B20

SAUDI ARABIA 2020

INTEGRITY & COMPLIANCE

POLICY PAPER 2020

TRANSFORMING FOR INCLUSIVE GROWTH

CONTENTS

FOREWORD

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History tells us that emergency situations and related disruption heighten integrity risk. The COVID-19 pandemic has already had a devastating effect on communities and the global economy. Its impact will continue to be widespread for years to come. The consequent risk of fraud, corruption and the misdirection of government funds (particularly in the health care sector) provide further impetus to both improve public financial management and to articulate expectations of higher standards of private sector conduct.

The current crisis offers all of us an opportunity to "*build back better*", placing a renewed focus on enhancing transparency, reinforcing integrity and fighting corruption. It is notable, that many businesses have intensified their public communications regarding their commitment to the societies in which they operate, emphasizing responsible business conduct; this increased attention should be capitalized on in the fight against corruption.

Over the course of this year, there has been a growing recognition of the need for global solidarity, essential to address a truly global crisis. Partnerships between the public and private sectors have become ever more important. Cross-border collaboration and coordination can and should be harnessed to promote integrity, root out corruption and build on current cross-border enforcement. Business leaders, who have worked shoulder-to-shoulder with competitors to fight the pandemic, should now lead the way to identify new and ambitious opportunities for Collective Action.

An important objective of the 2020 G20 Presidency is *empowering people and creating economic opportunities*; particularly women. Digitalization and adoption of new technologies offer solutions to break the reinforcing cycle of systemic corruption and social inequality.

We are pleased that combatting corruption remains a top priority for the G20. We remain optimistic that past G20 commitments will be implemented, and that targeted actions will be pursued as outlined in the G20 Anti-Corruption Working Group Action Plan for 2019-2021. We firmly believe these aspirations can be realized through the adoption of national anti-corruption plans that should take forward the recommendations we propose here.

I thank the Integrity & Compliance Taskforce members and the Knowledge Partners for their excellent contribution to this policy paper.

EXECUTIVE SUMMARY

This policy paper outlines three general recommendations for the G20 and covers a number of specific policy actions and considerations for each such recommendation.

The first recommendation focuses on the G20 pursuing and delivering a culture of high integrity in both the public and private sectors, encouraging governments and businesses to align their efforts to combat illicit payments and create appropriate support systems that will benefit all stakeholders. Specifically, this recommendation is supported though the following policy actions: (i) engage with the private sector to improve national anti-corruption plans and adopt new Collective Action initiatives; (ii) strengthen whistleblower protections and whistleblower programme management in cooperation with the private sector; and (iii) ensure that anti-corruption plans and whistleblower protections empower women to become part of the solution to corruption.

The second recommendation focuses on the G20 leveraging emerging technologies to manage risks related to corruption and fraud. In addition to highlighting the utility and encouraging the application of an Anti-Corruption Technology Road Map, the following policy actions are set forth to enhance transparency in beneficial ownership, and to improve third-party risk management: (i) adoption of consistent digital identity standards and systems; (ii) development of digital public national registers of beneficial ownership data; and (iii) pursuit of a public-private partnership project to support the development of new technologies to further improve data quality in, and data sharing among, national registers.

The third recommendation focuses on the G20 enhancing integrity and transparency in public procurement, emphasizing specific policy actions to: (i) ensure transparency, and promote integrity and accountability across the entire public procurement lifecycle; (ii) establish clear and consistent incentives to reward high standards of ethical business conduct in public procurement; and (iii) ensure greater integrity among public procurement officials by implementing conflict of interest policies and asset declarations, in line with the United Nations Convention Against Corruption (UNCAC) Article 8 for procurement officials, while bolstering anti-corruption training for these officials and providing transparent and independent channels for them to report instances of corruption.

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†All amounts expressed in U.S. dollars unless otherwise noted.

Overview of Policy Recommendations and Policy Actions	
Recommendation 1	**The G20 should pursue a culture of high integrity in the public and private sectors.**
Policy Action 1.1	The G20 should engage with the private sector to implement or improve national anti-corruption plans, and to adopt new Collective Action initiatives.
Policy Action 1.2	The G20 should strengthen laws protecting whistleblowers, and engage with the private sector regarding best-practices in whistleblower programme management.
Policy Action 1.3	The G20 should ensure that anti-corruption plans and whistleblower protections empower women to become part of the solution to corruption.
Recommendation 2	**The G20 should leverage emerging technologies to manage risks relating to corruption and fraud.**
Policy Action 2.1	The G20 should adopt consistent digital identity standards and systems to enhance transparency in beneficial ownership, and improve third-party risk management in the private sector.
Policy Action 2.2	The G20 should develop digital public national registers to increase transparency around beneficial ownership information, and to improve third-party risk management.
Policy Action 2.3	The G20 should launch a public-private partnership project to support the development of new technologies to further improve data quality in, and data sharing among, national registers.
Recommendation 3	**The G20 should enhance integrity and transparency in public procurement.**
Policy Action 3.1	The G20 should ensure transparency, and promote integrity and accountability across the entire public procurement lifecycle.
Policy Action 3.2	The G20 should establish clear and consistent incentives to reward high standards of ethical business conduct in the context of public procurement.
Policy Action 3.3	The G20 should ensure greater integrity among public procurement officials by implementing conflict of interest policies and asset declarations in line with UNCAC Article 8 for procurement officials, while bolstering anti-corruption training for these officials and providing transparent and independent channels for them to report instances of corruption.

Introduction

Corruption impacts the community in a multitude of ways on a global and a local level. Politically, it undermines the rule of law and democracy and erodes trust in institutions. Economically, it is a major barrier to inclusive growth - leading to inefficiencies, hindering fair markets, and causing business disruption. Socially, corrupt practices reinforce entrenched inequalities and divisions, with gender being an issue of particularly critical importance. The COVID-19 pandemic has served to heighten focus on integrity and compliance in the healthcare sector and beyond. Corruption already threatens the proper functioning of health systems in the form of misappropriation of medical supplies, corruption in new product research, counterfeit medical products and informal payments to doctors and hospital administrators.[2]

COVID-19 will place increased pressure on resources, weaken institutions and require emergency procurement processes. This will further elevate corruption risk[3] [4] in the healthcare sector, given urgent need to source medical equipment and develop diagnostics, therapeutics and a vaccine in record time and under extraordinary circumstances.

The current environment is bound to exacerbate ethics and compliance risks beyond the healthcare sector. As established suppliers close or shut temporarily, trusted partners have been challenged to meet extraordinary, if not impossible, demands and pressures to deliver in a time of increasingly shrinking margins. It is now more important than ever for the G20 Members to continue to strengthen and enforce anti-corruption measures.

Anti-corruption remains a thematic priority for the G20 and the B20 alike, and we wish to build on initiatives of previous presidencies. All G20 Members have ratified UNCAC[5], and have in recent years adopted a number of important anti-corruption commitments, including endorsing the *High-Level Principles on Organizing Against Corruption*,[6] the *High-Level Principles of Promoting Integrity in Public Procurement*,[7] the *High-Level Principles for the Effective Protection of Whistleblowers*,[8] the *High-Level Principles on Preventing Corruption and the High-Level Principles for Preventing Corruption and Ensuring Integrity in State-Owned Enterprises*[9] and the High-Level *Principles on Preventing and Managing Conflicts of Interest in the Public Sector*.[10]

The G20 Anti-Corruption Working Group (ACWG) was established during the 2010 G20 Presidency. The ACWG leads G20 anti-corruption efforts, and works closely with several international organizations, including the Organization for Economic Cooperation and Development (OECD), to promote cross-border cooperation in the fight against corruption.

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[2] https://ti-health.org/content/diagnosing-corruption-healthcare/

[3] https://www.u4.no/publications/corruption-in-the-time-of-covid-19-a-double-threat-for-low-income-countries.

[4] https://www.opengovpartnership.org/stories/emergency-procurement-for-covid-19-buying-fast-open-and-amart/

[5] https://www.unodc.org/unodc/en/treaties/CAC/.

[6] http://www.g20.utoronto.ca/2017/2017-g20-acwg-anti-corruption.pdf.

[7] http://www.seffaflik.org/wp-content/uploads/2015/02/G20-PRINCIPLES-FOR-PROMOTING-INTEGRITY-IN-PUBLIC-PROCUREMENT.pdf.

[8] https://www.bmjv.de/SharedDocs/Downloads/EN/G20/G20_2019_High-Level-Principles_Whistleblowers.pdf?__blob=publicationFile&v=1.

[9] http://www.g20.utoronto.ca/2018/final_hlps_on_soes.pdf.

[10] http://www.g20.utoronto.ca/2018/adopted_hlps_on_coi.pdf.

This policy paper, which is in all respect aligned with the objectives of the ACWG Action Plan for 2019-2021[11], provides the important perspective of the private sector with the overarching aim of accelerating the effective implementation of the G20's current and prior anti-corruption commitments. The COVID-19 crisis gives additional weight to these ACWG objectives. If corruption and fraud surge during this crisis, the G20's ongoing efforts to coordinate the public sector response will be severely undermined. Fortunately, the pandemic has led to an increased focus on responsible business conduct and international cooperation. The G20's anti-corruption response to the crisis should build on this sentiment with a particular focus on leveraging existing and emerging technologies in support of anti-corruption initiatives. Existing technologies, such as digitized government services in licensing, permitting, procurement and taxation can reduce corruption during, and after the pandemic. Emerging technologies can be used against illicit finance through improved sharing of beneficial ownership data between, and among governments and the private sector. New low-cost, anonymous and encrypted two-way communication platforms can increase the quantity and quality of information from concerned citizens and employees.

Delivering more ethical and inclusive growth also necessitates empowering women, a key objective of 2020 B20.[12] Addressing the inequalities between men and women is not only crucial to the lives and well-being of women, but it is fundamental in driving sustainable development. The 2020 G20 Presidency is strongly committed to building on the momentum generated in previous G20 Presidencies to empower women, including the joint B20/C20/W20 statement on gender and anti-corruption in 2018.[13] The G20 response to the pandemic must take into consideration the fact that women are not only disproportionately affected by corruption, but are more likely to be particularly affected by the pandemic, not least because the majority of healthcare workers are women, and women in particular are more likely to take on healthcare and educational responsibilities at home.[14]

To this end, the 2020 B20 is proud to launch a new global initiative to develop and deploy training modules addressing gender and anti-corruption for use within the private sector supply chains. These training materials will be tailored specifically for SMEs and women-owned enterprises.

With the above context, and with strong support from our Knowledge Partners, the members of this year's Taskforce have chosen to call for intensified effort from the G20 Members on three critical topics: (i) building a culture of high integrity supported by robust national anti-corruption plans; (ii) optimizing beneficial ownership data sharing; and (iii) protecting the public procurement from corrupt practices. National anti-corruption plans are the expression of governments' commitment to addressing the problem comprehensively, and now is the time to involve the private sector in helping to refresh risk assessments, and to leverage technology-related and industry sector-specific insights. Across all three recommendations, we have identified new, concrete and measurable policy actions that should be considered urgently. Our document also

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[11] https://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=DAF/WGB/RD(2018)10&docLanguage=En

[12] https://g20.org/en/Documents/Empowering%20People.pdf

[13] http://w20argentina.com/wp-content/uploads/2018/10/Joint_Statement_Gender_and_Corruption.pdf

[14] https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2020/policy-brief-the-impact-of-covid-19-on-women-en.pdf?la=en&vs=1406

includes, for the first time, an anti-corruption technology roadmap which we commend to the public and private sectors.

We welcome the opportunity to engage with all interested parties on these critical priorities. We must rise to the occasion of this global crisis, and meet the elevated expectations of our fellow citizens to truly rebuild our global society with a renewed focus on transparency, integrity and equality.

RECOMMENDATION 1:
The G20 should pursue a Culture of High Integrity in the Public and Private Sectors

This recommendation contributes to the achievement of SDGs 5, 16 and 17. Effective national anti-corruption strategies, including Collective Action and robust protections for whistleblowers, are aligned with 16.4 (reduction of illicit financial flows) and 16.5 (reduction of corruption and bribery). Progress in these efforts will benefit from more intensive cooperation between the public and private sector, including specific partnership projects (17.7 – promote public, public-private and civil society partnerships). Accelerating the empowerment of women in the fight against corruption is of critical importance as well, and is closely aligned to 5.5 (ensuring full and effective participation in leadership for women in political, economic and public life) and 5C (strengthen sound policies for the promotion of gender equality).

Policy Actions	
Policy Action 1.1	The G20 should engage with the private sector to implement or improve national anti-corruption plans and to adopt new Collective Action initiatives.
Policy Action 1.2	The G20 should strengthen laws protecting whistleblowers, and engage with the private sector regarding best-practices in whistleblower programme management.
Policy Action 1.3	The G20 should ensure that anti-corruption plans and whistleblower protections empower women to become part of the solution to corruption.

Context

Delivering a culture of high integrity across the G20 requires government and business to align their efforts in creating a greater force against requests for illicit payments, and producing support systems that generate stronger returns for business and improve the quality of life. This can be enhanced by: (i) encouraging the adoption of ambitious, enforceable national anti-corruption plans that embrace the potential of Collective Action, (ii) supporting whistleblower protections, and (iii) empowering women to more fully participate in the fight against corruption.

National anti-corruption plans are an excellent roadmap for building a culture of integrity. Within this context, Collective Action initiatives in various countries have made progress in recent years, with the support of past B20 initiatives. More can be done, especially by implementing strategies to target vulnerable industry sectors with novel Collective Action initiatives that are global in scale.

The G20 Members should encourage the adoption of anti-corruption plans and ensure that whistleblower programmes and protections are key features. The B20 and the G20 have

long held that backing for such programmes is essential, and the G20 itself adopted related high-level principles in 2019.[15] There is scope to take stock and explore innovative ideas and new technologies to advance the adoption of effective and innovative whistleblower protections and reporting.

In order for the foregoing to have meaningful, balanced impact, due consideration and further efforts must also be devoted to the issue of gender in the context of anti-corruption. To advance this, the Integrity & Compliance Taskforce launched a project around women's role in fighting corruption in the supply chain. The initiative will grow the movement for women's role in promoting ethical business, through training.

Policy Action 1.1: The G20 should engage with the private sector to implement or improve national anti-corruption plans and to adopt new collective action initiatives

The 2020 G20 Presidency has set the development and implementation of national anti-corruption strategies as a priority issue with the aim to share good practices. The successful implementation of anti-corruption actions by the Kingdom of Saudi Arabia will foster sustainable development and aid in the achievement of its Vision 2030.[16] More broadly, national anti-corruption plans can convey the efforts of a government to build integrity, to foster an ethical business culture, as well as to communicate a commitment for more robust legislation and greater enforcement efforts. Best-in-class plans include detailed risk assessments, sector-specific strategies (including Collective Action programmes), and quantitative measures of success. The challenge is to create and implement plans that are both rigorous, and specific enough to achieve the desired results.

- The B20 calls on the G20 Members to leverage the expertise and insights of local and foreign private sector with significant local business interests, to refresh and improve their respective national anti-corruption plans, with specific reference to risk assessments and the adoption of leading edge anti-corruption technologies.

Insights from the private sector may not only be useful to national anti-corruption strategies but can also be leveraged by state-owned enterprises (SOEs). As an example, the secondment of private sector compliance specialists to SOEs can lead to the building of expertise in critical topics, including anti-bribery and ethical culture, and contribute to enhanced compliance capacity.

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[15] https://www.bmjv.de/SharedDocs/Downloads/EN/G20/G20_2019_High-Level-Principles_Whistleblowers. pdf?__ blob=publication File &v=1.
[16] https://www.vision2030.gov.sa/en.

Exhibit 1 | Compliance without Borders – innovative knowledge-sharing through secondments
During the 2018 G20 Presidency, the B20 recommended that the G20 Members facilitate professional cooperation between the public and private sectors by developing joint initiatives, building trust, and exchanging information and lessons learned. In response to this recommendation, the OECD's Trust in Business Initiative[17] and the Basel Institute of Governance, supported by Business at the OECD (BIAC)—alongside the B20—developed *Compliance without Borders*. *Compliance without Borders*[18] serves as a skills exchange programme to promote trust in business by strengthening and modernizing SOEs' risk management, compliance and control systems so that they can optimally manage and mitigate corruption risks. The project is open to private- and public sector compliance experts globally. This innovative expert secondment programme, between compliance officers from private and public sectors, aims to facilitate the exchange of good corporate practices, based on international standards as outlined in the *G20 High-Level Principles for Preventing Corruption and Ensuring Integrity in State-Owned Enterprises.*[19] The programme, launched in 2019, has attracted interest from a number of G20 and non-G20 Members, and businesses.

Governments should also consider identifying particularly vulnerable industry sectors in their national anti-corruption plans. These plans should commit to fostering private sector Collective Action efforts, both locally and on a global level, to help mitigate related risks. These Collective Action efforts can bring together businesses and other concerned stakeholders, with the aim of raising standards of business integrity and helping to level the playing field between competitors. Where multinationals are required by their home country laws to have effective compliance systems and face liability for corrupt acts with public officials, they respond by imposing compliance obligations on their business partners and co-venturers. These businesses push their own culture of integrity out into their value chains. That creates a ripple effect, that raises the expectations for enterprises that want to do business with them. Collective Action can take many forms, including, among others, information-sharing, best-practices setting,[20] agreements to resist corruption, adoption of industry-specific codes[21] and capacity building (including through training, secondments and conferences).[22]

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[17] http://www.oecd.org/daf/ca/trust-business.

[18] https://www.oecd.org/corporate/Compliance-Without-Borders-OECD-Basel-Institute-on-Governance.pdf.

[19] http://www.g20.utoronto.ca/2018/final_hlps_on_soes.pdf.

[20] For example, the Ethical Principles in Health Care (EPIHC), a global Collective Action initiative developed in 2019 by the International Finance Corporation, a member of the World Bank Group, has provided health care organizations with ten clear principles to navigate. complex ethical decisions during and after the pandemic. See https://www.ifc.org/ wps/wcm/ connect/industry_ext_content/ ifc_external_corporate_site/health/epihc_landing+page.

[21] For example, the International Code of Ethics for Accountants ("The Code") Non-Compliance with Laws and Regulations (NOCLAR). The NOCLAR provision of The Code effectively establishes an ethical requirement that professional accountants, in whatever capacity they are engaged, act as whistleblowers.

[22] For example, the Business Ethics for APEC SMEs Initiative and APEC SME Leaders in Ethics and Integrity Program. See https://mcprinciples.apec.org.

Further opportunities remain to establish new Collective Action efforts – and to broaden the geographic scope of these efforts. Less than 20 of the more than 100 initiatives listed on the B20 Collective Action Hub are global in nature.[23]

- • The B20, therefore, calls on the G20 Members to intensify their efforts to: (i) actively support Collective Action, (ii) enshrine their commitment to Collective Action in their national anti-corruption action plans with an emphasis on promoting a culture of integrity and clean business, and (iii) partner with the private sector to strengthen existing global initiatives and initiate new, global and sector-specific Collective Action efforts.

Exhibit 2	B20 Collective Action Hub
In 2013, the B20 selected the International Centre for Collective Action (ICCA) at the Basel Institute on Governance to host the B20 Collective Action Hub. The Hub marked a significant development in the international effort to combat corruption. With a wealth of information and good practice examples on Collective Action, the B20 Collective Action Hub is intended as a resource and inspiration for businesses and other organizations interested in taking joint steps to strengthen ethical business practices. The Hub includes a dedicated resource page on integrity pacts[24] and High-Level Reporting Mechanisms[25], as well as a broad variety of sector-specific and cross-sectoral initiatives. It offers a space for business, civil society and government to collaborate in this endeavor, and for obtaining advice on setting up Collective Action initiatives. The B20 Hub and the ICCA have been set up with funding from the Siemens Integrity Initiative and other private sector businesses actively engaged in Collective Action.[26]

Policy Action 1.2: The G20 should strengthen laws protecting whistleblowers and engage with the private sector regarding best practices in whistleblower programme management

The protection of whistleblowers has been at the forefront of the ACWG agenda since 2010.[27] More recently, under the Japanese presidency in 2019, the G20 adopted the *High-Level Principles for the Effective Protection of Whistleblowers.*[28] The EU and Australia too have adopted landmark measures relating to whistleblower protections.[29] [30]

The B20 applauds the G20's focus on this critical topic. Yet, as in other areas, there is still opportunity to improve the consistent implementation of these previously adopted principles, especially in developing countries. The private sector implores the G20 Members to fully clarify the definition of the term "whistleblower," to agree on what constitutes protected communications and disclosures, and to encourage reporting by strengthening laws designed to deter retaliation.[31]

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[23] https://www.baselgovernance.org/b20-collective-action-hub/initiatives-database.
[24] https://www.baselgovernance.org/b20-collective-action-hub/integrity-pact.
[25] https://www.baselgovernance.org/b20-collective-action-hub/hrlm.
[26] https://baselgovernance.org/b20-collective-action-hub.
[27] http://www.g20.utoronto.ca/2010/g20seoul-anticorruption.pdf.
[28] https://www.bmjv.de/SharedDocs/Downloads/EN/G20/G20_2019_High-Level Principles_Whistleblowers.pdf?__blob=publicationFile&v=1.
[29] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L1937&rid=4.
[30] https://www.legislation.gov.au/Details/C2019A00010/Html/Text.
[31] https://www.oecd.org/corruption/48972967.pdf.

- The G20 should incentivize reporting directly to governments (and encourage the use of innovative whistleblower communications technology, along with other elements of good compliance practice), creating high-level reporting mechanisms,[32] where appropriate. Such incentives may include rewards and preferential treatment in government/multilateral contracts, public awards and mitigation during enforcement for entities that build an effective compliance programme, consistent with global standards such as UNCAC and the OECD Anti-Bribery Convention.

- The G20 Members should take steps to foster robust information exchange between government and business in order to boost Member' efforts to regularly monitor and evaluate their whistleblower protection frameworks, and to stay current with best practices in the private sector. Innovative, anonymous, encrypted, low-cost two-way communication platforms, capable of increasing the quantity and quality of whistleblower reports, should be addressed with particular focus in these discussions.

Exhibit 3 | Innovation in whistleblower platform technology

Technological advancements are creating opportunities for whistleblowers to establish anonymous communication channels with government agencies and businesses alike. Such platforms are becoming more prevalent and are supporting efforts to report, and investigate allegations of wrongdoing, and to improve compliance.

In Australia, following on from high profile investigations of money laundering and other forms of misconduct in the banking, superannuation and financial services industry, a Royal Commission was formed. The Commission's final report in early 2019 made numerous recommendations to the industry, and the Australian regulatory bodies.[33] One of these regulators, the Australian Competition and Consumer Commission (ACCC), later revised its cartel immunity and cooperation policy – and launched a new anonymous online channel for whistleblowers.

The new channel, in place since October 2019, enables whistleblowers "to contact the ACCC via an anonymous online portal which encrypts the information and removes the person's IP address so that their identity is anonymous to the ACCC." Whistleblowers can establish a password, and log in again later to continue to communicate with the regulator.[34]

Indeed, ACCC leadership emphasized in February 2020, that this enhanced method of collection of evidence was enabling more effective and efficient investigations. The new whistleblowing platform allows the ACCC's investigators to communicate with whistleblowers anonymously and provides ACCC staff with the means of following up with requests for further information from these whistleblowers.[35]

Willingness to embrace technology innovation is certainly among the reasons that some have characterized the ACCC as having gone from "strength to strength" in recent years.[36]

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[32] https://www.baselgovernance.org/sites/default/files/2019-01/Designing_a_HLRM_EN.pdf.
[33] https://financialservices.royalcommission.gov.au/Pages/reports.aspx#final.
[34] https://www.accc.gov.au/media-release/cartel-immunity-policy-strengthened-whistleblowing-tool-launched.
[35] https://www.accc.gov.au/speech/accc-2020-compliance-and-enforcement-priorities.
[36] https://www.lexology.com/library/detail.aspx?g=fc4022c3-6fb9-48e2-bb36-01d216fa3b95.

Policy Action 1.3: The G20 should ensure that anti-corruption plans and whistleblower protections empower women to become part of the solution to corruption

The B20 looks forward to collaborating with the G20 Members and civil society members to accelerate the ongoing efforts to enlist women in the fight against corruption. As set out in prior B20 and G20 policy documents, women suffer a particularly negative impact from corrupt conduct, which, as one example, can further hinder their political representation and opportunities for leadership in the public and private sectors. Anti-corruption plans and whistleblower protections that are responsive to women's needs can help to reduce the gendered impact of corruption.

- With the adoption of stronger anti-corruption plans and whistleblower protections, the G20 can empower women to become part of the solution to corruption. These programmes can (i) use gender-specific data to educate and train women to resist and report solicitation, (ii) penalize sexual extortion and protect women who report it, and (iii) actively promote women's participation in a wide range of public, economic and political spheres in combatting corruption.

Exhibit 4 | UNDP "FairBiz" Project
The United National Development Programme (UNDP) has implemented women's inclusion projects in developing countries for many years. In ASEAN, the "FairBiz" project[37] focuses on promoting business integrity and creating a fair environment for women. In many of these countries, women and girls are exposed to unfair and discriminatory, often corrupt, practices in their professional and family lives. At the extreme end of this, sexual extortion, harassment and modern slavery practices still persist. In 2019, FairBiz commissioned a baseline study showing that, on an average, women's representation on company boards is substantially lower in ASEAN than in advanced economies.[38] Other studies have shown a link between gender diversity, greater transparency and strong corporate governance. FairBiz is following up on this evidence-based approach with a regional mapping exercise in four countries to identify examples of how the private sector successfully promotes opportunities for women in the workplace. In August 2019, the First FairBiz Regional Dialogue, *"The Future of Leadership is Gender Equal",* launched a network of businesses in ASEAN committed to enabling diversity and inclusion as essential components of good corporate governance, sustainability and business integrity.[39] Now, with the enthusiastic support of these local businesses and entrepreneurs, and with the backing of multinationals and investors, FairBiz is poised to disseminate best practices, practical training and mentoring to women leaders, managers and entrepreneurs throughout the region.

Exhibit 5 | Alliance for Integrity's Anti-Corruption Training for Women Entrepreneurs
Complementing the efforts of the international community to understand the empirical relationship between gender and business integrity, the *Alliance for Integrity* has

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[37] https://www.asia-pacific.undp.org/content/rbap/en/home/programmes-and-initiatives/Fair-Biz/.

[38] https://www.undp.org/content/dam/rbap/docs/dg/Fairbiz4Prosperity/DRAFT_Gender%20Report_28Aug.pdf.

[39] https://www.asia-pacific.undp.org/content/rbap/en/home/presscenter/events/2019/genderequalleadership.html.

developed and implemented several exchange platforms and trainings since 2018, in order to provide a practical perspective on the topic.

In gender-specific formats, such as the Integrity Coffee in Mexico and Colombia, the "Integri-Tea" in India, and the Women for Integrity (WISe) series in Ghana, *Alliance for Integrity* invites women entrepreneurs to share experiences openly, discuss corruption-related challenges and exchange best practices. These events identify leading practices that can be utilized by other women entrepreneurs.

Implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, the *Alliance for Integrity*, together with executives from multinational businesses, developed eight hours of practical training for women entrepreneurs to help them to prevent corruption in businesses. Numerous practical insights have been identified, including ways to combine a company's gender-specific measures with its anti-corruption efforts. At the same time, in the countries in which it is active, the *Alliance for Integrity* creates space for discussions between the public and private sectors, strengthening Collective Action with women in compliance role, and encourages businesses to implement gender-sensitive compliance programmes.[40]

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[40] https://www.allianceforintegrity.org/en/.

Recommendation 2:
The G20 should Leverage Emerging Technologies to Manage Risks relating to Corruption and Fraud

This recommendation contributes to the achievement of SDGs 16 and 17. Technology continues to play a critical role in combatting corruption. The widespread use of globally accepted digital identities (16.9) and public national registers of beneficial ownership data will help to reduce illicit financial flows (16.4) and to reduce corruption (16.5). Fostering advanced technologies to improve data quality in, and data sharing among, these national registers will require close cooperation between the public and private sector. Public-private partnership projects focused on technology innovation can accelerate these developments (17.7).

Policy Actions	
Policy Action 2.1	The G20 should adopt consistent digital identity standards and systems to enhance transparency in beneficial ownership, and improve third-party risk management in the private sector.
Policy Action 2.2	The G20 should develop digital public national registers to increase transparency around beneficial ownership information, and to improve third-party risk management.
Policy Action 2.3	The G20 should launch a public-private partnership project to support the development of new technologies to further improve data quality in, and data sharing among, national registers.

Context

The G20 Anti-Corruption Action Plan 2019-2021[41] recognizes the need to accelerate the implementation of past commitments, and *"take concrete actions to strengthen and promote integrity and transparency in the public and private sector"* by *"sharing experiences and best practices relating to opportunities and risks of new technologies in relation to corruption."*[42]

The 2020 B20 aims to promote public and private sector integrity through the application of information and communication technologies, in order to reduce opportunities for corruption, enhance effectiveness and efficiency in the public and private sector, strengthen transparency and increase public trust. Technologies that support the digitization of government services, including licensing, permitting, tax collection and procurement serve a crucial role. Additionally, as referenced in policy actions 1.2 and 3.1, new technologies can

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[41]
https://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=DAF/WGB/RD(2018)10&docLanguage=En
[42] https://www.consilium.europa.eu/media/40124/final_g20_osaka_leaders_declaration.pdf.

support the reporting and investigation of corruption concerns as well as bolstering transparency in public procurement.

The 2020 G20 Presidency underscores the importance of deploying emerging technologies in the fight against corruption as part of its recommendations, and recognizes that the critical need for further action is a high-priority issue that should continue to be a core driver of its policy action recommendations to the G20.

According to a 2019 survey of 3,000 managers in compliance-related roles, 97 percent believe that technology can significantly help with bribery, corruption and other financial crime prevention.[43] As such, efforts to combat corruption, money laundering, tax evasion and terrorist financing may be enhanced when technology is deployed to increase transparency and accountability across end-to-end business dealings. Access to high-quality data on the beneficial owners of companies enables more effective risk management, including with respect to third parties.

Cross-Cutting Theme

In support of this overarching objective to drive transparency in business dealings, the Integrity & Compliance Taskforce recommends that the G20 Members evaluate whether the Global Value Chain (GVC) Passport on Financial Compliance concept can also support the prevention of corruption in the future, by reducing intermediary steps and eliminating duplications which may hinder doing business abroad in other participating countries. The key idea is that the GVC Passport on Financial Compliance could provide accreditation across the value chain of relevant financial requirements for firms. A firm incorporated in one participating country would thereby be reciprocally acknowledged as a legitimate business entity in other participating countries. Hence, this would eliminate the need for multiple re-certifications of the same financial requirement. *"Verifying entities"* are naturally those public authorities managing the relevant regulation, but can also possibly be private entities; for example, banks verifying information like KYC and credit records. Finally, the Passport concept anticipates leveraging emerging technologies to assist in data verification to establish trusted sources of standard, secure and traceable information for cross-border recognition by participating countries and by law enforcement.

Anti-Corruption Technology Road Map

As technology continues to evolve, it is important to think critically about its use to fight corruption in both the near and longer term. The Anti-Corruption Technology Road Map below outlines a strategic vision that identifies several corruption risk areas and defines potential solutions that can help reduce corruption in each risk area. These solutions may also be used to support expanding the GVC Passport on Financial Compliance concept, if considered by the G20 Members in the future.

Using emerging technologies to more efficiently and accurately identify and verify beneficial owners of companies, contributing therefore to more effective management of risk from third parties, will be addressed in this policy recommendation. Future presidencies are encouraged to consider addressing technology solutions for other risk areas, such as the public corporate registration process, public procurement (example, the RFP process),

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[43] https://www.refinitiv.com/content/dam/marketing/en_us/documents/reports/innovation-and-the-fight-against-financial-crime.pdf.

public supply chain (example, suppliers) and public payments (example, disbursements), as outlined in the Anti-Corruption Technology Road Map.

Similarly, the digital identity and the digital public national registers are key pillars to help reduce anonymity and increase accountability among beneficial owners and third parties, as discussed below. When these solutions are adopted, cross-border data quality and sharing issues will arise and a public/private partnership project (Data Quality/Sharing Technology Innovation Project) should be launched to address these challenges.

Future presidencies are also encouraged to consider adopting further measures to enhance integrity, including those relating to best practices in monitoring and testing the accuracy of beneficial ownership data. The outcome of the Data Quality/Sharing Technology Innovation Project proposed herein may inform technology solutions considered in the future. Artificial Intelligence and privacy-preserving data analytics are among the suggested technology tools which may be part of the Innovation Project and may be useful to meet these objectives in the future.

B20 Saudi Arabia: Anti-Corruption Technology Roadmap
Prevention, Detection and Mitigation of Corruption
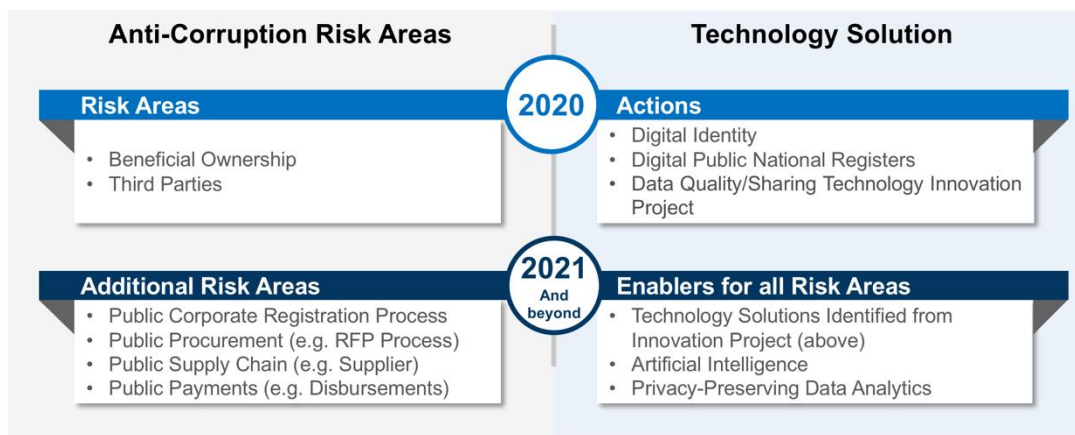
Policy Action 2.1: The G20 should adopt consistent digital identity standards and systems to enhance transparency in beneficial ownership and improve third-party risk management in the private sector

Establishing open source digital identity standards for individuals and businesses is a critical step to enhance trustworthiness, convenience, and security within the global economy. A digital identity comprises digitally captured and stored credentials of a person or an entity, such as name, date of birth/incorporation or gender/entity type, that is uniquely linked to an identifier that facilitates digital transactions.[44] Streamlined digital identification platforms eliminate manual, expensive, paper-based, redundant processes. While often associated with banking and payment processing, digital identities will contribute to more effective risk management across all industry sectors, enabling more efficient third-party due diligence/screening, and reduced accounts payable fraud.

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[44] https://www.pwc.ch/en/publications/2019/digital-identity-whitepaper-web.pdf.

The G20 Finance Ministers and Central Bank Governors began to address this issue in the aftermath of the 2008 Global Financial Crisis. In the years following, the G20 and the Financial Stability Board launched the Global Legal Entity Identifier Foundation (GLEIF), which today plays an important role in advancement of digital identities used by businesses and other legal entities.[45]

Substantial progress has also been made with respect to the digital identity of natural persons. The United Nations,[46] the International Monetary Fund[47], and the World Bank[48] have each made important contributions in the field. Particular geographies too have made progress on this topic, including the European Union.[49]

Underscoring the importance of digital identity in the fight against money laundering and terrorist financing, the Financial Action Task Force (FATF) published its digital identity guidance in March 2020.[50] As emphasized by the FATF, digital identities may support anti-fraud efforts by facilitating customer verification during onboarding, supporting ongoing due diligence of third-party transactions, and aiding in transaction monitoring and risk management. Digital identity systems enable portable proofs of identity which allow simpler customer interactions without duplication of identification or verification of personal information. Systems that do not meet necessary assurance levels pose the risks of cyber-attacks, identity theft, data security and privacy crimes. Therefore, digital identity standards should be aligned with national and international data protection regulations, and information-sharing between public and private digital identity systems should be encouraged.

For these reasons, the Taskforce recommends that the G20 Members:
- comprehensively and consistently adopt digital identity standards, including identifiers that may be used by decentralized systems,[51] for individuals and businesses to help verify beneficial ownership data; and
- adopt a global framework, such as the guidelines/recommendations from the FATF on digital identities[52] and beneficial ownership[53] to standardize the creation, collection, validation, monitoring and maintenance of beneficial ownership information by governments.

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[45]https://www.gleif.org/en/lei-solutions/lei-in-kyc-a-new-future-for-legal-entity-identification.
[46] https://unstats.un.org/legal-identity-agenda/LIEG/.
[47] https://www.imf.org/en/About/Factsheets/Sheets/2020/04/30/how-imf-covid19-financial-help-is-used.
[48] http://documents.worldbank.org/curated/en/248371559325561562/pdf/ID4D-Practitioner-s-Guide.pdf.
[49] https://ec.europa.eu/digital-single-market/en/learn-about-eidas.
[50] https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/Guidance-on-Digital-Identity.pdf.
[51] https://identity.foundation/.
[52] https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/Guidance-on-Digital-Identity.pdf.
[53] https://www.fatf-gafi.org/media/fatf/documents/Best-Practices-Beneficial-Ownership-Legal-Persons.pdf.

Policy Action 2.2: The G20 should develop digital public national registers to increase transparency around beneficial ownership information and to improve third-party risk management

Beneficial ownership transparency is an important element of the UNCAC, and its importance was further underscored by the UNODC and World Bank in 2011 and the FATF in 2012.[54] Yet today, while more than 80 countries have adopted legislation establishing national registers of beneficial ownership information,[55] much room for improvement remains within the G20.[56] While several countries have recently adopted enabling legislation, a significant majority of the G20 Members do not have such registers. Within the European Union, the process of transposing into national law the requirements of the 5th Anti-Money Laundering Directive to create public registers of beneficial ownership data is far from complete.[57]

Establishing a national register and publishing its data as an open data set, is a critical step to help deter corrupt practices.[58] A publicly accessible register, built on open data standards,[59] bolsters the quality of corporate due diligence, while continuing to provide law enforcement with data to support their investigations.

Digital public national registers enable data verification, and promote transparency among public and private sector participants. Requiring that public national registers contain essential corporate structure information also allows governments and the private sector to fulfill their risk management obligations.[60] Public access enables financial institutions and other businesses to effectively conduct customer due diligence, and potentially identify suspicious activity. A publicly accessible digital register enables civic oversight for assessing anomalies, and curbing corruption.[61]

The implementation of public national registers is also consistent with the *G20 High-Level Principles for Promoting Public Sector Integrity Through the Use of Information and Communications Technologies (ICT)*. Principle #5 promotes the adoption and implementation of open government standards, and digital public national registers gives access to government information and engages civil society. Steps must be taken to address a trust gap among some stakeholders, driven by different data protection laws, systemic corruption, national regulations and general resistance to emerging technologies, to encourage progress in adoption.

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[54] https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/4-6June2018/V1802075e.pdf.
[55] https://www.taxjustice.net/wp-content/uploads/2020/06/State-of-play-of-beneficial-ownership-Update-2020-Tax-Justice-Network.pdf.
[56] https://www.openownership.org/map/.
[57] https://www.globalwitness.org/en/campaigns/corruption-and-money-laundering/anonymous-company-owners/5amld-patchy-progress/.
[58] https://www.openownership.org/framework/.
[59] http://standard.openownership.org/en/0.2.0/.
[60] https://www.opengovpartnership.org/wp-content/uploads/2019/05/Global-Report_Beneficial-Ownership.pdf.
[61] https://www.imf.org/external/pubs/ft/fandd/2019/09/pdf/illicit-financial-flows-and-privacy-vs-transparency-purcell.pdf.

For these reasons, the Taskforce recommends that the G20 Members:

- accelerate their efforts to establish digital public national registers, consistent with the *G20 Anti-Corruption Open Data Principles*,[62] which would require businesses to share information on their respective beneficial owners, in line with internationally adopted recommendations from the FATF;[63] and
- validate and verify data stored in digital national public registers to ensure that it is both accurate and up-to-date. This may be done in partnership with the private sector, and with the sharing of technological capabilities.[64]

Exhibit 6 | Beneficial Ownership Registers
OpenOwnership is an initiative launched by a group of leading NGOs with financial support from the UK government, with the objective to develop a global standard for the effective disclosure of beneficial ownership data, and support governments around the world to implement it. This work supports businesses and individuals to perform a more thorough due diligence of prospective partners and thereby, deter corruption. Since the launch of *OpenOwnership* Register in 2017, over 80 countries, including 11 G20 Members, have committed to some form of beneficial ownership disclosure, and *OpenOwnership* has created a global register of beneficial owners, a technical standard for disclosure and directly supported more than 30 countries with the implementation of central and public registers of beneficial owners in their jurisdictions.[65]

Policy Action 2.3: The G20 should launch a public-private partnership project to support the development of new technologies to further improve data quality in, and data sharing among, national registers

With the G20 holding its first Anti-Corruption Ministerial this October, the G20 Members have an important opportunity to affirm their commitments to digital identities and public national registers. This convening may present an opportunity to gauge Member interest in a public-private initiative to address data quality and data sharing challenges across borders, as described in more detail below.

The widespread use of digital identities and the existence of public national registers are necessary but, in and of themselves, are not sufficient to deliver the important growth and integrity objectives of the private sector. As countries that have published publicly accessible open data sets from their national registers have seen, private sector users (and interested parties in civil society) have encountered significant levels of discrepancies and omissions in the data, compared to that available from other sources. For businesses seeking to perform robust due diligence on potential or existing third parties, or financial institutions onboarding new clients, these gaps can lead to ineffective compliance programmes and cost firms time and money.[66] In the European Union, the 5th AML Directive requires

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[62] http://www.g20.utoronto.ca/2015/G20-Anti-Corruption-Open-Data-Principles.pdf.
[63] https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf.
[64] http://www3.weforum.org/docs/WEF_Data_Collaboration_for_the_Common_Good.pdf.
[65] https://www.openownership.org/.
[66] For more information on risk and compliance function budget pressures within global financial services firms, see http://financial-risk-solutions.thomsonreuters.info/Cost-of-Compliance-2020.

regulated institutions to work with their governments to resolve such discrepancies, a task much easier said than done.

It is the right time, therefore, to explore technologies that will further improve the quality of beneficial ownership data, and allow the public and private sectors to benefit from analysis of larger data sets. Public access to high-quality data should also increase private sector compliance function cost effectiveness. Yet exchanging beneficial ownership data among financial institutions, or between financial institutions and governments, can raise complex cybersecurity, risk management, data privacy and other regulatory issues. Distributed ledger technologies (including blockchain) and artificial intelligence may contribute to technical solutions. There are also numerous privacy enhancing techniques, including homomorphic encryption and federated analysis, among others, that are being researched.[67] New forms of encryption are also enabling privacy-preserving data analytics in financial crime compliance and investigations.[68]

Exhibit 7 | Multi-stakeholder Initiative to Improve Beneficial Ownership Data Accuracy
The World Economic Forum Partnering Against Corruption Initiative (PACI), together with Tax Justice Network, The B Team and other leading organizations, has convened a network of experts from the public and private sectors, as well as civil society, to develop new approaches to improving beneficial ownership data accuracy. The Integrity & Compliance Taskforce members - HSBC, Bank of Montreal, and Refinitiv are active contributors to this initiative.   Launched in April 2020, the initiative identified the most common loopholes, challenges and risks in relation to beneficial ownership transparency, as well as the needs from the perspective of different users of beneficial ownership data in national registers. The group also mapped out current verification strategies[69], with a focus on emerging technology solutions, including machine learning and big data analytics being leveraged by governments, financial institutions and FinTech companies. In Denmark, for example, automated cross-checking of data from various government databases is being used to screen beneficial ownership data prior to allowing a legal entity to be registered.   In the coming months, the expertise of the network will be leveraged for the implementation of two pilot initiatives that will address specific verification needs on a country-level. While solutions will always be context-specific, it is envisaged that this multi-stakeholder project will generate learnings and scalable solutions for addressing the global data verification gap, an important priority in the fight against corruption and illicit financial flows.

Given the increasingly complex global compliance landscape, and the hundreds of billions of dollars in fines paid by businesses for misconduct in the last ten years, it is not surprising that investment in regulatory technology, or RegTech, continues to accelerate rapidly.

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[67] https://www.weforum.org/whitepapers/the-next-generation-of-data-sharing-in-financial-services-using-privacy-enhancing-techniques-to-unlock-new-value.

[68] Forthcoming Royal United Services Institute research project "The Role of Privacy Preserving Data Analytics in the Detection and Prevention of Financial Crime" details further examples of various encryption techniques to support financial crime information-sharing while preserving the privacy of underlying data.

[69] https://www.taxjustice.net/2020/06/04/how-authorities-banks-and-researchers-from-around-the-world-are-verifying-beneficial-ownership-information/.

Regulators around the world are increasingly supporting RegTech "sandboxes", where businesses can test new solutions in an effort to gain required regulatory approvals.

Indeed, many G20 Members are engaged with organizations like The Global Financial Innovation Network (GFIN),[70] an organization founded to provide an efficient way for innovative RegTech firms to interact with regulators. The UK's Financial Conduct Authority, which played a key role in establishing GFIN, has also been an innovator in supporting the development of new private sector technology solutions through its "TechSprint" events.[71]

These gatherings and others like them, which are often attended by regulators, bring together technology professionals in ad hoc teams over an intense few days to work on possible solutions to business challenges, identified in advance by the organizers.[72] [73] These competitions have already given rise to a number of promising leading edge AML/financial crime-related solutions. Such public-private initiatives are essential to continued progress.

For these reasons, the Taskforce recommends that the G20 Members:

- launch a Data Quality/Sharing Technology Innovation Project, a public-private partnership project engaging the ACWG, the Integrity & Compliance Taskforce and other interested stakeholders to assess the technology landscape, and develop standards to improve data quality in, and data sharing among, national registers to advance efforts to combat corruption; and
- as part of this project, convene a joint G20 and B20 technology event (example, TechSprint, hackathon, etc.) where regulators, and the business community can engage to foster critical over-the-horizon technology solutions.

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[70] The Global Financial Innovation Network includes public sector representations from dozens of countries, including G20 Members UK, US, Canada, Mexico, Brazil, South Africa and Australia (with China, the World Bank and the IMF as observers); https://www.thegfin.com.

[71] https://www.fca.org.uk/events/techsprints/2019-global-aml-and-financial-crime-techsprint.

[72] https://www.americanbanker.com/list/tech-sprints-privacy-fines-digital-id-takeaways-from-regtech-confab.

[73] https://www.fca.org.uk/publication/research/fostering-innovation-through-collaboration-evolution-techsprint-approach.pdf.

Recommendation 3: The G20 should Enhance Integrity and Transparency in Public Procurement

This recommendation contributes to the achievement of SDG 16. Corruption in public procurement remains a major challenge. Given the share of global GDP that is represented by the public sector acquisition of goods and services, reducing corruption in these activities offers a significant opportunity to substantially reduce corruption and bribery (16.5), and to combat organized crime (16.4).

Policy Actions	
Policy Action 3.1	The G20 should ensure transparency, and promote integrity and accountability across the entire public procurement lifecycle.
Policy Action 3.2	The G20 should establish clear and consistent incentives to reward high standards of ethical business conduct in the context of public procurement.
Policy Action 3.3	The G20 should ensure greater integrity among public procurement officials by implementing conflict of interest policies and asset declarations in line with UNCAC Article 8 for procurement officials, while bolstering anti-corruption training for these officials, and providing transparent and independent channels for them to report instances of corruption.

Context

Public procurement serves an important role in achieving development goals, as it constitutes the largest marketplace in developing and developed economies, accounting for 20 percent of the global GDP.[74] Given that the cost of public procurement activities is borne by all citizens, governments are expected to ensure that this spending is carried out both efficiently and by following high standards of conduct in order to deliver quality goods and services, while safeguarding the interests of all stakeholders. Meeting higher standards in public procurement also serves as an opportunity to strengthen integrity in the overall marketplace.

Public procurement is particularly vulnerable to corruption.[75] In addition to the volume of transactions and the financial interests at stake, corruption risks can be exacerbated by the complexity of the process, the close interaction between public officials and the private sector, and the high number of stakeholders. The direct costs of corruption in public procurement may include loss of public funds through misallocation or higher expenses, as

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[74] http://documents.worldbank.org/curated/en/121001523554026106/Benchmarking-Public-Procurement-2017-Assessing-Public-Procurement-Regulatory-Systems-in-180-Economies.pdf.
[75] https://read.oecd-ilibrary.org/governance/oecd-foreign-bribery-report_9789264226616-en.

well as lower quality of public goods and services.[76] While measuring the cost of corruption is difficult, OECD studies have cited estimates that between 10-30 percent of the investment in publicly funded construction projects may be lost through mismanagement and corruption.[77] In terms of indirect costs, corruption in public procurement may distort competition, lower productivity, limit market access, curb small- and medium-sized (SME) enterprise growth, hinder innovation and reduce appetite for new investment.

Higher levels of integrity and transparency in public procurement benefit all stakeholders. The need to improve integrity and transparency should be taken on collaboratively by all actors involved in the process: governments, state-owned enterprises and private sector. Governments may enhance integrity and transparency by working more closely with state-owned enterprises and the private sector, and by taking measures to improve their own controls, and hold public officials accountable for any misconduct.[78] Private businesses can do their part by improving internal controls and reporting mechanisms within their own organizations.

The critical need to address corruption risks in public procurement was underscored as an action item as part of the ACWG Action Plan 2019-2021.[79] Public procurement has long been a focus at past B20 summits due to its position at the confluence of business and government. Historically, B20 recommendations have focused mainly on infrastructure-spending. While infrastructure-spending is a major component of public procurement, this 2020 B20 recommendation calls for broad action and the application of past recommendations across all categories of public procurement, and seeks to build on the work of the previous B20s by improving accountability of stakeholders within the private and public sector.

The B20 calls on the G20 Members to take note of the inherent risks and vulnerabilities that exist throughout the public procurement process, and display commitment to collectively enhance integrity and transparency through impactful policy action.

Policy Action 3.1: The G20 should ensure transparency and promote integrity and accountability across the entire public procurement lifecycle

There are opportunities for misconduct across all stages of the procurement cycle. In order to mitigate these risks, it is critically important to enhance the transparency of the entire procurement process. Transparency deters corruption while simultaneously enabling all businesses, including SMEs, as well as minority- and women-owned businesses, to compete for contracts, ultimately resulting in better value for the public sector.

Transparency can also help address shortages of essential goods and reduce corruption during natural disasters and emergencies. When governments and businesses involved in emergency response are open and transparent about their needs and problems, other entities can fill the gaps that arise due to surges in demand for certain essential products. Transparency in emergency procurement also helps ensure that procurement processes

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[76] https://read.oecd-ilibrary.org/governance/consequences-of-corruption-at-the-sector-level-and-implications-for-economic-growth-and-development_9789264230781-en#page1.

[77] https://www.oecd.org/gov/public-procurement/publications/Corruption-Public-Procurement-Brochure.pdf.

[78] http://www.g20.utoronto.ca/2018/final_hlps_on_soes.pdf.

[79] https://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=DAF/WGB/RD(2018)10&docLanguage=En.

and due diligence are adequately completed despite the necessity for expedited procurement process.[80]

- The G20 Members should, guided by Article 9 of UNCAC and the *G20 High-Level Principles of Promoting Integrity in Public Procurement*[81], ensure that the public procurement process is open, fair, and transparent to foster accountability, prevent corruption, provide access to information, and encourage a more equitable business landscape by allowing SMEs to compete more effectively.

Policies suggested include the following:
- publishing procurement contracts executed on a sole-sourced basis to the extent feasible and appropriate, in keeping with the *G20 Principles for Promoting Integrity in Public Procurement*[82], and publishing in percentage terms the total annual federal/central government spending on such contracts;
- implementing e-procurement systems to reduce opportunities for corruption, by reducing manual intervention and increase effectiveness of audit activities in detecting irregularities such as bid rigging;
- embedding a strong internal control environment that reduces opportunities for misconduct, and is capable of effectively identifying and reporting any misconduct that does occur;
- pursuing new initiatives, among signatories and non-signatories to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions[83] alike, to encourage public and private sector actors to meet the highest standards of conduct embodied in the OECD Convention;
- publishing procurement policies, procedures and guidelines, which have been implemented and govern all procurement operations within public entities and institutions on open platforms;
- publishing emergency procurement procedures to govern procurement during emergencies that do not allow for usual procurement processes to occur. Emergency procurement procedures should include considerations for global procurement, and leverage the increasing digitization of public procurement. The use of emergency procedures should require justification, and be subject to a post-audit in order to identify any issues and promote accountability for any misconduct that may have occurred; and
- reporting of public procurement information and data across the entire lifecycle by promoting the Open Contracting Data Standards (OCDS), and ensuring alignment with the G20 Anti-Corruption Open Data Principles.[84],[85] The implementation of OCDS was initiated by Argentina, France, Italy, Mexico, the UK, the US and eight other non-G20 countries during the London Anti-Corruption Summit in 2016. As part of OCDS, disclosure obligations require the publication of information about the formation, award, execution, performance, and completion of public contracts.[86] Publication of

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[80] https://www.transparency.org/news/feature/corruption_and_the_coronavirus.
[81] https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf.
[82] http://www.seffaflik.org/wp-content/uploads/2015/02/G20-PRINCIPLES-FOR-PROMOTING-INTEGRITY-IN-PUBLIC-PROCUREMENT.pdf
[83] http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf.
[84] https://www.oecd.org/gov/digital-government/g20-oecd-compendium.pdf.
[85] http://www.g20.utoronto.ca/2015/G20-Anti-Corruption-Open-Data-Principles.pdf.
[86] Open Contracting Partnership, Global Principles, accessed March 9, 2020, https://www.open-contracting.org/what-is-open-contracting/global-principles/.

summary data on contracts awarded to SMEs, as well as minority- and women-owned businesses, should be considered.

Exhibit 8 | Contracting5 (C5)

Contracting5 (C5) is an initiative launched in collaboration among the governments of Colombia, France, Mexico, the UK and Ukraine. The main objective is to promote the implementation of open contracting, open data and open tools, as well as provide a platform for international knowledge-sharing. Started in 2016, it has since been joined by the government of Argentina and is supported by the Open Contracting Partnership (OCP) and OECD.[87]

The C5 is committed to undertaking actions in order to achieve the objectives outlined within the C5 Declaration, which include implementation of OCDS, through the creation of a multi-stakeholder accessible record providing data on the usage of public funds throughout the public contracting process, fostering innovation with the aim of automation, contributing to the development of OCDS, development of methodologies for building capacities, increasing the engagement of business and civic organizations in the public contracting process, promoting the participation of other countries in relevant international and sector-specific initiatives, and actively engaging their international development partners, and institutions in furthering the aforementioned objectives.

Since its launch in 2016, over 30 countries across the world have committed to driving change through the implementation of open contracting out of which the government agencies of seven countries, including Australia (New South Wales), Georgia, Mexico, Moldova, Nepal, Uganda and Zambia have published OCDS data for the first time.[88] Additionally, C5 has been involved in various notable projects at a country-specific level aimed at the implementation of OCDS which include development of the Contracts Finder platform in the UK, the launch of the Prozorro platform in Ukraine and launch of the Public Procurement Transparency portal in Nepal, among others.

Exhibit 9 | Saudi Arabia's e-Procurement Portal

A key initiative in the Middle East's drive to enhance integrity in Public Sector Procurement through ICT interventions is the launch of Etimad, an e-procurement portal by the government of Saudi Arabia.

Started in 2018 by the Ministry of Finance in Saudi Arabia, Etimad's main objective is to provide a platform for government entities and private sector contractors to engage in a fair and transparent public procurement process.[89] Etimad digitizes the end-to-end procurement cycle from the RFP phase until payment release, resulting in overall enhancement of the procurement process through greater accuracy of data, increased accountability, strengthened oversight and audit systems, and minimization of administrative procedural delays between the government, and various beneficiaries involved in public sector procurement.

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[87] https://www.oecd.org/gov/digital-government/g20-oecd-compendium.pdf.
[88] http://www.contracting5.org/wp-content/uploads/2018/06/OCP-AnnualReport2017.pdf.
[89] https://www.mof.gov.sa/en/tenders/Pages/saudiegp.aspx.

The B20 also recognizes that there is a link between public procurement, public sector accounting and corruption, and that implementation of high-quality accrual accounting standards in the public sector leads to lower incidences of corruption.[90]

The B20, therefore, further calls on the G20 Members to lead the way in the global application of accrual accounting in the public sector and, in particular, the International Public Sector Accounting Standards.[91]

Policy Action 3.2: The G20 should Establish clear and consistent incentives to reward high standards of ethical business conduct in the context of public procurement

The G20 Members should adopt clearly articulated policies that would incentivize access to public procurement opportunities for businesses that are able to demonstrate high-quality ethics, integrity and compliance standards. Ethics, integrity and compliance should be covered either as part of procurement pre-qualification criteria or tender evaluation criteria. It is the responsibility of all businesses participating in public procurement to ensure they are following ethical best practices, and have mechanisms in place to monitor the effectiveness of these compliance and ethics programmes.

Illicit payments made by businesses providing essential goods and services may result in unfair distribution of those goods and services. This is particularly damaging and prominent during large-scale emergencies. In a 2017 survey, 19 percent of EU citizens reported paying bribes while purchasing health care-related services.[92] This risk can be addressed by incentivizing high standards for ethical conduct at all entities involved in public procurement.

The G20 Members can enforce the implementation of, and enforce compliance to, high standards of ethics by adopting the following policies:
- requiring all entities engaging in public procurement to have a high-standard code of ethics, and adopt a process to monitor and evaluate the implementation of their ethics policies;
- requiring clarity and complete disclosure of beneficial ownership information from all participating suppliers and relevant subcontractors, consistent with applicable data privacy laws, in order to address potential conflict of interest scenarios, and thus enhance transparency;[93]
- including compliance and ethics evaluation criteria in the procurement process and developing or refining sanctions policies to appropriately redress unethical corporate conduct. Sanctions should have clear and consistently enforced policies that allow for remediation with improved ethics-related records, encourage self-reporting, and ensure that the sanction itself does not harm the market by reducing competition. Indeed, conditional non-debarment is an approach that is gaining traction at the World Bank.[94,95] Debarment and other sanctions, when they must be imposed, are

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[90] https://journals.sagepub.com/doi/abs/10.1177/0020852318819756.
[91] International Public Sector Financial Accountability Index, IFAC and CIPFA, 5 November 2018.
[92] https://ec.europa.eu/home-affairs/sites/homeaffairs/files/20170928_study_on_healthcare_corruption_en.pdf.
[93] Globally adopted standards for digital identities of natural persons and legal entities along with the establishment of public national registers will contribute to enhanced transparency in public procurement. See Policy Actions 2.1 and 2.2.
[94] https://fcpablog.com/2020/06/08/companies-are-part-of-the-solution-with-conditional-non-debarment/.
[95] https://projects.worldbank.org/en/projects-operations/procurement/debarred-firms.

most effective when implemented as a national, transparent and publicly available list with an independent body to hear appeals and monitor for consistent enforcement across jurisdictions;[96, 97]

- empowering SMEs to maintain compliance with high standards of ethical business conduct by investing in integrity and transparency training programmes;[98] and
- developing "*integrity pacts*" or an equivalent accountability tool with businesses, in conjunction with proper and complete due diligence, including but not limited to investigating the solvency and reputation of third parties to help establish a more robust public-private partnership, and extend integrity standards to businesses that are applicable to the public sector.

Exhibit 10 | Integrity Pacts in Mexico
Mexico has implemented integrity pacts with the support of Transparencia Mexicana in over 100 contracts totaling over 30 billion in contract value.[99] Mexico has begun to require integrity pacts in public works projects over a certain value threshold, and local projects using federal funds. Integrity pacts aim to provide assurance to all participants (both bidders and the relevant authority) that no corrupt practices have been undertaken during the procurement process, and that appropriate monitoring mechanisms are in place. Mexico's implementation of integrity pacts relies heavily on the appointment of **"Social Witnesses"**, who act as an independent authority in order to provide oversight during the procurement process. Social witnesses undergo a rigorous selection process, and must have specific experience in the subject of the tender, and be independent of both Transparencia Mexicana, the authority, as well as any bidders.

Exhibit 11 | US Ethical Business Conduct
The US enacted the Federal Acquisition Regulation in 1984, which applies to the procurement activities of all applicable executive agencies. The regulation requires that the Contractor Code of Business Ethics and Conduct is inserted into every government contract exceeding $5.5 million in value and 120 days performance period, and applies to both direct contractors as well as subcontractors. The Contractor Code of Business Ethics and Conduct encourages contractors to undertake greater care in preventing unethical behaviors, implement separate codes of business ethics and compliance programmes, and enhance their internal reporting mechanisms.[100]

Exhibit 12 | Delivering Ethics Training to SMEs in Chile

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[96] http://publicprocurementinternational.com/wp-content/uploads/2019/01/IRLE-2017-Auriol-S%C3%B8reide.pdf.
[97] https://www.transparency.org/files/content/corruptionqas/Blacklisting_in_public_procurement.pdf.
[98] The B20 Integrity & Compliance taskforce project on Women's Role in Fighting Corruption in the Supply Chain will include a specific focus on providing training materials for SMEs.
[99] https://www.oecd.org/gov/public-procurement/publications/Corruption-Public-Procurement-Brochure.pdf.
[100] https://fas.org/sgp/crs/misc/R42826.pdf.

In 2003, Chile launched **ChileCompra**, an e-procurement tool to be used for all public works. The platform serves to increase transparency and accountability for all goods and services procured by the Government of Chile. **ChileCompra** also provides online ethics training to participants, which supports SMEs and promotes ethical business practices.[101]

Exhibit 13 | Self-Assessment of Compliance with Integrity Pacts in Colombia

The **Alliance for Integrity** and its partners have developed **TheIntegrityApp** to be used in evaluating the implementation of integrity and compliance programmes of both private and public sectors.

In Colombia, **TheIntegrityApp** has been rolled out in conjunction with integrity pacts to allow for businesses to self-assess their compliance capacities, and to improve their compliance regime by making use of tailored content delivered through the app. Data collected through the app is then aggregated, anonymized and sent to the government on a biweekly basis to provide the status of compliance programmes of businesses participating in public procurement.[102]

Exhibit 14 | Incentives in Public Procurement in the Republic of Korea

According to the amended Article 9-356 of the Framework Act on the Construction Industry, Act No. 13469, introduced by the Ministry of Land, Infrastructure and Transport (MOLIT) of the Republic of Korea, any newly registered construction company should receive mandatory business ethics and technical training within six months from its registration date. Additionally, any construction company that has been suspended can reduce its penalty by up to 15 days if its CEO or a board member receives the training. This enables an earlier re-entry to public procurement bidding for the company. MOLIT has also provided fee-based training licenses to six nationwide construction industry associations implementing the training, for their role as catalysts for ethical business conduct in the construction industry. During the three years from 2016 to 2018, a total of 15,933 companies, mainly SMEs, were trained and about approximately 11 percent of the trained companies were suspended due to misconduct when they received the training.[103]

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[101] https://www.chilecompra.cl/wp-content/uploads/2016/11/strategic-plan-public-procurement-system-2002-2004-2.pdf.
[102] https://www.allianceforintegrity.org/en/offer/theintegrityapp.
[103] http://elaw.klri.re.kr/kor_service/lawView.do?hseq=37712&lang=ENG.

Policy Action 3.3: The G20 should ensure greater integrity amongst public procurement officials by implementing conflict of interest policies and asset declarations, in line with UNCAC Article 8 for procurement officials, while bolstering anti-corruption training for these officials, and providing transparent and independent channels for them to report instances of corruption

The 2020 B20 seeks to further augment past B20 recommendations by endorsing the requirement for additional accountability for government officials.[104] The G20 Members must hold public procurement officials accountable for solicitation of bribes, self-dealing or any other form of corruption perpetrated by themselves or by those under their direct supervision. It is also important to tackle cultures of corruption where they exist, and ensure that public procurement officials are compensated fairly to reduce incentives for corruption.[105]

The G20 Members should define consistent standards and expectations for the integrity of public procurement officials. Policies suggested include the following:

- requiring the definition and implementation of conflicts of interest policies and procedures for procurement officials, which may further help with cross-border public procurement integrity and transparency;
- given that asset declarations have been a priority for the G20 since at least the 2012 G20 Presidency,[106] the G20 Members should announce publicly prior to the United Nations General Assembly Special Session against Corruption 2021 how the Member will apply Article 8, Paragraph 5 of the UNCAC[107] regarding measures and systems relating to asset and other declarations to officials in their public procurement functions;
- providing transparent, independent and accessible channels to report cases of corruption or any other misconduct through an implementation of a High-Level Reporting Mechanism or a comparable tool, and
- facilitating increased professional commitment to, and capacity for the procurement skill set that focuses on governmental leading practices for civil servants and students seeking to advance and standardize procurement skills.

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[104] http://www.g20.utoronto.ca/b20/B20-2018-Communique.pdf.
[105] https://knowledgehub.transparency.org/assets/uploads/helpdesk/Salary_top-ups_and_their_impact_on_corruption_2013.pdf.
[106] http://www.g20.utoronto.ca/2012/2012-0619-loscabos.html.
[107] https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf.

Exhibit 15 | Digital Monitoring and Assessment of Integrity and Compliance in Brazil

The **Alliance for Integrity** and its partners have developed **TheIntegrityApp** to be used in evaluating the implementation of integrity and compliance programmes of both private and public sectors.

A different version of **TheIntegrityApp** developed jointly with the Ministry of Transparency, Supervision and Control has been rolled out in Brazil for the public sector. Public servants in Brazil can anonymously assess the compliance capacities of their superiors, their organizations, as well as their own knowledge of compliance. The government then receives on overview of the compliance capacities of participating agencies. In both Brazil and Colombia, the data collected through the app allows the government to better analyze their compliance shortfalls, and direct limited resources.[108]

Conclusion

The urgent need to intensify global efforts to fight corruption has never been more evident. The extraordinary pressures on economies and societies from the Covid-19 pandemic should make clear to the G20 Members that their populace's sensitivity to waste, fraud, and abuse by public and private sector actors is significantly heightened. Instances of illegal or unethical conduct should be met with unprecedented levels of condemnation and action.

As this policy paper unambiguously highlights, there are concrete, actionable and measurable steps that the G20 Members can take to intensify their collective anti-corruption efforts. Many of these initiatives will benefit from strong public-private partnerships.

The B20 community stands ready to contribute to governmental efforts to refresh national anti-corruption strategies, to support improvements to whistleblower protections and technologies to facilitate trusted communications, and to address linkages between gender and corruption. There is new momentum as well to take bold steps forward with respect to digital identities, public national registers of beneficial ownership information, and technologies to improve data quality in, and data sharing among, these registers. And, finally, given the immense strains on fiscal budgets around the world, there are many steps that should be taken by the G20 Members to further improve transparency in public procurement, and bolster public trust and confidence, including fulsome disclosures of expenditures on sole-sourced contracts.

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[108] https://www.allianceforintegrity.org/en/regions/latin-america/activities/Launch-TIA-SOE-Brazil.php.

ANNEXURE

Abbreviations

ACCC	Australian Competition and Consumer Commission
ACWG	Anti-Corruption Working Group
EU	European Union
FATF	Financial Action Task Force
GFIN	Global Financial Innovation Network
GLEIF	Global Legal Entity Identifier Foundation
GVC	Global Value Chain
ICCA	International Centre for Collective Action
ICT	Information and Communications Technologies
MOLIT	Ministry of Land, Infrastructure and Transport
OCDS	Open Contracting Data Standards
OCP	Open Contracting Partnership
PACI	Partnering Against Corruption Initiative
SOE	State-Owned Enterprise
UNCAC	United Nations Convention Against Corruption
UNDP	United National Development Programme

Taskforce Engagements

Date (2020)	Venue	Agenda
16 January	Riyadh, Saudi Arabia	Inception meeting
18 February	Teleconference	First teleconference
25 March	Teleconference	Second teleconference
16 April	Teleconference	Joint Virtual Taskforce Meeting
14 May	Teleconference	Third teleconference
16 June	Teleconference	Fourth teleconference
14 July	Teleconference	Fifth teleconference
21-22 September	Virtual	Pre-Summit
26-27 October	Riyadh, Saudi Arabia	B20 Summit

Distribution of Members

Country	#	Country	#	Country	#
Argentina	2	India	1	United Kingdom	14
Australia	2	Italy	4	United States	17
Brazil	2	Japan	1	Non-G20	10
Canada	2	Mexico	3		
China	8	Russia	2		
European Union (EU)	7	Saudi Arabia	11		
France	9	South Korea	1		
Germany	8	Turkey	3	**TOTAL**	**107**

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Klaus Moosmayer	Novartis	Switzerland
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