



THE CONVENTION ON BUSINESS INTEGRITY LTD. (GTE) RC 481360

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COMMUNICATION ON ENGAGEMENT

Period covered by this Communication on Engagement:

From: July 1st, 2021

To: June 30th, 2023

Part I. Statement of Continued Support by the Chief Executive or Equivalent

July 14, 2023

To our stakeholders:

I am pleased to confirm that The Convention on Business Integrity Ltd. (GTE) reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Mr. Soji Apampa
Chief Executive Officer
CBI Nigeria

Part II. Description of Activities

In support of the Global Compact Principles derived from the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption, CBI has carried out several Business Association and Civil Society Activities including outreach efforts and awareness raising, learning and dialogue workshops, trainings and events, partnership projects on corporate sustainability, and collective action efforts on establishment of transparent processes and checks and balances in corporate and public sectors. In ensuring that Public and Private institutions are subject to safeguards that promote efficiency, transparency, and accountability in Nigeria, CBI developed a learning management system, online platforms, codes of conduct, and influenced policy reforms among other achievements.

Corporate Governance Ratings System (CGRS)

In partnership with the Nigerian Exchange Group (NGX, formerly the Nigerian Stock Exchange or NSE), CBI continued to administrate a Corporate Governance Rating System (CGRS) for listed companies in Nigeria. The CGRS has become a diagnostic tool of the strengths and weaknesses of Nigerian Corporate Governance, and a critical mechanism in building the competitiveness of Nigerian companies, enabling them to position themselves favourably to receive external capital. The system consists of a Self-Assessment Test (developed by CBI and verified by external auditors), a Fiduciary Awareness Test (hosted on a CBI learning platform with Fiduciary Awareness Courses), and an Expert Multi-Stakeholder Group Corporate Integrity Assessment conducted by eight (8) chosen members with expert views based on specific industry/marketplace experience, and reputational integrity in relation to Corporate Governance. The CGRS was a requirement for companies pursuing public listing on the NGX until. Administration of the CGRS was terminated in 2022.

Open Society Foundations Project

Funded by the Open Society Foundation (OSF, formerly Open Society Initiative for West Africa, or OSIWA), CBI led the “Strengthening Asset Declaration Compliance and Asset Verification in Nigeria” project that concluded in 2022. The project’s goal was to ensure that public institutions are subject to safeguards that promote efficiency, transparency, and accountability to the public in collaboration with Nigeria’s Code of Conduct Bureau (CCB). Activities entailed the development of a transparent Asset Declaration Database for political candidates on the CCB platform, which would be available to members of the public. Additionally, through stringent outreach efforts and awareness raising, a multi-media campaign designed to mobilise citizens to hold politicians accountable for appropriating public funds and assets was launched. An online Call to Action petition to require members of the Senate/House of Representatives to declare their assets and the National Assembly to provide constitutional guidelines for the CCB to mandate public official’s disclosure and declaration of assets with verification was created. Other activities included the provision of ICT hardware to the CCB to display analytics and trends and manage the Asset Declaration Database.

MacArthur Foundation Projects

CBI executed two projects in partnership with the MacArthur Foundation – the “Corruption Prevention in the Private Sector” project (2018 – 2023), and the “Strengthening Anti-Corruption Systems and Responses in Nigeria’s Private Sector” (2022 – 2024). The first project’s goal was to enhance private sector integrity systems in independently verifiable ways.

To this end, within this COE's reporting period, CBI developed, and trained assessors to use a Corporate Governance and Internal Controls Assessment tool based on international standards (COSO 2013) that provides assessed companies with an in-depth analysis at how effectively they managed risks; CBI conducted assessments of several companies in the healthcare, legal, and construction sectors, offering recommendations and support to companies to address identified gaps. A Consequence Management Framework for business stakeholders to hold professionals accountable was also created to operationalise compliance with Nigeria's National Ethics and Integrity Policy (NEIP); serving to further establish certifiable anti-corruption standards.

CBI also leveraged the previous research it completed on the various attitudes or dispositions towards corruption to tailor communication to professionals to effectively discourage corruption and affirm obligations and commitments to socially responsible business among business intermediaries, culminating in the launch of the #IntegrityOverCorruption website. The site features educational media such as music, live-action videos, an animated series, and practical tools such as the Corporate Governance and Internal Controls Assessment, a Public Declaration, and a customizable Honour Code to enable professionals to "fight corruption" in their respective sectors. Following the website's launch, CBI created and educated professionals on an #IntegrityMovement, seeking to enable others to replicate a collective action approach within their own industries. An #IntegrityMovement Workshop was hosted in May 2023, and new educational videos and tools were created to this purpose, all of which will be hosted on an IT platform that will feature a customizable grievance reporting mechanism professionals can use to take action. Finally, CBI collaborated (and continues to partner) with professional associations and national licensing bodies such as the Nigerian Institute of Quantity Surveyors, to deliver ethics training, working to ensure such training is a recurring requisite for induction, licensing, and ongoing certification of professionals. Similarly, CBI has worked to develop a Court Monitoring System to hold all members of court accountable to judiciary standards during proceedings, publishing two policy briefs, "We Need Collective Action for an Ethical Legal Profession," and "Halting the Justice Sector's Downward Spiral – A Policy Approach," to further advocate for judicial due process and accountability.

The second ongoing MacArthur Foundation project seeks to scale the achievements of the first to all small and medium enterprises (SMEs) which account for 90% of organizations in Nigeria's business environment. To this end, CBI has collaborated with the Financial Reporting Council (FRC, a primary business regulator) and the United Nations Global Compact Nigeria Network (UNGC-NN) to create SME Corporate Governance Guidelines to embed best practices that protect transparency and accountability into the foundational framework of the private sector. The Guidelines are currently under open stakeholder review. By targeting larger companies to adopt these Guidelines that contain higher integrity standards and making such standards a requisite for companies who wish to be a part of large companies' value chains, we seek to incentivize SMEs to embed best practices relating to ethics, integrity, and corporate governance. CBI has also laid the groundwork to build a web portal to host the Guidelines, appropriate Incentive Framework measures (also being designed by CBI and UNGC-NN), and a directory of professionals (credit assessors, auditors, specialists, etc.) providing integrity support services to support SME adoption of the Guidelines. A learning management system to train entities on transparency and accountability in matters of corporate finance is also being developed. CBI also works in collaboration with the Lagos Chambers of Commerce and Industry (LCCI) to set the ethical tone for its membership, including reviewing the Code of Conduct and Ethics for its 22,000 participating organisations.

Maritime Anti-Corruption Network (MACN) Nigeria

In partnership with the Maritime Anti-Corruption Network (funded by Danish International Development Agency (DANIDA) and the Siemens Initiative), CBI is working against corruption in all its forms in the Nigerian Maritime Sector in accordance with Principle 10 and Principle 8 of the Global Compact. Previously referred to as Port Reform – Business Action Against Corruption in the Maritime Sector, vessel and cargo clearance initiatives have been instituted to foster the sustainable management of natural resources and ecosystems that support equitable social development, inclusion, and economic growth.

The DANIDA component of the project focussed on vessel clearance. During the reporting period, CBI worked hard to deepen Maritime Stakeholder Relationships among governmental, private sector, and civil society organisations through collective action, inter-sectoral learning, and dialogue. This has included continuing to push for the report and response to corrupt demands and deviances from the Nigerian Port Process Manual (NPPM) and Maritime Agency Standard Operating Procedures (SOPs) through the administration of a HelpDesk function, first established in 2019 still in operation today. MACN and CBI have recorded a drastic drop in the number of reported incidents related to vessel clearance; from 266 cases in 2019, to 54 at the end of 2022. CBI also completed the development and launch of the National Port Integrity Ratings Index for Nigerian Ports and Terminals and was granted an extension to the project by DANIDA which will see the Nigeria project replicated in other West and Central African countries. To this end, in January of 2023, CBI and MACN convened a West and Central Africa Regional Conference, held in Accra, Ghana, on Global Best Practices in the Vessel Clearance Process. Representatives from five African nations attended, culminating in a “Nigerian Case Study” shared with all attendees, and imminent plans to recreate the Nigerian methodology in Ghana.

The Siemens Initiative component of the project involved exhaustive collective action efforts with support from the Federal Ministry of Transportation, Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), Independent Corrupt Practices Commission (ICPC), and Nigerian Shippers’ Council among others. Several Maritime Regulatory Conversations, Compliance Roundtables, and Tone-at-the-Top Conventions with the Heads of Port Agency were held to align visions of the many maritime actors and to arrange practical implementation of Integrity Plans. CBI also orchestrated the development of a Harmonised Anti-Corruption and Code of Conduct Policy for Maritime Sector Agencies, backed by a corresponding Consequence Management Framework, to push for clean business along Port Corridors. CBI facilitated the expansion of its Integrity Alliance Network to include prominent Truckers’ Associations. Notably, CBI successfully led the charge for the strengthening of the Compliance Function at each maritime agency across all geographical zones to embed port reform at the local level; CBI went on to train over 200 individuals for their Compliance post. The project’s methodology for Compliance and Consequence Management is backed by the Federal Ministry of Transportation, is being mainstreamed into the Anti-Corruption Mandate of the ICPC and is being institutionalised through ICPC’s Anti-Corruption Academy of Nigeria.

Integrity Support Services in the Corporate Sector

During the reporting period, CBI provided expertise in Corporate Governance, Strategic Governance, Ethics, Leadership, and Collective Action in mass and niche markets. CBI also delivered Corporate Governance Advisory and Audits, Board Evaluations, and support to various companies, including companies that have been debarred or sanctioned by multi-lateral institutions such as the African Development Bank (AfDB).

Integrity@25 Essay Competition

In recognition that one's values and dispositions towards ethics and integrity can be set during youth, and in recognition that young people themselves face ethical dilemmas, CBI hosted a multi-level Integrity@25 Essay Competition where Nigerian secondary-school and university students were invited to submit compositions on themes of accountability, integrity, and anti-corruption. The competition which opened in April 2021 featured cash prizes of up to N600,000 for students who best conceived and communicated an anti-corruption strategy. Six students were awarded various prizes during a ceremony in 2022.

Part III. Measurement of Outcomes

Key Outcomes *for the specified reporting period (July 1st 2021 – June 30th 2023)*

Project	Key Outcome	No. of Participants/ Beneficiaries	Status/Impact
OSF	Development of one (1) Assets Declaration Database with Application Programming Interface (API) to a web-based analytics dashboard	1 Agency N/A specific beneficiaries – handed over to the CCB for use and deployment; CCB is yet to make dashboard available to the public.	Implications once made public by the CCB is access by entire population of Nigeria.
	Development of one (1) "Call to Action" website	Site Visitors – 81 Click Through (social media) Visitors – 605 Social Media Impressions – 680,487 Social Media Engagement – 277,643	Website and Call-to-Action remain active
	Deployment of a communications campaign involving: One (1) Vox pop video and two (2) illustrated strips (comics) in two newspapers	Vox Pop: 129 viewers (YouTube only, not inclusive of social media platforms) Comics: Estimated exposure to over 5 million newspaper readers	
CGRS	Administration of CGRS evaluations (inclusive of Self-Assessment Tests, Fiduciary Awareness Tests, and an Expert Multi-Stakeholder Group	117 Self-assessed companies 620 Fiduciary Tested directors	Impact to all stakeholders of the company (directors, employees, subcontractors, customers), and to anyone who accesses or NGX information for decision-

	Corporate Integrity Assessments)	41 Companies with multi-stakeholder assessments	making, or who trades in Nigeria's public markets
MacArthur	Independent Assessment of companies' Corporate Governance and Internal Controls, including recommendations and gap support	4 companies	
	Creation of one (1) IntegrityOverCorruption Website, including educative material and tools: music, live-action videos, an animated series, the Corporate Governance and Internal Controls Assessment, a Public Declaration, and a customizable Honour Code.	40,000 site visitors 130 visitor sign-ups	Greater understanding and more active engagement by professionals in anti-corruption efforts; we expect further amplification after creation of the #IntegrityMovement online tool that will link education with action.
	Hosting of one (1) #IntegrityMovement Workshop/Training in anti-corruption and collective action during	19 participants	See above. Expectation after workshop was professionals in attendance would be equipped to begin "cells" of an #IntegrityMovement independently.
	Development of two (2) policy briefs on the state of Nigeria's judiciary	N/A – Awaiting readership from Justice Reform Project, our legal-sector partners	
	Development of one (1) Court Monitoring System, inclusive of a web-based and phone-based application.	N/A – Awaiting deployment from Justice Reform Project, our legal-sector partners	
	Trainings in leadership, ethics, Codes of Conduct deployed to associations or institutions	3 organisations 1,600 attendees for APWEN (Association of Professional Women Engineers in Nigeria) Business Unusual Seminar (July and September 2021)	Will impact bodies of Nigerian Institute of Quantity Surveyors (NIQS) with approx. 10,000 in membership and the Lagos Chambers of Commerce and Industry (LCCI) with approx. 22,000 in membership
	Drafting and development of one (1) SME Corporate Governance Guidelines	N/A – Guidelines are in draft exposure phase and have not	As the Guidelines are made in collaboration with a regulatory body (Financial

		yet been ratified/deployed. 400+ individuals were specifically requested to provide feedback on the Guidelines, and they remain open to the public.	Reporting Council), we expect future impact to be nationwide.
MACN	Processing of pre-arrival notifications (a tool used by MACN members to alert an oversight body prior to arrival in Nigeria) and monitoring of their entry and exit from Nigeria	471 Vessels	The cumulative impact of activities include: Vessel delays have diminished from 7-10 days to 1-4 hours. Due to enacted stop-loss principles, vessels' operational costs due to delays decreased from estimated \$150,000 to \$20,000. Impact has gone beyond Nigeria: Our project's methodology is being replicated in Egypt, India, Bangladesh, Argentina, and formerly Ukraine. We are also working directly with representatives from Ghana, Cameroon, Senegal, and Côte d'Ivoire to establish public maritime standards for industry transparency and accountability.
	Handling and resolution of reports of corrupt behaviour via the HelpDesk (Grievance reporting mechanism)		
	One (1) Training in leadership, ethics, and compliance (Ikot Ekpene)	23 participants	
	Three (3) Trainings of Maritime Agency Compliance Officers (Lagos, Port Harcourt, Calabar)	214 participants	
	Hosting of three (3) Compliance Roundtables and one (1) Tone-at-the-Top meeting with Heads of Maritime Agencies	250+ participants	
	Hosting of four (4) Port User Group meetings and/or wide stakeholder discussions and/or local collective action regional stakeholder meetings	200+ attendees 24 members inducted into the Integrity Alliance	
	Hosting of one (1) West and Central Africa Regional Conference of Global Best Practices for Vessel Clearance	102 attendees	
	Development of one (1) e-learning platform on the vessel and cargo clearance process, the Nigerian Maritime Basic Course	243 users	

	Creation of one (1) Harmonised Anti-Corruption Policy and Code of Conduct Policy for Maritime Sector Agencies	9 Maritime Agencies	
Integrity@25	Hosting of one (1) Integrity@25 Essay Competition for Nigerian secondary-school and university students.	916 student participants from 26 states	Beyond cash prizes received by 6 students, one student received a scholarship to complete her secondary and university education, and state-level educational boards feel empowered to encourage their students in future competitions.