

**UN GLOBAL COMPACT**  
COMMUNICATION ON ENGAGEMENT FOR  
NON-BUSINESS ORGANISATIONS 2018-2020  
TRANSPARENCY INTERNATIONAL SECRETARIAT

United Nations Global Compact  
685 3rd Avenue, 12th Floor  
New York, NY 10017  
United States

**Re: Statement of Continued Support for the UN Global Compact**

Berlin, 08 September 2020

Dear Secretary General,

I am writing to confirm the continued support of the Transparency International (TI) Secretariat for the principles of the United Nations Global Compact.

In 2004 the UN Global Compact added a 10th Principle Against Corruption. Ever since, the Transparency International Secretariat has endeavoured to support the mission of the UN Global Compact and has cooperated actively with the initiative in numerous ways. As the organisation leading the fight against corruption, we are committed to maintaining our support for the Global Compact and in particular the 10th Principle Against Corruption, and will continue our active cooperation with this important initiative.

This third Communication on Engagement (COE) highlights activities that the secretariat undertook between October 2017 and June 2020 in contributing to the Global Compact's agenda, with a focus on the 10th Principle. It provides an update on, for example, our work as part of multi-stakeholder initiatives against corruption, our studies assessing and promoting corporate transparency and business integrity, and our participation in international high-level fora. Many of our activities have been undertaken in close cooperation with the Global Compact. Transparency International national chapters that are members of the Global Compact's local networks are entities in their own right and as such are required to submit individual COEs. Hence, this report relates to the Transparency International Secretariat only.

On behalf of the secretariat, it is my great pleasure to express our continued support for the UN Global Compact and to renew our commitment to the initiative and its principles, and the 10th principle in particular.

Sincerely,



Daniel Eriksson  
Interim Managing Director

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# 1. ABOUT TRANSPARENCY INTERNATIONAL

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As a global movement with one vision, we want a world free of corruption. We hold the powerful and corrupt to account, by exposing the systems and networks that enable corruption. We advocate for policies and laws to change systems, and build coalitions to drive national, regional and global change. Our vision of a corruption-free world is not an end in itself. It is a fight for social and economic justice, human rights, peace and security.

In order to turn this vision into reality, we are leading the fight against corruption through chapters in more than 100 countries, and an international secretariat in Berlin. Transparency International gives voice to the victims and witnesses of corruption. We work together with governments, businesses and citizens to stop the abuse of power, bribery and secret deals.

The Transparency International Secretariat tackles corruption on the regional and global stage. Based in Berlin, it provides leadership for the movement's international initiatives, supports chapters and coordinates our regional work through knowledge sharing, advocacy and coalition building.

In collaboration with national chapters the Secretariat produces numerous studies, tools and policy positions. It serves as a knowledge centre, offering valuable insights into the dynamics of corruption, and new approaches to tackling it.

Transparency International has a strong belief in coalitions. These efforts bring together a wide variety of representatives including policy-makers, citizens, companies and the media. We have played a crucial role in bringing about and bolstering anti-corruption initiatives such as the OECD Anti-Bribery Convention, the UN Convention against Corruption, and the UN Global Compact.

# 2. TRANSPARENCY INTERNATIONAL AND THE UN GLOBAL COMPACT

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On 24 June 2004, participants at the UN Global Compact Leaders' Summit unanimously agreed to add a 10th Principle Against Corruption. Since that milestone was achieved, Transparency International has endeavoured to support the mission of the Global Compact and to cooperate actively with the initiative.

Since 2004, Transparency International has assumed high-level representation on the governing body of the Global Compact. Our founder Peter Eigen first represented Transparency International on the Global Compact advisory board. In 2006 he was succeeded by former chair Huguette Labelle and in June 2015 by Cobus de Swardt, the former managing director of the Transparency International Secretariat. In 2018 and 2019, we were represented by former managing director Patricia Moreira. As of July 2020, Chair of the TI Board Delia Ferreira Rubio is our official representative on the UN Global Compact Board.

In addition, the Transparency International network is involved with the Global Compact local networks. Several of our chapters have been active in these networks, namely those of Australia, Austria, Georgia, Germany, Kenya, Korea, Lebanon and Turkey. Under the umbrella of our movement-wide strategy "Together against Corruption", the Chapters operate as independent organisations, with their strategic priorities and workplans based on the specific environments in which they are active. As such, each are required to submit their own Communication on Engagement (COE). As of July 2020, following a thorough internal and external consultation process, we have begun working on our next strategy covering 2021 to 2030. The final Transparency International 2030 Strategy will be reviewed and voted on in our Annual Membership Meeting in November. This report therefore focuses on the engagement of the Transparency International Secretariat with the Global Compact.

## 2.1 PROMOTING BUSINESS INTEGRITY

The Business Integrity Programme of the Transparency International Secretariat has been supporting the aims of the Global Compact and working closely with the initiative since 2004. The Business Integrity Programme has promoted the Global Compact within our network of more than 100 chapters, and has encouraged them to collaborate with the Global Compact, more specifically to ensure the implementation of the 10th Principle Against Corruption.

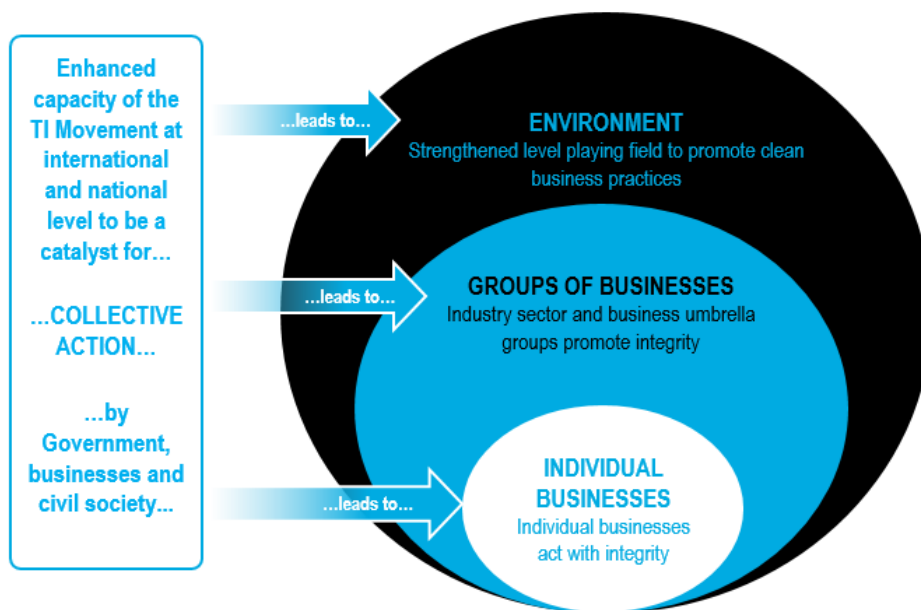
The Business Integrity Programme aims to achieve:

*“Reduced corruption through improved transparency, integrity and accountability in business practices worldwide”*

Accordingly, as also presented in the following graphic, the objectives of the programme are to significantly improve:

- the anti-corruption environment in which businesses operate, that is the rules and regulations that apply to the business sector and their enforcement, thereby contributing to a more level playing field
- the anti-corruption standards and practices of groups of businesses
- the anti-corruption standards and practices of individual businesses, and the behaviours of powerful individual business leaders

## The Business Integrity Programme



Collective action involving governments, businesses and civil society underpins our work on all three levels. We believe that sustainable change in the area of anti-corruption can only be achieved when stakeholders act jointly, while each party takes adequate measures individually to reduce corruption.

Central to this approach is Transparency International's work with bodies and initiatives such as the Global Compact. The secretariat, through its Business Integrity Programme, has concentrated its work over the past two years on the following activities to promote collective action as a means of addressing corruption. As a major collective action initiative, the UN Global Compact is an important platform and partner for Transparency International.

## 2.2 OUR WORK WITH INTERNATIONAL BUSINESS-FOCUSED ANTI-CORRUPTION INITIATIVES

### UN Global Compact 10th Principle Working Group

The Transparency International Secretariat represents our movement in various international fora, with the aim of contributing to their agendas and advancing international standards to achieve greater integrity and transparency in the business sector.

As part of its commitment to collaborate with the Global Compact, Transparency International has over the years contributed its expertise to the development of a number of Global Compact key resources, for use by companies that participate in the 10th Principle Working Group. This contribution has included Global Compact corporate guidance materials focusing on risk assessment, supply chains and whistleblowing. Transparency International promotes these resources to internal and external audiences.

In addition, much of Transparency International's advocacy work, although not necessarily conducted in collaboration with the Global Compact, broadly supports the objectives of its 10th Principle. We participate in a number of business fora (some of which the Global Compact also contributes to) to present our work, the details of which are presented in the following sections.

### The Sustainable Development Goals and Goal 16

The Sustainable Development Goals cover in their 17 principles a wide range of aspirations to be achieved through the actions of governments to “end poverty in all its forms” by 2030. Goal 16, which pledges *a peaceful world, one with access to justice and open and accountable institutions*, makes direct reference to the need to prohibit corruption in all its forms in Target 16.5.

Business plays a key role in the implementation of the SDGs, and Transparency International will continue to collaborate with the Global Compact to make this happen.

The role corruption plays in hindering the SDGs, by hampering growth, distorting the distribution of resources and undermining the provision of basic services, is widely acknowledged. In order to fight this situation and contribute to the implementation of the 2030 Agenda, Transparency International has focused on the effective achievement of SDG 16 targets, the impact(s) of corruption on the SDG framework, and finally the corruption risks in financing sustainable development.

- Corruption as a “standalone” issue under SDG 16

In 2018, Transparency International developed a methodology in the form of both a [questionnaire](#) and a [methodological note](#) that helps civil society and other actors monitor progress or lack thereof in the fight against corruption under SDG 16 at country level. Over 43 of our national chapters across all regions have produced parallel reports. We therefore now possess a wealth of

information on the state of anti-corruption efforts worldwide. Not surprisingly, the reports note some consistent and major shortcomings in most jurisdictions, with regards to political corruption and illicit financial flows.

Transparency International will continue producing SDG 16 parallel reports, and is exploring ways to make this information available to the public in a comparable and easy-to-use format.

- Corruption as a “cross-cutting” issue

Transparency International has pioneered an innovative approach to monitoring corruption’s impact across the SDG framework. Based on a [resource guide](#) published in 2017, and an [e-learning course](#) developed in 2018, we are piloting national SDG indicator dashboards to track, prioritise and tackle corruption risks in specific SDG sectors. This involves conducting sectoral risk assessments, identifying suitable anti-corruption measures for the most critical risks, and developing framework, progress and impact indicators to assess how corruption affects SDG implementation.

Transparency International has also developed case studies in which we have shed light on the links between grand corruption and the lack of progress in certain SDGs.

Transparency International will broaden its pilot study to other jurisdictions and sectors, and is exploring ways to launch a yearly product shedding light on the linkages between SDG 16 and other SDGs, potentially in the form of a 10-year count-down global report. In this year’s edition, for example, linkages between corruption and marginalised groups will be explored under the umbrella of “leave no-one behind”.

- Corruption in financing the SDGs

Very little research has been undertaken regarding the distortionary effect corruption can have on the mobilisation of funds needed to meet SDG targets, such as domestic revenue mobilization and development finance. For this reason we have also produced research into corruption in development finance, including a [working paper](#) on corruption in blended finance.

## Business 20

Since the Mexican presidency of the G20 in 2012, Transparency International has played an active role in Business 20 (B20), the business outreach group which provides advice to the G20. We are active in the B20 Anti-Corruption Task Force, and we are one of the few non-corporates that are part of B20.

During the 2018 G20 in Argentina, Poder Ciudadano, our chapter in the nation, hosted the C20 process. As one of seven engagement groups of the G20, the C20 is in a unique position to represent the interests of citizens and advocacy groups in urging world leaders to act on behalf of the people they serve, and not just in the best interests of politicians and special interest groups.



The C20 and the B20, the latter representing the private sector, have released two historic joint statements highlighting the crucial role of anti-corruption efforts in maintaining economic and financial stability.

The [first statement](#) urges G20 countries to create specific anti-corruption action plans, to help combat cross-border corruption and build accountability. The [second statement calls for increased integrity and transparency in state-owned enterprises](#), which are essential to national economic success. Transparency International has contributed to both of these statements.

Transparency International has joined CIVICUS and Amnesty International in [deciding not to participate in this year's C20 process hosted by Saudi Arabia](#). Consequently, this year we were also not involved in the B20 process. We have found the Saudi-led C20 process to be lacking in many respects, most notably in guaranteeing the C20's fundamental principles. Early in the 2020 C20 process, we have observed a marked lack of transparency from the C20 hosts. That being the case, we are committed to working together to make sure that the civil society's voices are heard in 2020 and beyond in the G20 processes.

## ISO 37002 and Whistleblower Protection

Transparency International has held an observer status with the ISO Technical Committee on Governance of Organizations ([ISO/TC309](#)) since March 2019, acting as a "liaison organisation". We have actively contributed to the development of ISO Guidelines for Whistleblowing Management Systems ([ISO 37002](#)), through the dedicated ISO Working Group. The guidelines, to be published in 2021, provide advice for organizations on how to set-up and run internal whistleblowing systems. Whistleblowing is one of the most effective means to prevent and uncover corruption and other wrongdoing. Not only does Transparency International believe that laws and regulations play a fundamental role in curbing corruption, but also we believe organisations have a responsibility to proactively contribute to combating malpractice. This can be achieved through leadership commitment to establishing a culture of integrity, transparency, openness and compliance. The ISO guidelines aim to support the fostering and implementation of such a culture.

Following sustained pressure and expert guidance from Transparency International, the EU adopted a directive on whistleblower protection in October 2019. Many of our recommendations were included in the agreed text, and as such the legislation is stronger than anyone had realistically anticipated. All EU member states as well as EU candidate countries will have to adopt whistleblower protection legislation in line with the directive by December 2021, and we are guiding the implementation process.

## Illicit Financial Flows and Anti-Money Laundering

In October 2019, members of the Financial Action Task Force (FATF), the global anti-money laundering standard-setter, met in Paris. As civil society organisations and experts from civil society are not allowed to participate in these meetings, Transparency International organised a parallel event with experts from the media, academia, think tanks and civil society organisations, including our chapters, Global Witness and Open Ownership. The meeting's main objectives were to demonstrate the value and expertise that civil society can bring to the debate around illicit financial flows and anti-money laundering, to share specific proposals for reforms and changes to the global anti-money laundering system, and to contribute to increasing media and policy attention about the role FATF and its member countries play.

During the 2020 FATF plenary in Paris between 16 and 21 February, Transparency International joined The B Team, Global Witness, Open Ownership and The Tax Justice Network in urging delegates to support proposals in which Recommendation 24 mandates verified, central registers of beneficial ownership information. Such registers must be public and online in an open data format.

## World Economic Forum Partnering Against Corruption Initiative

Transparency International has continued to participate in the work of the World Economic Forum's Partnering Against Corruption Initiative (PACI), as a board member of the initiative (**PACI Vanguard**) as well as on the working group level. PACI was created more than 10 years ago by a group of CEOs from the engineering and construction, mining and metals, and energy sectors, and is recognised as being a prominent cross-industry anti-corruption initiative with more than 80 corporate members and CEO-level involvement. Transparency International is committed to PACI's goal of re-building trust and integrity in business and institutions, as well as in public-private cooperation.

In 2017, Transparency International was invited to join the high-level **Advisory Board of the PACI Project "The Future of Trust and Integrity"** which is focused on achieving anti-corruption outcomes without creating political and economic instability, but rather through promoting trust and integrity, and the role of technology in governance. Delia Ferreira Rubio represents Transparency International in the WEF-PACI initiative, and is also the co-chair of the [Global Future Council on Transparency and Anti-Corruption](#).

In 2018, as Chair of the TI Board, Rubio was invited to Davos and to the WEF on Latin America with high-profile speaking slots. Our former managing director Patricia Moreira presented the [10 Anti-corruption Principles for State-Owned Enterprises](#) at the WEF Community Spring Meeting in April 2018.

In the most recent Davos Summit in January 2020, when addressing the audience Rubio highlighted connections between clean and not-so-clean countries. "The money that is stolen from those countries that are perceived as corrupt ends up in the countries perceived as clean and

transparent – in banks, as wealth, as luxuries," she said, calling on the cleaner nations to take more responsibility for corruption beyond their borders.

Additionally, in the context of the 2020 Davos Manifesto calling for stakeholder capitalism, our Business Integrity Team prepared four indicators that would demonstrate responsible business conduct and how to track success. These included disclosure of key performance indicators measuring diversity (including on gender) at its various managerial levels, adjusting business goals for risk (including corruption risk) and developing indicators accordingly, and disclosing indicators that demonstrate average staff pay levels and average executive remuneration in the communities a company operates in. Transparency International's last recommendation relates to corporate reporting, and key performance indicators that disclose and justify political contributions and lobbying activities throughout their supply chain. Details of the recommendations in advance of Davos 2020, and recommendations for responsible conduct, can be found at the [Transparency International blog site](#).

### International Anti-Corruption Conference (IACC)

At the IACC 2018 held in Copenhagen, Denmark, Transparency International's Business Integrity Team organized a session titled "Anti-Corruption & Business Integrity: How to increase the impact of separate initiatives into coordinated collective action". Experts at the session included representatives from the Maritime Anti-Corruption Network (MACN), Norges Bank Investment Management (NBIM), Fluor Corporation, OECD, the Basel Institute on Governance, Petrobras, Siemens AG, and the Alliance for Integrity. Key recommendations at the session included the following:

- Create incentive structures in order to ensure that anti-corruption is not only about prosecutions but ways of doing business.
- Find ways to get more businesses to support research initiatives that can produce evidence on the business case for anti-corruption and the incentives that encourage good business practice.
- Find ways to engage the private sector in supporting governments to fight corruption.

This year, due to the COVID-19 pandemic, the initially designated dates for the IACC 2020 to be held in Seoul, South Korea, had to be postponed to 1 to 4 December 2020, with the conference now [taking place in a virtual format](#).

The Business Integrity Team will also organise a panel on "The purpose of companies redefined - A roadmap to transparent, fair and responsible business", with representatives from sectors including state-owned enterprises, pension funds, international organisations and the private sector.

In the last decade corruption challenges have expanded in complexity and reach, given the ongoing inequality and digital and technology developments encountered in the current Fourth

Industrial Revolution, as well as the severity of climate change. As trust in the private sector fades, business strategies that consider the creation of social value (for instance through responsible business conduct in value chains and the maintenance of licenses to operate) form the “business case” as they enhance competitiveness and business success in the long run.

At this workshop panellists, will discuss potential solutions and accountability measures on how the purposes of companies have to meet the needs of the societies in which they operate. More specifically, session panellists will share good practices and tools on anti-corruption efforts from their respective business industries, as well as that regarding responsible business conduct in value chains, and social licenses to operate.

The current pandemic has shown that matters such as supply chain transparency and due diligence, resilience, the resurgence of “Environmental, Social and Governance” standards, and support to host communities and societies, are now more relevant and “life-saving” than ever.

## Business and Human Rights

In November 2019 a Transparency International delegation attended the UN Forum on Business and Human Rights, its theme being “Time to act: Governments as catalysts for business respect for human rights”, representing us for the first time at this forum. The UN Forum confirmed the shift in paradigm towards more inclusive, responsible and accountable business conduct with an increasing call from and pressure for businesses, including state-owned enterprises, to engage in social dialogue and more environmentally and societally conscious business decisions.

Furthermore, Transparency International made a submission to the UN Working Group on Business and Human Rights [multi-stakeholder consultation on “Connecting the business and human rights and anti-corruption agendas”](#) in May 2020.

The submission focuses on issues relating to cross-border activities of multinationals, and is divided into five sections. These sections include: The corruption and human rights nexus; Foreign bribery, human rights impact and victims’ remedies; Anti-corruption and human rights compliance; Sectors at high risk of human rights abuses due to corruption, and; The role of civil society as watchdog. Transparency International’s submission can be found [here](#).

Transparency International’s inputs and recommendations were also cited and referred to in the [final report](#) prepared by the UN Working Group on Business and Human Rights. The report was ultimately presented at the 44th session of the UN Human Rights Council, which took place between 30 June and 20 July 2020.

We will continue collaborating with the UN Working Group on Business and Human Rights and other key actors in this area, to create and promote incentives for multinational enterprises to respect and promote human rights and anti-corruption jointly in their business conduct. Ultimately, a responsible and transparent means of conducting business which takes workers’, societies’ and the environment’s interests into account will help “build resilience and long-term value” following the current crisis.

## Business Principles Steering Committee

The Business Principles Steering Committee is a multi-stakeholder group involving companies, academics, trade unions, international organisations including the UN Global Compact, and non-profit organisations. Established in 2000 the Steering Committee oversees and contributes to the content and development of Business Principles for Countering Bribery, a framework for companies to develop comprehensive anti-bribery programmes. The business principles are also the foundation of many other tools developed by Transparency International, such as the *Transparency in Corporate Reporting* (TRAC) report series. Most recently the Steering Committee has supported our work in developing '**10 Anti-corruption Principles for State-Owned Enterprises**'. This project came as a result of our latest TRAC reports on Emerging Market Multinationals, published in 2013 and 2016, which showed that state-owned enterprises practise low levels of transparency.

The new Business Integrity Programme (BIP) team is working on a new Global Integrity Programme for Business. In this new multi-stakeholder group, Transparency International intends to form a guidance council consisting of business CEOs committed to the fight against corruption, including a commitment to the UN Global Compact 10th principle. Through such a guidance council we aim to analyse, research and develop tools and solutions, and share good practices and lessons learnt. Additionally, with this council we aim to discuss integrity and anti-corruption related measurements for the effective implementation of a redefined purpose of a company. Added to this, our new advisory committee and its working groups will consist of business leaders, who will give advice on strategic direction and long-term focus areas regarding business integrity.

The new multi-stakeholder group, intended to be established by end of 2020, will replace the existing Business Principles Steering Committee.

## 2.3 FOSTERING GREATER CORPORATE TRANSPARENCY AND ACCOUNTABILITY

### Promoting transparency in corporate reporting

Transparency International has focused on corporating transparency as a key element of robust anti-corruption practice, and as a means of monitoring company measures designed to counter corruption. We believe that transparent and complete reporting demonstrates a company's anti-corruption commitment, and makes them more easily accountable for their shortcomings. Moreover improved company practices are an important building block in improving a country's overall business integrity environment.

Since 2008, we have published a number of “Transparency in Corporate Reporting” (TRAC) reports. The methodology of these studies has continually evolved to keep up-to-date with international standards in corporate transparency. The TRAC reports assess and rank major companies according to their disclosure practices across three relevant areas:

- anti-corruption programmes
- organisational transparency
- key financial information on a country-by-country basis

The latest TRAC report from 2016 was the second edition of our flagship study [Transparency in Corporate Reporting: Assessing Emerging Market Multinationals](#). The report looked at the anti-corruption disclosure practices of 100 multinational enterprises within 15 emerging markets. We continue to use the key messages and policy recommendations for our advocacy at global and national levels, for policy inputs in international fora, and for individual outreach to companies.

TRAC studies are also produced by Transparency International chapters. These studies have a national focus, serving as an effective vehicle for engaging in discussions with the business sector, and advocating for improved reporting standards in respective countries. To date, more than 20 chapters have published one or more TRAC reports.

In 2018, TI Russia and TI Brazil completed their national TRAC reports. Most recently, in June 2020, TI Sri Lanka published their first TRAC report.

## The Business Integrity Country Agenda

Progress has also been made in the [Business Integrity Country Agenda \(BICA\)](#), Transparency International’s tool for assessing and improving business integrity at the country level. Developed in 2014, each BICA aims to create a body of evidence on business integrity practices and conditions in a country, and to serve as the basis for building a shared reform agenda and collective action. BICA reports also provide important insights into risk assessment measures used by companies.

The BICA process takes place over two main stages:

1. The assessment stage involves the evaluation of a set of indicators organised according to three major stakeholder groups that influence the level of business integrity in a country: the public sector, the business sector and civil society. The process is supported by a multi-stakeholder National Advisory Group.
2. In the second stage the National Advisory Group will assist with translating assessment findings into a detailed reform agenda, which will be implemented over a longer timeframe.

A number of our chapters have launched BICA Assessment Reports over the last two years. These include reports by TI Malaysia, TI Kenya, TI Mongolia and TI Brazil.

Since early 2019, the Transparency International Secretariat, through national chapters in Serbia and Romania, are working on the research for and advocacy of BICA Assessment Reports in these two countries, a project funded by the European Bank for Reconstruction and Development

(EBRD). The final BICA reports, following some logistical delays caused by the current COVID-19 pandemic, are planned to be launched in September 2020, followed by a thorough and intensive reform agenda and advocacy process until mid-2021.

## 3. CONCLUSION

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The current economic and health crisis stemming from the COVID-19 pandemic has shown, once again, the importance of resilient and transparent supply chains, and of government accountability and transparency.

If we want to be better prepared for any future crisis, be it another pandemic or an environmental disaster, businesses will need to shift from “risk-to-business” to “risk-to-people” approaches that can improve business integrity. This is why strong multi-stakeholder partnerships are needed and dialogue between governments, businesses and NGOs are necessary now more than ever.

We strongly believe that significant progress in the fight against corruption requires the constructive collaboration of business, governments and civil society. The UN Global Compact offers a unique platform for joint efforts against corruption and other global challenges, and as such it is a natural and indispensable partner for fulfilling Transparency International’s mission of a world free from corruption.

Transparency International welcomes the opportunity to report on its continued engagement with the Global Compact, and hopes this short report provides a compelling snapshot of our activities that support the Global Compact’s 10<sup>th</sup> Principle either directly or indirectly.