 100 chapters around the world whose mission is promoting transparency, accountability and integrity at all levels and across all sectors of society.

Read more leadership statements at  
[www.anticorruption-manifesto.org](http://www.anticorruption-manifesto.org)

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The Leaders' Anti-Corruption Manifesto is a project organised with support of the partnership committee of 'Tackling Corruption Together' Conference, a major business and civil society conference being held in Marlborough House in London on 11 May 2016 and taking place immediately before the 2016 London Anti-Corruption Government Summit.

The civil society and business partners behind the Leaders' Anti-Corruption Manifesto are:



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