

# STORIES OF CHANGE

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**Better business  
by preventing corruption**



Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

**[www.transparency.org](http://www.transparency.org)**

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# INTRODUCTION

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## BUILDING INTEGRITY AS A BUSINESS ASSET

**Companies increasingly recognise that integrity is good for business.<sup>1</sup> Yet bribery and corruption persist. Large-scale corporate scandals show that much remains to be done to tackle corruption in the business sector. Based on four case studies, this paper shows how Transparency International is supporting companies worldwide to develop anti-corruption systems, which can help prevent corruption and boost business, so that more companies reap the benefits of high integrity and transparency standards.**

The business case for corporate integrity is clear. Not only do the costs of corruption outweigh the benefits in the long term, strong integrity and transparency programmes are also proven to be an important element for improved business performance. Measures to detect and prevent corruption help promote fair competition, minimise losses that can be incurred as a result of corruption, and increase access to capital. They also protect and enhance companies' reputations, which can unlock new commercial opportunities and create a competitive edge.<sup>2</sup>

The active and transparent implementation of high integrity standards also demonstrates a company's commitment to broader ethical values and corporate responsibility. Companies have an important role to play in tackling corruption worldwide and their individual and collective actions can make crucial contributions to levelling the playing field.

Corruption in business can increasingly be detected and prevented by using tools and approaches like those profiled in this paper.<sup>3</sup> Whether large and international, or small and local, companies are increasingly interlinked - via the supply chain, consumers, competitors, business associations, regulators and the general public. All of these links can play a role in tackling corruption, meaning any company can make a difference.

The diversity of the business sector is reflected in Transparency International's many approaches to addressing business integrity. Our Business Integrity Programme supports companies by aiming to reduce corruption through measures that increase transparency, accountability and integrity in business practices worldwide. With our national chapters, partners and allies, we harness our experience, in many different contexts, to develop the best tools and approaches for beating corruption and bolstering integrity and transparency.

### Building blocks for preventing corruption in business

Transparency International's approaches to fighting corruption in business began with the [Business Principles for Countering Bribery](#), created in 2003 through a multi-stakeholder process to support companies to design and implement effective anti-bribery programmes. The principles are the foundation for a range of guidelines and tools we have since developed to counter corruption in the business sector. Many are integrated into the [Business Integrity Toolkit](#), a user-friendly, six-step framework for companies on how to build a comprehensive anti-corruption programme – from high-level commitment, to planning and monitoring the programme, and regularly reporting on its progress.

We regularly adapt our tools and approaches to increase their impact in a dynamic business environment. The latest addition to our suite of business integrity tools is the [10 Anti-Corruption Principles for State-Owned Enterprises](#), which are based on the Business Principles and set out best practice for state-owned enterprises to counter corruption risks.

The four case studies in this paper reflect the diversity of our Business Integrity Programme, in the different challenges they address, and the range of contexts and solutions they present. Despite their differences, all showcase the powerful effect our work has had on business in recent years.

The case studies are:

- *Transparency in Corporate Reporting*: Driving disclosure to prevent corruption

Transparency International's flagship study on the business sector, the [Transparency in Corporate Reporting \(TRAC\)](#) report series, assesses and ranks major companies according to their disclosure practices. Whether based on global, sectoral or individual country studies, TRAC reports give valuable insight into corporate transparency to help companies improve disclosure practices – as shown by recent studies in Belgium, Brazil and South Africa.

- Indonesia: Partnerships to prevent corruption

Transparency International Indonesia has partnered with PLN, the country's state-owned electricity supplier, to help it tackle corruption and become one of Indonesia's most transparent state-owned enterprises.

- Italy: Business-driven best practice

In Italy, Transparency International is working with big business to cascade the anti-corruption message down the supply chain through a jointly developed integrity kit for small- and medium-sized enterprises.

- Mexico: Companies join the push for new anti-corruption laws

In coalition with businesses and other civil society organisations (CSOs), our Mexican chapter has harnessed people power and campaigned successfully for strong new anti-corruption laws that include regulation of the country's business sector.

## Strengthening business, from global to local

Whether at the international or individual company level, our experience shows that it is possible to make a real difference to corporate integrity and transparency in a wide range of contexts – and that this is consistently good for business. We hope these stories inspire you to help build business integrity, as well as highlighting some of the tools and support available. By working together to promote corporate anti-corruption practices, we can help create the level playing field needed for business to achieve its full potential.

To find out more about these stories and others, how Transparency International can help build business integrity in your context, or how to join the Business Principles for Countering Bribery Steering Committee, please contact our Business Integrity team at [BIP@transparency.org](mailto:BIP@transparency.org).





# TRANSPARENCY IN CORPORATE REPORTING

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## DRIVING DISCLOSURE TO PREVENT CORRUPTION

**Transparency International's report series *Transparency in Corporate Reporting (TRAC)* ranks major companies according to their disclosure practices, enabling public monitoring of corporate practice and encouraging corporate engagement in finding solutions to complex corruption challenges.**

Companies worldwide are increasingly taking steps to prevent corruption and increase transparency. However, although by now many companies comply with, or even surpass, some legal requirements, they could do more to prevent corruption and increase accountability by disclosing more information. This could include publishing financial information by country – to enable monitoring of payments to governments in different jurisdictions – and disclosing information on anti-corruption programmes, corporate structures, and beneficial ownership. These disclosures help to hold companies to account, reducing companies' reputational risk and costs from bribes or fines, and enabling them to compete on a level playing field, where no one has an unfair advantage through corruption.

To promote such disclosure, *TRAC* assesses and ranks major companies according to their disclosure practices in crucial areas. These include anti-corruption programmes, organisational transparency and financial information on a country-by-country basis – with beneficial ownership information soon to be added. Disclosure of this information demonstrates a company's commitment to countering corruption, enables others to hold companies to account and helps improve international perceptions of a country's overall business integrity. Since 2009, Transparency International has published three global *TRAC* studies assessing the world's largest companies, two assessing emerging market multinationals, and two sectoral assessments of the world's largest oil and gas and telecommunications companies. In addition, 25 national *TRAC* reports have assessed the largest companies in individual countries, including Belgium, South Africa and Brazil, which are showcased here.

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**“Our participation in the Brazilian *TRAC* study was extremely important... We will be constantly seeking improvements to achieve even better positions next time.”**

*Thamyle de Cassia Leite, ArcelorMittal Brasil*

### A proven anti-corruption tool

The *TRAC* reports compare individual company performances and reveal global, national or sectoral trends and shortcomings. They raise awareness among the business community of the benefits of effective anti-corruption measures and promote competition among companies to improve their disclosure practices. They are also powerful advocacy tools, and increase appreciation of corporate transparency among the public, government officials, the media and civil society. The *TRAC* research process provides companies with the opportunity to engage with Transparency



International on the study, which can result in substantial interaction between Transparency International and these companies. Active participation in a *TRAC* study is a sign of responsible corporate citizenship and public commitment to an anti-corruption stance. It enables companies to spread knowledge about ethical business standards and promote integrity among employees and partners. From mid-2017 to mid-2018 alone, 68 companies that actively engaged in a local *TRAC* process in Lithuania, Russia and Brazil improved their disclosure practices during the research phase.

Globally, Transparency International has assessed around 2,500 companies in over 20 countries, and *TRAC* research has led Transparency International to engage with well over 500 companies on their disclosure practices. Recent reports in Belgium, Brazil and South Africa have provided a platform for ongoing debate and action around preventing corruption in business. Each report profiles the country's largest companies, and all show the benefits of *TRAC*, which extend far beyond the reports themselves.

These benefits include:

- Ongoing corporate improvement

Companies' regular assessments can be a powerful stimulus for greater transparency. "Our participation in the Brazilian *TRAC* study was extremely important so we could compare our position in relation to the market and analyse what could be improved for next time," says Thamyle de Cassia Leite, a lawyer at ArcelorMittal Brasil. "We will be constantly seeking improvements to achieve even better positions, especially in disclosing financial reports of our subsidiaries abroad," she adds.

- Advancing corporate anti-corruption policies

The interactions between Transparency International and those companies that accept the invitation to engage during the *TRAC* research phase have helped to build relationships that advance corporate anti-corruption policies. Belgium's 2016 *TRAC* study focused on smaller international companies, and found they performed less well than larger companies in *TRAC* assessments. During the research process, some companies were initially defensive, stating that they were compliant with auditing regulations. However, through meetings and by sending companies their *TRAC* results for review before publication, Transparency International Belgium is building relationships that enable the chapter to help several companies improve their disclosure practices.

- Wide-ranging debate

The *TRAC* process can stimulate debate about the importance of disclosure and transparency. In 2016, South Africa's first *TRAC* attracted strong attention, ranging from the business press to popular TV. This stimulated animated public debate and provided valuable opportunities for Corruption Watch – Transparency International in South Africa – to explain the benefits of transparency and disclosure for both companies and society more broadly. Brazil's 2018 *TRAC* prompted government officials to ask for a similar tool to assess state-owned enterprises.

- Tailor-made responses

*TRAC* studies help identify gaps in companies' integrity and transparency frameworks, informing focused responses. Transparency International Belgium has developed specific materials to help smaller international companies improve disclosure. In South Africa, *TRAC* showed that many companies complied with regulations, but did not make information accessible in areas such as pre-tax profits, whistleblowing or facilitation payments. This enabled Corruption Watch to focus on



helping companies strengthen their anti-corruption measures in these areas. When Brazil's *TRAC* showed weak engagement by top management in anti-corruption programmes, Transparency International Brazil organised forums to increase CEO involvement. "Our *TRAC* score was weaker over public evidence of support for anti-corruption by company leadership," says João Paulo Mateus, director of Internal Audit and Compliance at energy company EDP (Energias de Portugal). "In response, we are taking action to demonstrate that support, including a clear statement from the board and management in our 2017 Annual Report. The *TRAC* report was very important for Brazil, to help businesses, public institutions and society change the state of the country in terms of corruption and business culture," he adds.

Although not all companies included in *TRAC* assessments engaged with Transparency International during the process, various companies in all three countries have asked Transparency International to repeat *TRAC*. Even companies not included in previous studies have requested an assessment. Building on the impact already achieved, all three countries are planning a new *TRAC* process during 2019, incentivising companies to improve their scores and keeping alive the debate on corporate integrity. Business leaders agree that *TRAC* has a powerful impact on the anti-corruption context. "Integrity and transparency were already on the agenda of Brazil's largest companies," says Thamyle de Cassia Leite. "But *TRAC* has encouraged us to see them as competitive differentials. It reinforces that being transparent with society is healthy for business," she adds.





# INDONESIA

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## PARTNERSHIPS TO PREVENT CORRUPTION

**Transparency International Indonesia's partnership with the country's state-owned electricity provider proves no business is too big to tackle corruption and develop a culture of integrity.**

Where corruption is embedded in big businesses, they can resemble super-tankers, too huge to turn around. Corruption seems simply “the way business is done”. But Transparency International Indonesia's partnership with the country's state-owned electricity provider shows that improving integrity and transparency is never out of reach.

Indonesia's state electricity provider, Perusahaan Listrik Negara (PLN), was among the state-owned enterprises known to have a deeply ingrained culture of corruption.<sup>4</sup> With a monopoly over electricity supply, PLN was often in the news for poor service delivery, price mark-ups or facilitation payments. In 2011, several PLN executives were convicted for corruption offenses, including a former PLN president who was sentenced to five years in prison for illegally awarding a contract to an industrial supply company.<sup>5</sup>

### A bespoke integrity programme

“After the scandals, PLN wanted to reduce corruption risks so it could improve service delivery to the public in Indonesia, while also attracting much-needed international investment. Tackling corruption was an urgent business priority”, says Dadang Trisasongko, executive director of Transparency International Indonesia. “In 2012, the company approached Transparency International Indonesia for help to transform itself into an integrity-driven organisation,” he adds.<sup>6</sup>

The first step was to gain top-level commitment by signing an agreement with PLN's CEO. Working with a multifunctional task force from across the organisation, Transparency International Indonesia then identified corruption risks in the electricity sector and evaluated PLN's existing anti-corruption measures. This showed the essential changes PLN needed to make to improve its integrity practices. To address those, the team developed a comprehensive anti-corruption programme for the organisation, called PLN *Berintegritas* (“PLN has integrity”), using [Sintesis](#), a local adaptation of the Business Integrity Toolkit.

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“We hope the collaboration model with Transparency International Indonesia will inspire more companies to embed integrity in their day-to-day activities. This way, we can create an ethical business environment.”

*Djonny Koesoemahardjono, compliance director, Gunung Sewu*

### Giving staff the right tools and skills

Based on a tailor-made ICT platform piloted by over 1,000 staff across PLN, *Berintegritas* provides employees with tools for assessing, preventing and mitigating corruption risks. The programme also includes whistleblowing and complaints mechanisms. Transparency International Indonesia runs

anti-corruption training for PLN staff, including on topics such as gift management and asset disclosure, while PLN's internal training programme uses an online *Berintegritas* module.

Although work is ongoing, its impact is evident. Indonesia's Central Information Commission assessed PLN as one of the most transparent state-owned enterprises from 2013 to 2016. In 2017 PLN ranked 5<sup>th</sup> out of 100 state-owned enterprises in the Commission's assessment. In addition, the country's Corruption Eradication Commission commended its asset disclosure system in 2017. Service delivery is monitored through an online anti-corruption application, making corruption easier to detect. Since 2017, *Berintegritas* has also helped PLN publicise its commitment to integrity, including during procurement for construction of a 35,000-megawatt power plant. With its improved anti-corruption framework, the company attracted higher rates of external investment for the plant than previously.

## A new model for preventing corruption

PLN's integrity programme has created a new collaborative model of corruption prevention, replicable in other state-owned enterprises or private companies, in which Transparency International Indonesia works with the business as a strategic partner in strengthening its integrity system. The more companies using the model, the stronger the collective integrity. Similar processes are currently underway with state-owned gas company Transgasindo and holding company Gunung Sewu, whose business interests include food, insurance, property and manufacturing. "We hope the collaboration model with Transparency International Indonesia will inspire more companies to embed integrity in their day-to-day activities. This way, we can create an ethical business environment," says Djonny Koesoemahardjono, compliance director of Gunung Sewu.

Based on these successes and with future adaptations considering the recently developed *10 Anti-Corruption Principles for State-Owned Enterprises*, Transparency International Indonesia plans to partner with more big companies in this way. PLN's experience shows that strengthened integrity systems are good for business, and that no corporation is too big to start turning.





# ITALY

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## BUSINESS-DRIVEN BEST PRACTICE

**Italian multinationals are sharing tools with smaller companies, in partnership with Transparency International Italy, to tackle corruption along their supply chains. The result is a cascade effect that is starting to strengthen integrity across Italy's business sector.**

Smaller companies have a vital but often unfulfilled role in preventing corruption – especially in countries like Italy, where small- and medium-sized enterprises (SMEs) form 95 per cent of the business sector in terms of numbers. However, these companies can lack both the resources and the skills to play their part. This undermines their competitive edge – and that of the entire business sector.

### The vital role of small businesses

“In our experience, many SMEs are not fully aware of the benefits of transparency and integrity as ways of preventing corruption,” says Davide del Monte, executive director of Transparency International Italy. “Companies that have good anti-corruption programmes and publicly report on them can increase their competitive advantage and benefit from risk reduction, cost savings and sustainable growth – and their individual actions can help level the playing field for all,” he adds.

As well as potentially damaging their own business interests, SMEs engaging in corruption present a risk to bigger companies' reputations and efficiency by allowing corruption further along the supply chain. So when Transparency International Italy approached multinational companies to collaborate in helping the country's SMEs strengthen their integrity measures, many were happy to take part. By tackling corruption down their supply chains, they would reduce their own financial and reputational risk and help reinforce Italy's business sector.

### Harnessing support from big business

To coordinate these efforts, Transparency International Italy founded a Business Integrity Forum in 2016, a working group that attracted 13 major companies in its initial year, including Snam, Enel and Edison.

Together, forum members, as their first joint project, adapted existing Transparency International tools to create an [SME Integrity Kit](#), which they give without charge to companies in their supply chains to raise SME understating of integrity as a business asset and to support improved practice. The kit contains a chart of general ethical principles, guidelines for implementing a whistleblowing system, business-to-business Integrity Pacts<sup>7</sup> and instructions for implementing the tools through company websites.

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“Alkim is recommending the *SME Integrity Kit* to other small companies. Spreading values is a priority.”

*Giansandro Scorsetti, CEO of Alkim, supplier to multinational Snam*



## Creating a cascade effect

Available in French, Spanish, English and Italian, the kit was launched in November 2017 and is available online for free, worldwide. In just five months, more than 730 SMEs in the forum companies' supply chains downloaded it. "At first, we were surprised," says Giansandro Scorsetti, CEO of Alkim, chemical supplier to multinational gas infrastructure company Snam. "But Snam's reputation and the kit itself convinced us it was worthwhile. We always had ethical values, but no real framework to safeguard them. The kit contains all the tools needed, and has helped us discuss topics we did not previously speak about," he continues.

Much of the toolkit's success stems from its business-sector origins. SMEs are now voluntarily passing the kit onto companies along their own supply chains, creating a cascade effect. Vito di Marco, CEO of Serintel, another Snam supplier, says: "We are inviting business partners to share this initiative. The feedback has been positive and we have already signed three business-to-business Integrity Pacts."

Although it is too early to measure the business impact of these tools, the conversation about integrity is now opening up across Italian business. The kit is showing the power of companies themselves, large or small, to encourage each other to tackle corruption.

*Download the SME Integrity Kit at: <http://businessintegrity.transparency.it/SMEIntegrityKit>*







# MEXICO

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## COMPANIES JOIN THE PUSH FOR NEW ANTI-CORRUPTION LAWS

**When a multi-stakeholder coalition of civil society actors and academics pushing for anti-corruption reform in Mexico was established, Mexican companies and business associations, for the first time ever, joined a collective effort to tackle public sector corruption and address the business sector's role in preventing corruption. The coalition succeeded in reforming laws that have changed Mexico's entire anti-corruption framework, and include new legal mandates for creating and strengthening compliance programmes.**

"By 2014, corruption in Mexico was widely understood as a barrier to economic development and equality," says Eduardo Bohorquez, executive director of Transparencia Mexicana (our Mexican chapter). "Although the business community acknowledged the situation, they rarely made open statements against corruption or addressed the business sector's role in the country's corruption issues. By 2015, things changed significantly. By being part of the anti-corruption coalition, the business sector not only raised its voice against corruption but recognised their responsibility and significantly contributed to building popular support for reform," he adds.

At the time, companies could only be held administratively – not criminally – responsible for corrupt acts, and there was poor coordination between authorities in charge of investigating, prosecuting and sanctioning corruption. Leading CSOs, including Transparencia Mexicana, agreed that both issues needed to be addressed by greatly strengthening Mexico's anti-corruption laws and ensuring their implementation.

### Partnering with business to drive reform

To promote their idea, CSOs formed a coalition in 2015, along with businesses and confederations such as the Mexican employers' association Coparmex and academic institutions including the National Autonomous University of Mexico, the Centre for Economic Research and Teaching and the Monterrey Institute of Technology and Higher Education. The coalition proposed reforms that would enable comprehensive criminal and administrative laws, thorough internal and external audits, strong institutions and the appointment of a new Special Prosecutor and specialist judges.

"We became involved in the campaign because it reflects our values," says José Luis García Chagoyán, coordinator at Coparmex. "Transparencia Mexicana led the process to design the proposed legislation and negotiate with Congress to agree an optimal legal framework. They gave us technical guidance to better understand proposals, and supported us in taking part in political negotiations. We also promoted the campaign among our members," he continues.

The first step was to draft amendments to strengthen the laws regulating corruption in public administration and companies. Measures included greater disclosure obligations for public officials and stronger mechanisms for investigating misconduct. To maximise popular support, the coalition decided to present their proposed law in Congress as a citizens' bill, rather than giving it to a legislator or presenting it to a congressional committee. The private sector was central to collecting the signatures needed for the citizens' bill. Cinema chains put stands in their foyers, and business



associations including the Business Coordination Council promoted the bill among members and ran media campaigns to gain support.

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“Corruption in Mexico was widely understood as a barrier to development.  
Business participation was crucial in building popular support for reform.”

*Eduardo Bohorquez, executive director, Transparencia Mexicana*

## Raising support for a citizens’ bill

Backed by a petition with 634,000 signatures from across the country, the coalition took the bill to Congress in 2016.<sup>8</sup> After four months of public dialogue with legislators, conducted under open-parliament rules and broadcast on Mexican TV, the law became the first ever citizens’ initiative passed by Mexico’s Congress, and globally one of the few, if not the only, comprehensive anti-corruption legislation co-created by legislators and citizens. Unprecedented levels of public support subsequently allowed CSOs to push for bolder changes in other existing anti-corruption laws, including the federal criminal code. Transparencia Mexicana successfully led demands for corporate criminal liability for corruption, punishable by sanction, including company dissolution and asset seizure.

Enacted in 2016, the laws reshaped Mexico’s legal anti-corruption framework, creating new coordination systems for institutions and giving them stronger capacities to prevent and prosecute corruption. Criminal offences for companies now include trading in influence, bribery of foreign public officials, and operations using resources from illicit sources. Sanctions which formerly applied only to employees involved in corrupt offences – even if their actions were approved by the company – now apply to companies as well. The laws also created a citizens’ committee to help shape national anti-corruption policy and ensure regular monitoring and evaluation.

## New laws, improved business practice

Despite resistance among some companies, the legal changes have altered the public debate on corporate corruption. Companies are competing to implement anti-corruption measures and seeking to spread them through their supply chains. José Luis García Chagoyán at Coparmex says: “The new laws enshrine business-sector responsibility for corporate corruption. They are creating a new environment for doing business so that it generates clearer benefits for all.”

Transparencia Mexicana has presented the new regulations at numerous private sector events, and has been approached by companies and organisations – including América Móvil, Grupo Modelo and the Mexican Chamber of the Construction Industry – for help to improve their anti-corruption policies so they meet the new regulations. The chapter will produce a report in late 2018 assessing the existence of these policies and the effect of the new laws on levels of corporate corruption. “In our 2017 baseline assessment of Mexico’s Index of the top 500 companies, based on Transparency International’s TRAC methodology, 60 per cent had no anti-corruption programme. After one year, 60 per cent did,” says Eduardo Bohorquez. “Already, the new legal framework shows the power companies have, when they join forces with civil society, to help create a fairer business environment for all,” he adds.

To find out more about these stories and others, how Transparency International can help build business integrity in your context, or how to join the Business Principles for Countering Bribery Steering Committee, please contact our Business Integrity team, at [BIP@transparency.org](mailto:BIP@transparency.org) or your national [Transparency International chapter](#).

# RESOURCES

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All global tools profiled in this paper are described below. To find out more, please follow the links to our website.

## *10 Anti-Corruption Principles for State-Owned Enterprises*

The *10 Anti-Corruption Principles for State-Owned Enterprises* help state-owned enterprises (SOEs) to implement anti-corruption programmes based on the highest standards of integrity and transparency. This tool sets out 10 best-practice principles on how SOEs can develop policies and procedures to counter corruption. In particular, they emphasise the role of corporate governance in providing accountability to stakeholders through transparency and public reporting. The SOE principles and accompanying resources can be found [here](#).

## *Business Integrity Toolkit*

Transparency International's *Business Integrity Toolkit* is a user-friendly six-step process for building an effective anti-corruption programme. It can be accessed on our [website](#).

## *Business Principles for Countering Bribery*

The *Business Principles for Countering Bribery* provide a framework for companies to develop comprehensive anti-bribery programmes. While many large companies have no-bribes policies, all too few implement these policies effectively. We encourage companies to consider using the business principles as a starting point for developing their own anti-bribery programmes or to benchmark existing ones. The business principles can be downloaded from our [website](#).

## *Transparency in Corporate Reporting (TRAC)*

The *TRAC* reports assess the extent to which leading companies report on the strategy, policies and management systems they have in place for combating bribery and corruption. The latest report on 100 major emerging market multinationals can be found [here](#).

# ENDNOTES

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<sup>1</sup> OECD *Corporate Governance and Business Integrity: A Stocktaking of Corporate Practices* (2015).

<sup>2</sup> Matthew Jenkins “The relationship between business integrity and commercial success”, *Transparency International U4 Anti-Corruption Helpdesk*, 5 April 2018. Available at: <https://knowledgehub.transparency.org/helpdesk/the-relationship-between-business-integrity-and-commercial-success>

<sup>3</sup> To find out more about the tools profiled in this paper, please refer to the Resources section.

<sup>4</sup> Innovation Norway, Norwegian Energy Partners, *Handbook – Challenges of Doing Business in Indonesia*. Available at: <https://www.innovasjon norge.no/globalassets/sats-internasjonalt/kontror/indonesia/2017.10.25-final-report---challenges-of-doing-business-in-indonesia.pdf>

<sup>5</sup> “Former PLN Head Gets 5 Years for Corruption”, *Jakarta Globe* (web), 22 December 2011. Available at: <https://jakartaglobe.id/archive/former-pln-head-gets-5-years-for-corruption/>

<sup>6</sup> “PLN Fights Corruption Alongside Transparency Indonesia”. *Tempo* (web), 23 April 2014. Available at: <https://en.tempco.co/read/news/2014/04/23/055572518/PLN-Fights-Corruption-Alongside-Transparency-Indonesia>

<sup>7</sup> A tool aimed at encouraging better relationships between business partners by signing a “pact” between business partners to introduce shared values such as correctness and fairness.

<sup>8</sup> “2016: El año del activismo ciudadano”, *Expansion* (web), 15 December 2016.



These four case studies were selected based on an initial assessment of various Transparency International projects working to fight corruption in the business sector, as they exemplify the range of projects in which Transparency International is involved. The information contained in this report was gathered between February 2018 and August 2018 via a desktop review of available literature and in-depth interviews with Transparency International Secretariat staff, Transparency International national chapters, and companies. We are grateful to all those who took part in the development of this paper.

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