



UNITED NATIONS GLOBAL COMPACT COMMUNICATION ON ENGAGEMENT

12 December 2020 – 14 December 2022



PART I. STATEMENT OF CONTINUED SUPPORT

14 December 2022

To our stakeholders:

I am pleased to reaffirm TRACE's commitment to advancing the Ten Principles of the United Nations Global Compact with a strong emphasis on Principle 10.

Since 2001, TRACE has endeavored to unite the international business community with civil society, academia, governments and other important stakeholders under a common goal: to advance commercial transparency worldwide through collective action.

The private sector is often the first line of defense against corruption—from petty bribery to state capture—as multinational companies and their business partners are uniquely positioned to stop financial crime before it happens. TRACE supports multinational companies and their third party intermediaries in acting on their commitments to anti-bribery, good governance and compliance by providing practical tools and resources, ample opportunities for networking and peer-to-peer benchmarking, unlimited multilingual eLearning and more. TRACE continues to evolve with its community of member companies and remains responsive to their needs.

I am pleased to reaffirm TRACE International's support for the UN Global Compact and its Ten Principles in the areas of human rights, labor, environment and anti-corruption. In this Communication on Engagement, we describe the actions that our organization has undertaken to support the UN Global Compact and its Principles. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Alexandra Wrage

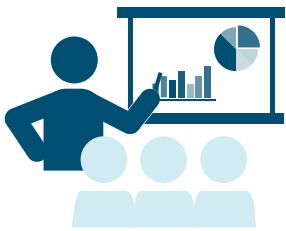
President and Founder, TRACE



ABOUT TRACE

TRACE is a non-profit international business association dedicated to anti-bribery, compliance and good governance. Founded in 2001 to make it easier and less expensive for companies to navigate and mitigate business bribery risk, TRACE is credited with establishing anti-bribery standards that have been adopted by hundreds of companies worldwide. Driven by the needs of its members, TRACE is continuously developing tools and resources that power compliance programs. TRACE is headquartered in the United States and registered in Canada, with a presence on four continents.

TRACE MEMBER BENEFITS



TRAINING & EFFECTIVE COMMUNICATION

- **Multilingual eLearning** on a wide variety of compliance issues
- Advanced training for individuals who manage compliance or are regularly exposed to compliance risk
- **Global events and webinars** to supplement eLearning
- Diverse library of compliance communications including training aids



RISK ASSESSMENT & MONITORING

- **Risk assessment platform** for collecting, analyzing and reporting on compliance-related information, including third party risk
- Local law resources, country risk information and other risk assessment guidance
- Tool for managing risks associated with gifts, travel and entertainment



CONTINUOUS IMPROVEMENT

- Access to compliance professionals for practical guidance on compliance best practices
- Opportunities for peer-to-peer benchmarking

PART II. DESCRIPTION OF ACTIONS

EVENTS AND WEBINARS

Over the past two years, TRACE organized learning and dialogue events on UNGC-specific topics, primarily the 10th Principle. Events included:

- the TRACE Forum, a twice-annual flagship event that brings TRACE member companies together in London and the Washington, D.C. area to network, hear from legal enforcement officials, and learn about compliance-related topics;
- 55 webinars on compliance-related topics;
- seven roundtables, workshops and other TRACE-hosted events around the world;
- and more.

TRACE participated in events focused on UNGC-specific topics, including the following activities:

- organized a workshop on protecting and supporting whistleblowers at the 2022 International Anti-Corruption Conference, co-hosted by Transparency International and the U.S. government;
- participated in the Women in Anti-Corruption Roundtable Event to Explore the Relationship Between Gender and Corruption, hosted by the Anti-Corruption Law Program, a collaborative partnership between the Centre for Business Law at the University of British Columbia Peter A. Allard School of Law, Transparency International Canada, and the International Centre for Criminal Reform & Criminal Justice Policy;
- delivered a keynote address at the Vancouver Anti-Corruption Institute's Whistleblowers and Public Integrity Conference;
- delivered remarks at the 38th Cambridge International Symposium on Economic Crime;
- participated in Berkeley's FraudFest in sponsorship and speaking roles;
- and more.

MEMBER ENGAGEMENT

In addition to regularly convening members for roundtables, workshops and discussions, TRACE facilitates quarterly peer benchmarking activities among member companies on compliance-specific topics.

TRAINING AND EDUCATION



eLearning and Accreditation

TRACE provides its members with multilingual eLearning on global anti-corruption compliance; avoiding trafficked labor in the supply chain; and environmental, social and corporate governance (ESG) in support of Principles 4, 7, 8 and 10 of the UNGC. TRACE educates a variety of audiences on anti-corruption and best practices in supply chain ethics through **TRACEpro**, a comprehensive training program designed to provide a foundational understanding of key concepts in anti-bribery compliance.

TRACE also works to educate future leaders on the importance of anti-bribery through Bribe Busters, its publicly available animated series that aims to inform schoolchildren about anti-corruption.



Multimedia Content

In 2021, TRACE produced a video series, entitled **Corruption Files**, which delivers riveting firsthand reports from the frontlines against corruption and reveals the real personal impact of financial crime.

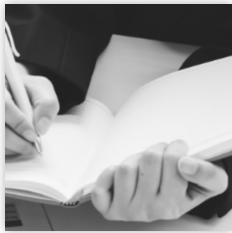
In 2022, TRACE published the video **Bribery's Deadly Consequences**, which underscores the enormous cost of corruption that individuals and communities ultimately pay.



Bribe, Swindle or Steal Podcast

In May 2017, TRACE launched the podcast **Bribe, Swindle or Steal** as a platform for wider discussion and exploration of topics related to corruption and other financial crime. Through interviews with investigative reporters, practitioners and other experts, host Alexandra Wrage explores what motivates people to break the law, how wrongdoers cover their tracks and what can be done to put a stop to the looting. Recent guests have included Omar Alshogre, Mandy Patinkin, Leonid Volkov and Bill Browder.

SUPPORTING INVESTIGATIVE JOURNALISTS



TRACE Prize for Investigative Reporting

With the annual **TRACE Prize for Investigative Reporting**, awarded through by the **TRACE Foundation**, TRACE recognizes journalism that uncovers business-related bribery and financial crime with the goal of increasing commercial transparency and good governance. Winning investigations may be print, broadcast or online reporters from any country who have investigated commercial bribery schemes, business activities that create serious conflicts of interest or similar commercial misconduct. A panel of independent judges reviews the submissions and selects up to two winners, who each receive a cash prize of US\$10,000. The judges may also name up to two honorable mentions, who will each receive US\$1,000.



Investigative Journalism Fellowships

The TRACE Foundation annually sponsors early-career professional journalists from developing countries in a fellowship with **Alfred Friendly Press Partners**. Alfred Friendly Press Partners provides training in the United States and abroad for journalists from countries with underdeveloped media. During the six-month fellowship program, reporters train at the **Missouri School of Journalism** and within leading U.S. newsrooms so they can practice journalism that is ethical, innovative and influential. Fellows learn from mentors and editors with broad experience. TRACE sponsored two fellows in 2020 and 2022, respectively, with the 2020 participants completing their fellowships in 2021.

Other Contributions to Investigative Journalism

The TRACE Foundation additionally provides support to the **International Center for Journalists**, the **Organized Crime and Corruption Reporting Project**, the **Global Reporting Centre** and other investigative journalism organizations.

Webinar Series: *Demystifying Anti-Corruption Enforcement for Journalists*

In 2022, TRACE partnered with the **Vancouver Anti-Corruption Institute** to produce a series of webinars designed to demystify anti-bribery enforcement and adjacent topics for investigative journalists. The four-part series brought together current and former government officials from several countries, international development bank personnel and private sector lawyers to provide an overview of anti-corruption investigations and enforcement for journalists.

PUBLICLY AVAILABLE RESOURCES

Publications

TRACE regularly publishes books, publicly available white papers and articles to provide the global anti-corruption community with resources and guidance on anti-bribery compliance. Recent publications have included the white papers “A Practical Guide to ESG/RBC”, “Human Trafficking, Bribery and Corruption”, and “A Guide to Corruption Risk Assessment and Risk Mapping.”

To learn more, visit www.TRACEinternational.org/publications.

The TRACE Bribery Risk Matrix

The **TRACE Bribery Risk Matrix®** (TRACE Matrix) measures business bribery risk in 194 jurisdictions and was originally published in 2014 to meet a need in the business community for more reliable, nuanced information about the risk of commercial bribery worldwide. It addresses the risk that companies will be asked for bribes within each country, rather than the conduct of the companies or citizens. Publicly available at no cost, the TRACE Matrix helps companies examine the conditions that allow commercial bribery to flourish: (1) the nature and extent of government interaction with the private sector; (2) societal attitudes toward bribery and the government’s ability to enforce its prohibition; (3) the degree of governmental transparency; and (4) the ability of civil society to monitor and expose corruption.

The TRACE Matrix is publicly available at www.TRACEinternational.org/trace-matrix.

The TRACE Matrix is updated annually and has been updated twice since our last COE.



TRACE Bribery Risk Matrix

The TRACE Matrix Data Browser

The **TRACE Matrix Data Browser** is a comprehensive tool for sorting and grouping the data from which the TRACE Bribery Risk Matrix scores are derived and identifying trends and patterns that may be relevant in understanding the risk environment each country presents. The tool was developed in 2018 and is publicly available at matrixbrowser.TRACEinternational.org.



TRACE e-Gov Portal

Launched in 2019, the **TRACE e-Gov Portal** is a comprehensive collection of links to country-level e-government services and resources of interest to businesses and their employees. As the only global e-government directory, the Portal makes these resources easily available to companies doing business worldwide and promotes governments' efforts to streamline the provision of administrative services over the internet. The TRACE e-Gov Portal includes over 25,000 links in more than 100 countries, and links are classified into categories and subcategories, providing users with ready access to the services they need across multiple jurisdictions.



TRACE Compendium

Launched in 2009, the **TRACE Compendium** is a user-friendly and fully searchable database of international anti-bribery enforcement actions. All enforcement actions in the TRACE Compendium involve bribery of a government official across international borders. Domestic anti-bribery investigations and enforcement matters involving commercial bribery purely between private parties are not included in the TRACE Compendium.

PART III. MEASUREMENT OF OUTCOMES

The activities TRACE has undertaken in the last two years in support of the 10th Principle have supported hundreds of multinational companies and their third party intermediaries in developing and implementing anti-corruption compliance programs. We continue to establish best practices and raise the standards of compliance while reducing the cost to companies through resource pooling based on collective action principles. Through our events, we have educated thousands of business and compliance professionals on fundamental responsibilities of the private sector in the area of anti-corruption and related compliance topics. Working in collaboration with other organizations, TRACE continues to offer publicly available resources and demonstrate thought leadership to drive the global anti-corruption agenda forward and educate stakeholders about the impact of financial crime.

