



ANNUAL REPORT 2022

Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. With 113 independent chapters and partners around the world and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

www.transparency.org

Cover: A participant from the Winter Integrity School 2022 speaking at the closing ceremony on 14 February 2023 in Amman, Jordan.

Photo: Rasheed for Integrity and Transparency
(Transparency International's Jordanian chapter)

Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of May 2023. Nevertheless, Transparency International cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

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ANNUAL REPORT

2022

TABLE OF CONTENTS

2

Change in the making

6

A world free of corruption

8

30 years of fighting corruption

10

Making waves across the world

12

**Safeguarding resources
for the common good**

*Strategic objective 1:
protect the public's resources*

22

**Nowhere to hide,
no one to help**

*Strategic objective 2:
stop the flows of dirty money*

30

**Transparent decisions,
cleaner politics**

*Strategic objective 3:
secure integrity in politics*

38

**Making a clean and
accountable business world**

*Strategic objective 4:
drive integrity in business*

42

**Making sure corruption
doesn't pay**

*Strategic objective 5:
pursue enforcement and justice*

46

**Raising a collective voice
against corruption**

*Strategic objective 6:
expand civic space for accountability*

52

**Empowering people
at the margins**

*Strategic objective 7:
build community leadership
against corruption*

61

**Our commitments to
driving change**

65

**Core principles
and methods**

69

Governance and organisation

70

Income and expenditure

73

Thank you to our supporters

CHANGE IN THE MAKING

2022 HIGHLIGHTS

Our Secretariat brings the Transparency International movement together to create vital, lasting change around the world. This year:

- + **We closed in on kleptocrats by leading action against cross-border corruption.** Blocking flows of dirty money requires fixing the loopholes of the global financial system, so we secured new international rules to stop corrupt people from hiding behind anonymous companies. At the same time, leading economies followed our calls to change policies and practices that make them complicit in the rise of kleptocracy. *See page 22*
- + **We pushed back against corruption in climate action.** To stop corporate interests from holding up responses to the climate crisis, our joint advocacy campaign secured several wins to increase accountability in climate policy-making. *See page 17*
- + **We used the world's best known anti-corruption product to defend human rights.** The Corruption Perceptions Index (CPI) revealed how corruption enables human rights abuses and democratic decline. It kicked off a year of global advocacy, including for the recognition of grand corruption as a form of organised crime with serious human rights impacts. Governments heeded our calls and are considering proposing a resolution on this matter to the UN. *See page 20*
- + **We supported victims of corruption and helped everyday people create systemic change.** Around the world, we provided legal advice and conducted case work to protect over 9,000 victims and witnesses of corruption, around 40 per cent of whom were women. Through this,

alongside broader advocacy and the involvement of around 15,000 citizens in accountability initiatives, we secured reforms to defend people and public resources from corruption. *See page 47*

- + **We established our goals for 2026.** Our movement recognised the role that corruption plays in perpetuating democratic decline, the climate crisis and growing economic and gender inequalities. The Secretariat will therefore coordinate global action against these challenges to promote integrity, transparency and accountability through all of our strategic objectives, spearhead collective action and stop the flow of dirty money. *See page 61*
- + **We countered wrongdoing in COVID-19 responses.** Our ongoing work identified gaps in anti-corruption frameworks related to the pandemic and exposed the misuse of funds, which led to policy changes and perpetrators being sanctioned. The production of databases on COVID-19 vaccine purchases and distribution was another way that we shielded people's health from corruption. *See page 14*
- + **We tackled autocratic foreign influence.** To protect democracy, Transparency International advised the EU and OGP governments on how they can address covert political finance from abroad. We convinced the European Parliament's special committee on foreign interference in democratic processes to adopt several recommendations to better safeguard against foreign political contributions. *See page 36*



Human rights are not simply a nice-to-have in the fight against corruption. Authoritarianism makes anti-corruption efforts dependent on the whims of an elite. Ensuring that civil society and the media can speak freely and hold power to account is the only sustainable route to a corruption-free society.

Delia Ferreira Rubio
Chair, Transparency International



Activists in Tbilisi, Georgia protested the detention of a media executive critical of the government. Photo: Transparency International Georgia.

2022 IN NUMBERS

200+

Jurisdictions will have to follow new rules on company ownership transparency, including financial centres that have so far been reluctant to fix the gaps in their frameworks.
See page 23

74

Corruption-related legal submissions made to hold the corrupt accountable.
See page 43

31,000,000+

People reached by worldwide media coverage on the Corruption Perceptions Index (CPI), covering stories on linkages between levels of corruption and democracy.
See page 20

3,339


Active participants (2,011 in person and 1,328 online) joined the world's largest independent global forum to fight corruption (IACC) in Washington, D.C. to collectively set the global anti-corruption agenda.
See page 55

64

Countries where our Advocacy and Legal Advice Centres (ALACs) provided free, confidential advice to victims and witnesses of corruption.
See page 8

90,000

Media articles and broadcast pieces highlighting our movement and emphasising the need to fight corruption to millions around the globe.
See page 20

A photograph of an outdoor event, likely a festival or conference, held under a clear blue sky. In the foreground, a large group of people is seated at tables, their backs to the camera, looking towards a stage area. The stage features a large screen on the left displaying a scene with boats. To the right, there are several white tents and a person standing near a table. The background is filled with lush green trees. The overall atmosphere is bright and open.

Transparency International's 113 independent chapters and partners around the world create and implement their own national strategies, but also join forces on critical issues to form the leading movement in the fight against corruption. This report showcases the work of the Transparency International Secretariat, which coordinates the broader movement worldwide, spearheads global and joint advocacy, gathers best practices, conducts world-class research, and provides financial and technical support to our chapters.

A WORLD FREE OF CORRUPTION

MESSAGE FROM OUR CEO



While we firmly know our direction, the world is at a crossroads. We need everyone who believes in democracy, rights and equality to act against corruption.

Daniel Eriksson

Chief Executive Officer, Transparency International

Photo: Transparency International.

As Russia invaded Ukraine, the international community finally realised what we've been stressing for years – unchecked, transnational corruption empowers kleptocrats and allows them to cause destruction at home and abroad. Leaders started really listening to our advice as we rapidly campaigned and produced research and guidance to address illicit financial flows that erode democracy, sustainable development and global security.

Our 2021 Corruption Perceptions Index had in January already shown to tens of millions of people that corruption, human rights abuses and democratic decline reinforce each other. We underlined the urgent need for action and pushed intergovernmental organisations like the UN to recognise grand corruption as a serious crime with devastating consequences for people's rights.

The year continued to reaffirm how relevant and urgent Transparency International's mission is. Amid a rapidly evolving global context – driven by security, health and democratic crises – our movement held power to account for the common good around the world. We innovated to meet new

challenges and opportunities, and worked with dedication to stop corruption throughout society. Transparency International advocated at all levels for better protection of people who expose and challenge corruption. We called out the UN for retaliation against whistleblowers, which was one of many disturbing instances of people defending the common good being persecuted around the world. We also helped brave citizens in over 60 countries safely report corruption and hold those in power to account.

Civic space kept shrinking in every region, and while autocrats frequently drove this, our work highlighted serious issues in Western democracies including investigations against journalists in Iceland and the blocking of whistleblower legislation in European states.

People in far too many countries are being harmed by kleptocrats and other corrupt actors who abuse the global financial system's loopholes to drain money from their economies and tighten their grip on power. Fortunately, in 2022 we secured a major breakthrough: the Financial Action

Task Force (FATF) adopted a new global standard that requires over 200 jurisdictions to track who really owns companies through beneficial ownership registers. This will help ensure that no one can hide behind a veil of corporate secrecy, anywhere.

Another win was further exposing the role of professional enablers in cross-border corruption and persuading the EU to tighten the supervision of financial and non-financial enablers across the bloc. We also ensured that EU policy-makers got tougher on Member States operating golden visa and passport schemes.

Alongside Transparency International's successes last year in protecting funds for COVID-19 responses and climate action, we made progress against the conflicts of interest and undue influence that undermine climate policy.

The year was not without setbacks, but we're keeping up the fight and have our sights resolutely set on a better world. Establishing our goals for 2026, we refined our strategy for the next four years, with a particular focus on ensuring governments act against corruption to counter democratic decline amid the rise of autocracy. An important part of this was our biggest Movement Summit yet, where 600 of us explored topics, solutions and impactful ways of working. Amongst a wide range of issues, a key part of the discussion focused on addressing corruption against women and other marginalised groups.

But while we firmly know our direction, the world is at a crossroads. We need everyone who believes in democracy, rights and equality to act against corruption. That's why we built new partnerships,

during the International Anti-Corruption Conference (IACC). The largest ever, we brought together over 2,000 participants including policy-makers, civil society, businesses and many others to discuss the most pressing topics and effective, cutting-edge solutions – and it underlined that our movement and the wider anti-corruption community is growing and getting stronger.

In 2023, Transparency International celebrates a key milestone, its 30th anniversary. We have grown to be a truly global network, fighting corruption in more than 100 countries. We have achieved so much – from convincing the international community that corruption can actually be addressed, to spearheading countless multi-level actions that tackle even the most sophisticated forms of corruption.

And we want to create further change with you. To our donors, thank you deeply for your commitment and support that allows us to pursue our vision. And to anyone else who has been or would like to make a difference, please share our stories, join in with chapter activities and boost our work with a donation.

Let's strengthen democracy by building a corruption-free future, together.



Daniel Eriksson
Chief Executive Officer
Transparency International

30 YEARS OF FIGHTING CORRUPTION

Transparency International turns 30 in 2023, and that's a reason to celebrate!

When Transparency International was established in Berlin in 1993, corruption was a taboo topic. So much has changed since then.

Transparency International put corruption on the map and showed that it can be stopped. Today, we are a global movement with **more than 100 independent national chapters and partners** working together to tackle corruption. We tirelessly promote transparency, accountability and integrity at all levels, and across all sectors of society. In the three decades of our existence, we have come a long way in achieving our mission, and here are some of our key achievements.

Dedicated, expert people

- + The Transparency International movement has grown to mobilise all kinds of people and organisations against corruption in over 100 countries and across borders. This includes founding international networks like the **UNCAC Coalition and the Extractive Industries Transparency Initiative** to drive change on a global scale.
- + Since 1997, we have been the Secretariat for the world's largest independent forum on our core topic, the **International Anti-Corruption Conference (IACC)**. Every two years, the IACC brings together heads of state, business leaders, investigative journalists, activists and young people from around the world to discuss solutions to tackle corruption and collectively set the anti-corruption agenda for the years to come.
- + In 2017, Transparency International and the **Organized Crime and Corruption Reporting Project (OCCRP)** established a ground-breaking partnership called the **Global Anti-Corruption Consortium**. The consortium has combined hard-hitting investigative journalism with skilful civil society advocacy to accelerate the global fight against corruption. With OCCRP's data and evidence in hand, we have brought legal action and effectively pushed for meaningful reforms to combat corruption.

Innovative research and tools

- + Since 1995, our annual **Corruption Perceptions Index (CPI)** has been the leading indicator of public sector corruption levels globally. It helped us make anti-corruption an international development agenda topic and continues to raise awareness and drive progress around the world.
- + Since 2003, Transparency International has run the only worldwide public opinion survey on corruption: the **Global Corruption Barometer (GCB)**. We have surveyed over 850,000 people in more than 150 countries in Africa, the Americas, Asia and the Pacific, the Middle East and Europe about their experiences of being confronted by corruption and its presence in their societies. This work has been key in gathering data on sextortion, a gendered form of corruption where people are pressured into providing sex rather than money.
- + Our **Advocacy and Legal Advice Centres (ALACs)** – established in 2003 – were the first-ever services to provide advice and support to victims and witnesses of corruption, enabling them to assert

their rights, seek redress and contribute to case-based advocacy. Through ALACs, we have served **320,000 people** in more than **60 countries**.

- + Transparency International's flagship collective action tool known as the **Integrity Pact** has been used for the past two decades by civil society in more than 30 countries to monitor public contracting. It has protected over a billion dollars' worth of public procurement projects across a wide range of sectors and triggered many improved procurement procedures and policies.

Meaningful progress to change lives

- + The Transparency International movement contributed to the first and most comprehensive binding global agreement against corruption, the **United Nations Convention against Corruption (UNCAC)**. After our experts secured key successes during negotiations, the UN General Assembly adopted UNCAC in 2003 and 189 state parties have ratified it. Our movement now works to ensure that countries implement the convention effectively by having robust anti-corruption legislation.
- + Our research and advocacy helped to shape the highest international standard for whistleblower protection, which was adopted in 2019 by the European Parliament and Council: the **European Union's directive on whistleblower protection**. This is making it safer to expose corruption throughout Europe.

- + Our biggest in a series of successes against cross-border corruption happened last year. Following our campaigning, the global anti-money laundering watchdog, the **Financial Action Task Force (FATF)**, revised the global standard on corporate transparency. This means that more than 200 jurisdictions have to track who the real owners of companies are so that corrupt people find it significantly harder to hide.
- + By driving the adoption of the **OECD Anti-Bribery Convention** and pushing states to enforce it since then, we have played a decisive role in efforts to stop companies bribing foreign public officials for business abroad. This has led to hundreds of individuals and companies being criminally sanctioned for foreign bribery and billions being paid in penalties.

MAKING WAVES ACROSS THE WORLD



AMERICAS

- + More than 2,000 anti-corruption fighters from around the world gathered at our **International Anti-Corruption Conference (IACC)** in the **US**, to collectively shape the global anti-corruption agenda. **See page 55**
- + Our **Mexican** chapter is going beyond simply involving citizens in social accountability initiatives. More than 1,800 people in the municipality of Guadalajara – the country’s second largest – are now deciding which programmes and projects must be audited, to include the perspective of groups in vulnerable situations.
- + Our **Brazilian** chapter used a transparency index to evaluate public resource management in 27 states and more than 180 municipalities across the country. They uncovered a range of corruption risks, which sparked widespread debate in the media and changes to how several authorities work. **See page 15**



EUROPE & CENTRAL ASIA

- + We built expertise on beneficial ownership transparency in seven countries by training close to 350 activists, journalists, and private and public professionals. We held 15 participatory local events, reaching almost 1,000 people, on improving policy and regulation around this topic. **See page 24**
- + We strengthened anti-corruption frameworks in **Bosnia and Herzegovina, Kosovo*¹** and **Serbia**. Our chapters guided a national anti-corruption strategy and secured reforms in the financing of political parties, public procurement and the transparency of public sector recruitment. **See page 33**
- + Our chapters significantly guided new whistleblower protection legislation to make reporting corruption much safer in **Belgium, France, Ireland, Latvia, Lithuania, the Netherlands** and **Romania**. **See page 47**

113 INDEPENDENT CHAPTERS AND PARTNERS AROUND THE WORLD



MIDDLE EAST AND NORTH AFRICA

- + Together with our **Lebanese** chapter, we supported greater transparency in aid monitoring, pushing for better data and analysis of the use of relief funds. We also strengthened the anti-corruption capacities of six civil society organisations (CSOs) leading relief, reconstruction and gender equality in politics work. *See page 16*
- + To protect funds and increase accountability, Transparency International **Palestine** ensured that local government agencies formally adopted transparency as a core principle of their work. *See page 50*



SUB-SAHARAN AFRICA

- + Our assessment of the world's largest climate action funds led to reform in two funds working in **Africa**. Key progress included improved CSO engagement, whistleblower support and management of corruption risks. *See page 17*
- + Transparency International **Uganda** joined the steering committee of the National Land Coalition and – to protect people's homes and livelihoods – made land corruption a long-term focus of its strategy. *See page 18*



ASIA PACIFIC

- + Transparency International **Sri Lanka** supplied safe reporting mechanisms to victims of sextortion – a form of corruption that pressures people, mostly vulnerable groups, to provide sex rather than money. Our chapter also successfully engaged in national level advocacy to have sextortion legally recognised as a form of corruption. *See page 48*
- + We filled an important knowledge gap by publishing research on people's perceptions and experiences of corruption in seven small – and understudied – **Pacific island countries** and one territory. *See page 51*

SAFEGUARDING RESOURCES FOR THE COMMON GOOD

STRATEGIC OBJECTIVE 1: PROTECT THE PUBLIC'S RESOURCES

Whether it's a nation's funds or the land that people depend on, we have long put protecting the public's resources at the heart of what we do. Bribery, theft and exploitation of such critical assets threatens essential services, increases inequalities and hinders development, leaving the most vulnerable behind. As various crises – including wars, natural disasters and economic decline – put severe pressure on public resources, Transparency International carries out innovative and collaborative work to safeguard them for the benefit of all.

Public spending to best serve everyone

Every year, huge parts of government budgets are spent on public projects. Better infrastructure alongside strengthened services for people's needs – like education and poverty eradication – have the potential to drive development. But they can also be made substandard or even non-existent by corruption. Public projects have the potential to drain public funds into wrongdoers' pockets on a vast scale. Each year in various kleptocracies the state loses tens of billions of dollars in this way, but the EU has serious issues with this too: annual contract costs grow by an estimated €5 billion due to inflated bids². This is why open, transparent, responsive public procurement is essential.

A key tool for ensuring this is our **integrity pact**, which has entered the **EU's** best procurement practices due to the taxpayer money it saves, the efficiencies it creates for projects and the corruption it prevents. This monitoring tool involves contracting authorities, bidders and civil society organisations (CSOs) working together to comply with high standards and maximum transparency to serve the public interest.

In 2022, we completed our integrity pact EU project that fostered transparency, accountability and participation in 18 EU-funded procurement projects – **protecting €920 million of public funds**. Across 11 countries, the pacts prevented, detected and resolved irregularities in a diverse range of projects from transport infrastructure to cultural heritage. This included strategic green investments, showing that civic monitoring can drive better public procurement to benefit the planet and secure a brighter future for all.

What is an integrity pact?

An **integrity pact** is a collaborative mechanism through which public entities, civil society and bidders commit to enhance transparency and accountability in a public procurement process. Acting as an independent monitor, a civil society organisation ensures that this commitment is upheld, and corruption risks are addressed.

There were several instances in the **EU** project where our integrity pacts protected against serious threats. One pact revealed that the winning bidder in an **Italian** energy project had concealed a criminal record and a corruption investigation – the award was subsequently withdrawn. Our chapter monitoring a highway contract in **Hungary** saved the taxpayer €700,000 by uncovering significant overpricing.

Over six years, we submitted **770 recommendations** to strengthen the practices of contracting authorities and identified systemic issues for reform. This led to some broader impacts, including the **Romanian** National Agency for Public Procurement encouraging contracting authorities to use integrity pacts and regional **Polish** authorities introducing the pacts as a tool to increase transparency and accountability in five EU-funded programmes for regional development. Another clear sign of integrity pacts' sustainability is that the EU Commission is proactively promoting them among authorities that manage EU funds, and it encouraged governments to embed their use in the current plans for the EU budget 2021-2027.

The EU Commission is also providing Transparency International-led training on the tool to EU Member States' experts to encourage adoption by new actors and strengthen links between integrity pact practitioners. A key result of our project was the creation of an extensive network of experts on procurement and integrity issues across the EU, alongside the generation of a bank of knowledge on the pacts to inform future practice.

In 2022, we shifted from predominantly delivering integrity pacts to being more of a technical and strategic guide, as we convene and upskill the civic monitoring movement. A key moment for this was bringing together hundreds of decision-makers and other participants to discuss learning from our EU project and help establish an EU community of practice around civic monitoring.

This conference also explored the tool's future on the continent and beyond, and Transparency International is driving a global rollout of integrity pacts. We are building a worldwide coalition of civil society, government and business representatives who are committed to using, promoting and exchanging knowledge on integrity pacts. They will be making use of our new global compendium to pool data on the tool's implementation from 28 countries across four regions and drive best practice.

Integrity pacts are about to become more useful for sustainable development than ever. We are upgrading them strategically by developing a **worldwide standard that focuses on safeguarding public investments** that are critical to the **Sustainable Development Goals (SDGs)**.

Briefly widening the lens to cover a range of progress with the management and oversight of public resources – our chapters in **Cambodia, The Gambia, Indonesia, Kenya, Pakistan, Serbia, Zambia** and **Zimbabwe** worked with the Secretariat to secure legal, policy or procedural changes in 2022 to strengthen the protection of state funds.

Integrity during crises

Emergencies force public authorities to respond rapidly and intensively. However, crisis management often involves lower public scrutiny and control of how funds are spent, which opens the door for resources to be allocated discretionally and siphoned into criminals' pockets. Transparency International helps protect these resources to save and rebuild lives.

COVID-19 has made it undeniably clear that corruption is deadly. Already losing half a trillion dollars to theft and error each year³, the health care sector failed victims of the pandemic across the globe. The lack of transparency, accountability and other anti-corruption controls undermined the capacity of countries to face the crucial challenges that have been emerging for the last three years. Authorities allocating public contracts with little or no public scrutiny grossly undermined people's access to quality vaccines, medicines and medical supplies.

In 2022, we continued to identify key COVID-19 related wrongdoing and corruption risks, pushed decision-makers to address them and developed innovative responses to boost transparency in responses to the pandemic. This has equipped us



Chapters and Secretariat staff visiting our Ghanaian chapter's office during ISDA's inception meeting in November 2022 in Accra, Ghana. Photo: Transparency International.

with important strategies and lessons to shape future models to respond quickly to other emergency contexts with large-scale and rapid public procurement needs.

The Secretariat coordinated advocacy by our chapters who made **56 policy and advocacy interventions** in 11 countries to fill holes in anti-corruption frameworks that had risks linked to COVID-19. Chapters in five countries also uncovered attempted misuse of COVID-19 related funds and other abuses, which led to the offenders being sanctioned.

In **Argentina, Brazil, Honduras, Hungary, Indonesia, Kyrgyzstan, Lebanon, Lithuania, Maldives, Pakistan, Russia, Sierra Leone, Zambia** and **Zimbabwe**, our chapters carried out an array of other activities on this topic. This included providing expertise and guidance to parliamentarians, ministries and public procurement institutions, and producing databases on COVID-19 vaccine purchases and distribution to **make sure that no funds or supplies went missing**.

Transparency International **Zambia** analysed businesses awarded significant contracts by government ministries during the pandemic. They found that state authorities did not always follow the rules on due diligence, many companies did not disclose beneficial ownership information, and some of the businesses' shareholders had

identifiable links to politically exposed persons. The **chapter also found** that some COVID-19 response funds provided by the World Bank had not been allocated to or used by districts. This monitoring **gave local communities a chance to hold authorities accountable** and made the **Zambian National Public Health Institute** commit to strengthening mechanisms for financial reporting and monitoring.

The pandemic has showed us now more than ever the importance of transparency, accountability and strong oversight mechanisms to guarantee resources are used as they are intended, most of all in emergency situations where people's lives are at risk. Our activities are driving improvements that impact the health sector and all other parts of the 2030 Agenda to help ensure that those in need are supported.

On another success with health care and various other topics, our **Brazilian** chapter used a **transparency index** to evaluate public resource management in 27 states and more than 180 municipalities across the country. This **uncovered a range of corruption risks, sparked widespread debate in the media** and was used by the chapter to guide authorities on best practices.

However, many governments are still unable to control COVID-19 and other health threats because of their inaction against corruption.

This is painfully evident throughout **Africa** so – coordinated by our Secretariat – 28 Transparency International chapters **called on African Union leaders to urgently meet their anti-corruption commitments**. We demanded that states open up procurement information and punish any abuses of COVID-19 recovery funds. Our chapters also urged leaders to intensively combat the illicit financial flows that undermine public services in the continent.

This was part of multi-year, regional activities that assessed how well African governments were meeting their commitments to the Africa Union’s anti-corruption convention and pushed them to step up action. Our chapters developed advocacy tactics that held governments accountable and created progress in areas including CSO and state collaboration, and whistleblower protection. Last year, we put these advocacy tactics into a toolkit

so that other CSOs in Africa could replicate them in their own anti-corruption campaigning work. To create stronger evidence, build the case for transparency in aid monitoring and strengthen CSOs’ oversight of emergency funds, we worked with our chapter to improve data and analysis on the transparent, accountable use of humanitarian relief funds in **Lebanon**. We built the capacity of CSOs to integrate transparency and accountability practices into their relief and reconstruction work, expanding their knowledge of anti-corruption legal frameworks and tools, and of the role they can play in advancing reforms. Hosting multiple forums, we **brought stakeholders from the Middle East and North Africa (MENA) region** together to address key issues, particularly those related to post-blast recovery and other relief efforts. We also created online platforms to encourage a wider audience to engage, learn, question, constructively criticise and demand accountability.



To mark International Anti-Corruption Day, Transparency International's Kosovo*¹ chapter launched the *Immunize Against Corruption* campaign, 9 December 2022, in Pristina, Kosovo. Photo: Kosovo Democratic Institute.

Cleaning up climate action

Scientists are warning that this is our last chance to save the planet from irrevocable damage due to climate change. We cannot afford to have climate action undermined by corruption. This means that funds for mitigation and adaptation must be protected, and undue influence on climate policy by those who benefit from the fossil fuel industry should be prevented. With much-needed action being blocked or watered down by decisions that put corporate interests over survival, our Secretariat is **tackling the capture of climate policy-making**.

Focusing on global fora like the United Nations Framework Convention on Climate Change (UNFCCC), we campaigned on undue influence with other CSOs, including **Corporate Accountability** and the Climate Action Network (CAN). This ensured that the UNFCCC included the issue of conflict of interest policy in its process to strengthen observer engagement. This is an important step toward ensuring that those making crucial decisions on climate action do not have financial incentives to undermine it.

At the **27th Conference of the Parties (COP27)**, we called for a policy on declaration and management of conflict of interest. Subsequently, the UNFCCC publicly recognised the need for more accountability. We also organised an official side event on public participation in climate policies and projects to ensure that the people affected by the climate crisis get a say in the ways that it's addressed. They have the most to lose from corruption hijacking climate action.

Our Secretariat used COP27 to advocate for better practice in climate finance. We pointed out governance obstacles hindering progress in **Central Africa** and the UNFCCC indicated that this topic will be on the agenda in 2023. A side event on upholding integrity in green funds was a further chance to raise our well-respected voice on this issue. Earlier in the year, we **published our latest governance assessment of major global climate funds** and held a webinar that was attended by key stakeholders from all sides.

In response, the Green Climate Fund has been acting on several recommendations, including the creation of an engagement strategy for CSOs. Similarly, the Central Africa Forest Initiative made key information for whistleblowers more accessible and adopted a new risk management strategy and a new monitoring, evaluation and learning (MEL) policy, both of which have anti-corruption elements. In response to **gender inequality** in relation to both climate change and action, the climate funds assessment included a section on gender, and we published knowledge products on the **relationship between gender, anti-corruption and climate actions**, based on initial research by several of our chapters. Furthermore, we mainstreamed gender and inclusion in the design of an ambitious, **multi-year climate programme** that we are preparing to launch. Through this, we will assess the impact of corruption on marginalised groups that are affected by climate change and work with them, including by bringing their cases to international fora.

Also in 2022, Transparency International, the Trade Records Analysis of Flora and Fauna in Commerce (TRAFFIC), the World Wildlife Fund (WWF) and the



Photo: Mika Baumeister / Unsplash.

Basel Institute on Governance launched a [new community](#) to bring together environmental and anti-corruption activists to work together across their fields. This is aimed at strengthening capabilities while advancing and collaborating on impactful initiatives.

The Secretariat also supported our chapters with various successes at the national levels. These included Transparency International **Maldives** guiding a law that will allow CSOs to have more influence on climate policy. This chapter also drafted an asset declaration bill that, if passed into law, would help prevent politicians from stealing money from climate projects. Additionally, our **Bangladeshi** chapter revealed that entrenched corruption – including policy capture – has been causing continued dependence on fossil fuel-based power plants, despite commitments to reduce them and move toward renewable energy. Subsequently, **Japan** withdrew financing from a coal-fired plant.

Equal access to land and services

Corruption does not have to involve big projects or crises to create harm. When communities or individuals have the land they work or live on stolen

or when people are denied quality education or health care the results can be catastrophic for them. In 2022, Transparency International used research, reporting services and advocacy planning to help ensure that people – particularly if they are vulnerable – keep their land and their access to essential services.

Eight African chapters and the Secretariat launched the four-year **Land and Corruption in Africa** project to tackle corruption practices in land administration and land deals, and to improve livelihoods. We worked with communities to better understand land corruption risks across different contexts, while training and mentoring our chapters to develop national advocacy action plans to create systemic change.

Our Secretariat researched ways that data and IT solutions can be harnessed to address the issue of land corruption. This led to a comprehensive data and technology action plan, which will be rolled out in 2023 to **drive accountability in African land administration**.

Some initial positive results were seen in coalition building at the national level. Transparency International **Uganda** joined the steering

committee of the National Land Coalition and – to safeguard homes and livelihoods – secured a thematic track on land corruption in its five-year strategic plan. The chapter also co-hosted a national land forum, an event that will ensure that land corruption remains a priority within the national land governance agenda.

To stop environmental crime and protect communities, our **Brazilian** chapter convinced the Federal State Environment Commission that land grabbing is a land corruption issue and guided how the commission addresses it. The chapter also ensured that the country's coordination body for combatting corruption and money laundering established a working group to oversee the digitalisation of land registration in Brazil. This will help **prevent land grabbers and corrupt officials from opaquely changing land ownership.**

At the community level, our Advocacy and Legal Advice Centres (ALACs) across seven African countries supported victims and witnesses of land corruption. In 2022, they received **252 complaints** on this issue, and advised on protecting citizens' land rights while building momentum toward widespread citizen action. For example, in **Madagascar**, around 80 community organisations expressed interest in getting involved with this issue and contributing to change.

To address corruption-related barriers to education and health care access for women, girls and discriminated groups in the **Democratic Republic of the Congo (DRC), Ghana, Madagascar, Rwanda** and **Zimbabwe**, we finalised an inclusive tool to assess corruption risks in these public services. Once it has been adapted to national

contexts, findings will **inform advocacy with and training for government officials in these sectors** to highlight corruption risks and improve policy and practice. A dedicated gender specialist worked with the Secretariat team and guided all the products, activities and indicators of this work while training chapters on gender mainstreaming and integration. They played a key role in our efforts to include and support beneficiaries as effectively as possible.



Illustration: Transparency International.

Corruption Perceptions Index: corruption and human rights abuses are intertwined

Frequently cited by media, academics and businesses, the **Corruption Perceptions Index (CPI)** is the world's most widely used ranking of countries by their public sector corruption levels. The headlines it makes every year are an opportunity to highlight the most pressing corruption issues and spark debate.

In 2022, we showed how **corruption enables human rights abuses and democratic decline**. In turn, these factors lead to higher levels of corruption, setting off a vicious cycle. In contrast, ensuring basic rights and freedoms means there is less space for corruption to go unchallenged. The CPI results showed that countries with well-protected civil and political liberties generally control corruption better.

Over 9,000 media articles and programmes used the CPI as a chance to discuss corruption, with an estimated **over 31 million people reached**. Governments across the globe took notice of the results and officials from **Jamaica to Taiwan** made statements about it. Several governments recognised that the CPI flagged a need for change – the head of **South Korea's** anti-corruption agency held a press conference to announce the results and communicate plans, and Pakistan's information minister acknowledged in a press conference that the drop in **Pakistan's** score could be caused by weak rule of law and state capture. We particularly welcomed the **Kuwaiti** anti-corruption agency reaching out to our chapter to discuss ways in which the country can improve its standing in the CPI, and many of our other chapters used the CPI as an opportunity to recommend to their governments how to best address their country's corruption issues.



"Circulating corruption is a greater crime than corruption itself," reads a poster displayed at a demonstration in Taz, Yemen.
Photo: Ahmad Al-Basha / AFP.

NOWHERE TO HIDE, NO ONE TO HELP

STRATEGIC OBJECTIVE 2: STOP THE FLOWS OF DIRTY MONEY

Transparency International works to close the loopholes in the global financial system that allow corruption schemes to thrive, and funds stolen from people in one country to be laundered and hidden in other places. We produce evidence, design policy proposals and advocate for progressive reforms to block illicit financial flows.

In 2022, we secured a new international standard to fix one of the global financial system's greatest gaps that makes cross-border corruption possible: anonymous company ownership. The European Parliament strongly echoed our calls to regulate EU golden visa schemes, while the European Commission pursued an outright ban on the sale of citizenship. We also ensured progress in improving supervision of banks and other gatekeepers of the financial system, which often facilitate cross-border corruption.

Anonymous companies

Thanks to the sustained advocacy by Transparency International and our partners over the past decade, there is now a global consensus that criminals and the corrupt should not be allowed to abuse corporate secrecy. However, many governments have long resisted reforms.

In 2019, Transparency International [called for the revision of the global standard on beneficial ownership transparency](#). We asked the Financial Action Task Force (FATF) – which sets anti-money laundering standards – to require a multi-pronged approach and to explicitly demand that countries have centralised, public registers of companies' true owners. Having overcome the initial resistance and generated evidence to convince member governments, we came close to this goal in October 2021 when FATF proposed much-needed amendments.

In the run-up to the final vote in March 2022, Transparency International kept up the pressure to help bring the reform over the finish line. Our chapters in **twelve African countries** [publicly called on FATF members](#) to support a meaningful revision of the standard. We also **mobilised 700 signatories** to the previous year's [petition targeting the UN General Assembly](#) and launched a [page on our website](#) to allow concerned individuals to send messages to FATF.

In a [major win for transparency](#), FATF agreed to change the standard. It **now requires that every country sets up a register or sufficient alternative mechanism to see who really own companies**. Countries will also need to have three mechanisms in place – with information on beneficial owners available from a register, from companies themselves and from supplementary sources like banks. More than 200 jurisdictions have to



Sanctioned Russian billionaire Roman Abramovich's superyacht, Solaris, spotted in Bodrum, Turkey. Photo: BT1976 / Shutterstock.



An event organised by Transparency International Spain brought together 100 participants online and in-person to discuss the state of beneficial ownership transparency in the country. Photo: Transparency International.

follow these new rules, including financial centres that have so far been reluctant to fix the gaps in their frameworks. From **Australia to Panama and Switzerland to South Africa**, several countries have now started their preparations for setting up the registers and meet the new standard.

There is one area where the reform fell short: the standard does not require countries to open up their registers to additional stakeholders and the public. Public beneficial ownership registers have been gaining prominence as a critical tool for deterring financial crime. Most notably, the **EU** recognised this in 2018 when it required all Member States to open up their registers to the public, with **visible impact**.

Still, the registers established across the EU have had their shortcomings. Throughout the year, we worked to detail necessary improvements and enable a range of stakeholders to better tap into the potential of beneficial ownership data as part of the Civil Society Advancing Beneficial Ownership Transparency (CSABOT) project – which we implemented together with the Tax Justice Network,

Transcrime and the Government Transparency Institute on behalf of the European Commission. **Fifteen highly participatory local events kick-started important conversations on ways to improve the policy and regulatory frameworks.** We also trained **hundreds of journalists, activists and students in seven countries** on the importance of beneficial ownership information and the use of registers.

But as these discussions were advancing across the bloc, in November 2022 the **EU Court of Justice delivered a surprise ruling**: the anti-money laundering provision guaranteeing public access to information on companies' real owners is now invalid. However, the court did state that civil society and media play an important role in the fight against money laundering and should have access to the information.

We made our position clear: this ruling sets back the fight against cross-border corruption by years. We briefed investigative journalists, offered commentary to news media and exchanged information with civil society partners

and decision-makers – inside and outside the EU – to make sure that the implications were well understood. **The resulting public pressure was so strong that the court issued a clarification** – something that rarely happens – to reaffirm that media and civil society should still have access to the information. And yet, Transparency International’s real-time monitoring revealed that eight countries almost immediately **shut down public access** to their registers, which meant loss of direct access to the data for activists, journalists, academia and even foreign authorities.

In the final weeks of 2022, **Transparency International mobilised allies in civil society and media, setting up an ad hoc coalition** to help ensure that not all progress is lost. A key opportunity is the current revision of the EU anti-money laundering framework, concluding in 2023. Transparency International **will continue to build the evidence and design ambitious yet feasible proposals to prevent the EU from sliding back into the era of corporate secrecy.**

Anonymous trusts

2022 was also a year when the international community started to scrutinise trusts – another vehicle often used in corruption schemes – more seriously.

In line with our calls and expectations, the revision of the global standard on company ownership triggered a review of the standard on beneficial ownership transparency of trusts, also set by the Financial Action Task Force (FATF). Transparency International and our chapters gathered evidence on the specific risks associated with secretive

trusts and developed proposals for global reform. We saw that our **comprehensive inputs** were well received as several of **our recommendations made their way into FATF’s draft amendments.** For example, FATF agreed that new transparency rules should cover all parties to a trust and that there should be a requirement for trustees to disclose their status in their dealings with entities that have anti-money laundering obligations. However, important aspects such as mandatory registration of trusts had not been addressed, so Transparency International outlined the remaining loopholes in **another submission.**

We will keep up the pressure on FATF and member governments in early 2023, when the final decision is expected.

Golden visas and passports

Ever since Transparency International first documented corruption and money laundering risks associated with the haphazard sale of EU citizenship and residency in 2018, **decision-makers have been paying attention.**

Despite the increased scrutiny of recent years, the need to harmonise rules across the EU remained. So, **it was welcome** when in March the European Parliament adopted a report – to which we heavily contributed – proposing to end golden passports and regulate golden visa programmes through a legislative route. For the first time, all political groups agreed on the need for legislation to harmonise these schemes at the EU level and called on the European Commission to bring forward its proposals.

Many super-wealthy Russians have over the past decade secured EU golden passports and visas, so the Russian invasion of Ukraine in February 2022 helped renew public attention to the issue. The European Commission issued a recommendation that, while insufficient, sent another signal to Member States on the need to terminate golden passports schemes and increase scrutiny over who visas are awarded to.

In its pursuit of a ban on golden passports, the Commission decided to refer **Malta** to the EU Court of Justice over its continued refusal to end the sale of citizenship. The Commission argues

that Malta fails to ensure the “genuine link” to the country – something we highlighted in 2018. Transparency International [called on the European Commission](#) to seek the scheme’s suspension as an interim measure until a final decision is reached, which may take years.

Professional enablers of financial crime

In recent years, major leaks of financial data have powered **our calls to rein in the enablers of cross-border corruption** – especially banks.



A CSABOT event organised by Transparency International Belgium and Loyens & Loeff brought together members of civil society and the private and public sectors. Photo: Transparency International.



Representatives of national authorities, EU institutions, civil society, private sector, academia and media met in Brussels, Belgium to take stock of progress and discuss findings from the CSABOT project. Photo: Transparency International.

Failure to effectively supervise and punish banks for wrongdoing across the EU already prompted the European Commission to heed our [calls for a better approach](#). The proposal to [create a new EU anti-money laundering authority](#) has been [steadily advancing](#) and we used every opportunity to engage with EU co-legislators on ways to ensure its effectiveness. We will continue to bring home the message that the new authority needs to have powers to directly oversee risky financial institutions and monitor the work of national supervisory authorities.

Outside the EU, one of **Switzerland's** largest banks Credit Suisse became the subject of media investigations that shed light on the bank's dubious clients and questionable practices over a long period of time. While Credit Suisse faced legal action this year in a separate case of money laundering, we argued that Swiss authorities need to do more to promptly identify and sanction failings in the banking sector.

This year we also zoomed in on another group of enablers: real estate agents. We joined expert conversations and provided [FATF with extensive](#)

[comments](#) for its guidance to the real estate sector. As a result of our contributions, **supervisory authorities are now asked to ensure controls** against the risk of conflicts of interest wherever supervision is under the responsibility of self-regulatory bodies.

Following the Russian invasion of Ukraine, we [issued a call to governments](#) to ramp up their supervision efforts to prevent private sector intermediaries from aiding sanctioned individuals to move their assets. Encouragingly, advanced Western economies increased their focus on gatekeepers. For example, the International Group of Seven (G7) Leaders' Communiqué specifically [mentioned the need to hold kleptocrats' enablers to account](#).

To ensure greater exposure of professional enablers, this year we developed a framework to help Transparency International's national chapters, journalists and other partners assess the role of financial and non-financial enablers in cross-border corruption cases. The framework is currently being piloted, with the findings expected in 2023.



Illustration: Transparency International.

Ending Western complicity in kleptocracy

After Russia's brutal invasion of Ukraine in February, Transparency International's calls to meaningfully counter transnational corruption and the kleptocracy that it fuels moved to the forefront of the global agenda like never before.

Western governments' first response was to unleash targeted sanctions against Kremlin-linked elites. However, experience shows that sanctioned individuals are often successful in concealing their money and influence. Transparency International made it clear that **sanctions will achieve little unless authorities can track down the assets bought with dirty money** and it [campaigned for meaningful action against kleptocrats](#).

In a welcome step, several governments – such as those making up the G7 – set up the Russian Elites, Proxies, and Oligarchs (REPO) Task Force to strengthen cooperation, information-sharing and coordination on sanctions implementation. We decided to examine participating countries' ability to deliver on this mandate. Our report, [Up to the Task?](#), found that authorities tasked with freezing, seizing and confiscating illicit assets did not yet have sufficient powers, resources or tools.

Many of the issues we highlighted soon gained significant prominence. The **German** government, for example, announced additional measures to effectively deal with dirty money, including the creation of a new federal police unit to tackle complex money-laundering cases. In the **US**, our colleagues and their partners used the report's findings to push for more funding for the Financial Crimes Enforcement Network, with [some success](#) already.

Investigations into complex financial crime cases have long been hampered by poor international cooperation, which means that the REPO Task Force could be a promising new model for disrupting transnational corruption. That is why we [called on G7 leaders](#) to look into expanding REPO's mandate to allow governments to share intelligence on investigations into corruption, money laundering

and financial crime – on cases from beyond Russia too. We were pleased to see that the [G7 leaders recognised the need](#) to hold kleptocrats accountable, and showed openness to improving their frameworks and scaling up the effort.

Another influential multilateral gathering that has both the mandate and duty to get transnational corruption in check is the Group of 20 (G20), so we urged it to show more ambition. Transparency International also directly called on the G20 to stop kleptocrats, [outlining necessary anti-corruption measures](#). Because we knew that the G20 had been dodging the issue under the Indonesian presidency, we decided to greet delegations arriving for the Bali summit with a billboard reminding them of their responsibility. However, our #StopKleptocrats message was apparently not “positive” enough and our billboard was blocked. We were not completely surprised that the G20 Leaders’ Summit commitments related to corruption were devoid of focus and ambition, and we called out G20 leaders for [giving a free pass to kleptocrats](#).

Initially, both the decision-makers’ and the public’s attention was predominantly focused on sanctioning oligarchs. In our engagements with policy-makers and commentary offered to numerous journalists, we consistently emphasised the need to scrutinise the suspect assets of kleptocrats and political elites. This was not in vain, and we saw a narrative shift in governments’ communications and in the way that the media covered these issues in the months that followed. At the same time, we worked to mobilise public opinion: [our petition, launched in March in partnership with change.org, was signed by more than 170,000 people](#) by the end of 2022.

This year, leading economies finally recognised the dangers of unchecked, cross-border corruption and paid attention to our calls. In 2023, Transparency International will continue to press that ending complicity in cross-border corruption – originating from Russia and beyond – requires a long-term, concerted effort.

TRANSPARENT DECISIONS, CLEANER POLITICS

STRATEGIC OBJECTIVE 3: SECURE INTEGRITY IN POLITICS

To ensure that no one gets left behind, political power should consistently be used for the common good. When politicians abuse their position for personal gain, the resulting inequality, weakened democracy and rights violations have catastrophic effects on society.

Transparency International holds the powerful to account for the benefit of all. Around the world, we drive integrity in politics by monitoring, detecting and countering political corruption. In 2022, we uncovered weak spots in political systems and worked with governments and intergovernmental bodies to build resilience while we expanded the countries where high-tech tools are uncovering wrongdoing. A key activity was guiding democracies on how to protect themselves from autocratic foreign influence.

More transparency to prevent political corruption

Effective tools are crucial for detecting political corruption and Transparency International is rolling them out on a global scale. In 2022, as part of our **Global Integrity Monitor** umbrella, 27 national chapters in **Africa, the Americas and Asia** and the Secretariat developed initiatives to generate money-in-politics datasets, visualise them in user-friendly platforms and build evidence to advocate for stronger safeguarding. The approach is based on [Integrity Watch, an initiative that has been enabling public scrutiny of political integrity in Europe](#) since 2015.

Integrity Watch provides public, online tools for the visualisation of data to identify where opacity may be covering up undue influence, ill-gotten assets, conflicts of interest and revolving doors. It also brings key actors together to better prevent political corruption risks. In 2022, Integrity Watch expanded into seven more EU countries and five in the **Western Balkans** and **Turkey**. In both regions, the data tools will enable innovations with cross-checking information to better spot risks.

In the **EU**, to create and update existing Integrity Watch platforms, **16 chapters** scoped over **130 datasets** and governing rules for political integrity data. The most valuable 22 of these have been selected for dataset building and visualisation. By the end of last year, seven datasets were ready for anyone – including officials, civil society and journalists – to use to fight corruption. Integrity Watch in the EU will host a total of 45 political integrity datasets in 2023.

Every step along the way, chapters exchange knowledge with journalists, researchers, government and civil society organisation (CSO) watchdog experts in national advisory groups. The groups inform our work – including the selection of which data we visualise – and provide a space for domestic and cross-border dialogue on open data and identification of reforms that could improve oversight.

Informed by collaboration with the Global Data Barometer and the Open Government Partnership (OGP), the Secretariat convened experts from across the movement to persuade OGP countries to provide high quality, publicly accessible political integrity data.

Qatargate and the need for reform

Qatargate is the most serious corruption scandal the European Union has seen in years, involving allegations that European Parliament officials have been bribed by the government of Qatar. The scandal demonstrated how valuable **Integrity Watch** is to journalists, experts and citizens. With over **1,300 news articles** – from outlets such as *Politico*, *Financial Times*, *The Economist*, *Le Monde* and *The New York Times* – using data from Integrity Watch EU or citing **Transparency International EU's** messaging on political integrity, **we successfully raised awareness on how EU institutions can reform to protect themselves from such corruption in the future**. Our data-driven advocacy helped guide the European Parliament's initial response, which took into account many of [Transparency International EU's recommendations](#). In particular, more transparent and precise declarations of financial interests and the mandatory publication of all lobby meetings of members of the European Parliament (MEPs), European Parliament staff and parliamentary assistants would contribute to enhancing political integrity within the institution, if the parliament follows through on these proposals.



European Parliament officials got caught amidst the Qatargate corruption scandal. Photo: Christian Lue / Unsplash.

In March 2022, Transparency International **Lithuania's** Integrity Watch platform, **ManoSeimas.It**, became a Global Champion in the World Summit Award's best practice examples for digital tools that help to narrow societal gaps to improve society around the world. It won in the **Government and Citizen Engagement** category.

Pushing for stronger lobbying standards

Lobbying is the least regulated area of public integrity systems and, where regulations do exist, transparency is low. This allows politicians to secretly give preferential treatment to a few individuals and companies while ignoring everyone else's needs. **We advocated for the 38 OECD Member States to close the persistent gaps between law and practice regarding lobbying transparency**, and to build momentum toward wider progress – a world where political decisions are made for the common good.

First, together with the Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR), we gathered **23 chapters from Europe and Central Asia** for the fourth Political Integrity Bootcamp to further develop their understanding of how implementing lobbying regulations can curb undue influence. The chapters also developed their advocacy skills for promoting lobbying reform and exchanged knowledge on the use of prevention tools.

Then, in December 2022, chapters from 18 OECD countries and our Secretariat **submitted 22 proposals to improve the OECD's draft revised Recommendation on Transparency and Integrity in Lobbying and Influence**, which is arguably the global standard on the issue.

Further to a renewed push for more transparency registers, proactive disclosure, and stronger

incentivisation and enforcement, our proposals reflected our research on the increasingly sophisticated influencing techniques that are outstripping integrity standards. These include the use of misinformation to skew public discourse, crowding out delegations to intergovernmental fora, and cross-border activities by covert foreign actors. We also sought to significantly broaden who influences policy-making by calling for inclusive access, better whistleblower protection and independent oversight.

Gathering evidence to secure change

Another tool that Transparency International has used to change how politics works in over 100 countries is **National Integrity System (NIS)** assessments. They comprehensively analyse a country's integrity system, including its anti-corruption mechanisms, and were updated in 2022 to contain gender and environment indicators. NIS work in **Turkey** and the **Western Balkans** is having an impact before the assessments are even published. With research almost complete in seven countries, our chapters are leveraging the NIS insights generated to **make policy recommendations, affect legislation and engage with key stakeholders**.

Last year, this led to a range of wins that strengthened anti-corruption frameworks. For example, Transparency International **Serbia** influenced its country's law on the financing of political activities and the implementation of the public procurement development programme. The chapter

also ensured that the recruitment of the director of the Agency for Prevention of Corruption was more transparent. Other NIS successes included Transparency International **Kosovo***¹ significantly steering a law on the financing of political parties and our **Bosnia and Herzegovina** chapter securing 20 changes to the national anti-corruption strategy and action plan. Campaigning on public integrity in Kosovo*, **Montenegro**, Serbia and **Turkey** also

gained significant stakeholder and media attention, **reaching an estimated over 280,000 people.**

We will soon embark on an NIS assessment of **Iraq** and have been building multi-stakeholder networks in the country – that include high-level government institutions – to ensure that the assessment and other anti-corruption work there is highly effective.



Anti-corruption conference in Montenegro, December 2022. Photo: MANS.

Driving political integrity in the Americas

We influenced the agenda of the ninth Summit of the Americas by demanding that governments tackle the continent's unprecedented crisis of corruption, democratic backsliding and erosion of human rights. During the months preceding the summit, nineteen of our chapters, the Secretariat and our movement's Chair called on leaders to reaffirm the largely ignored 2018 Lima Commitment. In an **open letter to the heads of state**, we emphasised the need for integrity in elections and appointments, asset declarations, regulation of political finance and promotion of diverse leadership. Our recommendations also focused on human rights, procurement and dirty money. This contributed to the leaders adopting an inter-American action plan on democratic governance, where they reaffirmed the Lima Commitment.

Stronger checks and balances

Most countries are not making enough use of democratic checks and balances to curb abuse of power and protect the common good. That is why the Secretariat and chapters throughout the world have been creating and mobilising networks of CSOs to demand that specific duty-bearing agencies become more accountable and that elected officials ensure this.

In 2022, our 26-country **Strengthening Accountability Networks among Civil Society (SANCUS)** project achieved significant impact on checks and balances. It also generated knowledge on oversight institutions and citizen participation (see strategic objective 6 section). Seven chapters in **Brazil, Indonesia, Kenya, Maldives, Palestine, Zambia** and **Zimbabwe** contributed to 21 legislative, procedural or policy changes to strengthen oversight institutions' effectiveness, accountability and independence.

Ten others engaged in parliamentary oversight assessments, an area the chapters have identified as essential, given the crucial role of parliament in holding those with power to account. These countries include **Armenia, Cambodia, Colombia, The Gambia, Guatemala, Jamaica, Kenya, Panama, Zambia** and **Zimbabwe**. Such external assessments have been missing in most SANCUS countries, so we filled a significant gap by providing credible evidence on the strengths and shortcomings of parliaments. The chapters undertook this work with a Secretariat-developed [assessment tool](#) to evaluate the strength of parliamentary oversight in terms of mandate, performance and impact.

Our Secretariat also produced an [overview of parliamentary oversight tools and mechanisms](#) to highlight the various ways that parliaments can apply checks and balances to government. It fed the chapters' knowledge into **Civil Society Interventions to Enhance Parliamentary Oversight**, a collection of practical ideas on entry points to enhance parliamentary oversight.



A volunteer election observer stands next to a rural polling station in Papua New Guinea. Photo: Transparency International Papua New Guinea.

Making us an increasingly respected voice on the topic, these activities have enabled us to join existing communities of practice at national and global level, including parliamentary monitoring organisations. Such influence has led to impacts like Transparency International **Zambia** securing an enhanced oversight role for the national assembly in public financial management.

Another check on governments' power – in this case their use of public resources – is **supreme audit institutions (SAIs)**. SAIs regularly audit government budgets, revenues and expenditures to detect problems, including wrongdoing. To effectively hold governments to account on their financial activities, SAIs must be independent from the bodies they audit. Yet, SAI independence is increasingly being challenged throughout the world and, in turn, their oversight activities are being impaired.

To prevent undue influence on these key accountability bodies, we have developed a resource kit to help CSOs advocate for SAI independence effectively at the global, regional and national level. So far, our chapters in **Kenya** and **Lebanon** have

been using the kit to engage CSOs, SAIs and other accountability stakeholders in their countries.

Tackling autocratic foreign influence

We advised the EU and OGP governments on how they can counter covert political finance from hostile foreign countries. Across the world, autocrats are seeking to secretly influence elections and shift public discourse abroad. Opaque contributions to candidates and political parties, often channelled through proxies, are used to interfere with political and electoral processes, and ultimately damage democracy.

Days before the Russian invasion of Ukraine, the European Parliament's special committee on foreign interference in democratic processes issued its final report with dozens of recommendations to protect democracies from autocratic influence. Convinced about the weak spots and solutions that we had highlighted, the committee **adopted seven Transparency International recommendations against foreign political financing**.



Thousands rallied in Tbilisi, Georgia in support of the country's EU candidacy, which is dependent on the fulfilment of 12 priorities – including progress against corruption. Photo: Transparency International Georgia.

Our recommendations centred on expanding bans on foreign donations in the EU countries that still allow them, closing the loopholes that allow the circumvention of existing bans where they exist and granting greater enforcement powers to bodies responsible for finance regulations.

Making further use of our expertise to **strengthen democracy around the world**, we advised OGP countries on how to protect themselves too. Together with the OGP and the National

Democratic Institute, our Secretariat published a policy brief with 22 recommendations on how to overhaul political finance regimes to deter covert foreign political influence.

MAKING A CLEAN AND ACCOUNTABLE BUSINESS WORLD

STRATEGIC OBJECTIVE 4: DRIVE INTEGRITY IN BUSINESS

Transparency International is building a critical mass of corporate leaders who are strongly committed to integrity. The business case for this is clearer than ever with corruption distorting competition, increasing uncertainty, and damaging customers and partners. We expand the base of responsible business actors, while providing expertise, standards and resources to help them deliver on their commitments.

The damage to economies and the environment, and the human rights abuses that can be caused by corporate corruption require decisive action. Where businesses fail to meet integrity standards or commit crimes, we assess and expose misconduct, while pushing governments to strengthen and enforce laws to tackle corruption in business and bring offending companies and their executives to justice.



Isabel Cane, head of OECD's Trust in Business initiative, discusses integrity pacts at the IACC. Photo: Transparency International.

Innovating together

One of our key achievements regarding business in 2022 was developing a global standard for integrity pacts. This will help businesses make important contributions to public projects – particularly those **supporting the Sustainable Development Goals (SDGs)** – by strengthening their collaboration with local authorities and civil society organisations (CSOs) during clean contracting processes. Our Secretariat convened an expert working group for the creation of this standard, comprising 12 of our chapters and external experts from organisations, such as the OECD Trust in Business Initiative, the Basel Institute of Governance and the International Anti-Corruption Academy. We also developed a narrative to build the business case for integrity pacts and convince a broad range of companies to adopt this tool, which supports economic growth alongside the common good.

The Secretariat supported our **Australian** chapter to [develop a tool](#) that allows users to identify corruption loopholes in infrastructure projects' approval processes. This helps address corruption

risks before they create damage in the infrastructure sector. It is also useful to reputable infrastructure firms that want to check the projects they are bidding for to understand and mitigate corruption risks, and to avoid getting involved with ventures that could damage their business and reputation.

The [International Anti-Corruption Conference \(IACC\)](#) was a chance to convene experts on integrity in business – we organised a business roundtable with 10 companies, which our US chapter and the US Department of Commerce hosted. This was aimed at moving multi-stakeholder conversations from simply “blaming and shaming” to **collaborative solutions and effective strategies**, with the private sector taking ownership of their role in advancing the anti-corruption agenda.

Our Movement Summit was another moment when our own professionals explored how to create progress in the business world. Our chapters led a discussion on adapting and modernising our assessments of how transparent corporations are in their reporting. In another discussion, we addressed cross-regional challenges and

opportunities with environmental, social and governance (ESG) standards. This was informed by cutting-edge analysis on this topic.

Research and development

Our Secretariat published a **ground-breaking paper on anti-corruption in ESG standards**, which explored how corruption is currently addressed as part of existing environmental, social and governance reporting standards and initiatives. The paper found that ESG standards aim to assess a company's measures and strategies in fighting corruption as part of sound governance. However, the lack of consistency among ESG providers and their heavy dependence on voluntary disclosure by companies has resulted in incomplete standards that do not fully capture the issue of corruption nor ensure that it is effectively addressed. This set the stage for guiding ESG providers to make significant improvements in 2023.

Transparency International produced [its latest report](#) on companies paying bribes for public contracts abroad (see Exporting corruption report in SO6 for full details), which can drain vast amounts of public resources and destabilise countries. The report showed the current state of play with foreign bribery and how well it is policed at the global and national levels, **building the case for significantly more enforcement against companies committing this offence in around 45 countries.**

Preparing for four exciting years

Business integrity work is thriving among our chapters. For example, in Europe many are successfully expanding their business integrity forums to drive change at a crucial time – while the EU's Corporate Sustainability Due Diligence Directive is finalised and transposed into national law.

Much of the Secretariat's work is focused on supporting chapters to exchange knowledge and best practices with each other. However, toward the end of the year we laid the groundwork for intensive Secretariat-led business integrity work between 2023 and 2026. We created a theory of change and planned activities, while leveraging the expertise and activities of our movement to build our capacity and foster engagement with our chapters. This included taking steps toward creating a **movement-wide business integrity working group**. We believe that all this puts us in a very strong position to drive progress toward a clean, accountable corporate world.



Through the *Immunize Against Corruption* campaign, Transparency International's Kosovo*¹ chapter informed and mobilised institutions, businesses and citizens to work together toward the eradication of corruption, December 2022, Prishtina, Kosovo. Photo: Kosovo Democratic Institute.

MAKING SURE CORRUPTION DOESN'T PAY

STRATEGIC OBJECTIVE 5: PURSUE ENFORCEMENT AND JUSTICE

Despite the devastation they cause, corruption offenders often escape punishment – especially high-level officials. This is because they have the power and influence to capture and weaken legal frameworks and courts that are supposed to uphold the law. The foreign countries where offenders hide their corrupt gains also usually fail to bring them to justice.

Transparency International works to strengthen independence, capacity and actions in all integrity institutions so that they can effectively prevent, investigate and punish wrongdoing. This includes supporting international cooperation on criminal matters and mechanisms to return funds to the countries they were stolen from. In 2022, we mounted legal action, closed in on grand corruption offenders and pushed for better asset recovery.

Bringing cases to authorities to confront high-level corruption

Leveraging our partnership with investigative journalists as part of the Global Anti-Corruption Consortium, the Secretariat and chapters **pushed judicial authorities to take action by filing 74 submissions** to law enforcement or regulatory agencies. In 2022, at least three official investigations were opened on the basis of our submissions, and one case – following a 2020 submission – was discussed in court.

In 2020, the government of **Ghana** proposed selling the majority of its future gold royalties from mining leases to an offshore company – Agyapa Royalties Ltd – registered in the notoriously secretive British Crown Dependency of Jersey. Under the deal, the government would sell 49 per cent of the shares of this company through a public offering on the London Stock Exchange. It deemed this an “innovative financing solution” to help ease the country’s debt crisis, but valued the gold rights at far less than they could be worth.

In light of numerous irregularities and corruption risks, Transparency International, together with our chapter and the Ghana Anti-Corruption Coalition brought the case to the Economic Community of West African States (ECOWAS) Court of Justice, asking that it restrain the Ghanaian government from going ahead with the Agyapa royalties deal. The ECOWAS court heard the case in March 2022, and we are currently waiting for the court’s judgement. A win would set a precedent for civil society organisations (CSOS) outside of ECOWAS member countries to take such issues directly to the regional court.

We also supported our chapters while they demanded justice. In **Georgia**, our chapter analysed a range of high-level corruption cases and made 47 submissions to investigative and oversight bodies. To address corruption in **Madagascar’s** litchi sector, the chapter made [legal submissions](#) to the national anti-corruption court and to prosecutors in **France**, which sparked two official investigations.

Also in France, prosecutors launched an investigation into suspected assets of several sanctioned Russian individuals following a complaint from Transparency International France. If criminality is established, it will be grounds for confiscation of these assets.

Another success was our Georgian chapter setting up an independent committee to select five per cent (about 300) of all public officials’ asset declarations to be checked during 2023 so that those with unexplained wealth can be held accountable.

Grand corruption – a serious and organised crime

Over years, Transparency International has boldly shifted the focus of the international community from wrongdoing by low and mid-level officials to systematic corruption by the most powerful members of society. Grand corruption causes widespread harm, such as gross human rights violations, and often comes with capture of oversight and enforcement powers.

In 2022, we pushed for the recognition of **grand corruption as a form of organised crime** and



An IACC young journalist interviews an attendee of the conference. Photo: Raúl Fernando Pérez Lira / Transparency International.

as one with serious human rights impacts, urging links to be made between the UN's work on corruption, organised crime and human rights. Our Secretariat drove this with [global communications](#) and advocacy at side events to the UN Crime Commission and at the United Nations Convention Against Transnational Organized Crime (UNTOC) Conference of Parties. Governments heeded our calls and are considering proposing a resolution on corruption and organised crime linkages at the United Nations Convention against Corruption (UNCAC) Conference of States Parties in December 2023.

Transparency International also highlighted the problem of grand corruption to non-governmental stakeholders by **co-founding a UNCAC Coalition working group on the issue**. A member of our Secretariat team serves as co-chair of the group. The working group's two sessions in 2022 were well attended and covered strategies against grand corruption and the proposal for an international anti-corruption court.

We also advocated for action on grand corruption in a workshop at the International Anti-Corruption

Conference (IACC), which was so packed that some interested participants could not enter, a World Bank symposium where we presented two draft papers and at a Dutch government-hosted conference.

Pushing for action against foreign bribery

When companies bribe officials abroad for contracts, their illicit profiteering causes shockwaves in the countries they target. Foreign bribery diverts resources, undermines democracy and the rule of law, and distorts markets.

Our [Exporting Corruption 2022 report](#) showed that **fewer and fewer countries are enforcing foreign bribery laws**. Only the **US** and **Switzerland** are actively enforcing them, while nations that produce 88 per cent of global exports are not doing enough or are doing nothing at all. However, there does seem to be growing awareness of the need for victims' compensation in foreign bribery cases, including in the US. With a dedicated section on this, we **sparked debate about victims'**

compensation in major media outlets while pushing for the world's 47 biggest exporters to step up enforcement.

Recovery of stolen assets

Too often, the proceeds of corruption that are transferred across borders are not recovered. If they are, these proceeds are usually kept by the country where they were stashed, rather than returned to the people of the country from which they were stolen. Transparency International advocates at all levels for increased and effective recovery and return of stolen assets to help people rebuild their societies after damaging corruption. In **The Gambia**, we strengthened the rights of vulnerable communities harmed by corruption

by ensuring that funds from an upcoming asset return **will be spent** on the declared needs of registered victims of the Jammeh regime.

Transparency International also built corruption victims' ability to engage in litigation in **France** – as a destination country for proceeds of high-level corruption – so that they have a say on the return of assets.

We **advocated to governments about improving asset recovery**, including at a United Nations Convention against Corruption (UNCAC) Coalition side event. Additionally, we coordinated an UNCAC Coalition working group on asset recovery, providing opportunities for exchange among member organisations.



Illustration: Transparency International.

RAISING A COLLECTIVE VOICE AGAINST CORRUPTION



STRATEGIC OBJECTIVE 6: EXPAND CIVIC SPACE FOR ACCOUNTABILITY

Integrity and accountability rely on the ability of people, community groups, civil society organisations (CSOs), whistleblowers and the media to stand up for what is right, expose abuses of power, pursue remedies and trigger political change. Strong civic space is crucial for effective social action and oversight, without which checks and balances may not work, and power is not held to account. However, this space is shrinking worldwide as authoritarianism grows. Transparency International is working intensively to reverse this trend.

In 2022 at global, regional and national levels, we supported and helped protect people who are exposing and standing up to corruption. We also increased the opportunity and capacity of citizens to safely report corruption and demand accountability from powerholders. Our chapters are on the front line of much of this work, and the Secretariat helped enhance their impact through developing tools, coordinating knowledge exchanges and collaborating on engagement strategies.

Protecting corruption fighters

Shrinking civic space remains a serious concern for many countries where political instability, restrictive CSO legislation and pushback from elites have limited the ability of civil society to operate and freely advocate for accountability and transparency.

Countering this at the global level, we **convened an event at the UN Human Rights Council** to discuss the UN Special Rapporteur on human rights defenders' report – which included many of our recommendations – on the protection of anti-corruption activists. We **pushed decision-makers to take decisive safeguarding steps**. Many of these centred on the specific protection needs of anti-corruption activists working on discriminatory corruption and the particular risks they face as a result of their work.

We continued to explore action with the office of this UN Special Rapporteur during a panel discussion at the International Anti-Corruption Conference (IACC), and discussed the implementation of the report's recommendations at our movement-wide summit. Together with allies and our chapter in **Germany** – which served as co-leader of the Civil Society Seven (C7) Open Societies working group – we called on the International Group of Seven (G7) for **more robust action to protect civic space and activists**.

Through the Secretariat's Rapid Response Unit, we used our influential voice to support efforts to protect civic space at the national level. For example, we joined our chapter in **Iceland** in raising alarm over reports that police opened investigations

against journalists for their coverage of alleged misconduct at **Samherji**, the company at the centre of the Fishrot Files corruption scandal.

In **Guatemala**, we spoke out against the prosecution of journalists and other anti-corruption defenders, and the controversial re-appointment of Attorney-General Maria Consuelo Porras, in spite of them being included in the US "Engel List" of corrupt public officials in Central America.

Our chapters significantly guided new whistleblower protection legislation that was adopted in **Belgium, France, Ireland, Latvia, Lithuania, the Netherlands** and **Romania**. We also supported organisations' implementation of effective internal whistleblowing systems, including those in the EU that are working to meet their obligations under the EU directive on whistleblower protection. The Secretariat did this by publishing **best practice principles for internal whistleblowing systems**, which it developed with experts from across our movement, other CSOs, a major trade union and academia.

Another success at the national level was our **Malagasy** chapter guiding a law to protect human rights defenders, which will help people fighting corruption to stay free and safe.

A safe way to report corruption

In 2022, the Secretariat supported chapters' **Advocacy and Legal Advice Centres (ALACs)**, which **empower people around the world** to safely report corruption, provide free and confidential advice, and support victims and witnesses.



A seminar on gender and corruption organised in District Qasoor, Punjab, Pakistan in February 2022. Photo: Transparency International Pakistan.

We received 8,728 cases across 28 countries – with more than half of cases resolved – and our chapters identified trends in the issues people reported. They then developed targeted advocacy strategies to push for reforms to address the challenges faced by citizens.

Transparency International **Sri Lanka's** ALAC, for instance, supplied safe reporting mechanisms to victims of sextortion, a form of corruption that disproportionately affects women and vulnerable groups where people are pressured into providing sex rather than money. They complemented

this with national level advocacy for the anti-corruption legal framework to recognise sextortion as a form of corruption – and the government is now in the process of introducing a new law that addresses this. The ALAC also advocated for and facilitated local authorities to meaningfully engage communities in budgeting processes.

Mobile outreach by ALACs has **enabled rural communities to voice their grievances** and seek assistance, resulting in many instances of people taking action. Bringing these centres to harder-to-reach populations was particularly successful in the



An exhibition in Banja Luka, Bosnia and Herzegovina encouraging people to use their right to information. Photo: Transparency International Bosnia and Herzegovina.

Asia Pacific. For example, a case in **Nepal** ensured that a local government better fulfilled its obligations to give citizens information on public services.

ALACs in the **EU and south-eastern Europe** provided technical and legal aid, along with advice on access to information and the referral of clients to competent authorities or organisations. In **Kosovo**^{*1}, supporting a justice sector whistleblower, our chapter realised that the prosecutors' offices and some courts were not following the law requiring each public institution to designate an official to handle internal whistleblowing cases.

After pressure from the chapter, the justice institutions appointed the officials responsible for this and have taken a stand to encourage whistleblowing in their institutions.

Strengthening accountability and citizen participation

Around the world, our Strengthening Accountability Networks among Civil Society (SANUS) (see strategic objective 3 section) drove people's ability to hold officials accountable.



A mobile ALAC desk set up to solicit grievances from citizens in August 2022 in Kathmandu, Nepal. Photo: Transparency International Nepal.

Numerous chapters affected the awareness and behaviour of citizens – including underrepresented groups – and duty-bearers. Overall, nine chapters secured a total of 29 key legislative, procedural or policy changes to strengthen citizen participation processes.

Chapters, our Secretariat and partners achieved this by campaigning strategically, strengthening networks and creating digital tools. We undertook 44 joint advocacy actions and 24 case-based collaborations with journalists, and delivered 101 national, multi-stakeholder dialogues to advance in-country networks. We also **mobilised 4,776 people** to participate in monitoring and scrutiny processes in 14 countries. This demonstrates Transparency International's strong ability to be a convener and create pressure through citizen engagement.

At least 1,867 of the participants were women⁴ and **45 per cent of people SANCUS meaningfully included in accountability processes were from underrepresented groups**. With guidance on building and advocating for inclusion from the Secretariat, chapters achieved this by

strengthening community-based CSOs, diversifying the composition of anti-corruption coalitions and advocating to members of parliament to address the unique issues faced by marginalised people.

Chapters navigated challenging civic spaces to engage duty-bearers and push for positive change. For instance, concerted advocacy by our **Palestinian** chapter led to the formal adoption of transparency as a core principle in the work of local governments. In **Zambia**, the national chapter successfully advocated for the decentralisation of decision-making authority around the use of local development funds.

To bring people power to budget processes, we developed a **multi-dimensional toolkit** to assess the nature, depth and quality of public participation in budget processes and the enabling conditions for them in public institutions.

This toolkit has generated significant interest across our movement and beyond. Chapters in 12 countries and prominent global players in the budget advocacy space, including the International

Budget Partnership (IBP) and the Centre for Budget and Governance Accountability, have begun to use the resource. They are employing the evidence it is generating to advocate for reforms to advance meaningful, inclusive **public participation in budget processes** in public institutions at sub-national and national levels.

Our 14-country Asia Pacific project on strong networks for good governance continued to strengthen civil society anti-corruption voices across the region. Despite a worrying backdrop of shrinking civic space and decline in democracy, **more than 10,000 people participated in our anti-corruption initiatives**, including almost 5,000 women and 5,000 young people. We worked with them to monitor public processes or service delivery, and provided free, confidential advice on more than 800 cases that they reported.

In parallel, we developed evidence and tools to monitor and strengthen anti-corruption frameworks and institutions. This was an opportunity for the Secretariat to strengthen chapters with knowledge exchanges on priority topics and dedicated support in the face of security risks. Such work is helping to ensure a firm footing for democratic, values-based CSOs that act as watchdogs and promote checks and balances in a region with a strong autocratic influence.

The Secretariat also built understanding of people's perceptions and experiences of corruption in seven small, understudied **Pacific island** countries and one territory. The [report's findings](#) and additional gender analysis is supporting continued focus-group discussions with citizens and advocacy with government institutions.

Across the planet in the **Western Balkans** and **Turkey**, we joined forces with more than 200 CSOs on a range of corruption-related issues, including the environment, gender equality and youth policies. These collaborations will mobilise citizens and CSOs to synchronise advocacy efforts and include audiences that are not usually involved in anti-corruption initiatives.

EMPOWERING PEOPLE AT THE MARGINS

STRATEGIC OBJECTIVE 7: BUILD COMMUNITY LEADERSHIP AGAINST CORRUPTION

As our movement grows across the globe, we are supporting emerging civic, public and business leaders as they begin their journeys toward a better world and helping to empower communities that do not traditionally have a say in the decisions that affect them. Corruption impacts all aspects of society at all levels, but certain groups are disproportionately affected, such as young, female, LGBTQI+ or in other ways marginalised people. These groups are often overlooked by government programmes designed to assist those in need, or they lack access to reporting channels and information about their rights.

By informing, mobilising and giving a voice to such communities, we generate public pressure and help change conversations and actions on corruption. As a crucial part of our fight against corruption, our chapters understand the importance of reaching out to and working with them.

Next generation of anti-corruption fighters

Our Secretariat supported 14 Asia Pacific chapters to strengthen the voice of young people against corruption. Using youth democracy camps and ongoing guidance, in 2022, Transparency International **Solomon Islands** supported young people to participate in public life and engage their peers. Twenty-four university graduates, postgraduates and youth leaders were empowered with critical knowledge to stand up for transparency in the public space. Camp participants went on to form the **Youth for Democracy Network**. With support from our chapter, they run their own outreach programme in seven schools and a community, sharing knowledge with other young people and their families about corruption, rights and national issues to create change.

Transparency International **Indonesia** empowered the public by establishing **youth-led anti-corruption networks** in three regions to increase citizen participation in public budgeting and public procurement processes. To guide how public procurement officers can work with such networks, the chapter trained officers from eight districts. We also developed 15 products for the networks and other Indonesian corruption fighters to use to drive integrity, including social audit tools, policy papers and public procurement monitoring guidelines.

Our **Cambodian** chapter also engaged in high levels of youth outreach by running trainings and awareness raising activities across the country. These evolved into wider forums for engaging other young people and joining monthly meetings with local authorities to push for accountability.

Throughout the year, 344 young people (61 per cent were women) received capacity-building training and went on to run 10 youth-led initiatives. These aimed at promoting good local governance and service delivery, gender inclusion, village safety and environmental conservation. The initiatives engaged a further 713 people.

Tackling discrimination and corruption

The Transparency International Secretariat built knowledge – and loudly communicated it – on the effects of corruption on marginalised groups. We [produced a report on how the sport sector is alarmingly vulnerable to sextortion](#), and how sport organisations must urgently address the hierarchies, systems and cultures that drive and cover up this abuse. We launched the report with a webinar that featured our experts, the OECD, the International Association of Women Judges (IAWJ) and Human Rights Watch – attendees included the UN and FIFA. The event **sparked significant debate** on social media and was covered by 48 national and international news outlets.

We also hosted policy development discussions with experts from the OECD and IAWJ, and produced a [research paper](#) on criminalising sextortion. The paper explored challenges and various ways of bringing people to justice who commit this prevalent, but hidden and grossly underpunished form of corruption. This was particularly useful to our **Chilean** chapter as it collaborated with public authorities and academia to raise awareness about sextortion in the country and the need to make it a crime. This campaigning also **encouraged women and girls to speak up and report sextortion**.

And we followed up 2021's flagship report ***Defying Exclusion: Stories and Insights on the Link Between Corruption and Discrimination*** by producing two papers to further explore how corruption affects [people with disabilities](#) and [LGBTQI+ individuals](#). A Secretariat expert presented the

findings to the U4 group of development agencies and provided input to the United Nations Office on Drugs and Crime (UNODC) GRACE Initiative's project "Inclusion and leadership of youth with disabilities to contribute to the achievement of SDG 16".



People at the Sziget Festival 2022 visit Transparency International Hungary's exhibition. Photo: Transparency International Hungary.

Convening change makers at the International Anti-Corruption Conference

Transparency International brings a diverse range of people together from all sections of the anti-corruption world to share knowledge and ideas.

Over two thousand people joined us in Washington D.C. for the **20th International Anti-Corruption Conference (IACC)**, the world's largest independent forum on this topic. United by the common goal to stop corruption, heads of state, business leaders, major international financial institutions, civil society organisations (CSOs), academics and journalists from over 130 countries debated how to respond to key global challenges in which corruption plays a central role. These included the **climate crisis, the rise of kleptocratic regimes, global security and the influence of dirty money on our economic and political systems**. Co-hosted with the **US government**, the conference provided 88 thematic workshop sessions and 10 high-level plenary sessions, with participants [calling for prompt, concerted action to end corruption](#).

The IACC Young Journalists Initiative welcomed **21 print and video reporters** from countries including **Kenya, Nepal** and **Sweden**. While covering the conference, they deepened their understanding of corruption and how to investigate it and gained resources, insight, inspiration and training. Several of the network members took on the role of moderators for the high-level plenary sessions to further build their skills.

One of the highlights of this initiative was a feature by our Journalists for Transparency network member, Maurice Oniango, in the innovative, award-winning African news outlet, The Continent. He exposed the plight of female **Kenyan** workers being shipped to work in **Saudi Arabia**. Addressing gender discrimination, weak institutions and the absence of law enforcement, it resonated in many **Sub-Saharan African** countries that also export domestic workers to **Saudi Arabia**.

Young musicians gathered in Washington D.C. to speak out against corruption and social injustice in their communities and beyond with our **Fair Play** initiative. Winners of our competition to create activist music videos from **Italy**, the **Democratic Republic of the Congo (DRC)** and **Malawi** played alongside hip-hop legend, Rakim, at a famous concert venue.

The **6th Films 4 Transparency** festival took place at the conference to raise awareness of corruption, human rights violations and the demise of public accountability. The festival happens across the globe, connecting filmmakers and activists, and building a network that delivers positive social change. This year, it presented **eight powerful documentaries**, each with an urgent story to tell about the indispensable role of free, independent media in the fight against wrongdoing.



US Secretary of State Antony J. Blinken interviews anti-corruption award winners at the IACC. Photo: Raúl Fernando Pérez Lira / Transparency International.



Panel discussion at an IACC session. Photo: Transparency International.



The Fair Play concert. Photo: Raúl Fernando Pérez Lira.



Interview with Maria Pevchikh, Head of the investigation department at the Anti-Corruption Foundation. Photo: Raúl Fernando Pérez Lira / Transparency International.



Lively discussion follows an IACC session. Photo: Raúl Fernando Pérez Lira / Transparency International.



Attendees gather for IACC Plenary One. Photo: Transparency International.



Participants in the Integrity School during an exercise in Amman, Jordan. Photo: Rasheed for Integrity and Transparency.

Exchange at the regional and national level

With the Secretariat, our **Lebanese** chapter hosted two regional forums for our chapters and others involved in anti-corruption, aid or government. The second event explored the nexus between human rights and fighting corruption, alongside protecting relief funds and efforts from corruption.

Our **Peruvian** chapter held a side event during the Conference of the Parties on the Escazú Agreement, the first international treaty for protecting the environment in Latin America and the Caribbean. Before an audience of CSOs and policy-makers, a range of our chapters discussed how the agreement can be used to combat corruption and prevent attacks on environmental defenders.

The Secretariat further drove our collaboration in this region by holding an event at the IACC on weakening democracy, human rights violations

and corruption in the **Northern Triangle of Central America**. We discussed these challenges that the sub-region faces and presented a set of recommendations – which we created with several chapters – to guide the international community's efforts to address them.

Also in 2022, Transparency International **Cambodia** helped organise and fund the National Conference on Digital Rights and Internet Freedom. Participants from CSOs, the media, development partners, companies and government institutions debated a sub-decree for enabling large-scale censorship and surveillance of online communication. They also discussed shrinking space for freedom of expression. The conference received widespread media coverage. Since then, the group has developed a **joint strategy for defending online freedom** that combines capacity building, public awareness, legal analysis, lobbying and dialogue.



An event organised by the Youth for Democracy Network with Transparency International Solomon Islands' support, Honiara, Solomon Islands. Photo: Transparency International Solomon Islands.

Causing a ripple effect in the Solomon Islands

Through its youth democracy camps and ongoing guidance, our **Solomon Islands** chapter is supporting young people with tools and platforms to participate in public life and encourage their peers to join them.

In the Solomon Islands, where 70 per cent of the population is aged 18 to 34, youth play a vital role in shaping public life. To make a difference, young people need to know their political, legal and civil rights, and have platforms to speak out with. Our chapter is working to ensure that this is the case.

To support young activists from across the country, the chapter hosted two week-long **Youth Democracy Camps** in 2021 and 2022. From over 200 applicants, staff selected a total of 44 attendees over the two years – mostly university graduates, postgraduate students and community youth leaders, half of them women. The camps aimed to **empower participants with critical knowledge to speak up for transparency** in public life. The sessions also developed attendees' leadership skills, enabling them to engage other young people and organise awareness-raising activities to promote good governance.

Sharing the tools for change

The youth camps covered a wide range of topics, including corruption and its effects; the state and the constitution; electoral legislation, and the role of civil society and the media in democracy. Transparency International **Solomon Islands** also introduced attendees to its work and invited speakers from government institutions, who outlined their roles, offered valuable advice for achieving impact and provided a unique opportunity for participants to interact with officials.

Transparency **Solomon Islands'** focus on youth is having a **powerful impact on how young people contribute to debates on national issues**, encouraging them to speak up for citizens' rights and good governance. The chapter is providing ongoing guidance to camp participants, involving them in its community outreach work and helping to coordinate them, including through social media. These activities are having an increasing impact on the Solomon Islands' public life.

A network for national impact

Youth Democracy Camp participants have now formed the **Youth for Democracy Network**. They successfully ran their own outreach programme in seven schools and a community, sharing knowledge gained at the camps to communicate with other young people and their families about corruption, rights and national issues. Network members voiced their concerns over a secretive security pact with China during a live radio discussion organised by our **Solomon Islands** chapter, and it played an important role as election observers when the country's electoral commission invited civil society to observe national and provincial elections.

The chapter's guidance and mentoring enabled the network to make a submission to Parliament's Bills and Legislation Committee over the controversial Constitution (Amendment) Bill 2022 – the only youth group to do so. This bill sought to defer the next general election until after the Pacific Games, giving parliamentarians an extra year in office. Although the bill was enacted within a week, by-passing parliamentary procedures and preventing the committee from completing its hearings, the network's submission demonstrates young people's progress towards ensuring that their demands for accountable government are heard.

Each of these activities strengthens the ripple effect from the democracy camps, meaning that an increasing percentage of young Solomon Islanders are **joining together and taking informed steps towards a transparent, accountable future**. "I feel privileged to attend the workshop," said one camp participant. "I learned many things about our government. Now I'm fully aware of my rights, I can inform my people so they can understand how their voice and leadership choices are vital for our constituency." With three democracy camps planned for 2023, reaching 90 more participants, Transparency Solomon Islands is ensuring that this impact spreads even further across the country.

OUR COMMITMENTS TO DRIVING CHANGE

The Transparency International movement is committed to creating change. As the strategic hub for over 113 independent chapters and partners across the globe, the Transparency International Secretariat drives that change by coordinating and ensuring that the whole movement can act together as one.

Our **Strategy 2030: Holding Power to Account**, is also underpinned by a set of core commitments that will allow us to continue to be more flexible, innovative and adaptable in the fight against corruption – when and where it occurs.

Agile timeframes

The Transparency International Strategy 2030 is divided into three strategic cycles, so that our movement can be more flexible and adaptable. The Secretariat's Strategic Plan follows these same cycles. Following the first strategic cycle in 2022, our movement identified key opportunities for change during our next 2023 to 2026 cycle. These were unanimously adopted by the Transparency International membership in November 2022.



Transparency International's Maíra Martini received the 2022 Amalia Award for Professional Excellence. Photo: Raúl Fernando Pérez Lira / Transparency International.



Connected global and national strategies

Recognising the role corruption plays in perpetuating the climate crisis, democratic decline and growing inequalities, our movement set goals for our upcoming strategic cycle that focus on strengthening political integrity, and driving justice, equality and democracy by raising voices for the common good, with 61 per cent of chapters engaged in the movement-wide planning process for 2023-2026.

Our Secretariat developed its **Strategic Plan 2023-2026** in close alignment with these movement-wide goals and ambitions. The Secretariat continued to mainstream the strategy into its organisational structure and processes – from organisational portfolio and performance management to communication and monitoring, evaluation and

learning (MEL). We created seven communities of practice around each of our strategic objectives for 2030, which have been growing in size and providing expert direction throughout the year.

We continued to support chapters with their strategic planning by working with them to agree on regional priorities and giving one-to-one support. We provided guidance throughout their strategy design process and advised them on the use of participatory approaches to consult their members and communities at the national level. The 2022 Movement Summit was crucial for co-designing the movement's priorities for the next four years and we also provided online support through the movement's Strategy Hub. This is a virtual resource space to coordinate the implementation of the global strategy within the movement.

Effective coordination, advocacy and support

Our 2022 Movement Summit brought together **over 600 people** from 103 chapters and national partners to share knowledge and experiences, highlight our successes as a movement, strengthen our network, and align and commit to joint actions. More than **115 speakers** from across our movement and external experts also shared their experiences, stories, good practices and lessons learned across 31 sessions covering Transparency International's strategic objectives. Before and after the summit, we organised over 32 virtual and in-person opportunities for chapters to collaborate and learn from one another. These ranged from regional meetings and training sessions in **Africa, Asia, Europe, Latin America and the Middle East and North Africa (MENA)**.

During the summit, chapters directly fed into new initiatives and campaigns, for instance, by shaping a global narrative on how to foster the use of integrity pacts to safeguard strategic public investments. They also built on our research to identify new approaches for generating evidence from marginalised groups in a sensitive, participatory manner at country level. The summit also helped to build vibrant communities of practice online for collective action.

Some of these included: discussing the movement's policy position on minimum integrity standards for the development of artificial intelligence (AI) and machine learning tools, which fed into a published paper on corruption risks of AI; a West African dialogue on conflict and security;

coordinating advocacy messages in the lead up to the Summit of the Americas; a political integrity bootcamp bringing together more than 23 European and Central Asian chapters; and knowledge exchanges in Asia on topics, such as right to information, gender and inclusivity, and electoral integrity.

Effective coordination also means having chapters that are fit for purpose to collaborate with each other. We therefore finalised a new chapter accreditation policy and agreements, which will make it easier for new partnerships to be developed within the movement. At the same time, our day-to-day support and connection of chapter priorities with global advocacy goals continued, with exchanges across our strategic objectives, including on integrity pacts, state capture and dirty money.

Stronger partnerships and presence

The Transparency International network continues to be our main strength when it comes to effective, far-reaching action against corruption. We currently have **97 national chapters, 4 chapters in formation and 13 national contacts**. In 2022, the Secretariat supported our US office to become a national chapter in formation.

We secured new funding opportunities so that our chapters can expand their work. This enabled 11 chapters in **Sub-Saharan Africa** to increase action on land and corruption, the expansion of our flagship Integrity Watch programme to fight political corruption in the **Western Balkans and Turkey**,

and the provision of specific support for chapters in **Central Asia**, such as **Kyrgyzstan**, on the topic of civic empowerment and digital technologies. In the **Middle East**, we kickstarted our first project in **Iraq** to boost integrity in this post-conflict state and pivotal actor in the region. We built partnerships in the lead up to the 2023 Summit for Democracy, including with the **Moldovan** and **South Korean** governments.

Impact and learning

In 2022, we reviewed progress made during the first strategic cycle (2021-2022) with a focus on learning from successes and challenges. Strategic insights and reflections were discussed in 12 thematic and cross-regional sessions at movement level. These discussions happened alongside

numerous reflection and planning sessions, and workshops at the Secretariat, which resulted in our **Strategic Plan 2023-2026**.

To measure the progress and effectiveness of this plan, we have complemented it with the **Secretariat Road Map 2023-2026**. This document describes the specific outcomes we aim to achieve in the next four years, alongside baselines, progress markers, indicators and targets.

We discussed across teams how to better demonstrate the impact of our work. In addition to ongoing efforts to implement high-quality monitoring and evaluation frameworks for our projects and programmes, we conducted reviews and commissioned [independent evaluations](#) of our work.

CORE PRINCIPLES AND METHODS



In marking International Women's Day, Transparency International Papua New Guinea staff recognise the leadership and contribution of women in empowering us to take action against corruption. Photo: Transparency International Papua New Guinea.

In 2022, we further strengthened our main principles and practices.

Inclusive and intersectional

Our strategy commits us to being inclusive and intersectional in everything we do. This means understanding the multi-layered factors such as age, origin, religion, gender, ethnicity, education or sexual orientation that affect certain groups of people's exposure to and experience of corruption, and how such factors affect their interaction with anti-corruption activities.

In 2022, we addressed knowledge gaps on the linkages between corruption, gender and discrimination by exploring in greater depth how corruption affects persons with disabilities and LGBTQI+ individuals.

Diversity and inclusion are being mainstreamed in Transparency International's tools and research products. For example, the National Integrity System (NIS) methodology has been updated to include gender indicators, and data is being collected in six **Western Balkan** countries and **Turkey**. A gender analysis of Global Corruption Barometer (GCB) Asia data was conducted that will be followed by focus group discussions in the region in 2023. Research is also under way in five **African** countries to assess corruption risks in health and education, and their impact on women and other marginalised groups. This year, we established or sustained partnerships with organisations working on gender and other forms of discrimination at the national, regional and global levels, including the Equal Rights Trust, the Global Fund for Women and UN Women.

Key inclusivity reports published in 2022

- + *May: Corruption and the Equal Enjoyment of Rights for Persons with Disabilities*
- + *May: On your Marks, Set... Stop. Understanding and Ending Sextortion in Sports*
- + *June: Criminalising Sextortion: Challenges and Alternatives*
- + *September: The Impact of Corruption on LGBTQI+ Rights*
- + *October: Climate Change, Gender and Corruption*

Internally, we developed gender and inclusion mainstreaming guidelines for project design. We have established internal mechanisms to collect and monitor a disaggregated set of data, including staff composition and attendance at major events (International Anti-Corruption Conference [IACC], Movement Summit). Furthermore, we've increased our organisational capacity by hiring a gender and inclusion specialist, and our chapters participating in the Rallying Efforts to Accelerate Progress (REAP) project received gender mainstreaming training. As part of the planning process of the next strategy cycle, we conducted a survey to consult the movement on issues to prioritise in this work area. We also organised two sessions at the Movement Summit to showcase and share experiences of advancing the diversity and inclusion agenda across the movement.

Climate conscious

Through our climate integrity programme, we maintained and developed important partnerships. For example, we launched a new **practitioners forum** that bridges the gap between environmental and anti-corruption communities. We also created a preliminary analysis of the environmental impact of the implementation and delivery of our Secretariat's Strategic Plan, and begun to mainstream environmental considerations in key projects, like REAP and Land and Corruption in Africa Phase II. Similarly, we have started to include environmental considerations more systematically in project proposals.

Additionally, we conducted a carbon footprint assessment of 2020 and organised a discussion amongst staff on the results and next steps. The assessment showed that most of our carbon emissions come from travel. This was reduced in 2022 due to a halt on trips but was further impacted by our procurement of services.

Evidence-based

This year, research has generated a wealth of evidence in support of our strategic priorities. In particular, democratic accountability was promoted in 21 countries with the production of innovative assessment tools on public participation in budgeting processes and parliamentary oversight. These helped us engage with leading organisations, such as the International Budget Partnership (IBP), the Inter-Parliamentary Union (IPU) and INTER PARES. The knowledge needs of key stakeholders were met by providing helpdesk services to U4 partner



Chapter and Secretariat representatives reflecting on the impact of our work during the IPP STRONGG programme meeting in Bali, Indonesia, November 2022. Photo: Transparency International.

agencies and our movement. Eighty requests were answered, including the publication of 53 fully developed anti-corruption briefs on topics as diverse as grand corruption and climate change policies, the impact of corruption on LGBTQI+ rights and the corruption risks of artificial intelligence.

Additionally, National Integrity System (NIS) assessments are being conducted in **Iraq, Turkey** and the **Western Balkans**, while data on money in politics was collected in **Africa, the Americas, Asia and Europe** through our Integrity Watch approach.

The year 2022 was marked by dramatic developments in **Ukraine**, which led to us creating research products that support advocacy and campaigning efforts focused on effective implementation of financial sanctions. This culminated in the launch of the *Up to the Task* report, which assessed the effectiveness of countries leading multilateral efforts to freeze and seize kleptocrats' assets. The war in **Ukraine** and sanctions against **Russian** kleptocrats gave visibility to the beneficial ownership transparency agenda. This

was promoted across **Europe** with the delivery of seven training sessions and fifteen local participatory events, and the launch of the Network of Experts on Beneficial Ownership Transparency (NEBOT) that provides cutting-edge, actionable research studies on topics related to beneficial ownership transparency, money laundering and related crime.

Tech savvy

We are ramping up efforts to be more tech-savvy in a world changed by technology. In September 2022, we published a working paper on *Corruption Risks of Artificial Intelligence*, to show how power-holders can exploit AI systems. The paper maps out key problems and recommendations to safeguard AI against corrupt abuse.

In addition to diagnosing corruption risks in technology, we have continued our work to use it to detect, expose and counter corruption. In 2022, we developed and piloted a methodology to automatically cross-reference various datasets – such

as public procurement records, political campaign donations, and the assets and interests of officials – to detect and red-flag political corruption risks. During our Movement Summit, we discussed money laundering risks posed by cryptocurrencies.

Protective of our people

The deteriorating civic space across many countries is directly impacting our movement, which faces increasing levels of risk. Throughout 2022, our Safeguarding Anti-Corruption Fighters' Efforts (SAFE) **provided guidance and support to 25 chapters facing security risks**, including by delivering security training to a chapter in **Asia** at particular risk following a smear campaign. We facilitated access to strategic communication support and released 12 media statements in coordination with our chapters to use our international influence to support national chapters and contacts under threat. We also used our high-profile social media presence and website to apply pressure where needed.

The Secretariat supported seven chapters to deploy a new case management system for their Advocacy and Legal Advice Centres (ALACs), to better protect sensitive information and extract meaningful data.

Additionally, we invested in ensuring appropriate travel security risk management for Secretariat personnel travelling to higher risk locations, including in connection with a new programme of work started in Iraq. For 2023, we will have expanded capacity in the security team to be able

to fully resume the delivery of security training to our chapters.

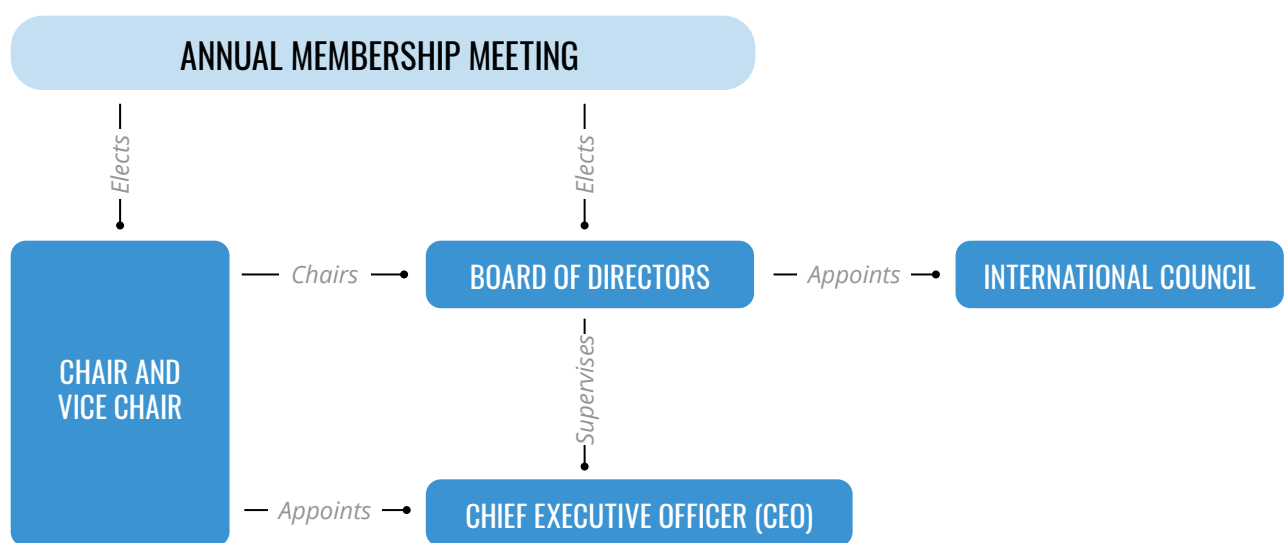
Ethical and accountable

In 2022, we further developed and worked to increase trust in the Secretariat's integrity system. Our achievements in this area include an increase in positive employee feedback seen during our annual staff survey, publishing a document setting expectations about internal investigations, new suppliers' standards and producing case statistics. An additional internal whistleblowing channel was designed in 2022 and will be rolled out in 2023. Our teams also spent time in workshops exploring practical applications of the integrity system for their areas, leading to new operational accountability measures.

To support our chapters in strengthening their own integrity systems, we developed a dedicated capacity-building programme. The contents and approach to this programme were designed and agreed in 2022. Our approach follows international standards related to risk and compliance management, and will be adaptive to each chapter's environment and needs. Starting in 2023, this programme will be piloted and progressively implemented.

GOVERNANCE AND ORGANISATION

TRANSPARENCY INTERNATIONAL'S GOVERNANCE STRUCTURE



Transparency International is a German-based, non-profit association with 102 members, comprised of 97 national chapters and five individual members. Four national chapters in formation are on the way to becoming national chapters, and 13 national partner organisations support Transparency International's mission in their own countries.

Our Annual Membership Meeting is the highest decision-making body. The Annual Membership Meeting elects and controls the chair, vice-chair and the Board of Directors. It also passes resolutions and discusses critical issues.

Our Board of Directors is the supervisory organ of the association, while our chief executive officer is responsible for the operations of Transparency International.

Our International Council is a body of experts providing advice to the whole Transparency International movement. Members of the International Council are appointed by the Board of Directors and can run for chair, vice-chair and board elections.

In 2022, the Annual Membership Meeting elected three new board members – Susan Côté-Freeman, Andrés Hernández and François Valérien – and adopted six resolutions. The Annual Membership Meeting condemned the **Russian** invasion of **Ukraine**, set priority areas for the next cycle of our Strategy 2030, adopted a substantial revision of our accreditation policy, underlined the importance of the Extractive Industries Transparency Initiative, took a position on a potential anti-corruption court, and declared the legitimate interest of civil society organisations and journalists in access to information on beneficial ownership.

INCOME AND EXPENDITURE

Last year, we streamlined our internal processes with some significant innovations, including the implementation of a paperless document management system that is compliant with German regulations. We also adopted two complex and important policies: one on compliance with laws and regulation, focusing on the complexities of German and international tax laws; and one on the management of our reserves. Further work is being conducted on advancing our budgeting techniques, with a focus on ensuring full recovery of costs on projects, which is now a critical priority due to the reduction of unrestricted resources. Below we present a summary of our income and expenditure for 2022.

Income

Our operating income in 2022 reached €20.5 million, with a €3.1 million or 18 per cent increase compared to 2021. The increase is entirely related to restricted income, which increased €3.8 million or 30 per cent as the implementation of existing projects proceeded at a faster pace and new engagements were added. In 2022, the efforts of the fundraising team in renewing and increasing the project portfolio are becoming fully visible and further growth is expected for 2023. Unrestricted income decreased by €1.6 million or 34 per cent compared to 2021, in line with the reduced availabilities of institutional partners to provide unrestricted support.

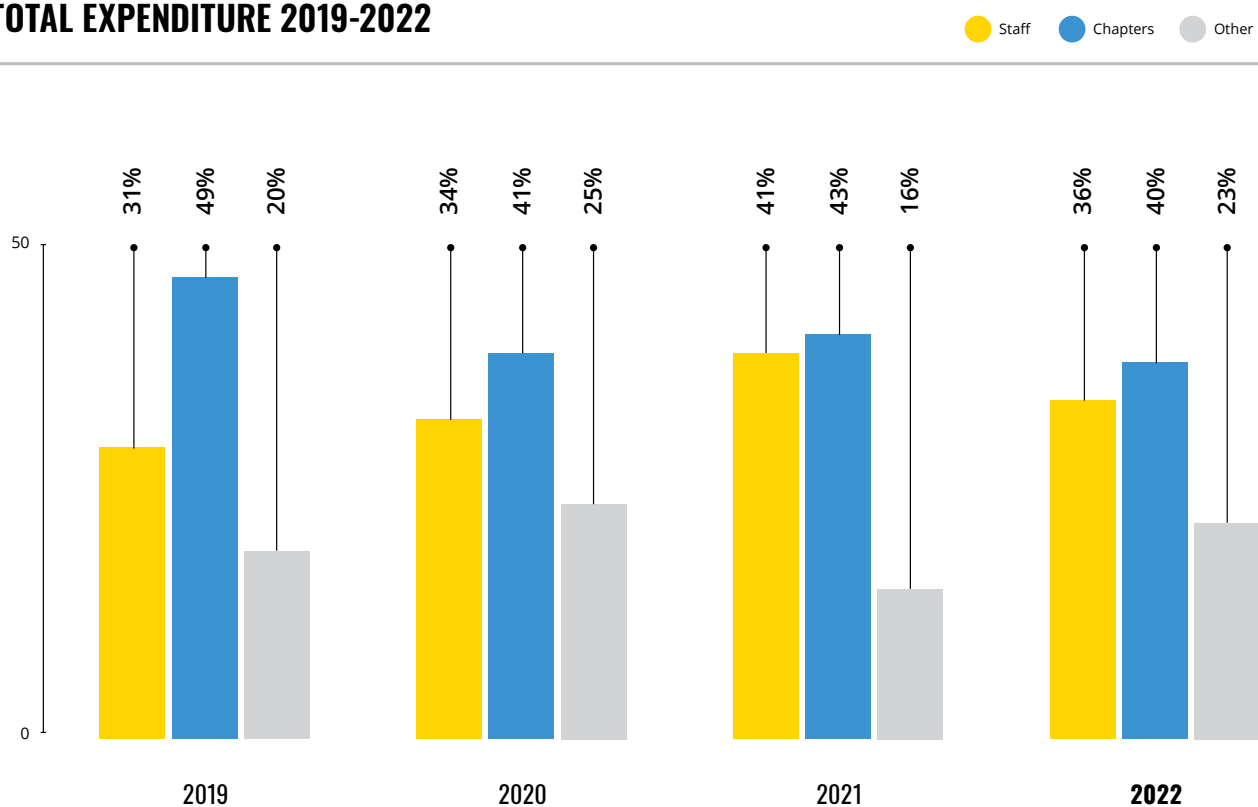
Expenditure

Operating expenditure totalled €21 million, with an increase of €3.7 million or 21 per cent, reflecting the changes in income. Transfers to partners increased by €1 million to €8.5 million. However, their share of total expenditure decreased from 43 per cent to 40 per cent on account of the significant increase in other expenses. Other expenses increased by €2.1 million or 86 per cent compared to 2021 due to the costs associated with the International Anti-Corruption Conference, which was entirely organised by the Secretariat. Staff costs increased by €516,000 as a result of slight increases in headcount and salaries, which were partly adjusted to reflect the steep increase in cost of living.

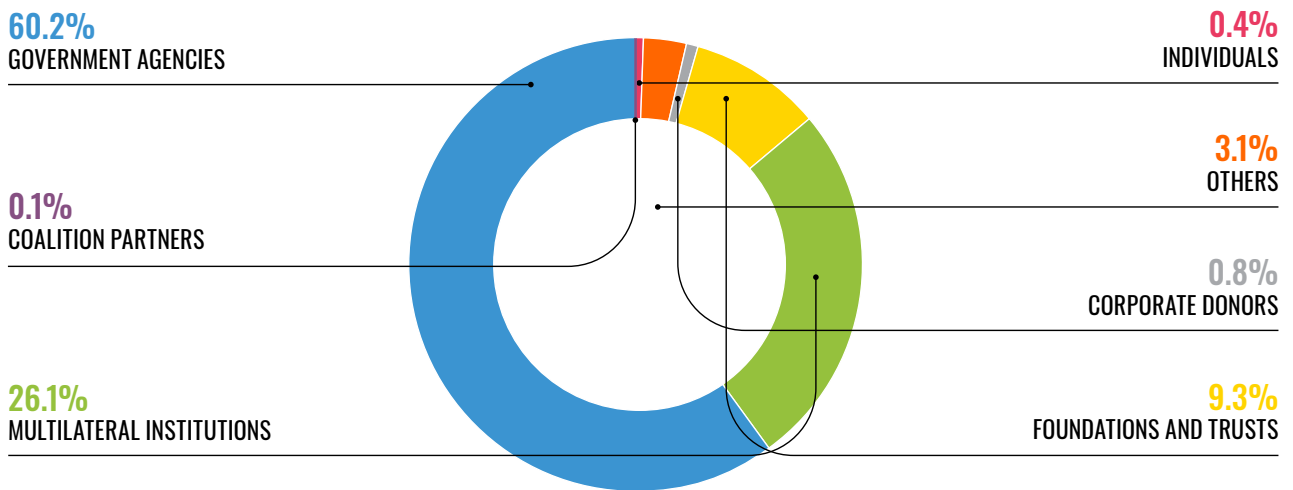
INCOME

	2018	2019	2020	2021	2022
<i>Amounts in millions of euros</i>					
Unrestricted	2.712	4.288	5.400	4.681	3.059
Restricted	19.646	20.573	16.969	12.681	16.501
Other	0.36	0.1	<0.1	<0.1	0.9
Total	22.716	24.954	22.390	17.386	20.454

TOTAL EXPENDITURE 2019-2022



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THANK YOU TO OUR SUPPORTERS

Transparency International is a non-profit organisation and we rely on the generosity of our supporters and partners to pursue our mission fighting corruption. Without your support, the achievements celebrated in this report would not have been possible.

For more information on ways to support our work, please get in touch at fundraising@transparency.org. To make a gift today, please visit: www.transparency.org/donate.

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- + Journalism Development Network (JDN)
- + Financial Transparency Coalition
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- + European Centre for Non-Profit Law (ECNL)
- + Civitates

Individuals

We would also like to warmly recognise all our individual contributors and other donors, who support our work in the fight against corruption.

- + Rolf Hellenbrand
- + J. Peter Jessen
- + James Addison
- + Johannes Wery
- + Laurenz Reichl
- + Martin Dunlavey
- + Mellennesse Blackbird
- + Patrice Palmero
- + Patrick Kinsch
- + Giovanna Longo
- + Detlev Elsner
- + Richard Waltonsmith
- + Roussev Family

ENDNOTES

- 1 This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.
- 2 European Parliament. The Cost of Non-Europe in the area of Organised Crime and Corruption, 2016.
Available at: https://www.rand.org/pubs/research_reports/RR1483.html
- 3 B. Jones and A. Jing, Prevention not Cure in Tackling Health-Care Fraud, Bulletin of the World Health Organization, December 2011, 858-859.
- 4 There may have been more. However, data on the gender breakdown is incomplete.
- 5 Co-funded by IPP STRONGG and the Pacific Community's Pacific People Advancing Change Micro-Grant Facility for Advocacy Coalitions.

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