Second EGM on Legal Incentives for Corporate Integrity and Cooperation

UNODC/IACA

23-24 May 2013

Laxenburg, Austria

Meeting Report

Within the framework of the UNODC/IACA implemented, Siemens Integrity Initiative funded project, *Legal Incentives for Corporate Integrity and Cooperation*, UNODC and IACA organised a second expert group meeting to provide a forum for the exchange of knowledge on international good practices on legal incentives and sanctions for encouraging greater corporate integrity, including the encouraging of reporting of corruption. Main topics of discussion were: corporate criminal legal liability, legislation as a tool to encourage reporting, whistleblower programmes, cooperating offenders, and incentive/sanctions schemes, as well as private sector perspectives on methods of encouraging integrity and reporting of corruption internally and externally. The meeting also provided a platform for sharing good practices and case studies on State's legislation concerning UNCAC articles on: liability of legal persons; protection of witnesses, experts and victims; protection of reporting persons; cooperation with law enforcement authorities; and cooperation between national authorities and the private sector.

Day One: Opening session: *Ms. Elisabeth Taeubl, Policy Advisor, IACA, Ms. Birgit Forstnig-Errath, Corporate Legal and Compliance, Siemens Integrity Initiative, and Ms. Shannon Bullock of UNODC*

The meeting began with welcome words from partners in this project, UNODC and IACA, which were followed by those of the donor, the Siemens Integrity Initiative. The list of participants, including their contact details, is attached.

Ms. Elisabeth Taeubl of IACA provided a background on IACA and their work in anti-corruption. The IACA recently celebrated its second anniversary as an international organization. IACA is a pioneering institution that aims to overcome current shortcomings in knowledge and practice in the field of anti-corruption. In pursuing this aim, the Academy stands as an independent centre of excellence in the field of anti-corruption education, training, networking and cooperation, as well as academic research. It pursues a holistic approach which is international, inter-disciplinary, inter-sectoral, integrative and sustainable.

Siemens has launched the global US$100 million Siemens Integrity Initiative which will support organizations and projects that fight corruption and fraud through collective action, education and training. The Initiative will focus on supporting projects that have a clear impact on the business environment, can demonstrate objective and measurable results and have the potential to be scaled up and replicated. The Siemens Initiative is part of the

World Bank-Siemens AG comprehensive settlement that was agreed upon on July 2, 2009. Since that date, 170 conferences have been organized. Siemens has provided funds to UNODC for three projects on:

- Public procurement
- Legal incentives for corporate integrity
- Outreach and communication to the private sector

Working Groups were established in India and Mexico to conduct legal analysis and baseline studies on what these two important economies are doing to encourage private sector integrity. This work is complimented by work at the global level focusing on accumulating and publishing a good practice guide on incentives and sanctions for corporate integrity.

Day One: Session One: Review and feedback session on new UNODC draft publications: good practice guide and curriculum: *Mr. Michael Fine, UNODC Consultant, Principal, NXG Global Law & Compliance PLLC.*

The meeting provided a forum for sharing examples of countries' good practices in the fight against corruption. Participants shared the types of incentives and sanctions being used in several countries, such as India, Mexico, Brazil, Nigeria, Russia, South Korea and Malaysia.

Michael Fine presented the outline of the draft publication on global good practices. An introductory section briefly described the purpose/use of the Guide, explaining that it (a) focuses on UNCAC provisions relating to corporate integrity, (b) provides an overview and good practice examples of legal sanctions and incentives in this area, and (c) is designed to support State Party implementation. The draft publication focuses on promoting corporate integrity and cooperation. A core message will be that while private sector engagement can be challenging, it is already being done effectively and with many options and resources to draw upon.

The overall chapters to be included in the guide are:

- Chapter I – UNCAC and the private sector
- Chapter II – A closer look at the private sector
- Chapter III – Using sanctions and Incentives
- Chapter IV – Conclusions and recommendations

The draft publication will focus on key points and recommendations. Indeed, the private sector, broadly defined, is central to the problem of corruption, as both a source of funding for corrupt payments and a resource for combating them. This mixed private sector role is reflected in UNCAC provisions that call for positive engagement and cooperation as well as punishment and deterrence. Corruption involving the private sector is a complex problem, with companies being at times victims and at other times, perpetrators. Nevertheless, there is a shared

interest in combating corruption. Corporate compliance programs are the primary tool for preventing and detecting corruption within the private sector.

State Parties can encourage corporate integrity through an appropriate combination of sanctions and incentives. Sanctions are a primary driver for corporate integrity and UNCAC serves as a baseline. Legal fines are a starting point, but a much broader array of sanctions is available and recommended. Incentives are an important complement to sanctions and help to advance good practice. State Parties can also draw on a growing inventory of non-traditional measures for enhancing corporate integrity.

Some general comments from the discussion on the draft are:

- The "victim card" is played by some companies: It allows them to say that corruption is inherent to the economic environment; however, they also have responsibilities in preventing corruption.
- Some books on corruption and ethics were suggested: *Empire,* by Michael Hardt and Antonio Negri and *Ethics of Liberation,* by Enrique Dussel
- It is crucial to raise awareness about the benefits of ethics investments, such as reputation, reduced costs, greater control over business operations, and stable markets.

Some examples of good practices:

- In Colombia, a high level reporting mechanism and commission was launched in April. It is a pilot programme that set up an independent body that receives complaints and reports on cases where private sector and/or government have been involved in corruption.
- In Nigeria, few people report corruption due to fear and apathy, so the authorities launched a web site where reporting is done anonymously.

Day One: Session Two: Research findings on public procurement in India and Mexico: *Ms. Neiha Bansal, Project Associate, UNODC Regional Office for South Asia and Ms. Lorena de la Barrera Soria, National Consultant, UNODC Liaison and Partnership Office for Mexico.*

Ms. Lorena de la Barrera Soria presented an overview of the main findings from a research and baseline study that UNODC Mexico conducted through the project. The survey showed that there is not a system of legal incentives in Mexico, despite some prevention mechanisms against corruption. Due to a lack of trust and knowledge of reporting channels, Mexican companies usually do not report corruption cases. The country has an unbalanced system between strict laws for corruption amongst public officials and limited and flexible laws for bribery in the private sector. Today, the challenge is to create awareness and a sense of responsibility.

Regarding the liability of legal persons, 50% of the surveyed persons agreed that enterprises that commit illicit acts related to corruption should be sanctioned. More than 80% of the enterprises recognized that cooperation with the public sector has positive effects, but 50% had never cooperated with authorities in a corruption related event. The private sector stated that 70% of them had never received a legal incentive to report. Usually, the only companies having compliance systems are big transnational enterprises.

In Mexico, the private sector is represented by CONCAMIN, a chamber in charge of the various industrial sectors (with 46 national chambers, 14 local chambers and 3 generic chamber and 41 associations). CONCAMIN has created the Social Responsibility Commission as an indicator of fulfillment of each chamber, association or corporation of the social and corporate responsibility requirements. The commission aims to support the ethical development of the private sector actions.

Ms. Neiha Bansal provided the main findings of UNODC Regional Office for South Asia's research studies. India's private sector accounts for 75% of the country's GDP, despite the global financial crisis. An orientation towards corporate integrity issues recently emerged. The urge for action is stronger and the legislation for private sector corruption has to be more strict. Indeed, India has no concrete and comprehensive law for the private sector so far. The offences are provided across different laws (Indian Penal Code, Prevention of Corruption Act 1988). There are also several new bills and amendments awaiting enactment.

The challenge is to include provisions on prevention of corruption in the laws. This could lead to separate legal entities with detached accountability. Some suggestions are that penalties could be reduced in case of self-disclosure, whistleblower programs could be implemented, and more incentives to corporate integrity could be implemented.

The India baseline survey showed that 95% of the interviewed people felt that government and law enforcement play a role in enhancing corporate integrity. Many suggestions related to "ethics training" in the private sector were recommended, especially those with a collaborative approach.

Day One: Session Three: Whistleblower protection programmes: Case examples from OECD and South Korea: *Presentation of research findings on whistleblower systems in OECD countries: Ms. Leah Amber, Legal Analyst, Anti-corruption Division, Organisation for Economic Cooperation and Development and Mr. In Jong Kim, Director of Public Interest Whistleblowing Inspection and Policy, South Korea*

Ms. Leah Amber started by explaining that whistleblower protection should not be confused with witness protection. Indeed, whistleblower protection is a "protection from discriminatory or disciplinary action for public and private sector employees who report in good faith and on reasonable grounds suspicions of corruption to

competent authorities". A whistleblower may become a witness when s/he comes to trial, but before that, s/he needs to be protected for having disclosed a case of corruption inside the company. By reporting misconducts, fraud and corruption, the whistleblower's act of reporting can have far reaching consequences, i.e it may decrease future corruption risks, help companies better self-monitor, and create a more accountable workplace. The legal sources that can help in designing an effective whistleblower protection programme are sectoral laws (anti-corruption laws, labour laws, employment law), specific dedicated laws (comprehensive whistleblower protection laws, public interest disclosure laws) and international anti-corruption instruments (UNCAC, OECD Anti-Bribery Convention).

Among the mechanisms for whistleblower protection, there is a need of a specific protection against retaliation and against civil and criminal liability, as well as anonymity, confidentiality and burden of proof. The report should be facilitated by means of hotlines, prescribed channels for reporting and incentives.

Regarding the features of whistleblower protection mechanisms, enforcement mechanisms (whistleblowers must not face retaliation) and awareness-raising and evaluation mechanisms (public employee must know of and trust the effectiveness of the mechanism) should be taken into account. The whistleblower protection measures in the private sector include domestic laws covering this kind of protection, voluntary measures, and internal controls on ethics.

Most of the time, lack of implementation and insufficient knowledge of the law, fear of reprisals, confidentiality provisions, and cultural and historical barriers are challenges to the enforcement of protection measures. There is a clear need for a shift in mentality about whistleblowers: people need to be convinced of their benefit in creating a culture of transparency.

Mr. In Jong Kim explained that the Whistleblower Protection Act in South Korea has been in effect for one year. The law is designed to protect people who report violations of the public interest. Korea's Whistleblower Protection Act serves as a very effective and powerful tool in protecting whistleblowers for the following reasons. First, the law requires the administration to directly intervene in protecting whistleblowers subjected to disadvantageous measures. Second, it also allows a court ruling of imposing criminal punishment on people who have conducted disadvantageous measures. In addition, Korea's whistleblower act includes a provision on mitigation and remission of culpability of the whistleblowers.

One case of protection was discussed during the meeting: an employee of a railway company reported that defective parts were being used. After having been dismissed for reporting this, he was later allowed to go back to work thanks to successful law enforcement. Whistleblowers are compensated for possible damages and protected from criminal trial. They can also be provided immunity, though it is not mandatory.

Mr. In Jong Kim shared a success story in relation with the mitigation of culpability: Korea's prosecutors granted four whistleblowers immunity from prosecution. This is the first case where the whistleblowers were immune from criminal responsibility, since Korea's Whistleblower Protection Act took effect. Four employees testified that the company had instructed them to lower the concentration of HCL, by removing the filter or releasing the cork if it was high. Based on their testimony, the Ministry of Environment conducted a fact-finding investigation and reported the four employees to the city police station on charges of violation of Clean Air Conservation Act. However, ACRC notified the police of the fact that their whistleblowing was done to report a violation of the public interest, and therefore they should be protected by law. The police agreed with ACRC's position. The prosecutors granted the four whistleblowers immunity from prosecution.

In South Korea, a monetary award is available for whistleblowers. The US has the biggest financial reward for whistleblower, but unlike South Korea, the whistleblower has to testify in a trial.

Korea's whistleblower protection act will be revised to expand the scope. The application of mitigation of culpability will also be expanded i.e.) if whistleblowing leads to detection of the whistleblower's illegal acts, adverse administrative actions against whistleblower as a result of whistleblowing would be mitigated or remitted.

Day Two: Session Four: Legal Incentives good practices: Cases of Brazil and Malaysia. *Good practices from Brazil: Ms.Roberta Ribeiro and Mr. Renato Capanema, Office of the Comptroller Genera and Good practices from Malaysia: Mr. Han Chee Rull, Deputy Commissioner of the Malaysian Anti-Corruption Commission.*

Mr. Renato Capanema explained that the Brazilian government plays a mixed role by providing sanctions and incentives to encourage corporate commitment. In the 1990s, Brazil improved its legal framework to achieve this goal. In 1992, the country passed the Public Probity Law which allows companies to be punished in cases of corruption. The Procurement Law of 1993 provides rules for bidding and procedures. Companies can be punished by means of fines and debarment. Brazil also ratified international agreements regarding tax regulations or financial statements (for example: the OAS Convention against Corruption in 1997, the OECD Convention against Corruption in 2000 and the UNCAC in 2005). In 2008, Brazil created the Debarment List identifying the companies subjected to penalties. This national database allows everyone to know about those debarred, which affects the reputation of the companies. There are approximately 2,500 companies in this list.

Before 2006, the main focus of the Brazilian laws was on sanctions. Since 2006, studies have focused on positive incentives that could build mutual trust amongst the companies. In 2009, in partnership with the Ethos Institute (a NGO helping companies to manage their business in a responsible way), the government created a handbook called "Business social responsibilities in combating corruption". This guidebook gives advice on the implementation of compliance programs in the private sector. A "Pro-Ethics list" was launched on the internet in

2010, recognizing companies that give visibility to their anti-corruption work and fulfill compliance requirements. Though it is not a certificate that could give advantages in the bidding process, this list identifies enterprises showing proof of their integrity. To be placed on this list, companies must fulfill some of a list of criteria:

- An effective code of conduct
- Education and training programs
- A reporting system and procedures for complaints
- A non-retaliation policy
- Information from financial statements
- Adoption of risk assessment program
- Disclosure of information of interest for employees, stakeholders and investors
- Participation in collective action

Every two years, the company is evaluated again and can be removed from the list in cases of non-compliance. A specific committee is in charge of the evaluation.

In 2013, the government proposed a Draft Bill on the liability of legal person to address the administrative and civil liability of legal persons for acts of corruption, even though criminal liability is not mandatory in UNCAC. On the administrative level, the power to sanction belongs to the highest authority of the agency or entity involved. The applicable sanctions are partial suspension and compulsory dissolution. The reduction of sanctions is possible if the legal person has effective compliance mechanisms. Agreements can be considered if the company cooperates with the investigation.

Mr. Han Chee Rull underlined the efforts and commitment of the Malaysian government in combatting corruption, as set out in the National Key Result Areas (NKRA). Created in 2010, the Special Cabinet Committee on Integrity of Governmental Management recognizes public servants reporting bribes. The main idea is not to punish officials, but rather to send a message that bribes are not needed to obtain a public service. While integrity of public servants is recognized, the image of the public sector has improved and reporting is encouraged. This initiative was also designed to help overcome a negative perception with regards to reporting corruption.

When a citizen reports the case of bribery, the report is given to the Malaysian Anti-Corruption Commission (MACC). The giving or receiving of bribes must be in a tangible form that can be valued. To take into account the contribution of the whistleblower and reward him or her, the case must lead to a conviction by the court to the point that no further appeal can be made. The panel is responsible for evaluating and recommending recognition for any public servants based on case reports and prosecutions against perpetrators of corruption. The evaluation panel takes place once per year and is in charge of considering the value or the form of the remuneration to be

given. The value of the bribes or corruption are based on the determination of current market value of the movable and immovable property. This project is implemented within the framework of the Malaysian Anti-Corruption Act of 2009.

Day Two: Session Five: Private sector experiences on cooperating with national authorities in corruption cases: Sharing of Siemens private sector perspectives, *Dr. Klaus Moosmayer, Siemens AG*

After the corruption scandal hit Siemens in 2006-2007, Siemens needed to make changes and adopt several more effective anti-corruption systems. Immediately after the scandal, the leadership team was removed, banks accounts were centralized, and an independent investigation took place. In 2007, the company decided to implement a compliance program focusing on three main areas:

- Prevention: policies and procedures, compliance risk management, training and communication, advice and support, integration in personnel processes, collective action.
- Detection: whistleblowing channels, monitoring and compliance reviews, compliance audits and compliance investigations.
- Response: applicable consequences for misconduct, remediation and global case tracking.

IT-based tools were designed to make sure that compliance policies are implemented in an effective and reviewable manner. Policies are designed to have internal and external impact. An internal impact would be to maximize support for global implementation, to increase transparency and to standardize processes and language. External consequences would be the case that the company wants to minimize the corruption risk in the entire value chain and to improve the company's reputation in the external environment.

The business process must be natural and not too bureaucratic. The investigation takes place with the objective to "find the bad guy" in the company and take actions visibly. This implies the equal treatment for all people in case of sanctions, regardless of their position or level in the company. With controls in place, the need to foster a culture of integrity is still important. Siemens started collective action with NGOs, governments, customers, competitors and civil society to share experiences and make the market a fairer place. This collective action has three forms:

- Integrity Pacts: target implementation of Integrity Pacts where possible and where supported by civil society.
- Compliance Pacts: Broaden reach of voluntary standards and strengthen commitment to proper implementation of existing standards.
- Long-Term Initiatives for Market Development (an awareness raising with local competitors): Energize market dynamics, fair competition and business environment.

As part of the settlement, Siemens agreed to pay USD100 million over the next 15 years to support organizations and projects combating corruption and fraud through collective action, training, education. Moreover, the World Bank Group will have audit rights over the use of these funds and veto rights over the selection of anti-corruption groups or programs receiving funds.

To implement effective compliance systems and to cooperate with law enforcement, companies need incentives. Challenges are numerous:

- Even the most effective compliance system will not completely prevent misconduct of individual employees.
- Companies do detect internal misconduct, but face the risk of significant fines, debarment and loss of reputation if they disclose and cooperate with law enforcement agencies.
- Only some countries (e.g. UK, Italy) provide guidance/legal "incentives" as "corporate defense" against fines and debarment.

Possible solutions:

A) Unified legal standards incentivizing companies to implement and maintain effective compliance systems (e.g. Sentencing Guidelines in the USA).

B) Corporate leniency regulations not only in antitrust matters, but extended to detected corruption in cases of voluntary disclosure.

Day Two: Session Six: Business motivations for integrity, collective action and other tools for promoting corporate integrity. *Mr. Aleksander Shkolnikov, Principal, Strategic Investment Development Group and Ms. Marina Martins Ferro, Ethos Institute, and Speaker: Mr. Soji Apampa, Integrity Organisation*

Mr. Alexsander Shkolnikov of Strategic Investment Development Group explained that the role of the economic environment is crucial in terms of corrupt practices. It was interesting to learn that in Russia the word compliance does not exist. This is a reflection of the environment. In order to begin improving corporate integrity, it is essential to not only improve corporate compliance programmes, but also to better assess risks and mitigate them with the specific context. The question is how can governments fix the environment prone to corruption? Big companies, such as IKEA, have strong global compliance systems, but amongst SMEs there are few incentives to put compliance progammes in place. If the environment, does not change the compliance system they use will not be effective. The government needs to promote compliance, but especially it must work with the SMEs, which are more at risk in relation to bribery. It is important to show small companies the costs and benefits of corruption.

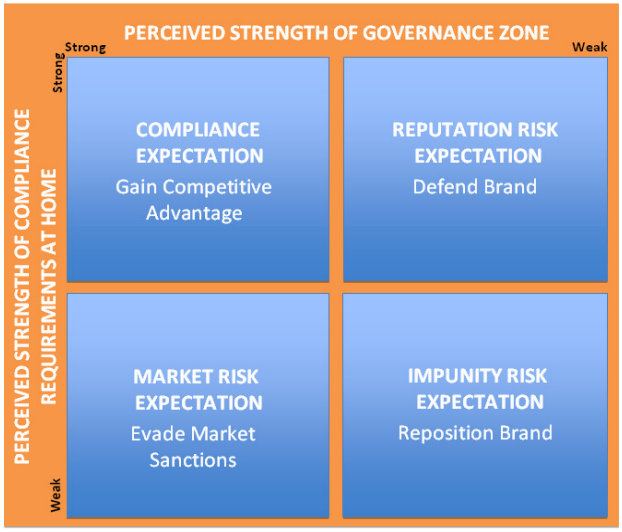
Regarding law enforcement, the Russian government has been trying to give feedback to the public on the small success-stories they have at the national level. For example, there have been news of a decrease in cases of

extortion by public officials. Companies are encouraged to stop bribing when they see the environment is getting cleaner.

Ms. Marina Martins Ferro of Ethos Institute explained that in order to promote greater coordination between enterprises and to enhance private-public sector relations through efforts to combat corruption and impunity, in 2005, the Ethos Institute for Business and Social Responsibility, in partnership with Patri Relações Governamentais & Políticas Públicas, the United Nations Development Programme (UNDP), the United Nations Office on Drugs and Crime (UNODC), the World Economic Forum and the Brazilian Committee of the Global Compact launched the *Business Pact for Integrity and Against Corruption*.

Ms. Martins Ferro explained that this Pact brings together companies that fulfill some or all of the requirements. This pact has 350 companies on its list today. By signing the Pact, enterprises undertake a commitment to disseminate Brazil's anticorruption legislation to their employees and stakeholders so as to ensure full compliance with the law. In addition, they pledge to prohibit any form of bribery, to work to assure the legality and transparency of all contributions to political campaigns, and to strive for transparency in the information and cooperation provided to official investigations, as necessary.
Within the context of the Clean Games, the Ethos Institute is trying to convince the local authorities to ratify this pact and implement it.

Mr. Soji Apampa of Integrity Organisation explained that in Nigeria the private sector must self-regulate, but this requires political will, knowledge of the standards, and achievement of outcomes. These conditions do not currently exist in Nigeria. Control of the economic environment lies within the collective action of corporate, civil society, and governments. Mr. Apampa drew a motivation table for companies to increase integrity:



In Nigeria, the Convention on Business Integrity is a private sector project which demonstrates, that some companies do respect the principles of integrity. The idea was to develop mutual accountability focusing on the values of reliability and financial transparency. Companies are encouraged to publicly sign the Convention. This way if the company does not honor their commitment, they will be publically denounced.

The ranking system contains criteria like track record and reputation, trustful fiduciary leadership, corporate compliance and corporate integrity. Nigeria also has a collective action agenda seeking incremental changes by bringing business, government and civil society together, encouraging them to set targets to reduce barriers to growth and investment, increase levels of compliance and integrity and to enter into mutually accountable arrangements.

Day Two: Wrap up session and feedback. *Mr. Michael Fine, UNODC Consultant, Principal, NXG Global Law & Compliance PLLC.*

The wrap up session provided EGM participants with an opportunity to share their thoughts and ideas concerning the UNODC publication on global good practices. The meeting underlined the complex and diverse points of view on legal incentives for corporate integrity and cooperation. It appears that no solution fits in every context. Some of the lessons learned can be summarized as:

- It is not always a matter of capacities and willingness, but it is also about "changing the water of the fish tank", meaning that the environment is central to the issue.
- "Non-traditional" approaches are particularly meaningful in systems with poor enforcement and rule of law challenges.
- It is important to target the public service to change mentalities.
- The experts highlighted the need for a balanced system where credit is given for good practices and sanctions for offences.
- Whistleblowers are becoming the key element to corporate integrity and need to be protected.

List of Participants

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