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GLOBAL COMPACT FOR THE 10TH PRINCIPLE

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**CORPORATE  
SUSTAINABILITY  
WITH INTEGRITY:  
ORGANIZATIONAL  
CHANGE TO  
COLLECTIVE  
ACTION**



**United Nations** Global Compact

The United Nations Global Compact is a call to companies everywhere to voluntarily align their operations and strategies with ten universally- accepted principles in the areas of human rights, labour, environment and anti-corruption, and to take action in support of UN goals, including the Millennium Development Goals. The UN Global Compact is a leadership platform for the development, implementation, and disclosure of responsible corporate policies and practices. Launched in 2000, it is largest corporate responsibility initiative in the world, with over 8,000 signatories based in 140 countries. For more information: [www.unglobalcompact.org](http://www.unglobalcompact.org)

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## Introduction

Derived from the United Nations Convention against Corruption, the Global Compact 10th Principle urges businesses to fight against corruption: “Businesses should work against corruption in all its forms, including extortion and bribery”.

Corruption negatively impacts social and economic development as well as environmental sustainability. Ineffective implementation of anti-corruption policies contributes to illegal logging, water and air pollution, exploitation of mineral resources, and unsustainable bio-fuel use. Corruption undermines the gains and positive effects generated by sustainable corporate practices.

To combat this problem, the Global Compact promotes the implementation of rigorous anti-corruption measures through organization change at the company level and collective action at the country level. First, companies are asked to integrate anti-corruption and compliance measures into their business strategies and operations. Companies develop their own code of conduct, including the implementation of a zero tolerance policy and a range of rules and regulations concerning gifts, political contributions, charities and travel. To apply these policies, companies implement a range of actions, including the establishment of anonymous hotlines, employee training, supply chain management, risk assessment and disciplinary measures. Second, companies are asked to take part in collective action<sup>1</sup>, multi-stakeholder dialogue, and integrity or compliance pacts with industry peers. Global Compact business participants are required to present their efforts to advance the 10th Principle in an annual Communication on Progress.

The Global Compact and key partners have developed a range of resources to help participating companies implement the 10th principle, including the following publications: *Business Against Corruption: Framework for Action*; *Reporting Guidance on the 10th Principle against Corruption*; *The Fight against Corruption: E-Learning Tool, Fighting Corruption in the Supply Chain: a Guide for Customers and Suppliers*; *Collective Action – Building a Coalition against Corruption*; and *Clean Business is Good Business*. These resources outline the ethical and business

benefits of anti-corruption initiatives based on legal risks, compromised reputation, financial cost, and the erosion of consumer trust and confidence. Additionally, the Global Compact has embarked upon a multi-year collective action project with Global Compact Local Networks and strategic partners to foster anti-corruption action<sup>2</sup>.

Despite understanding the importance and advantages of anti-corruption initiatives, many companies struggle to implement the 10th Principle. There is a substantial gap in anti-corruption action between large corporations (over 5,000 employees) and small and medium enterprises. Here are several examples of the differences: Only nine per cent of SMEs implement anonymous hotlines as opposed to 68 per cent of large companies; less than 12 per cent of SMEs record corruption as opposed to 57 per cent of large companies; less than 23 per cent of SMEs integrate anti-corruption into their management system as opposed to 65 per cent of large companies. Similarly, anti-corruption is one of the least reported principles in the annual Communication on Progress. The Global Compact differentiation framework categorizes companies into three groups: Learner, Active, and Advanced. One of the main reasons Global Compact participants stay in the Learner group is because of a failure to report anti-corruption implementation efforts.

Over the last year, the Global Compact

1. “Collective Action” is a process of cooperation between various stakeholders with the aim to jointly counter corruption. Through such alliance of like-minded organizations the problem can be approached and resolved from multiple angles, and the impact of individual action can be increased. The ultimate aim of these joint efforts is to create fair and equal market conditions—a “level playing field”—for all market players and to eliminate the temptations of corruption for all of them. Adopted directly from *Collective Action in the Fight Against Corruption* (2010) [http://www.unglobalcompact.org/docs/issues\\_doc/Anti-Corruption/CollectiveAction2010.pdf](http://www.unglobalcompact.org/docs/issues_doc/Anti-Corruption/CollectiveAction2010.pdf) - A joint publication by the members of the World Bank Institute Working Group (the World Bank Institute, the Center for International Private Enterprise, Global Advice Network, Grant Thornton, Siemens, Transparency International and the United Nations Global Compact)

2. Supported by the Siemens Integrity Initiative, the UN Global Compact launched five collective action projects in December 2010. The UN Global Compact joined forces with Local Networks and strategic partners to develop anti-corruption collective action projects in the emerging markets of Brazil, Egypt, Nigeria, India and South Africa. In addition to the UN Global Compact, over 30 projects from over 20 countries including the ones implemented by the United Nations Office on Drugs and Crime were selected by the Siemens Integrity Initiative.

Office asked Global Compact signatories and strategic partners to share examples of how they are implementing the 10th Principle. This publication is a collection of selected examples from abstracts that the Global Compact Office received from companies and stakeholders around the world to illustrate anti-corruption implementation efforts. The abstracts showcase the unique dilemmas organizations face and the efforts they have made to enhance transparency and anti-corruption compliance. The first part includes examples that highlight how individual

companies incorporate anti-corruption policies and action measures. The second part introduces collective action efforts taken by business associations and the Global Compact Local Networks.

The Global Compact Office is grateful to the large number of company managers, academics, activists and experts who have shared their experiences and contributed to this publication. It is our hope that the collection serves as an instrument and inspire Global Compact participants to share their own insights into how to effectively tackle corruption.

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I call on business leaders worldwide to denounce corruption and to back their words with strict prohibitions against it. **They should adopt anti-corruption policies in line with the United Nations Convention** and put in place the necessary checks to strengthen integrity and transparency. I also urge corporations to work more closely with the United Nations on this issue. In particular, **they should consider joining the UN Global Compact**, the world's largest corporate sustainability initiative, which provides participants with tools to fight all forms of corruption, including extortion and bribery.

*His Excellency Mr. BAN Ki-moon, Secretary-General of the United Nations*

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Company Name: **Alstom**

Sector: **General Industry**

Country of Origin: **France**

Action: **Organizational/Internal**

Theme: **Certification**

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## Certification of the Integrity Programme

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**T**o prevent a range of compliance and corruption risks and to promote a culture of integrity, Alstom, a global group with over 100,000 employees, set up the Alstom Integrity Programme, consisting of a dedicated unit, a code of ethics, administrative instructions, training, and communication.

To ensure the successful implementation of the Alstom Integrity Programme, Alstom requested “ETHIC Intelligence”, an expert and independent entity, to evaluate and certify the Alstom Integrity Programme’s progress. Alstom chose to be certified by a third party external organization to fulfil the following objectives: a) benchmark Alstom’s integrity performance against best international practices; b) identify areas for improvement to enhance the integrity programme; and c) create an internal stimulus for continuous improvement and learning.

The first certification process was launched in November 2008 on the Rules and Procedures for Dealing with Business Advisors for Power and Transport. The first certificate was awarded on 12 March 2009, and lasted two years. The second certification process took place in 2011 to renew and reassess the compliance programme. Four areas of Alstom’s integrity programme were reviewed during the certification process (audit, analysis, and report writing): Information (how Alstom communicates its compliance policy); training (how Alstom conducts training on its compliance policy); tools (processes and tools that Alstom uses to develop and implement its compliance policy); and control (how Alstom’s Integrity Programme is monitored and controlled).

The audit of these four areas was based upon international anti-corruption agreements, including the United Nations Convention against Corruption, and guidelines from

national legislations and regional agreements. The certification process requires the audit of 13 sites located in eight countries where Alstom operates, and interview of 140 Alstom employees including the Chief Executive Officers, members of the Executive Committee, the Ethics and Compliance Department, Country Presidents, Representatives of Sales, Sourcing & Supply Chain, Project Management, Legal, Finance, Internal Audit, Communication, Human Resource, Sustainable Development, and Ethics and Compliance Ambassadors.

The final audit report contained the following items: Alstom Chief Executive’s Letter of Intent; Risk Assessment; Compliance Policy Communication, Training, Tools and Control; and the Reviewer’s Evaluation. The certification exercise embarked on in 2011 led to the renewal of the certificate for the Rule and Procedures for Dealing with Business Advisors for Power and Transport (8 April 2011). The certificate of the Sales Intermediaries’ Rules for Grid was awarded on 16 May 2011, and the certificate of the entire Alstom integrity Programme was awarded on 12 September 2011.

In addition to the certification of its compliance programme, Alstom sees that the process provides a number of benefits to enhance its compliance measures. First, it sends a clear message at the organizational level that the company is fully committed to the certified compliance procedures guided by international standards. Second, it provides assurance to internal and external stakeholders that Alstom has implemented appropriate rules to prevent corruption and compliance risks. Third, it helps the company to continuously improve its compliance programme based upon the recommendations given by external experts.

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## From Code of Ethics to Dialogue on Anti-Corruption

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**T**he need for a Code of Ethics was cited on 1 March 2010 in the third version of the King Report on Corporate Governance for South Africa (King III). The Board of every company in South Africa is to ensure that Management actively cultivates a culture of ethical conduct, sets the values to which every company will adhere and incorporates them in a Code of Conduct. Furthermore, the Board of a company is to ensure that integrity permeates all aspects of the company and its operations, and that the company's objectives are ethically sound. To be compliant with King III, Altron approved and adopted a Code of Ethics for the entire Altron Group.

To implement the Code of Ethics, awareness sessions called the Ethics Dialogue were conducted for Executives and Managers at all levels within the Group facilitated by senior members of the Bytes People Solutions Management Team and Lead Consultants, a world class training and education provider within the Altron Group. The objective of the Ethics Dialogue was to allow for a discussion around the concept of ethics, the challenges around ethical behaviour and the practicality of the Code of Ethics within the various Altron Group of companies. Prior to the delivery of the sessions, a consultative process with the Altron Group Secretary ensured that the design of the sessions was in alignment and compliance with the Altron Code of Ethics. Blended delivery approach sessions and e-learning were utilized to convey the message. The duration of each session was approximately one hour. The presentation addressed the following topics:

- Context and purpose of the Code of Ethics (with specific focus on anti-corruption);
- Summary of the Code of Ethics (including anti-corruption aspects);
- Applications of the Code of Ethics;
- Guidelines on reporting ethical misconduct and anti-corruption; and
- Practical case studies within the group.

During the sessions, delegates were asked to answer four (4) questions via an interactive

polling device (in some cases on paper). At the end of the sessions a Code of Ethics questionnaire was completed and each delegate signed a declaration, acknowledging that they attended the Ethics Dialogue. The purpose of the questions was to understand the state of ethical awareness throughout the Altron Group and to assess future awareness requirements. Questionnaires were completed anonymously. Specific feedback, where applicable, was given to ensure that prompt actions will be taken to address the issues raised.

Some of the major findings from the sessions included:

1. The awareness sessions were received positively in 90% of the cases. Employees enjoyed the learning experience and reported that they understood why it was necessary to attend the sessions.
2. In a minority of cases, employees were sceptical that the Code of Ethics will make a difference. This could be seen in companies where managers have been subjected to unethical behaviour from either competitors or customers.
3. Employees still do not trust Tip-off Tim (an anonymous tip-off service) that was established by the Altron Group because they fear retribution after cases are reported. Some employees were not aware of the existence of the Tip-Off Tim. It was therefore recommended that information on the Tip-off Tim be disseminated more widely to employees to raise awareness. The process should be made more visible, especially the outcome of cases, without revealing the details or personal information. It is important to build trust in the Tip-off Tim.
4. Managers felt that the same effort must be put into the communication of the Code of Ethics to all other employees.

The main findings represent a starting point for valuable and detailed future exploration on ethical awareness and anti-corruption efforts within the Altron Group.

Company Name: **Altron**

Sector: **General Industry**

Country of Origin: **South Africa**

Action: **Organizational/Internal**

Theme: **Code of Ethics/  
Training/Anonymous Hotline**

Company Name: **Alcatel-Lucent**

Sector: **Fixed Line Telecommunication**

Country of Origin: **France**

Action: **Organizational/Internal**

Theme: **Zero Tolerance/Training/Anonymous Hotline**

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## Translating Zero Tolerance into Action

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**A**s part of Alcatel-Lucent's overall Corporate Responsibility programme, the company has a strong commitment to integrity, ethics and compliance in all aspects of its business. Its policy is to conduct business with transparency and in compliance with all applicable laws and regulations, both locally and internationally. This commitment is communicated throughout the company. It is also supported by the overall Compliance Plan and related management structure, which is focused on continuing to develop, implement and maintain a culture of compliance and ethical behavior that is embedded in business operations and consistent with the highest standards of business excellence.

**Zero-Tolerance Policy and Anti-Corruption Programme:** Alcatel-Lucent has designated anti-corruption as a compliance area of the utmost importance to the company. The company has acknowledged compliance violations in the past, largely before the merger of Alcatel and Lucent Technologies in 2006. Today, the company is a radically different one, with a new CEO, new executive leaders and a corporate culture that reflects integrity and transparency. To embody this change, Alcatel-Lucent has implemented a zero-tolerance policy, processes and training regarding bribery and corruption to prevent these types of situations in all aspects of our business.

In November 2008, the company announced a strategy – the first in its industry to do so - to phase out the use of sales agents and consultants on the basis that the corruption risk inherent in their use is inconsistent with Alcatel-Lucent's zero-tolerance policy. The status of this programme is reviewed regularly at the company's most senior levels, including the Alcatel-Lucent Ethics & Compliance Council and the Board of Directors.

Detailed risk mitigation plans have been developed for every operating unit across the business. In addition to a corporate-wide anti-corruption programme, which establishes anti-corruption standards, policies and procedures, an anti-corruption competency center was established in 2009 to test the effectiveness of the controls in place to help ensure compliance with internal anti-cor-

ruption practices and procedures.

**Education and Training on Anti-Corruption:** The Alcatel-Lucent Anti-Corruption Compliance Programme focuses on ensuring employee awareness of and compliance with applicable anti-corruption laws and company policies consistent with the company's zero-tolerance policy.

Formal training on anti-corruption laws, policies, and requirements has been deployed in two formats: web-based training and live training. Web-based training was initially established in November 2007, to ensure that employees are fully aware of important anti-corruption requirements and are updated on key anti-corruption policies. The training was updated and redeployed in 2010 to a target audience, including corporate executives and employees who interact or interface directly or indirectly with external parties, as well as in-country customer teams (e.g., Sales, Finance, and Procurement). Alcatel-Lucent observes legislative developments on the field of anti-corruption and organizes related alerts and trainings to employees in countries in which changes take place.

**Compliance Hotline:** Fundamental to the success of Alcatel-Lucent's Compliance Management System is the ability of employees to raise ethical questions and concerns without fear of retaliation. Under the Compliance Issues Reporting Methods initiative, employees are encouraged to initially raise issues with their direct line Manager. There are times, however, when these first lines of communication are insufficient, for example where the employee perceives a conflict of interest. In these instances, employees are encouraged to use the company's global Compliance Hotline (to the extent permitted under local law) to report compliance issues, concerns, violations or suspected violations of law or company policy. The Compliance Hotline has been formally deployed in 114 countries and is available via a multilingual web interface in 12 languages and via telephone access with additional language options. The company has a "no retaliation" policy, which specifically prohibits adverse action against employees who report in good faith suspected violations of law or company policy.

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## Four Step Approach to Internal Compliance Measures

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**T**he China National Offshore Oil Corporation's (CNOOC) internal compliance system is a central pillar of its anti-corruption and transparency efforts, and is guided by the four-step approach of "ethical education, compliance framework, supervision and disciplinary action, and culture of integrity".

The first step is to emphasize education and training on anti-corruption measures. Based on years of practice, CNOOC has formulated a training framework managed by responsible executives who coordinate centralized educational events and evaluate the results of all trainings. Senior management executives are required to take anti-corruption and ethical training. All relevant departments are asked to participate in trainings to raise employee awareness.

The second step is to strengthen compliance and anti-corruption measures, including incorporating anti-corruption initiative into corporate governance structures. The company puts a significant amount of emphasis on integrating anti-corruption measures into an overall management system. In addition, CNOOC developed a three-level internal control system, which includes 12 sub-systems, 24 basic guidelines, 199 regulations, 350 implementation rules, 338 processes, and 932 key risk control activities. All the regulations included in the internal control system are formulated, reviewed, issued and revised at corporate headquarters to send a strong signal from top-level management. The regulations are also designed as a practical and applicable mechanism based upon all the leading practices of risk management, existing regulations, and the relevant requirements from the State-owned Assets Supervision and Administration Commission (SASAC) and the Ministry of Finance, China.

The third step is to identify ways to tackle the root causes of the violation of compliance codes. In order to do so, CNOOC identified a range of risk areas and developed a set of instructions to mitigate and prevent such risks. Further, through top management's continued emphasis on ethical conduct and

the integration of ethical performance into overall management evaluation, the company aims to foster a culture of integrity and "red line" (zero tolerance). To help with this, CNOOC developed a series of regulations, such as: 1) *CNOOC Internal Disciplines for Non-compliance Activities*; 2) In order to promote the strict compliance of overseas operations and safeguard CNOOC overseas assets, the company introduced the *Guideline for Compliance in Overseas Operations*; and 3) In order to avoid harming society and CNOOC due to conflict of interests, the company issued a *Guideline for Management of Conflict of Interests*.

The fourth step is to focus on monitoring and supervision of detected noncompliance. CNOOC has a designated team to handle whistleblowers. The team's contact information is available to all employees and CNOOC's partners. Whistleblowers can report to the team by fax, email or voice message. CNOOC adheres to the principles of "clear facts, confirmed evidence, right determination of nature, conformity to working procedure and handle properly" in detecting noncompliance. Suspicious violation cases will be passed to a legislative body for further handling. In the past 5 years, CNOOC received 574 reports from whistleblowers and a potential loss of RMB1.1 million was recovered. From the reports, 47 people received internal warnings or other disciplinary action. The detected cases were summarized and circulated to employees as training materials, by which CNOOC has achieved the goal of "one case detected, an area regulated and a mass of people educated". The results of compliance and anti-corruption initiatives are linked to the following measures: 1) Employee performance appraisal; 2) Annual labor cost and total salary of designated subsidiaries; 3) Total compensation package of executives; and 4) Promotion and selection of back-up executives.

A preliminary sound compliance and anti-corruption system has provided strong support and safeguard for the sustainable development of China's offshore oil industry.

Company Name: **China National Offshore Oil Corporation**

Sector: **Oil and Gas**

Country of Origin: **China**

Action: **Organizational/Internal**

Theme: **Compliance Policy/ Training / Detection**

Company Name: **Microsoft**

Sector: **Software and  
Computer Services**

Country of Origin: **U.S.A.**

Action: **Partnerships**

Theme: **Public-Private  
Partnerships/UN Convention  
against Corruption**

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## Supporting the UN Convention against Corruption through Core Expertise

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**T**he United Nations Office on Drugs and Crime (UNODC)<sup>3</sup> signed a formal agreement with Microsoft for the development, on a pro bono basis, of a blueprint for UNODC's anti-corruption portal TRACK (Tools and Resources for Anti-Corruption Knowledge, [www.track.unodc.org](http://www.track.unodc.org)) on 25 September 2009. Microsoft provided the technology necessary to develop such a blueprint, drawing on its newest SharePoint platform. A representative of Microsoft and UNODC presented the proof of concept in the plenary session of the Conference of the States Parties to the UN Convention against Corruption at its third session in Doha, Qatar, where it was positively received. The project was also presented at the UN Global Compact Leaders Summit in New York in June 2010, the Microsoft Public Security Symposium (Seattle, January 2010), and other meetings of intergovernmental bodies.

Meetings were held in Vienna and Seattle with representatives of Microsoft to determine the requirements necessary to turn the proof of concept for the project into a fully functional and publicly accessible electronic portal. A two-day architectural design session was held in Munich in early July 2010 to discuss design and developmental aspects of the portal.

TRACK is a web-based platform containing the UNCAC Legal Library, an electronic repository of anti-corruption legislation, jurisprudence, strategies and institutional data from 178 States. The portal is also a powerful

search engine that enables States, the anti-corruption community, the general public and the private sector to access a wide variety of anti-corruption knowledge and tools generated by UNODC and its partner organizations in one central location. Recognising the challenges inherent in cross-border communication among practitioners, TRACK also provides a community of practice for registered practitioners. The website was launched successfully on 1 September 2011 utilizing state-of-the art solutions, and has received broad visibility and positive feedback.

UNODC's collaboration on the TRACK portal is part of a larger partnership with Microsoft that harnesses the use of information and communication technology for preventing and fighting corruption, child exploitation, and cybercrime, and as a means of improving livelihoods, particularly in the developing world.

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3. As the custodian of the United Nations Convention against Corruption (UNCAC), the UNODC works closely with countries to assist them in ratifying the Convention and in putting legislation in place to ensure compliance with recommended anti-corruption measures. To date, 159 countries have become State Parties to the Convention, thereby demonstrating their commitment to the internationally agreed upon anti-corruption legal instrument. While ratification is the first step in developing a comprehensive anti-corruption framework, there is still the need to turn provisions into concrete laws and policies that have a significant impact on corruption levels in countries around the world.

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## Ethics Begins at Home

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**M**TN Nigeria Communications Limited is a subsidiary of the MTN Group and has footprints across 22 countries in Africa, Asia and the Middle East. MTN Nigeria commenced operations in 2001 and currently has over 41 million subscribers. It is one of the most visible brands in Nigeria.

Owing to the rapid growth of the telecommunication industry in Nigeria, which resulted in the expansion of its operations, MTN Nigeria realized early on that it would have to put in place a robust and effective ethics and governance programme. This programme would not only reinforce its corporate values but would provide employees with the assurance that doing the right thing benefits both the individual and the company. In an environment where corruption is a major concern for the public and private sectors, effective stakeholder engagement and the creation of an environment that supports ethical behaviour is critical.

MTN Nigeria realizes the importance of promoting a culture that rewards the “how” as much as it does the “what” in the achievement of high performance standards by employees.

One of the most productive employee engagement platforms has been the Divisional Village meetings. This initiative provides an engaging, interactive forum where all employees of respective Divisions congregate, regardless of level. Village meetings are a familiar concept in Nigerian and African communities and this is often where matters of concern to the community are discussed and resolved. By integrating the ethics campaign into the village meeting setting, the ethical risks identified as concerns for respective Divisions are raised, discussed and solutions are proffered in a collaborative manner.

At village meetings, everyone has a right to speak and to be heard. Employees are reminded of the need to comply with existing ethics policies and also guided on the internal sources available to assist in resolving ethical dilemmas. There’s always an ‘aha’ moment when people not only realize the

ethical implications of seemingly harmless actions or omissions, but also the impact of unethical behaviour on the company and the employees themselves. The eroding effects of fraud and other corrupt practices on salaries, performance bonuses, welfare incentives, job security and the impact of a negative corporate reputation on future employment opportunities are matters that resonate with employees.

The Ethica series was also created to further engage employees. This is a monthly cartoon release wherein Ethica, the central character, deals with specific ethical issues in a simple, reader friendly manner. A link is provided to the relevant policy document. The series has become one of the most widely read internal communications across the business.

Furthermore, illustrated online reminders are deployed throughout festive seasons to remind employees of the provisions of the Gifts Policy.

MTN Nigeria’s Supplier Code of Conduct seeks to communicate and reinforce the company’s ethical business principles within its supplier community. Suppliers who breach the code are blacklisted and barred from engaging in any business transactions with the company. Where any of their promoters are also directors of other suppliers, the related company is also barred from doing business with MTN. Stakeholders are more likely to take personal responsibility for preventing and reporting in good faith unethical behaviour when faced with certain realities. Assurances are given that there will be no victimization or retaliation for reporting unethical conducts.

With MTN Nigeria’s determination to be an ethical company, there is no slowing down efforts to continuously and consistently drive home the company’s zero tolerance policy towards fraudulent and unethical practices.

Company Name: **MTN Nigeria**

Sector: **Mobile Telecommunication**

Country of Origin: **Nigeria**

Action: **Organizational/Internal**

Theme: **Training/Awareness Raising**

Company Name: **Kenya Power, KPLC**

Sector: **Gas, Water & Multiutilities**

Country of Origin: **Kenya**

Action: **Organizational/Internal**

Theme: **Business Process/Corporate Policy/Training**

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## Advancing Transparency through Business Processes and Corporate Policy

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**K**PLC, a **Public Limited Liability** Company with 1.4 million customer accounts serving 10 million Kenyans, is responsible for procurement, transmission, distribution and retailing of electricity throughout Kenya. KPLC's Corruption Prevention Policy (CPP) was developed in 2009 to guide employees on KPLC Values and the standards of personal and professional behavior expected of KPLC staff in the performance of their duties as public officers. The CPP is informed by legislation and policies such as the Public Officer Ethics Act, 2003. It was approved by the Board for implementation and is currently being disseminated to all staff and stakeholders. The CPP provides for measures to assess the nature, likelihood and impact of corruption risks in all functions and how to develop and implement mitigation measures against those risks. Functional and corporate corruption risk assessments have been conducted and mitigation measures are under implementation. These efforts are characterized into two parts: Improvement of business processes to advance transparency; and implementation of anti-corruption policy throughout the company.

Three programmes were established to incorporate anti-corruption measures into business operations. First, the *Stima Flow Campaign* through which KPLC publicizes service standards to make its service commitments (including charges) known to the public to reduce corruption opportunities. Clients are provided with mobile phone contacts of key managers and branch business heads to ensure instant feedback. Second, the company introduced pre-payment metering to

empower customers to have more control of usage — the meter reading and disconnection function often presents an opportunity for corruption, and this system helps to enhance effective service delivery. Third, the company strengthened its customer service by utilizing technology in order to reduce opportunities for corruption. When bill payment, inquiry, and checking order status were identified as possible areas for petty corruption, KPLC introduced a system for customers to inquire and pay bills through SMS messages.

KPLC has established an Integrity and Ethics Office to coordinate, monitor and continuously evaluate the Corruption Prevention/Integrity & Ethics programme. The Ethics Office reports to the Audit Committee of the KPLC Board of Directors. Furthermore, within senior management, a corruption prevention committee was established to oversee existing corruption prevention initiatives. These are implemented at the central, divisional, and regional levels. KPLC also appoints integrity champions to serve as a secretary to the Corruption Prevention Committee. The Central Corruption Prevention Committee is chaired by the Managing Director and Chief Executive Officer. Approximately 78 change agents from all cadres and levels of seniority were appointed based on integrity criteria and standards to assist in the coordination of the Integrity & Ethics Programme throughout the company. KPLC organizes regular forums and training sessions to ensure that all of its employees are aware of their anti-corruption programmes as well as their improved processes.

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## Developing Policies on Gifts, Travel, and Entertainment

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**S**ymantec Corporation (Symantec), a security, storage, and systems management solutions company based in Mountain View, California, with operations in more than 40 countries, has put in place the Symantec Code of Conduct in order to promote a culture of ethics and responsibility among employees. The Code of Conduct applies to all Symantec employees (including directors and officers), subsidiaries, and entities worldwide and emphasizes compliance with the provisions of the U.S. Foreign Corrupt Practices Act and other global anti-bribery and anti-corruption laws. The company's ethics, integrity policies and procedures are based upon the Code of Conduct, and the Board of Directors is responsible for the company's legal and ethical compliance including its anti-corruption policies and actions.

In an effort to fully integrate the Code of Conduct into the company, the Board of Directors has introduced a series of communication and engagement campaigns designed to educate Managers. Since the results of an internal survey revealed that 75 percent of Symantec's employees with questions about ethics would turn first to their direct supervisor for guidance, Managers will participate in training sessions that will equip them with practical tools and information which will help them recognize and effectively respond to their employee's concerns. The company has also produced a quarterly Ethics & Compliance Manual in order to provide Managers with high-level key messages, resources, training reminders, and enhanced internal self-help resources. In addition, a mini-campaign called "Need to Raise a Red Flag" has been launched using posters and the corporate intranet.

The company views the Code of Conduct as an evolving document. Symantec has developed guidelines for employees detailing policies and procedures on topics ranging

from gifts, travel and entertainment, training materials and written dilemmas scenarios, to charitable contributions. The training materials outline what is acceptable as a good will gesture vis-a-vis inappropriate conduct and red-flag items. It is critically important that employees clearly understand how a goodwill gesture could easily be misunderstood or inadvertently breach the Code of Conduct. As the company's understanding of these issues develops, they will supplement the Code with relevant topics.

Employees are expected to report any Code of Conduct violations, and the company provides numerous avenues to do so. Employees may report concerns to their Manager, anyone in their management reporting chain, a Human Resources representative, or the Office of Ethics and Compliance. Matters may also be discussed with line managers or senior managers. An external, independent third party anonymous hotline called Ethicsline is open to employees, customers, suppliers, partners, shareholders and any stakeholder in the company who wishes to inform Symantec of suspected ethics violations. On average, during 2008, 2009, and the first half of 2010, 22 percent of all calls were made anonymously via Ethicsline.

All reports of possible Code of Conduct violations will be forwarded to the Office of Ethics and Compliance. The Office of Ethics and Compliance ensures that all complaints are addressed by the most appropriate Symantec office or department. In addition to investigating reported concerns, the Office of Ethics and Compliance monitors and audits employees' compliance with the Code of Conduct. The Chief Ethics & Compliance Officer has direct access to Symantec's CEO and the Board's Audit Committee so that matters of concern can be escalated quickly.

Company Name: **Symantec**

Sector: **Software & Computer Service**

Country of Origin: **U.S.A.**

Action: **Organizational/Internal**

Theme: **Policy on Gifts, travel, and entertainments/Training**

Organization Name: **Ethos Institute**

Partner: **Office of the Comptroller General of Brazil (CGU)**

Sector: **Business Association**

Country of Origin: **Brazil**

Action: **Collective Action**

Theme: **Policy Incentive**

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## Pro-Ethics Company List in Brazil

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**R**ecognizing the importance of developing anti-corruption initiatives and integrity policies to level the playing field in the private sector, the Office of the Comptroller-General (CGU) has developed a portfolio of actions, many in partnership with the Ethos Institute for Business and Social Responsibility. The Ethos Institute<sup>4</sup> is a Brazilian non-governmental organization created with the mission of mobilizing and helping companies to manage their businesses in a socially responsible way, making them partners in the construction of a fair and sustainable society.

To create an incentive structure for ethical performance, the CGU and Ethos Institute developed a list of clean (ethical) companies with a strong emphasis on compliance and ethics. The Pro-Ethics Company List project ([www.cgu.gov.br/cadastropoetica](http://www.cgu.gov.br/cadastropoetica)) was launched on 9 December 2010 to mark International Anti-Corruption Day. The Pro-Ethics Company List aims to publish the list of corporations committed to implementing integrity measures and promoting a transparent business environment. The first list, published on 2 September 2011, included the following four companies: AES Gaúcha, EDP Energias do Brasil, Johnson Controls Building Efficiency, and Siemens. The second list was published on 1 December 2011 and featured four additional companies: AES Eletropaulo, AES Tiete, CPFL Energia and Infraero. The next round of evaluations will be announced on 12 April 2012.

While it is voluntary for companies to choose to be considered for the pro-ethics list, they must meet several mandatory and non-mandatory requirements for eligibility. The vetting process is done through the provision of a questionnaire. Any corporation interested in joining the list is asked to complete and submit a voluntary membership request form, available on the website of the Pro-Ethics Company List. In addition, a company is asked to fill out a questionnaire on the company's implementation of integrity and anti-corruption measures. For each item on the questionnaire, a company must provide specific evidence to support its claim. In the questionnaire, there are 29 mandatory requirements for 100 per cent compliance and 36 desirable requirements for over 50

per cent compliance. The Pro-Ethics Company List's Executive Secretariat, supported by CGU staff, is responsible for validating information and documents, and conducting, when judged appropriate, site visits in order to verify the authenticity of documents provided. Furthermore, the Executive Secretariat conducts interviews with employees and stakeholders to confirm the practical implementation of ethics and integrity measures. The Executive Secretariat makes an assessment by reviewing all the information and documents made available through an electronic system. After the initial analysis, the Executive Secretariat writes a report assessing whether a candidate's firm complies with all the necessary requirements for its membership, and submits the report for the Steering Committee's review and approval.

The Steering Committee is a multi-stakeholder body responsible for analyzing requests by companies wishing to be considered for the list and for assessing the need to update participation criteria. It consists of one member from the nine following public and private institutions: Office of the Comptroller General (CGU), Ethos Institute, National Confederation of Industries (CNI), Brazilian Federation of Banks (Febraban), BM&F Bovespa (São Paulo Stock Exchange), Ministry of Development, Industry and Trade (MDIC), Brazilian Agency for the Promotion of Exports and Investments (Apex), Independent Auditors Institute of Brazil (Ibracon) and Brazilian Support Service to Micro and Small Companies (Sebrae). The Committee is

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It is a center for mobilization, organization of knowledge, exchange of experiences and development of tools that can help companies to analyze their management practices and deepen their commitment with corporate responsibility. The Ethos Institute, Patri Governmental Relations and Public Policies, the UNDP, the UNODC, the WEF and the Brazilian Committee of the Global Compact started articulating in 2005 for the creation of the Business Pact for Integrity and Against Corruption, launched in 2006 as a collective action of the private sector towards preventing and combating corruption. Back in 2007, the CGU, together with the Brazil and South Cone branch of the United Nations Office on Drugs and Crime (UNODC) supported, institutionally and financially, the creation of the "Clean Company" (EmpresaLimpa) Campaign, designed by the Ethos Institute. The campaign's website can be accessed at [www.empresalimpa.org.br](http://www.empresalimpa.org.br). The Ethos Institute, supported by 15 enterprises and the CGU, created the Working Group of the Pact, established in order to mobilize business leaders and develop strategies to provide support to signatories for the implementation of integrity and anti-corruption policies. This working group now has about 40 companies who meet monthly in Sao Paulo and Rio de Janeiro to discuss lessons learned and actions to implement the Pact.

alternately chaired by a member of the CGU or Ethos Institute.

There is no time limit for a company to remain on the list. However, every two years all the listed firms must go through a process of reassessment and revalidation of the information originally provided. The Steering Committee may decide to update the requirements needed to join the list. In cases where a situation raises doubts about a listed company's commitment to ethics and integrity, the firm in question may be suspended temporarily or permanently. A company will be removed from the list if it: a) Remains suspended for a period of a year; b) Is included in the CEIS – List of Ineligible and Suspended Firms; or c)

Quits or is excluded from the Ethos Institute's Business Pact for Integrity and against Corruption. If a company is removed due to a) or b) reasons, it may request membership again a year after its exclusion. A company that is considered ineligible to join the list may appeal the decision of the Steering Committee, which will reassess the company's case.

Currently, the Executive Secretariat is working on the development of the Guidelines to help interested firms answer the assessment questionnaire. These Guidelines will serve as an orientation guide on measures that will be accepted as evidence for each item of the questionnaire.

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## Fostering Better Business Environment through Collective Action

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**B**eijing New Century Academy on Transnational Corporations (NATC) is a Beijing-based non-governmental organization specializing in research strategies for multinational companies who seek to invest in China and Chinese companies operating abroad.

With the growing influence of Chinese businesses around the world, there is a greater need to strengthen transparency and compliance measures in the private sector. Important efforts have been made to improve existing laws and regulations. The NATC recognizes the importance of bringing together like-minded individuals to create a framework for anti-corruption collective action to support these existing efforts. Since 2009, the NATC has embarked on a collective action initiative to combat corruption. Influential government departments and officials, as well as state-owned and private-owned enterprises, have joined forces with multinational corporations in China. This initiative aims to: a) Motivate and facilitate Chinese companies to enhance their compliance efforts; b) Submit policy recommendations to the central government and related departments to improve law enforcement mechanisms; and c) Facilitate dialogues between govern-

ment officials and business leaders to enable a collective action.

Publication: NATC conducts theoretical and empirical studies on anti-corruption issues, and disseminates research findings to wider audiences by publishing a series of books on compliance and integrity. The first book in the series, Compliance-First Priority of Corporate Responsibilities, was published in 2009. The second book, Compliance New Trend of Global Corporate Governance, was published in March 2012. More books will be published in due course. The NATC believes that these books will help businesses raise awareness of compliance issues.

Practical Guide for Chinese Companies: Based upon international law, regulations and resources including the Organisation for Economic Co-operation and Development Conventions, the Global Compact Reporting Guidance on the 10th Principle, the Foreign Corrupt Practice Act of the U.S., and the UK Bribery Act as well as practices of advanced companies on integrity and compliance, the NATC has issued 17 indexes to advise companies in China to establish or strengthen corporate compliance systems. In the future, the NATC aims to integrate research findings and to develop a practical guide.

Organization Name:

**New Century Academy on Transnational Corporations**

**Partner: Siemens Integrity Initiative**

Sector: **Non Governmental Organisation**

Country of Origin: **China**

Action: **Collective Action**

Theme: **Policy Incentive/ Dialogue Forum**

**Training Workshops:** To apply research findings outlined in the books and put practical guides to use, the NATC provides training and educational opportunities to Chinese companies. Government officials are invited to join selected training programmes. The NATC views these training workshops as a platform for education as well as an opportunity to foster communication between business leaders and policy makers. Two training workshops have already been organized. The first one brought together officials from relevant government departments, managers from multinational companies, Chinese state-owned enterprises, Chinese private companies and international organizations. The second training was conducted for staff of the Hainan Airline Group whose work is closely related to compliance. In 2012, more training workshops will be held specifically targeting state-owned enterprises and government officials.

**Policy Recommendations to the Government:** A key strategic advantage that NATC brings to the fight against corruption is that it is able to submit policy recommendations directly to the relevant central government departments and officials. A number of legislations have been drafted on the basis of the NATC's theoretical and empirical studies. Two internal reports on compliance have been produced and submitted to government authorities (the abstracts of these reports can be accessed at <http://www.compliance.org.cn/>).

**Chinese Compliance Information Website:** An official website for compliance was launched on 1 July 2011 (<http://www.compliance.org.cn/>). The objective of the website is to provide native Chinese speakers with up-to-date information on anti-corruption compliance and an overview of the business environment at home and abroad. NATC continues to collect, translate and update data on the website.

**Compliance Club:** NATC has set up a club for executives and compliance officers where members can form an alliance to fight corruption and bribery in China. The members meet on a regular basis to exchange knowledge, experience, and ideas on how to keep themselves and their businesses free from all forms of corruption.

**Annual Compliance Forum:** Annually, NATC holds a day-long forum to distribute the findings in the compliance book and other resources, as well as annual updated information on progress made to provide a clean business environment. Key members of the Compliance Executive Club are invited to share insights and wisdom generated from the Club. Not only do hundreds of individuals attend these forums, but many more remain in constant contact with one another, strengthening the network and the fight against corruption. The annual forum of 2012 was held in Beijing on 30 March 2012.

Organization Name: **Global Compact Kenya Network**

Partner: **Kenyan Private Sector Alliance, the Ethics and Anti-Corruption Commission, and GIZ**

Sector: **Business Association**

Country of Origin: **Kenya**

Action: **Collective Action**

Theme: **Industry Code of Conduct**

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## Anti-Corruption Action through Code of Ethics for Businesses

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**T**he Global Compact Kenya Network embarked on a three-year project called the "National Corruption Prevention Pact" together with the Kenyan Private Sector Alliance, the Ethics and Anti-Corruption Commission, and GIZ, a German development cooperation agency to implement the United Nations Global Compact's 10th principle through a multi-stakeholder approach. The project aims to expedite the development of a National Corruption Prevention Pact between the

public and private sectors in Kenya and to strengthen anti-corruption measures. The project builds upon a series of anti-corruption learning workshops that the Global Compact Kenya Network (GCKN) organized in the last few years.

In collaboration with the Ethics Institute of South Africa, a leading expert on ethics and governance, the project team drafted the Code of Ethics for Businesses in Kenya as a first step towards collective action. In November 2011, a workshop was conducted on the

draft of the Code of Ethics for Businesses with participants from over 20 companies including new Global Compact signatories. To seek broader views and comments, the draft was posted on the website of the Kenya Association of Manufacturers (hosting the GCKN).

In March 2012, the final draft of the Code of Ethics for Businesses in Kenya was launched with the initial 44 signatories representing leading Kenyan companies in manufacturing, agriculture, telecommunication, academia, service, banking, and hospitality. Inspired by the United Nations Global Compact's Principles, the Code asks participating corporations to make a commitment to conduct business in a responsible manner. The Code is one of the initiatives in which businesses are being encouraged to play a greater role in advancing self-regulation within the industry and championing ethical conduct in business. The Code is voluntary and applies to signatories, but it is meant to complement, not replace, an individual company code of ethics. The Code also aims to enable companies that have not developed a company code to take their cue from the Code of Ethics for Businesses in Kenya.

The Code identifies the stakeholders of a business and its specific commitments: organizations, shareholders and investors, customers, suppliers, contractors & agents, society, state and government, and the natural environment. The commitments are based on respect, responsibility, compliance and corruption prevention with respect to each stakeholder. They will teach businesses how to interact with these stakeholders, and signatories will be responsible for making sure their commitments honor the Code. Commitments to the Code will be renewed annually. In the first year following their commitment to the Code, companies are not expected to report on their adherence to the Code, but to: a) aspire to adhere to the Code; b) make it public that they have committed to the Code (on a website, in an annual report, or through the annual Global Compact Communication on Progress report); and c) participate in seminars and workshops organized by GCNK, where relevant. In the second year, signatories are expected to publicly report on their

progress. Each company will make its report available to the GCNK Secretariat. In the report, the company will indicate: How it has applied and integrated the Code in the company; and progress it has made with implementing an internal ethics and anti-corruption management programme, for example, ethics and corruption risk assessment; top level commitment; policies and procedures; effectiveness of implementation; training; awareness; and monitoring and review.

In addition, a company will visibly promote responsible business conduct, exert influence on other companies in its sphere of influence to commit to the Code, and participate in relevant seminars and workshops organized by GCNK. A company may immediately start adhering to the criteria under 'Integration and Reporting' from the first year, but only needs to start reporting from the second year.

Non-adherence to the Code has consequences. Should a signatory company transgress the Code, organized business will institute the following three steps, taking cognizance of the particulars of the case:

- Step 1:** Discuss the transgression with the offending company at the highest level (Board of Directors, CEO) to ensure that steps are put in place to avoid a recurrence;
- Step 2:** Release a public statement expressing moral disapproval of the transgression;
- Step 3:** Publicly exclude the offending company from the Code until it is satisfied that the transgression has been corrected.

If the Code is endorsed and adopted, it will create a sustainable business environment and a win-win situation for the stakeholders. Since it has been demonstrated that being associated with good corporate citizenship is a useful tool for competitive advantage, it is also anticipated that this will help create an honest business environment, which ultimately will reduce costs and increase company profiles.

Organization Name: **Global Compact Serbia Network**

Partner: **Serbian National Chamber of Commerce and the UNDP Serbia**

Sector: **Business Association**

Country of Origin: **Serbia**

Action: **Collective Action**

Theme: **Reporting Guidance on the 10th Principle**

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## Fighting Corruption through Anti-Corruption Declaration

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**T**he Global Compact in Serbia began as a joint initiative of the United Nations Development Programme in Serbia and the National Bank of Serbia, and it is devoted to assisting its participants strengthen compliance and anti-corruption measures through the implementation of the 10th Principle. The first nine organizations (8 companies and 1 civil society organizations) joined the United Nations Global Compact in December 2007; in 2011, the Network has 71 participants and runs 7 working groups. With numerous activities and active outreach efforts, the Global Compact Serbia Network (GC Serbia Network) has grown into one of the most vibrant Global Compact Networks in the world.

In 2008, the Working Group for Anti-Corruption in Serbia agreed to undertake a range of concrete activities to help companies prevent corruption by recognizing it as one of the major problems business face in the country. The Group decided to institutionalize good anti-corruption practice by developing a Declaration against Corruption and creating a series of events in order to facilitate learning and encourage dialogue among participants as well as inspire concrete action towards positive change. Extensive consultations took place with all its participants as well as other relevant stakeholders in the country.

The outcome of these consultations was the Anti-Corruption Declaration adopted by the Assembly of the GC Serbia Network in December 2010. The Declaration is designed to act as a core criteria in assessing participants' successful implementation of corporate social responsibility in Serbia. The Declaration also requests that its signatories implement the Global Compact/Transparency International's Reporting Guidance on the 10th Principle against Corruption for reporting (communications on progress) and benchmarking processes. In addition, it states that participants involved in corruption can be permanently excluded from the Global Compact Serbia Network. The Declaration was circulated to all participants and their endorsement of the Declaration sent a strong signal that the com-

pany embraces their role and responsibility in the fight against corruption. In the Declaration, participants reiterate their commitment to develop a compliance mechanism to prevent corruption in their organizations as well as to help others by sharing their expertise and experiences with the full support of the Working Group for Anti-Corruption in Serbia.

Serbia is one of the first Global Compact Networks that ask its participants to use the Reporting Guidance in the development of their annual Communications on Progress in the fight against corruption. One year after signing the Declaration, signatories are required to submit a summary of measures undertaken to prevent and fight against corruption in their companies to the Working Group for Anti-Corruption in Serbia. The Network Steering Committee is responsible for monitoring the implementation of the Declaration including its signatories' ethical practices.

The Declaration also played a critical role in bringing other national stakeholders and the GC Serbia Network together to join forces with signatories of the Anti-Corruption Declaration. This example showcases how the GC Serbia Network inspires collective action and supports strengthening an enabling environment for anti-corruption policies.

Since the 10th Principle was instituted in 2004, a strong signal has been sent worldwide that business shares a responsibility in the fight against corruption, and that ethical policies are an essential part of corporate responsibility. The Declaration provides a mechanism for companies in Serbia to endorse their ongoing commitment to the 10th Principle. It also sends an important message that one can do business ethically and responsibly without jeopardizing others. The GC Serbia Network's activity is noted as Best Practice 2010 in the GC Local Network Report 2011 (issued in May 2011).

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## Strengthening Industry-Wide Awareness of Corruption

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**T**he Royal Institution of Chartered Surveyors (RICS) has around 100,000 qualified members and over 50,000 students and trainees in some 140 countries and provides the world's leading professional qualification in land, property, construction and the associated environmental issues. Since it is an independent organization, RICS acts in the public interest. It sets and regulates the highest standards of competence and integrity among our members; and provides impartial, authoritative advice on key issues for business, society and governments worldwide. Because the RICS is a UK-anchored institution, the UK Bribery Act, which came into force on 1 July 2011, applies in all territories where RICS has a presence.

The RICS Executive Team has issued an internal zero tolerance statement and has adopted and introduced a Global Anti-Bribery and Corruption Policy which covers critical aspects such as whistle blowing, conflicts of interests and gifts and hospitality. To be able to identify corruption risks across non-UK locations and to tailor our anti-corruption procedures accordingly, all RICS world regional directors have to complete a Bribery Act Risk

Assessment, and all employees must learn how to recognize and deal with bribery and corruption issues and pass an anti-bribery training module.

RICS has also provided RICS members and regulated firms with advice and guidance about the Bribery Act 2010 and the measures that firms can put in place to help combat bribery and corruption. Dedicated web content has been made available on: [www.rics.org/bribery](http://www.rics.org/bribery). To raise further awareness of the Bribery Act, as well as strengthen corporate anti-corruption measures, the RICS is developing a similar training module to the various RICS member committees and Boards as part of their induction programme.

As a member of the UK Anti-Corruption Forum, RICS has been involved in promoting anti-corruption and anti-bribery standards. RICS also joined a multi-stakeholder group together with Transparency International, which oversees the UK section of the Construction Sector Transparency Initiative (CoST). This World Bank guided study was piloted in seven countries and designed to highlight corruption and mismanagement in the construction sector.

Organization Name: **Royal Institutions of Chartered Surveyors**

Sector: **Business Association**

Country of Origin: **UK**

Action: **Collective Action**

Theme: **Industry Awareness Raising**

## **Annex: Global Compact Resources – Anti-Corruption**

The following resources have been produced by the Global Compact Office – often in cooperation with key partners and experts – or by one of the associated UN agencies. For more information and to download resources, please visit the Global Compact website: [http://www.unglobalcompact.org/Issues/transparency\\_anticorruption/Anti-Corruption\\_Guidance\\_Material.html](http://www.unglobalcompact.org/Issues/transparency_anticorruption/Anti-Corruption_Guidance_Material.html)

### **Fighting Corruption in the Supply Chain: A Guide for Customers and Suppliers**

Outlines common supply chain corruption scenarios and provides a framework and set of tools for addressing them. (UNGC, 2010)

### **The Fight Against Corruption –E-Learning Tool**

Offers an online learning platform that companies can easily access to obtain practical guidance on how to fight corruption in all forms through six interactive dilemma scenarios. (UNGC/ UNODC, 2010)

### **Collective Action – Building a Coalition against Corruption**

Provides options for combating market corruption based on “how to” examples, including a range of tools that help users tailor collective action frameworks to their specific circumstances. (UNGC/ICC/Transparency International/WEF/WBI/CIPE/Global Advice Network/Grant Thornton/Siemens, 2010)

### **Reporting Guidance on the 10th Principle Against Corruption**

Equips business with practical means to report on anti-corruption policies and actions comprehensively and effectively through a set of 22 reporting elements. (UNGC/Transparency International, 2009)

### **RESIST – Resisting Extortion and Solicitation in International Transactions**

A scenario-based tool for employee training on resisting extortion and solicitation in international transactions. (UNGC/ICC/Transparency International/ WEF, 2009)

### **Clean Business is Good Business – The Business Case Against Corruption Brochure**

outlining why companies and corporate practitioners should actively engage in the fight against corruption. (UNGC/ICC/Transparency International/ WEF, 2008)

### **Business Against Corruption – Case Stories and Examples**

Examples of how to deal with challenges when implementing the Global Compact’s anti-corruption principle. (UNGC, 2006)

### **Business Against Corruption –A Framework for Action**

Resources and tools to assist companies in implementing the 10th principle on corruption. (UNGC/IBLF/Transparency International, 2011)



# The Ten Principles of the United Nations Global Compact

## HUMAN RIGHTS

- Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2 make sure that they are not complicit in human rights abuses.

## LABOUR

- Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4 the elimination of all forms of forced and compulsory labour;
- Principle 5 the effective abolition of child labour; and
- Principle 6 the elimination of discrimination in respect of employment and occupation.

## ENVIRONMENT

- Principle 7 Businesses should support a precautionary approach to environmental challenges;
- Principle 8 undertake initiatives to promote greater environmental responsibility; and
- Principle 9 encourage the development and diffusion of environmentally friendly technologies.

## ANTI-CORRUPTION

- Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

