

**LET'S  
WEED OUT  
CORRUPTION**

# ANNUAL REPORT 2021



**TRANSPARENCY  
INTERNATIONAL**  
the global coalition against corruption

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

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

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# ANNUAL REPORT

## 2021

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Thank you to our supporters



# OUR SHARED WINS

## 2021 HIGHLIGHTS

Through the Transparency International Secretariat, more than 100 national chapters and contacts worldwide come together as a united, global force for change. This year:

### **We edged closer to ending secretive corporate structures, everywhere.**

Following our persistent campaigning against the abuse of anonymous companies – a favourite vehicle for laundering stolen funds – registers of true company ownership are now set to become a worldwide requirement. » *See p. 21*

### **We took the fight against corruption to the global stage, with two major firsts.**

In June, the first-ever UN General Assembly Special Session against Corruption heeded our calls and drew up several significant international commitments. In December, in a move that echoed our recommendations, the first Summit for Democracy produced pledges to address forms of cross-border corruption that are undermining democracy.

» *See p. 35*

### **We exposed how corruption is crippling lifesaving COVID-19 responses.**

The launch of our flagship **Corruption Perceptions Index** kick-started a global conversation on corruption and health care. We followed up by calling for transparent vaccine contracts and secured critical anti-corruption measures in emergency pandemic loans. » *See p. 15*

### **We launched our 10-year strategy *Holding Power to Account*.**

Developed in close collaboration with our diverse global movement, the strategy is guiding Transparency International's connected and collective ambition for 2030.

### **We made protecting anti-corruption activists a human rights priority.**

Our ongoing efforts contributed to the UN Special Rapporteur on Human Rights Defenders acknowledging the risk-taking and bravery of those who hold power to account by calling out corrupt acts. » *See p. 41*

### **We expanded the world's largest survey on the impact of corruption in daily life.**

Our 2021 **Global Corruption Barometer** in the European Union (EU) and the Pacific surveyed thousands of people in more than 35 countries, providing the only comparable data on favouritism in public services and sexual extortion. Other disturbing patterns of exploitation were exposed in our ground-breaking report on corruption and discrimination. » *See p. 28*





**COVID-19 is not just a health and economic crisis. It is a corruption crisis. The past year has tested governments like no other in memory, and those with higher levels of corruption have been less able to meet the challenge.**

**Delia Ferreira Rubio**  
Chair of Transparency International



International Anti-Corruption Day event on 11 December 2021, in Harare, Zimbabwe. Photo: Transparency International Zimbabwe

# 2021 IN NUMBERS

## 67,000 +

**Media articles** referring to findings and recommendations from our movement, expanding the anti-corruption conversation to new audiences.

## 46,000 +

**People surveyed** for our *Global Corruption Barometer* in the EU and the Pacific.

## 700 +

**Organisations, academics and businesses**, brought together by Transparency International to call on the UN General Assembly to end the abuse of anonymous companies. » **See p. 20**

## 80

**IMF emergency COVID-19 loans**, which we helped to ensure contained critical transparency and accountability measures to support livelihoods and save lives during the ongoing pandemic. » **See p. 15**

## 62

**Countries** where our Advocacy and Legal Advice Centres provided free, confidential advice to victims and witnesses of corruption. » **See p. 39**

## 34

**Corruption-related legal submissions** made by our movement in 17 countries to hold the corrupt accountable. » **See p. 37**



Transparency International's 113 independent chapters and contacts 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



2021 was another remarkable and demanding year for the Transparency International movement. As the pandemic continued to disrupt and reshape global affairs, our chapters and partners around the world adapted to new ways of working and persisted in the fight against corruption – from the grassroots level through to global, coordinated action.

In January, we used the much-anticipated launch of our annual *Corruption Perceptions Index* to call for action on corruption amid the ongoing health and economic crisis. With corruption risks growing due to rapid public procurements and pandemic-related restrictions, our advocacy secured critical anti-corruption measures in IMF emergency COVID-19 loans.

Later in the year, fresh money-laundering revelations from the OpenLux and Pandora Papers investigations strengthened our global calls to end the exploitation of secretive corporate structures, while the explosive news about government spying using Pegasus software raised acute concerns for journalists and activists around the world – including our own people.

Alongside political unrest in Afghanistan, Myanmar and elsewhere, the Pegasus scandal was a harsh reminder that as civic space shrinks in the face of authoritarianism and populism, we must not lose sight of the big picture: fighting corruption is a human rights issue. This was recognised by the UN Special Rapporteur on Human Rights Defenders, who – informed by our evidence – will call on

governments to protect anti-corruption activists at the UN Human Rights Council in 2022.

2021 was the year Transparency International embarked on an ambitious new 10-year strategy: *Holding Power to Account*. As a movement operating in over 100 countries, this is our shared roadmap to a fairer and more equitable 2030 – and the world's promise, through the Sustainable Development Goals, to "leave no one behind".

Over the course of this first year, we realigned our operations to focus more closely on advocacy, stepped up new partnerships, and held the first-ever Transparency International Movement Summit to celebrate and leverage our biggest strength in the fight against corruption: our national chapters. Over 250

**“ The challenges ahead are significant, but we will continue to raise our voice wherever there is a need for anti-corruption expertise, advocacy and action.**

**Daniel Eriksson**

anti-corruption fighters from around the world took part in this virtual event to exchange insights, ask questions and spark new ideas. As the year came to a close, we marked International Anti-Corruption Day by calling on governments at the US-hosted Summit for Democracy to deliver on old promises and make new, bold commitments.

Today, that call remains urgent as we see new, deeply troubling threats to peace and security. 2022 was already poised to be a “pivotal year of action” for uprooting corruption and

defending democracy, and our global campaign to end kleptocracy is demanding that governments act now. In this push for change, one highlight is certain to be our International Anti-Corruption Conference, hosted by the US government in December, which will bring global leaders, decision-makers and activists together around a shared agenda.

Changing the world requires passion, patience and perseverance. At Transparency International, we have all three. The challenges ahead are

significant, but we will continue to raise our voice wherever there is a need for anti-corruption expertise, advocacy and action. Like all our achievements to date, this work is only made possible through the support of our donors. I'd like to express our deep gratitude for their continued trust and partnership.

For others who share our vision of a corruption-free world, I invite you to be part of our work. Follow our campaigns, share our stories and donate if possible.

**Together, we can make corruption a thing of the past.**



Daniel Eriksson  
Chief Executive Officer of Transparency International

# CORRUPTION KNOWS NO BORDERS, SO NEITHER DO WE

## WORKING AROUND THE WORLD, AROUND THE CLOCK

In response to years of advocacy, the **Canadian** government has finally committed the funds needed to make company ownership information transparent, closing a door on dirty money.  
» See p. 20

The first-ever **US** Strategy for Countering Corruption reflects many of our recommendations for effective and lasting action, including a call to extend anti-bribery laws to those who demand bribes. Our US office is leading the bipartisan effort to pass this landmark expansion of the law. » See p. 35

In **Latin America and the Caribbean**, we produced innovative new research exposing how gender-based discrimination can overlap with corruption and extortion.  
» See p. 47

We helped our partner in **the Gambia** to successfully challenge the National Assembly for awarding its own members 54.5 million dalasi (over US\$1 million) in public funds for their personal use.  
» See p. 38

The European Commission advanced legal action against **Cyprus** and **Malta** over their golden passport schemes – which we and our partners had exposed as a back-door for corruption – reaffirming the intention to ban all such schemes in the EU. » See p. 37

We published a study of secretive investment funds in **Luxembourg** – prompting the government to announce far-reaching reforms.  
» See p. 23

Our anti-corruption recommendations were adopted by the Central African Forest Initiative, responsible for one of the world's largest carbon sinks in the **Congo** Basin. » See p. 17



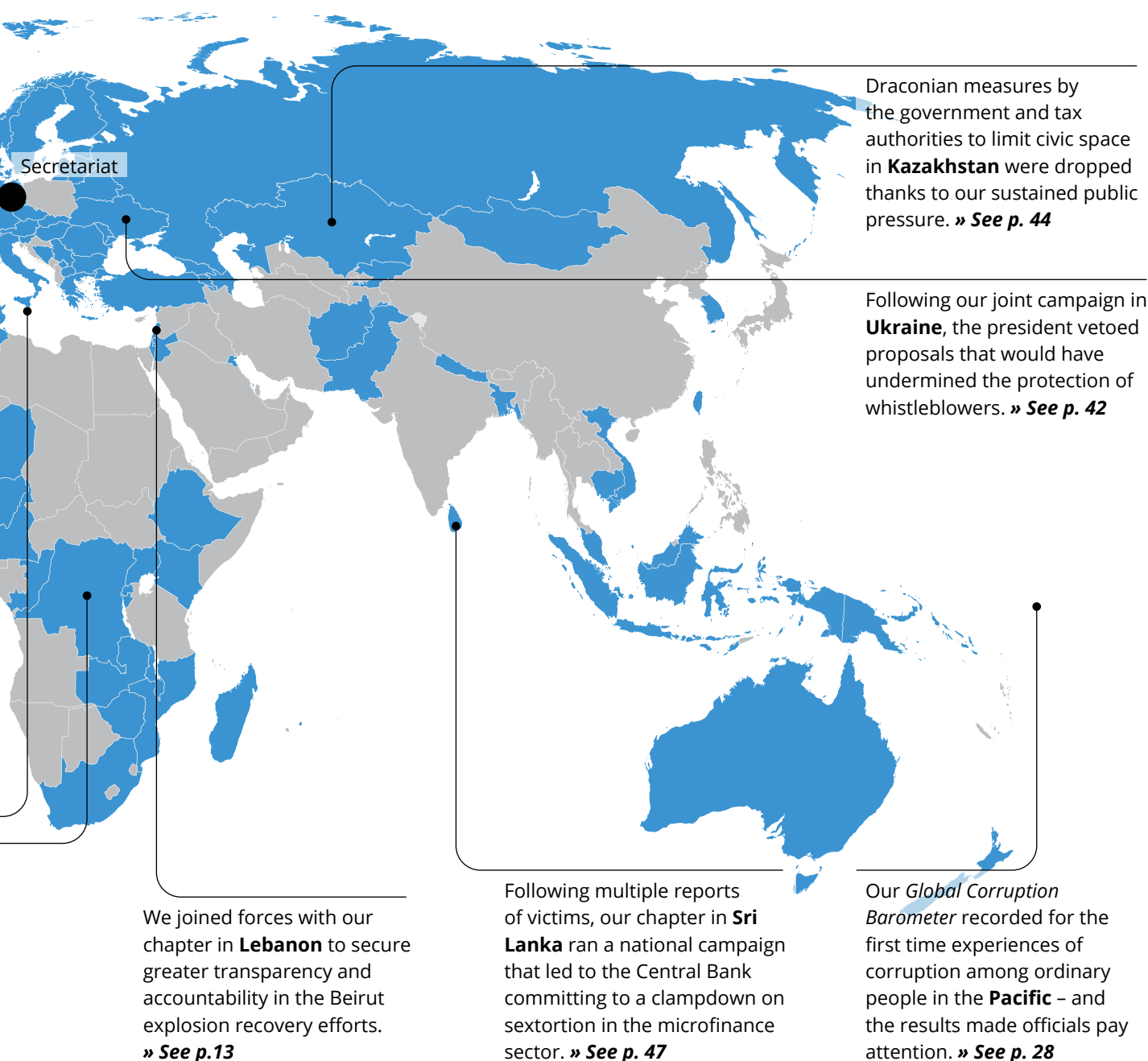
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NATIONAL  
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# PUBLIC MONEY FOR PUBLIC GOOD

The background of the entire page is a photograph of several construction cranes against a clear blue sky. The cranes are silhouetted, with some lights visible on their jibs. The perspective is looking up at the cranes, which are angled diagonally across the frame.

## **STRATEGIC OBJECTIVE 1: PROTECT THE PUBLIC'S RESOURCES**

Protecting public resources against bribery, theft and exploitation is the bread and butter of our work fighting corruption. As rising social inequality strains public services, and governments spend trillions combatting crises, from pandemic-induced recessions to the global climate breakdown, Transparency International is working to safeguard public assets and resources to ensure they best serve the citizens relying on them.



## A watchful eye on public spending

Each year, governments spend vast sums of money on public projects – building or upgrading roads, schools, housing, water networks and power infrastructure. Without transparent decision-making and contract awards, and careful checks and balances, these enormous procurements can create serious corruption risks. In the EU alone, corrupt bidding processes have increased annual contract costs by an estimated €5 billion<sup>1</sup> and our 2021 *Global Corruption Barometer - EU* survey found that 52 per cent of Europeans believe government contracts are not allocated in a competitive and fair manner.

Across the EU, our collaborative civic monitoring tool – the **integrity pact** – has successfully tackled these corruption risks. Companies, local authorities and civil society groups have worked together to save taxpayer money, deliver projects efficiently and shut down opportunities for the corrupt. It is an approach that opens up decision-making to public scrutiny, while fostering real collaboration between public officials and the people they serve.

Beyond the EU, our chapters in **Lebanon, Indonesia, Fiji, the**

**Maldives, Mongolia, Nepal and Pakistan** all secured changes to public procurement processes this year. In 2021 alone, our chapter in **Pakistan** sent over 60 complaints to public authorities for not following procurement regulations. As a result of their advocacy, **several major contracting processes were reviewed, saving the public purse billions of rupees** (millions of US dollars). In **Lebanon**, we joined forces with our chapter to ensure transparency and accountability in the Beirut explosion recovery efforts, including ringfencing funding for humanitarian support and reconstruction.

Elsewhere we continued working to safeguard other critical public resources. In **Sub-Saharan Africa**, we renewed our work on land corruption, with an enhanced focus on women and girls, who are disproportionately impacted by this form of corruption.

Our chapters in eight countries are working with local communities to **equip women with the tools and knowledge to demand their rights and report land corruption safely**. They are also leading national advocacy efforts to secure gender-sensitive anti-corruption laws. Look out for more on this in 2022.

<sup>1</sup> 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](https://www.rand.org/pubs/research_reports/RR1483.html)





Photo: Science in HD / Unsplash

## Integrity pacts: a collaborative approach to clean contracting

For the last six years, we have rolled out integrity pacts to **monitor 18 major EU infrastructure projects worth €920 million**, from flood protection in **Greece** to highways in **Hungary**. Developed by Transparency International in the 1990s, integrity pacts involve a public and legally binding commitment made by the contracting authorities and bidders in a tender process to refrain from corruption – a commitment then monitored by an independent civil society organisation.

In 2021, we finalised this monitoring and presented our findings to the EU and national decision-makers in charge of EU procurement. Over **750 recommendations** were made throughout the project to strengthen procurement processes, allow competitive bidding and reduce corruption risks. In one example, monitors in **Italy** discovered that the winning bidder for an energy project did not disclose a previous conviction and corruption investigation, and their bid was therefore disqualified. In another, our Hungarian chapter argued that the value of the highway contract should be much lower, resulting in savings of €700,000.

The success of this collaborative approach has not gone unnoticed. Equipped with valuable lessons, Transparency International has secured funding to take integrity pacts to the global stage under a new initiative that will set **a worldwide standard for public contracting** by 2024. The use of integrity pacts to strengthen trust in public contracting was also recommended to the Group of 20 (G20) – the world's largest economies – by its business-focused forum, the B20.

“ The G20 should stimulate the adoption and implementation of effective measures, such as [...] Integrity Pacts in key contracting projects, in order to increase transparency and accountability, enhance trust in authorities and government contracting, and contribute to a good reputation of contracting parties.

B20 recommendations, 2021



An “Anti-Corruption Brigade” workshop to help citizens monitor public investment projects, organised by our chapter in Peru. Photo: Carlos Arroyo / Proética

## Closing the door on corruption during COVID-19

2021 was profoundly shaped by the ongoing pandemic. It is crucial that governments can respond quickly in times of crisis to protect the public’s resources. But as our work over the year demonstrates, this calls for greater transparency – not less.

Even before COVID-19, corruption was a health care catastrophe, with the World Health Organisation estimating a drain of US\$500 billion every year from vital health resources due to the combined effects of corruption and error.<sup>2</sup> Citizens may also face corruption when seeking treatment, such as requests for bribes. This includes devastating cases of sextortion, where sex is demanded instead of money. Health care workers can face intimidation, even dismissal, if they speak out, as reports to our Advocacy and Legal Advice Centres consistently reveal.

The COVID-19 pandemic not only exposed these existing

vulnerabilities, but exacerbated them. The scramble for essential equipment and vaccines saw governments and business negotiating contracts with little or no public scrutiny. Our **global call to action** in March demanded governments ensure fair and equal access to vaccines and treatments, and provided an **online toolkit** to help citizens submit access to information requests to help hold their officials accountable. We also worked with multiple chapters to assess corruption risks in their countries’ national COVID-19 strategies and design tailored responses.

Our chapters led **COVID-19 procurement monitoring campaigns** in their own countries and raised awareness of procurement corruption risks and vaccine bribery. In **Tunisia**, for example, multiple cases of fraud relating to the COVID-19 vaccine campaign – including members of parliament skipping the vaccination queue – prompted our chapter to take action. In March, they launched an online monitor

and opened a channel for complaints. Their work exposed systemic mismanagement in the vaccination campaign and widespread falsification of vaccination certificates, kicking off a nationwide public debate that ultimately **helped to ensure vaccines went to those who needed them most**.

We also helped to **plug integrity gaps** in COVID-19 emergency loans from the International Monetary Fund (IMF). Working with Human Rights Watch and partners in **Cameroon, Ecuador, Egypt and Nigeria**, we exposed serious shortcomings and inconsistencies in how the IMF was ensuring that anti-corruption commitments made by these governments were met, and developed targeted recommendations. The IMF took heed and **used our findings to strengthen transparency and compliance measures** across its emergency loans.

<sup>2</sup> B. Jones and A. Jing, “Prevention not cure in tackling health-care fraud”, *Bulletin of the World Health Organization*, December 2011. 858-859.





Illustration: United Nations COVID-19 Response on Unsplash

## Corruption Perceptions Index 2021: corruption blights pandemic response

Our annual *Corruption Perceptions Index* (CPI) remains the most widely used and cited measurement of corruption in business, policy and academia. Each year, we harness its high-profile launch to focus attention on the most urgent anti-corruption issues globally.

In 2021 we examined how corruption undermines a country's capacity to respond to emergencies like COVID-19. We showed that **corruption strips funds from essential services such as health care**, leaving countries under-prepared to deal with health crises. On top of this, countries that fail to control corruption have also tended to breach human rights in their pandemic responses.

In the first week following the CPI launch, more than 6,300 media articles picked up the corruption conversation. As always, governments around the world paid close attention to the results, with officials from Malaysia to Kazakhstan responding publicly. In **Nigeria**, the president's office [attempted to shift responsibility](#) for their low score. **Armenian** Prime Minister Nikol Pashinyan has announced that his country [hopes to increase its CPI score](#) – our chapter there was quick to flag unfulfilled anti-corruption commitments that need action if this is to succeed. Several chapters also used their countries' results as an opening to advise officials, including anti-corruption agencies and supreme court justices, on ways to strengthen their responses to corruption.



## Keeping climate responses clean

Transparency International is also fighting corruption in the response to climate change. Ahead of the annual UN climate conference in November, COP26, we worked with our **UK** chapter and others to apply pressure to open up decision-making for closer scrutiny, and to expose and prevent undue influence by the fossil fuel industry. While the final agreement did not deliver robust anti-corruption measures,

some integrity and transparency measures were secured, including a provision for an independent grievance process. We also published our *Climate and Corruption Case Atlas*, which features cases from around the world and can be used by journalists, policymakers and activists to take targeted action.

Elsewhere, the Central African Forest Initiative, which works to protect the world's second largest tropical rainforest – a **major carbon sink** – integrated

our proposals for spending disclosure, handling complaints and civil society monitoring. The Green Climate Fund, the **largest global fund dedicated to fighting climate change**, adopted an integrity policy to which we contributed. The changes we helped bring about will make sure that **activities across both initiatives are resistant to corruption, and can deliver sustainable climate action** for both people and the planet.

## Climate change and corruption: a link we can no longer ignore

The impacts of climate change and environmental destruction are vast and accelerating, with the world's poorest communities on the frontline. The **countries most vulnerable to climate change** often face high levels of public-sector corruption, while new corruption risks are being created through efforts to urgently respond to rising sea levels, unstable weather patterns and unexpected droughts.

As governments and businesses finally speed up their response to the climate emergency, some of the multi-billion-dollar funds provided have gone missing – lost through negligence or funnelled away to line the pockets of the corrupt. In **Bangladesh**, an *estimated 35 per cent of climate project funds are embezzled*, while the **Maldives**, the lowest-lying nation in the world, has seen millions of dollars vanish from a tsunami relief fund.

Transparency International is tackling this leaky funding pipeline. In partnership with our chapters around the world, we have **piloted anti-corruption safeguards and solutions that reduce risks for investors and ensure funds arrive at the right destination**. Critically, we make sure that local communities impacted by climate change have a say in the response. This is particularly important, as people speaking out against corruption or illegal activities are often threatened. In cases like these, our legal advice centres can assist citizens to make official complaints and protect their homes and livelihoods.

# NOWHERE TO HIDE, NO ONE TO HELP

## **STRATEGIC OBJECTIVE 2: STOP THE FLOWS OF DIRTY MONEY**

In 2021, a new leak revealed more financial secrets of a wealthy and well-connected global elite. In over 14 million documents, the Pandora Papers investigations exposed – once again – that kleptocrats and the corrupt routinely use anonymous companies and loopholes in the global financial system to enrich themselves and avoid scrutiny.

This lawlessness in offshore finance is failing us all by allowing corruption, money laundering and tax evasion to flourish. Aided by professional enablers of financial crime – like corporate service providers, banks, lawyers and accountants – powerful and well-connected elites bribe, lie and pocket billions at the expense of ordinary citizens. Transparency International is working to change this – and we've already made significant progress.





Photo: Asaf Gazit / Unsplash

## Closing the lid on Pandora

The **Pandora Papers investigation** exposed how billionaires, oligarchs and high-level officials move their wealth to secrecy jurisdictions, while concealing their identities and snapping up lucrative real estate and other luxury items. Over 300 politicians from 90 countries – including 35 former or current government leaders – are alleged to have **shielded themselves with anonymity**.

These are the very people who should be working to protect public interests and prevent illicit finance. All this was facilitated by supposedly “clean” countries, such as New Zealand and the United States, which have allowed secretive company structures to proliferate and overlooked the lawyers and investment advisors helping to exploit them.

We leveraged these latest revelations to intensify our global call for action on dirty money and for governments to get their own houses in order.

Years of work on these very issues meant our expertise was in high demand. In the week after the Pandora Papers revelations broke, **our recommendations on fighting money laundering** were mentioned in at least 1,700 media stories published across 30 countries in 16 languages.

## Getting company owners to come clean

People who own or control companies and other legal entities should be identifiable – this is what beneficial ownership transparency is all about. And to make sure that the corrupt have no secret companies where they can stash their loot or conceal assets, we have been calling for **all countries to establish public, central registers of company owners** as a global standard. Building on extensive advocacy over the last decade, in 2021 we edged much closer to this goal when the Financial Action Task Force finally **proposed much-needed amendments** to the existing standard in October. Leading up to this important milestone, we secured key endorsements from the G7, the G20 and the IMF. » **See box p. 21**

Our recommendations were also echoed in the report of the UN High-Level Panel on International Financial Accountability, Transparency and Integrity; the UN General Assembly Special Session (UNGASS) Political Declaration and a resolution adopted by the UN Convention against Corruption (UNCAC) Conference of State Parties. These key UN gatherings focused much-needed attention on the issue of dirty money and helped to keep beneficial ownership transparency where it still needs to be – high on the global agenda.

## The enablers of corruption

**What?** To move or wash dirty money, corrupt actors need help from private-sector intermediaries, who hold the keys to the financial system. These professionals have specialised roles and at times neglect, overlook or abuse their obligations, in order to facilitate the crime.

**Who?** The list is long. It includes legal and financial advisors, such as lawyers or accountants, as well as banks, real estate agents and company formation agents.

**How do they do it?** Enablers help corrupt actors move suspect funds, especially across jurisdictions. Sometimes they handle the dirty money themselves. They might set up anonymous companies on behalf of their client to obscure their true ownership, or serve as proxies, falsify paperwork or facilitate illegal tax schemes.

**How do they get away with it?** In many countries, these professions are yet to be regulated and have no obligations at all. In countries where rules do exist, they are marred by gaps and loopholes. On top of this, weak supervision and enforcement mean gatekeepers have few incentives to prevent or report the flow of suspicious funds. Some even view punitive measures such as sanctions as an easily absorbed cost of doing business.

**What should they be doing?** As gatekeepers of the financial sector, these professionals should be required to check both the identity of their clients and the sources of their funds. They should pay particular attention to clients with political connections (“politically exposed persons”) and report suspicious transactions to the authorities.

At the national level, we have already **secured significant wins**, most notably through new plans to establish beneficial ownership registers in Canada, Chile, Japan and the United States.

In January, the **US** Congress passed the historic Corporate Transparency Act into law, which requires companies to disclose their real owners. The Act, which our US office helped

to craft, marks the culmination of over a decade of civil society campaigning and coalition building.

The **Canadian** government took the long-awaited step of committing funds to set up public beneficial ownership registers for all companies in its 2022 national budget, putting Canada on the growing list of global economies that are realising the power of beneficial ownership

data to combat corruption and money laundering. In **Chile**, the government has taken the first steps towards setting up a new register of all companies providing goods or services to the state, including a study on best practises for a full and transparent register. This will help to both prevent corruption within the country and strengthen **Chile's** defences against dirty money from abroad.





Corrupt officials and business people often purchase yachts and other luxury goods through anonymous companies registered in secrecy jurisdictions. Photo: Milano / Unsplash



**We commit to making efforts in international cooperation and taking appropriate measures to enhance beneficial ownership transparency [...] by promoting beneficial ownership disclosures and transparency, such as through appropriate registries.**

**UNGASS 2021 political declaration**



## Anonymous companies: the end of a secretive era?

Almost without fail, anonymous shell companies appear at the centre of major cases of corruption, money laundering and tax evasion. For years, we have heard politicians pledging to end the era of secretive corporate structures. In practice, they have **long resisted reforms**.


Transparency International has been advocating for change since 2013, marking many victories along the way – from the G20 adopting high-level beneficial ownership transparency principles, to a directive mandating public registers across the EU. But what is needed is concerted action by all countries, everywhere. In 2019, we honed in on the Financial Action Task Force (FATF) – the global anti-money laundering standard-setter – calling on it to require public, central beneficial ownership registers containing verified information in all countries.

At first, FATF members seemed unwilling to consider these changes. In response, we mobilised our partners and allies, met with country delegations and made sure beneficial ownership registers were on the agenda of every major international gathering in 2021 – from the G7 to the Summit for Democracy. We coordinated **a public call to end anonymous companies**, signed by more than 700 academics, business leaders, economists, trade unions and civil society groups from 120 countries. Our national chapters questioned their governments, organised meetings and wrote letters. Together, we provided detailed input at public consultations, drawing on experiences from 30 countries to ensure these proposals considered different contexts and legal frameworks. We listened to any objections and provided compelling responses.

After mounting evidence and intensive consultations, FATF announced a series of proposed changes in October 2021, which would require all countries to establish beneficial ownership registers. In early 2022, FATF's members will decide whether to adopt the proposed measures. A “yes” vote will be a game-changer: **more than 200 jurisdictions will have to follow the new standard**, including financial centres that have so far been unwilling to fix the gaps in their frameworks. That's why in 2022 we are continuing our public campaign, encouraging ordinary people to ask FATF members not to miss this historic opportunity.

“The new global standard would allow financial institutions to effectively tackle financial crime, allow prosecutors to identify politically exposed persons in corruption cases, and allow citizens to see who exactly their government is doing business with.

Mashudu Masutha, Corruption Watch, South Africa



Beneficial ownership registers stop corrupt actors from hiding behind anonymous companies. Photo: Jirsak / iStock

## Missed deadlines and the OpenLux fallout

How much is at stake was made extremely clear by the OpenLux investigations in February, which sifted through Luxembourg's beneficial ownership data and **exposed serious shortcomings**.

Our work with the Anti-Corruption Data Collective showed that 81 per cent of hedge and private equity funds in Luxembourg present money laundering risks. These findings triggered discussions at the highest international levels on dirty money loopholes. Luxembourg has since **proposed reforms to address these weaknesses** and improve the quality of beneficial ownership data.

In May, we published a review of the state of public beneficial

ownership data across the EU, which found that more than a year after an EU deadline for action had passed, **nine countries** still did not have public beneficial ownership registers. The report was timed to catch the attention of policymakers developing the European Commission's anti-money laundering legislative package. Our findings were discussed widely, prompting responses from officials in the Czech Republic, Latvia and Lithuania.

As we hoped, good news followed. The anti-money laundering package proposed in July contains **important provisions to strengthen beneficial ownership registers** across EU member states.

Gaps remain, particularly in terms of making the data freely and easily accessible, so in 2022 we

will be working with our EU office to push for these improvements.

Scandals like OpenLux have also exposed weaknesses in banks across the EU. That is why we welcomed **the European Commission's proposal this year to establish a dedicated anti-money laundering body – which Transparency International has been calling for since 2019**. This agency would have the powers to supervise and sanction financial institutions and national supervisory bodies. More of our recommendations also featured in the new package, including proposals to tackle dirty money in real estate, better regulate foreign companies and clamp down on the unregulated golden visa industry.

# TRANSPARENT DECISIONS, CLEANER POLITICS

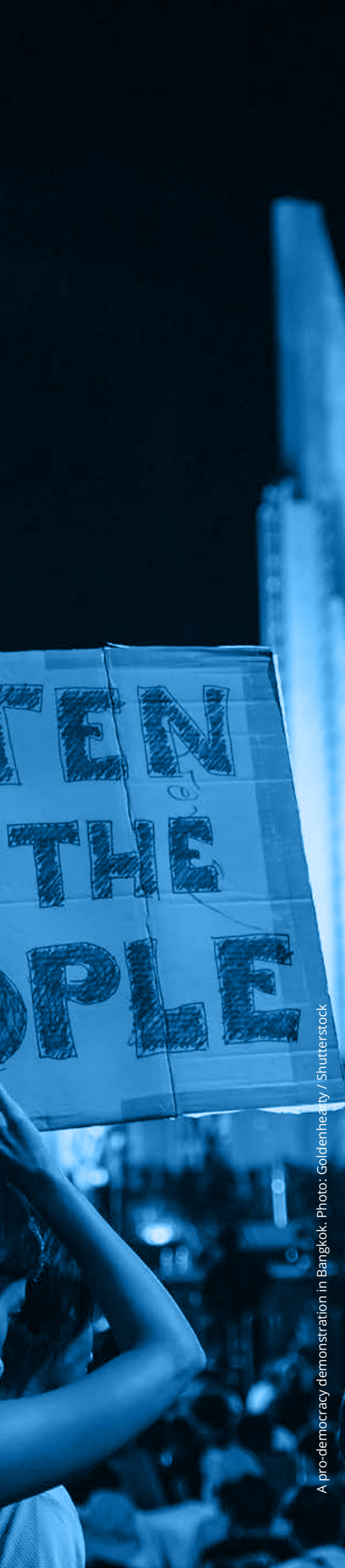
## **STRATEGIC OBJECTIVE 3: SECURE INTEGRITY IN POLITICS**

Political integrity is the cornerstone of any thriving democracy. It means political power is used transparently, in the interests of the common good – not to sustain private interests or enrich powerful individuals. When important decisions are made behind closed doors or decision-makers are leaned on to favour a particular group, society as a whole suffers.

Around the world, Transparency International monitors whether government policies are created openly and free from undue influence. In 2021, we sharpened the tools available to flag possible violations, mobilised partners to push integrity to the front of political decision-making and launched a community of chapters to roll out new risk-monitoring and detection tools.







A pro-democracy demonstration in Bangkok. Photo: Goldenhearty / Shutterstock

## Trailblazing international detection

To spot problems in political processes, we need strong tools. In 2021, we launched a community of 51 chapters **pioneering new approaches to monitoring and detecting** such risks. Called the *Global Integrity Monitor*, this community generates money-in-politics datasets where they do not yet exist, monitors risks where the data does exist, and uses new digital solutions to visualise potential violations clearly and quickly.

For example, we began work across 10 countries in Africa and Latin America with little or no political transparency data. We are **compiling for the first time a trove of national-level data** on how political parties are being financed and whether politicians are disclosing their personal connections and potential conflicts of interest. Elsewhere,

twenty-five chapters also joined civil society partners to test out risk indicators for political corruption. This led to a how-to guide for chapters and other monitoring groups.

This community evolved from our long-running Integrity Watch project – a **public, data-driven monitor** providing free, online tools for scrutinising political decision-making in EU countries and institutions. In 2021, the national platforms and online data hubs were accessed by over 100,000 unique users. We will launch Integrity Watch 3.0 in February 2022, which will **expand its scope** from eight to sixteen countries, and upgrade it from only visualising datasets to also cross-checking them to better detect risks. Through these easy-to-use platforms, researchers, journalists and civil society organisations are using the data to spot anomalies and hold their elected officials accountable.



Plenary Hall, Bundeshaus Bern, Switzerland. Photo: Hansjörg Keller / Unsplash

## Using data to detect corruption

Through the *Global Integrity Monitor*, we are applying lessons from our Integrity Watch project to other regions. This showcases the role of the Transparency International Secretariat as a global coordinator, providing space for chapters across the movement to share expertise and secure national change.

The Integrity Watch platform run by our chapter in **Lithuania**, for example, has won a national competition **for digital innovation in civic engagement**.

In March, data from the **Netherlands'** platform flagged politicians at risk of undue influence. This helped spur the Dutch House of Representatives to **establish an independent integrity commission** to investigate politicians suspected of violating the rules of clean politics.



## Creating a clearer picture of integrity

Alongside new tools, we also generated new knowledge. In September, we launched the People's Perceptions of Political Integrity (PPPI) measure, reporting on 40,000 people surveyed as part of our 2021 Global Corruption Barometer in the EU. The PPPI reveals that **EU citizens perceive a widespread and systemic lack of political integrity**, and that levels of democracy and equality affect their perceptions. People in countries with high levels of economic disenfranchisement, inequality, Euroscepticism and political polarisation are less

likely to believe in their leaders. We are using the findings to help diagnose corruption challenges and design evidence-based responses.

Transparency International also provided expert input for the upcoming [Global Data Barometer](#), and supported our chapters in **Argentina, France, Italy** and **Latvia** to submit national data. This collaborative new project will map out the political integrity data available globally, to identify weaknesses and support scrutiny and accountability. Once ready, this unique open-access dataset will provide **new political integrity data from 108 countries** that

will inform our own policy and advocacy work.

We also focused on better data collection at national level. In **Brazil**, for example, we worked with our chapter to upgrade their digital monitoring tool for detecting political integrity violations and conflicts of interest. The improved tool mapped over 70 parliamentarians in terms of their **engagement on environmental issues, influence in Congress, and ties with the agribusiness and mining sectors**. The chapter is using this information to hold powerful interests to account.



Photo: johnwoo / Flickr



## The world's largest survey on experiences of corruption

For many years, Transparency International has conducted surveys for the *Global Corruption Barometer* in different regions of the world, gathering detailed data from the public. In 2021, we turned our attention to the **EU** and the **Pacific**.

When it comes to corruption, Pacific countries and territories have been among the most under-studied in the world. We set out to change that, asking over 6,000 Pacific Islanders across 10 countries and territories what they thought about corruption, if they had directly experienced it and whether things could change. Launched in November 2021, the result was **the most extensive such dataset ever gathered in the region**. Some of the findings were extremely concerning, revealing high levels of bribery, sexual extortion – or “sextortion” – and vote-buying. Almost one in three respondents who used public services in the last year paid a bribe to do so – higher than any other region we surveyed – and a quarter of respondents have been offered a bribe for their votes. But a majority remain hopeful, believing that their government is doing a good job at tackling corruption.

Interest in the findings was high, helping to spark more informed conversations about corruption at all levels. The Pacific Islands Forum Secretariat responded, as did officials in Samoa, Fiji and Kiribati, while the Federated States of Micronesia cited the report during the 2021 Summit for Democracy. Transparency International was invited to discuss the findings with the Global Organization of Parliamentarians Against Corruption Oceania and the Pacific Association of Supreme Audit Institutions. Civil society groups across the Pacific told us that they appreciate now having **concrete data to help hold leaders to account**.

The *Global Corruption Barometer* for the EU, published in June, found that all 27 countries have their share of corruption problems. In a region often seen as a bastion of integrity, over half of respondents think their government is run by a few private interests, and **29 per cent used personal connections to receive health services** – a finding with potentially life-threatening consequences during a pandemic. But 64 per cent continue to believe that ordinary people can make a difference in the fight against corruption.

We launched these findings with our EU office and held a high-level discussion with members of the European Parliament, who stressed that transparency in lobbying and accountability for the private sector is needed to regain citizens' trust in democracy. » See [www.transparency.org/gcb](https://www.transparency.org/gcb)





A man holds a sign reading "No more corruption" during a protest against President Nayib Bukele and for an independent judiciary in El Salvador, 12 December 2021. Photo: Marvin Recinos / AFP via Getty Images

## Delivering national and global change

Throughout the year, we pushed for political integrity reforms at both the national and international levels. In **Panama**, the **Maldives**, and **Trinidad and Tobago**, we supported national chapters to develop suitable integrity recommendations. We also joined the Expert Advisory Group of a [joint initiative](#) from the Open Government Partnership and National Democratic Institute targeting illiberal foreign influences and contributed to

the European Committee on Democracy and Governance deliberations regarding the accountability of elected officials. Following consultations with several of our EU-based chapters, we prepared a joint submission with our EU office on sponsored political content. At the Summit for Democracy, we worked with our US office to formulate national pledge recommendations to **protect politics from the influence of dirty money from abroad**.

We also helped to reconvene the international Community of Practice on Money in Politics. In 2021, this informal global network met three times, bringing together **political integrity experts and thought leaders** to exchange ideas that can keep political financing in check. The network will be instrumental for our advocacy in 2022, including on the issue of foreign political interference and reform of global lobbying standards.

## Paying for views: the trouble with online political adverts

Although online ads can help level the playing field for accessing politics, the rapid rise of online political campaigning has rendered many political finance regulations obsolete. This is a **growing threat to democracy**, as the 2018 Cambridge Analytica scandal showed.

In March, our *Paying for Views* report, jointly published with chapters in the **Czech Republic**, **Lithuania**, **Spain** and **New Zealand**, proposed five recommendations that would enable regulators to protect transparency online. These included holding platforms and advertisers accountable. In February, we presented the advance findings via testimony to a European Parliament special committee, and in April, we submitted the recommendations to the European Commission's [Justice and Consumers Directorate General](#).

In November, we welcomed the Commission's **adoption of a new proposal** to regulate [transparency and targeting of political advertising](#), which echoed some of our recommendations on transparency of the financing of advertising, and some of our proposals on micro-targeting. Given the stakes involved, this will also be a focus of our advocacy work in 2022.

# PUSHING BUSINESS TO COME CLEAN

## **STRATEGIC OBJECTIVE 4: DRIVE INTEGRITY IN BUSINESS**

In a globalised economy, the business case for fighting corruption is clear. Bribery and corruption distort competition, create uncertainty and lead to exploitation of both resources and customers.

In response, Transparency International is working with the business community to highlight risks and embed integrity across policy and practice. Our vision is a critical mass of businesses acting with the highest standards of integrity – putting citizens before bank balances and confronting the challenges of growing inequality, environmental degradation and climate change. Where corruption persists, we hold business to account and push governments to strengthen deterrents and penalties.



## Getting leading economies to join the fight

In 2021, our Business Integrity Programme created valuable connections with the private sector and advanced important measures for clean procurement, safe whistleblowing and transparent beneficial ownership information.

We primarily targeted the high-level B20 forum, the official dialogue platform between the global business community and the G20. Our **interventions with business leaders** at B20 Integrity and Compliance Task Force meetings throughout the year helped make the case for better anti-corruption safeguards. This led to the task force's Policy Paper 2021 echoing our recommendations on due diligence across supply chains, responsible procurement, whistleblower protection and beneficial ownership transparency.

Our US office also played a significant role in drafting and building momentum for a **bipartisan bill that extends US anti-bribery laws** to corrupt foreign officials who demand bribes - **not** just those who pay them. The bill has garnered diverse support across the business community and civil society, as it protects US companies working internationally.

## Making integrity our business

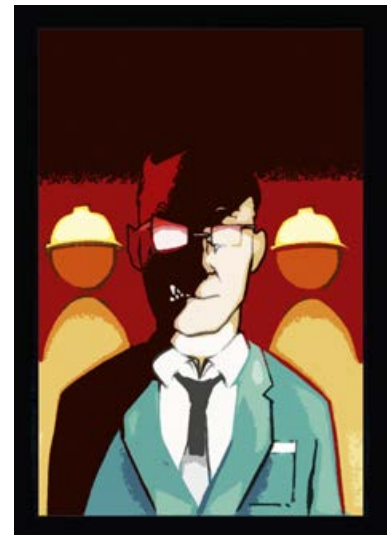
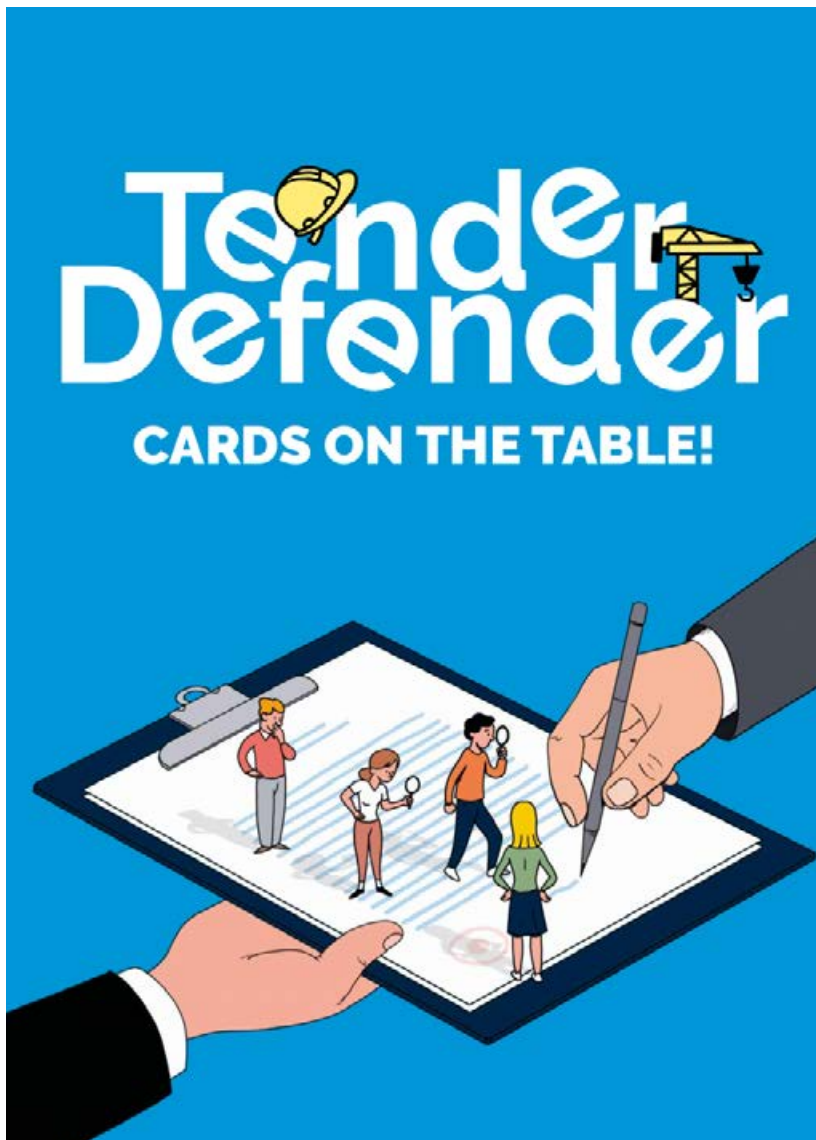
The *Global Corruption Barometer* in the **Pacific** revealed some worrying findings about businesses. A majority of

respondents believe that corruption is a big problem in the business sector, and over two-thirds believe that businesses secure government contracts through bribes and connections, rather than fair competition. The *Global Corruption Barometer* in the **European Union** also revealed that 24 per cent of people believe that most or all business executives are involved in corruption.

To address these challenges and enable more effective work with corporate partners under our *Strategy 2030*, we updated and strengthened our integrity due diligence process. Our chapter in **Chile** also led a mapping of Transparency International's work with the private sector across the Latin American, Caribbean, Middle East, North African and Asia Pacific regions. As well as identifying opportunities for future business engagement, the findings are being used to develop tools and training materials. Elsewhere, we launched an online community for knowledge exchange across our movement, led by our business integrity champions – chapters spearheading anti-corruption work with the corporate sector globally.

These efforts have enabled us to gather good practice, share new ideas and collaborate constructively with the private sector. In 2022, we will use every available platform – from the Organisation for Economic Cooperation and Development (OECD) to the World Economic Forum – to amplify our call for governments and businesses to adopt, implement and enforce international anti-corruption standards and ensure businesses worldwide act with integrity.





Images from “Tender Defender”, a board game we produced as part of our Integrity Pacts project. The game helps civil society groups, journalists and activists learn about public procurement and identify potential corruption risks in tenders involving the private sector.

“ Transparency International has been strategic and systematic in focusing on licensing and approvals as a point of pressure and leverage. This has given their work a level of rigour that is unmatched in this space.

Nicky Black, Director, International Council on Mining and Metals





Protest against the weakening of Indonesia's anti-corruption agency. Photo: Kevin Herbian / Shutterstock

## Business integrity champions

Chapters around the world have also been piloting approaches to make businesses more accountable and encourage higher integrity standards. While strengthening business integrity at the national level, these new tools and partnerships are also informing work with the business sector across our global movement.

With our support, our chapter in **Mongolia** secured a trilateral agreement with the Mongolian **National Chamber of Commerce and mining company Rio Tinto**, for businesses to lead change from within. This agreement established a specialist Business Integrity Centre, marking a new era for ethical private-sector operations in the country.

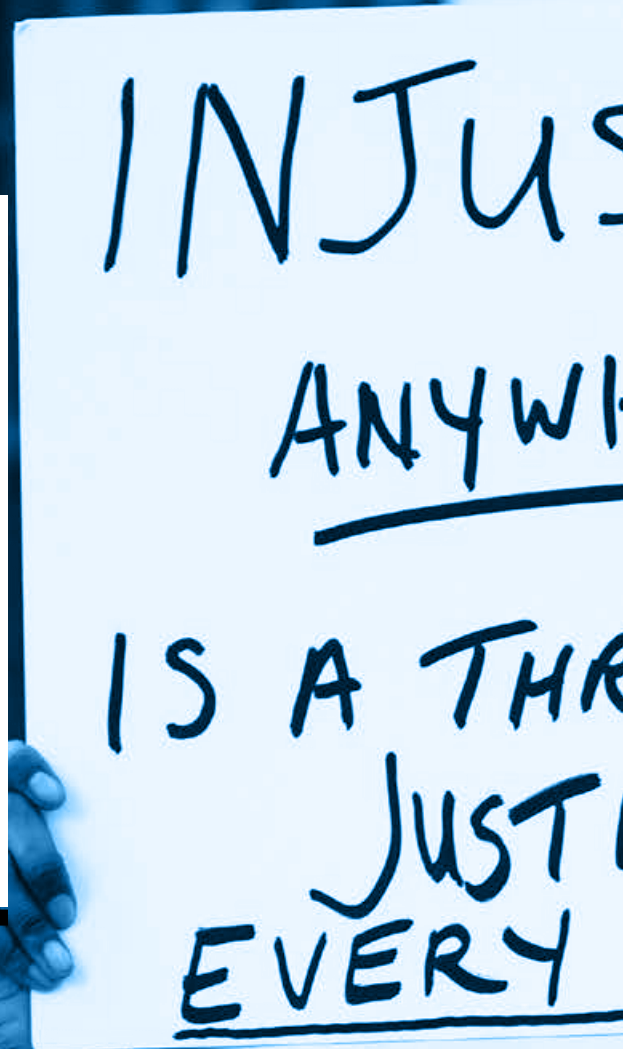
Transparency International's Accountable Mining Programme targets corruption risks in mining licensing – a stage of business dealings particularly vulnerable to corruption. Led by our chapter in **Australia**, 23 chapters have taken part in the programme since 2016. To date, the programme has **secured numerous policy reforms at local, national and global levels** that are delivering long-term impact.

Our chapter in **Kenya**, for example, has established a regional network to monitor mining activities. The network brings together the main mining company in the area, local government, civil society and affected communities, who will continue to consult on future mining deals. This multi-stakeholder platform is an example of successful and sustainable collaboration that embeds integrity into business practice. This is an approach we will foster with other partners in 2022 and beyond.

## **STRATEGIC OBJECTIVE 5: PURSUE ENFORCEMENT AND JUSTICE**

Corruption is not a victimless crime. It has devastating consequences for both individuals and whole societies, but the legal frameworks to prevent and punish corruption are often weak or poorly enforced.

Transparency International works to strengthen the policies, systems and institutions put in place to address corruption – including cross-border mechanisms to restore assets to the countries they were stolen from. In 2021, we continued our global efforts, generating momentum on the heels of hard-hitting investigative exposés of corruption, and building support for victims and witnesses of corruption.



# MAKING SURE CORRUPTION DOESN'T PAY

STICE  
HERE  
REAT TO  
ICE  
WHERE!



Photo: Johnny Silvercloud / Shutterstock

### Cracking down on grand corruption

While the first-ever UN General Assembly Special Session (UNGASS) on corruption in June was a landmark moment, the resulting declaration failed to acknowledge the elephant in the room: **high-level, large-scale corruption, involving vast quantities of assets** – otherwise known as grand corruption. However, it did open a door for a review of the gaps in UNCAC and the broader international anti-corruption framework.

Building on that opportunity, we ramped up our advocacy for the criminalisation of grand corruption, targeting governments and gathering support from civil society partners. In July, we addressed the International Chamber of Commerce and in September and December, we co-organised side-events at the UN Convention against Corruption (UNCAC) meetings of states parties, to maintain the momentum.

While the follow-up on commitments made at UNGASS remains to be seen, the **new US Strategy Against Corruption**

is tackling grand corruption head on. Released in the run-up to the December Summit for Democracy, the strategy defines grand corruption as “when political elites steal large sums of public funds or otherwise abuse power for personal or political advantage”. As definitions of grand corruption have long been omitted from international anti-corruption frameworks such as UNCAC, this acknowledgement follows **years of dedicated advocacy** by anti-corruption actors and paves the way for an action-oriented definition in criminal law and targeted special measures.

Our movement also kept up the pressure at the regional level. When 70 state and non-state anti-corruption stakeholders met to mark **20 years of the Economic Community of West African States Protocol on the Fight against Corruption**, we worked with 10 chapters to assess just how well the protocol has been implemented by its signatories. Our review and its recommendations were discussed during the session and continue to inform anti-corruption advocacy in the region.



## What is grand corruption?

Grand corruption is the abuse of high-level power that benefits the few at the expense of the many, causing serious and widespread harm to individuals and society. It results in the gross misappropriation of public funds or resources, or grave or systematic violations of human rights, and is often transnational in nature.

When a doctor pockets a bribe to speed up a patient's treatment, this is clearly corruption – but **petty corruption**. When a health minister colludes with other officials and companies to siphon public resources away from a country's entire medical system, this is **grand corruption**.

Perpetrators typically include corrupt high-level officials and their accomplices in the private sector – such as professional enablers of financial crime – who work together to siphon off state resources for personal gain. They use their power and influence over law enforcement agencies, regulatory bodies and courts to suppress efforts to expose, investigate and prosecute wrongdoing.





## Rooting out transnational corruption

In another first, the 2021 recommendations of the OECD Working Group on Bribery included specific guidance on how governments should **collectively target the demand side of foreign bribery**. This important progress towards tackling international corruption, regardless of borders, also comes after sustained advocacy by

Transparency International over several years.

Despite this win, efforts to tackle cross-border corruption remain modest compared to the scale of the problem. Progress requires consistent and effective international coordination between governments, and real enforcement of national legal frameworks. We used a position paper to highlight to G20 governments the growing

connection between cross-border corruption, organised criminal networks and economic crime. Evidence presented in the paper included case studies gathered through our ongoing collaboration with investigative journalists. Our submission to the UNCAC Conference of States Parties in December also highlighted the links between corruption and organised crime.

## Digging for the truth with investigative journalists

The Pandora Papers revelations and the Pegasus spying scandal were two investigations in 2021 that clearly demonstrated the value of good journalism in exposing corruption and unethical behaviour.

Transparency International has long recognised this potential through our Global Anti-Corruption Consortium, which brings together investigative journalists and anti-corruption activists. Together, we not only turn corruption exposés into headlines, but also **drive systemic change** through advocacy and legal proceedings.

In 2021 alone, Transparency International made 34 legal submissions in 17 countries. Some take years to bear fruit, but the reward is seeing justice done. In December 2021, for example, a submission made in the previous year led to two former Angolan officials losing access to their US-based assets. Leopoldino Fragoso do Nascimento and General Manuel Hélder Vieira Dias Júnior were **sanctioned for misappropriating public funds** for their personal benefit during their time in government. This followed years of advocacy by our chapter in Portugal, and Angolan activists, journalists and ordinary citizens. Other highlights last year saw solid investigative work by our media partners achieve real change:

- + Several European politicians are being investigated as part of the **Azerbaijani Laundromat case**, for their role in allegedly receiving bribes to help the country launder its human rights record.
- + The EU advanced its legal action against Cyprus and Malta over their **golden passport schemes**, which have allowed corrupt and criminal foreign nationals to receive citizenship in exchange for money. Members of the European Parliament heeded the recommendations compiled by our EU office when drafting proposals for EU-wide legislation to end citizenship-for-sale schemes and regulate residency schemes.
- + Germany corrected its **beneficial ownership register records** to reflect the previously undisclosed links of former Czech prime minister Andrej Babiš to Agrofert's German subsidiary. The case highlights the power of public registers for detecting conflicts of interest, as well as the need to properly check the data they contain.

## Justice for victims

Asset recovery is a process for returning the stolen proceeds of corruption to the country or community from which they were taken.

In a **win for victims of corruption**, the G7 policy paper adopted in September underlined that such confiscated assets should be returned in a manner that is transparent and accountable, and ultimately benefit those harmed by the corruption. It also noted the importance of asset confiscation without a conviction. This followed recommendations we made at a G7 consultation with civil society. Elsewhere, we ensured victims' rights were raised at an UNGASS side-event

for policymakers which we co-organised in June, and at a December webinar ahead of the Summit for Democracy.

The OECD Working Group on Bribery also began seriously considering victims' rights, following substantial advocacy by ourselves and other civil society organisations. While the group did not include the subject in its 2021 recommendations, our sustained efforts have ensured that the issue remains on the OECD agenda.

## Cementing protection into law

When corruption or conflicts of interest are exposed, the law can be used as a tool for

pursuing justice. In **the Gambia**, for example, we helped our partner to successfully mount a legal challenge against the Gambian National Assembly for awarding its own members 54.5 million dalasi (over US\$1 million) in loans. Granted from the national budget, the money was authorised for private use by members and staff of the legislature. When our partner brought the case before the Supreme Court, our research was used as the basis of the amicus brief – and the funds were **successfully returned to the public budget**.

Although the law can provide important protection, new laws can also be introduced that chip away at rights or clamp down on freedoms. In 2021, we supported



several of our chapters to push back against restrictive new laws in their countries.

In April, our chapter in **Brazil** joined a public campaign that successfully blocked the approval of two bills that would have incentivised land grabbing in

areas generally associated with deforestation and conflict with local communities. On the other side of the world, our partner in **Fiji** joined other civil society actors to successfully advocate against a draft policing bill containing worrying proposals to limit access to information and

bypass important privacy laws. Thanks to the involvement of young people in this campaign, the bill was withdrawn by the prime minister.

## Using the law for good

Sometimes, exposing corruption begins with a single story, either from a concerned citizen or a direct victim. When this happens, our **Advocacy and Legal Advice Centres** in 62 countries around the world listen carefully.

These centres provide free, confidential advice and support to victims and witnesses of corruption. Our purpose is to help deliver justice in individual cases, and to drive systemic change for society as a whole. While some people only seek advice to make informed decisions, our centres can take specific cases to court or amplify a complaint through major public advocacy campaigns.

One of the many successes of 2021 took place in the **Maldives**, where 52 families secured financial compensation for being relocated from their homes, after a five-year fight for justice. Our chapter first campaigned about the case in 2016, when these families were moved to a new island by the government, but were not provided with proper replacement housing.

In **North Macedonia**, as a result of many reports of nepotism and clientelism in public administration, our chapter made 42 recommendations to the government on ways to improve appointment procedures. In 2021, the first recommendation was adopted by the government, which created a plan for amending the regulations for public-sector employees. The chapter continues to monitor progress closely.

The cases reported to our legal advice centres can also kick-start broader reforms. Based on information received from citizens, our chapter in **Serbia** successfully pushed for the National Assembly to publish the reports of independent oversight bodies – including the Information Commissioner and the Anti-Corruption Agency – as a step towards more effective public scrutiny of the government's work in these areas.

In **Palestine**, our chapter followed up on anonymous reports that businesses were falsifying their accounts to the Ministry of Finance, amounting to vast tax evasion that stretched back an estimated 15 years. After our chapter's work with the Anti-Corruption Commission, a new set of measures to prevent this from occurring in future is now being considered.



# RAISING A COLLECTIVE VOICE AGAINST CORRUPTION

A blue-tinted photograph of a person shouting into a megaphone, with other people visible in the background, suggesting a protest or public demonstration.

## **STRATEGIC OBJECTIVE 6: EXPAND CIVIC SPACE FOR ACCOUNTABILITY**

Societies rely on concerned individuals, civil society organisations, whistleblowers and the media to speak up, expose abuses of power and trigger change. But anti-corruption fighters around the world are increasingly under threat.

Coming to their aid is a core pillar of our work – through legal advice, whistleblower protection, rapid responses, and demands for better legal and institutional frameworks. This not only makes a difference for the individuals involved, but protects everyone by working towards an environment that allows people to speak out safely against corruption, and be heard.



Photo: Rawpixel.com / Shutterstock

## Anti-corruption activists as human rights defenders

One of the most important developments in 2021 was **official UN guidance** – for the first time – on how to support and protect anti-corruption activists.

This has been set out in a draft report by the UN Special Rapporteur on Human Rights Defenders, which recognises the grim situation faced by many who speak out against corruption. **The report reflects both our recommendations and the detailed testimonies submitted by our chapters in Argentina, Brazil, Colombia, Ecuador, Palestine, Peru, Russia, Venezuela** and elsewhere. It also extensively references our new research findings (» **See p. 46**)

on the need to ensure that existing protection mechanisms are sensitive to those at risk of discrimination.

The report goes before the UN Human Rights Council in March 2022, as they discuss ways to strengthen national and international protections for anti-corruption activists.

Unfortunately, other parts of the UN sent a very different message. Eight prominent civil society groups, including our chapter in **Georgia**, were prevented from attending the UNCAC Conference of States Parties due to an objection raised by Turkey. Their exclusion shows that the UNCAC rules of procedure must be revised – a change we will be pushing for with our partners.

## Protecting whistleblowers from retaliation

Whistleblowing is one of the most effective ways to uncover corruption and other wrongdoing that harm the public interest. Enforceable national laws are needed to protect those who bravely speak up and report corruption.

In the EU, a new directive **promised to protect whistleblowers** in all countries by the end of 2021 – an important development, given that 45 per cent of European citizens surveyed in our 2021 *Global Corruption Barometer* fear reprisals if they report corruption. Throughout the year, 20 of our chapters and our **EU** office

actively monitored how this directive was being transposed into law in each country, and submitted recommendations to relevant governments. When it seemed likely that many countries would fail to meet the deadline, we **mounted an online campaign** to mobilise EU citizens.

In **Denmark, Lithuania and Sweden**, our recommendations were reflected in new or updated whistleblower laws. Unfortunately, 22 other EU countries are significantly behind schedule, so in 2022 we will step up pressure to fulfil this important directive.

Elsewhere in the world, we supported our chapter in **Mongolia** to provide input and recommendations to

the government, which subsequently adopted new whistleblower protection laws. In February, a campaign led by the Whistleblowing International Network and supported by our chapter in **Ukraine** led to the country's president vetoing proposals that would have stripped valuable legal protections from whistleblowers.

For World Whistleblower Day in June, we flooded social media with information on how to report wrongdoing through our Advocacy and Legal Advice Centres globally, and receive follow-up support. This includes mobile centres, which travel to rural communities which may otherwise be unable to access help.

“ [Those] who work against corruption are often attacked for exposing or looking into abuses of power, graft, bribery, fraud and other malpractices. Despite often very dangerous circumstances, I continue to be impressed by the real success many have achieved in their work against corruption.

Mary Lawlor, UN Special Rapporteur on Human Rights Defenders



## Blowing the whistle on corruption

Speaking up against corruption often means **challenging powerful interests**, which can be inherently dangerous. That is why we fight to ensure that people who blow the whistle on wrongdoing are protected from harassment or retaliation.

In 2021, we joined global calls to protect six individual whistleblowers facing extreme retaliation for speaking truth to power. Three cases involved staff from UN agencies responsible for global health, development and human rights affairs. One case involved two former bank employees from the Democratic Republic of the Congo, who were sentenced to death after reporting their employer's possible involvement in a major money laundering network – a draconian sentence handed down in a way that undermined their rights to a fair trial.

We also helped to free Jonathan Taylor, who in 2013 blew the whistle on a massive bribery scheme in the offshore oil industry. He was detained in Croatia for a year, due to a retaliatory extradition request from Monaco. We joined other civil society partners to call for his immediate and unconditional release, including through direct letters to the governments involved. Thanks to this **international pressure**, Jonathan was able to return to his family in the UK this year.

The extreme punishments facing these whistleblowers highlight the very real risks that some can encounter when speaking up. They also reveal how powerful vested interests can influence the legal processes and institutions meant to provide impartial judgements – unless public attention brings this influence to light.



2021 International Anti-corruption Day event on 11 December 2021, Harare, Zimbabwe. Photo: Transparency International Zimbabwe



## Rapid threats and security support

Disturbingly, threats against our own staff and partners are also on the rise, ranging from digital security attacks and orchestrated smear campaigns to intimidation, investigations and lawsuits. In 2021, we supported 23 chapters and 3 partners facing such attacks, by providing risk management assistance, security advice and crisis support – including following political upheavals. This was the case in **Myanmar**, for example, where the immediate priority was to

ensure that our partners were safe, before joining calls for the EU to support Burmese civil society and for targeted sanctions against the military junta.

In **Kazakhstan**, the government and tax authorities withdrew draconian measures to limit civic space, following our joint advocacy with our national chapter. The measures, including fines, had targeted civil society organisations working to promote election integrity, human rights and public oversight. We published a statement calling on the government to end the

harassment and uphold the rule of law, which was widely circulated by many national media outlets and journalists. Following this public pressure, the government backed down.

Combined with our efforts in 2021 to protect whistleblowers and expand civic space, especially through assisting people to access information and claim their rights ([» See p. 39](#)), this security support will provide a stronger foundation for Transparency International to protect those who call out corruption around the world.

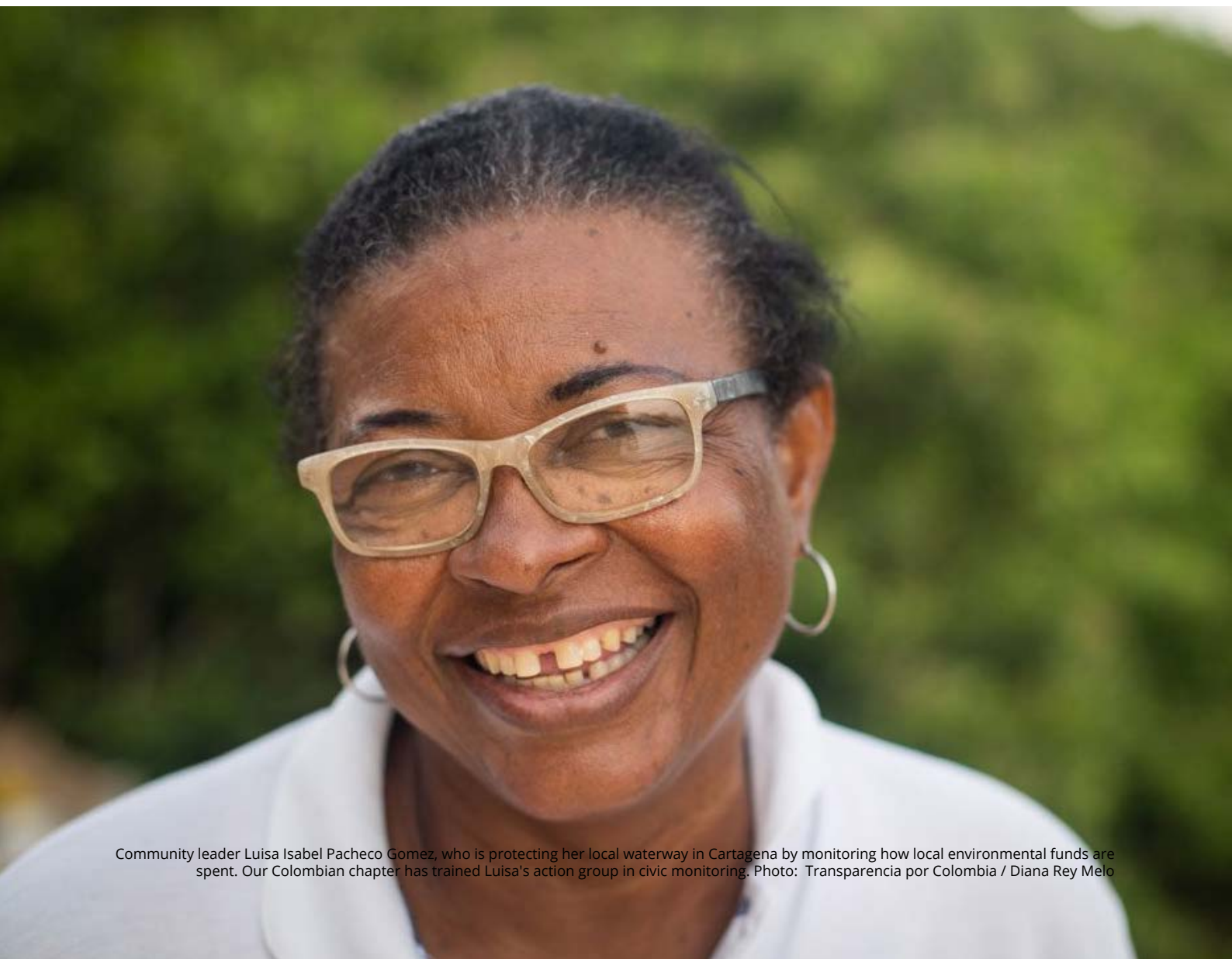


A Chiquimula community leader speaks during the National Dialogue for Democracy held by our Guatemalan chapter in December, attended by representatives from across the country. Photo: Acción Ciudadana

## Creating space to monitor

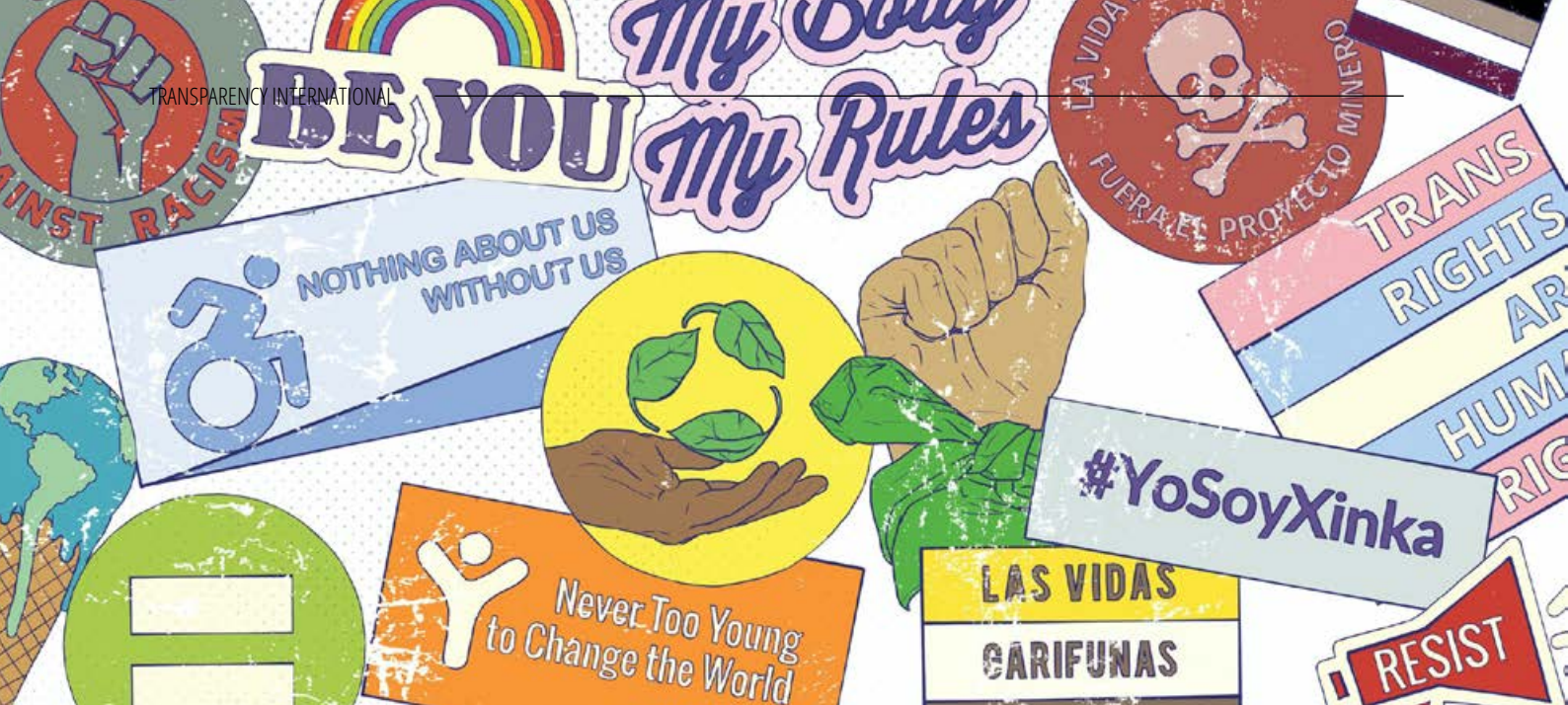
Our governments work better when citizens and civil society groups hold them to account, ensuring fairness and transparency in decisions that affect us all. But when normal checks and balances are not performing as they should, ordinary people find they have little space to raise concerns.

A new Transparency International project launched in 2021 is connecting **citizen groups across 21 countries** to build momentum for more responsive governments and stronger institutions to oversee them. During this first year, our chapters began monitoring 20 parliaments and oversight institutions around the world. In **Indonesia**, for example, our chapter worked with the Judicial Monitoring Coalition to ensure transparency in the appointment of new Supreme Court Justices, by checking candidates' track records, monitoring the selection process and holding hearings with the Judicial Commission.



Community leader Luisa Isabel Pacheco Gomez, who is protecting her local waterway in Cartagena by monitoring how local environmental funds are spent. Our Colombian chapter has trained Luisa's action group in civic monitoring. Photo: Transparencia por Colombia / Diana Rey Melo





## Countering a double harm

Corruption thrives in the shadow of discrimination, making it even harder to prove, denounce and uproot.

People already dealing with structural racism, sexism or homophobia are more likely to be on the receiving end of corrupt demands, because dishonest officials know they are less likely to be held to account when they prey on marginalised communities. Some forms of corruption even **target particular groups** – for example, sextortion, with women overwhelmingly the victims. The extortion of LGBTQI+ people is another example.

Despite this, academic and policy debates have been largely silent on the way that discrimination and corruption interact. To fill a glaring gap, we partnered with the Equal Rights Trust to produce a ground-breaking 2021 report, *Defying Exclusion: Stories and Insights on the Links between Corruption and Discrimination*.

The report gathered **evidence about how corruption affects the daily lives of vulnerable groups around the world**, uncovering disturbing patterns.

An unprecedented wealth of data has also been collected through our 2021 *Global Corruption Barometer* survey in the EU and Pacific regions. The gender-disaggregated responses have allowed us to publish a paper

on [gender barriers to reporting corruption in the EU](#), revealing that women are less likely to report corruption and seek redress than men. New questions on sextortion in the survey have captured the disturbing prevalence of this egregious form of corruption.

We are now developing a movement-wide approach to sextortion, and have commissioned a study on sextortion in sports. We have also initiated partnership discussions with international organisations and NGOs working to uphold human rights and end discrimination.

## “ We were looked down on, made invisible and denied our rights

Ever Benito, Xinka leader, Guatemala, describing his community's fight to protect their land from corrupt deals. His story is included in our report, which features the voices of people battling both discrimination and corruption.

## National successes against corruption and discrimination

In 2021, our chapter in **Mozambique** published the results of an undercover investigation at Ndhlavela Women's Prison. Inmates were forced into prostitution by prison guards, who reportedly sexually harassed and physically abused them. These revelations had an [immediate impact](#). The Ministry of Justice suspended the prison's management and [announced a high-level inquiry](#), which has already resulted in a formal change of management and new measures to prevent future abuse. The official investigations continue, and the case is expected to go to court to seek justice for the victims.

In **Sri Lanka**, numerous victims trusted the staff of the Transparency International legal assistance centre enough to come forward and report the sexual extortion – or “sextortion” – they experienced when applying for microfinance loans. Our chapter ran a national campaign demanding action, which led to an invitation from the Central Bank to discuss the issue. Following this, the chapter was invited to continue gathering evidence and submit a formal complaint. This case will now be used to push for evidence-based policy change to prevent sextortion.

Such cases of sextortion overwhelmingly affect women and vulnerable individuals. They are just one example of how corruption – while it hurts us all – does not affect each of us equally.

In 2021, many of our chapters focused on how corruption and gender-based discrimination interact. Our chapters in **Nepal** and **Pakistan** developed partnerships with women's organisations, and rolled out measures such as ensuring female interviewers for surveys and a gender balance on speaking panels. In **Cambodia**, similar changes resulted in 57 per cent of participants in our chapter's activities being women. We published an innovative new regional report on best practices for addressing the links between gender and corruption across **Latin America and the Caribbean**, while our chapter in **Venezuela** examined how corruption affects migrant women in the context of COVID-19.

Other vulnerable and disenfranchised groups have also been rightly centred as we seek to understand the many faces and experiences of corruption. In the **Maldives**, **Nepal** and **Vanuatu**, our chapters are working with organisations focusing on people living with disabilities. Chapters in **Fiji** and **Pakistan** are supporting young people to drive anti-corruption initiatives, while multiple chapters, from **Rwanda** to **Peru**, continue to actively include indigenous groups and ethnic minorities in anti-corruption outreach initiatives.



# THE NEXT GENERATION OF CORRUPTION FIGHTERS

## **STRATEGIC OBJECTIVE 7: BUILD COMMUNITY LEADERSHIP AGAINST CORRUPTION**

In villages and cities across the world, in countries large and small, our movement is helping to build the next generation of civic, public and business leaders. We inform and mobilise people to generate public pressure and help change the conversation about corruption.





## Reaching communities and young people

Corruption reaches into all aspects of society, affecting all levels. But many affected communities, such as rural populations and young people, are often overlooked by government programmes designed to help, or they lack access to reporting channels and information about their rights.

Our chapters understand the importance of outreach in expanding the fight against corruption. Young people are central to this vision. From housing shortages to educational inequality, corruption lies at the root of many problems that the world's youth experience.

We are expanding opportunities for communities and young people to take action against corruption, from informing young people in **Vanuatu** about their voting rights and constitutional protections, to setting up anti-corruption clubs in **Zimbabwean** schools.

Many of these approaches are being driven by a grouping of national chapters under our new cross-chapter Youth Integrity Initiative. In the coming years, we will build this up into concerted global action, connecting with partners to create a network of young people engaged in fighting corruption.

**Watch out for more on this in 2022.**

Youth representative Fredlyn Turimbo reads through the materials in Transparency International Papua New Guinea's Active Civic Engagement programme. Fredlyn was one of 48 representatives from 13 District Youth Associations who participated this workshop, held in December in the Autonomous Region of Bougainville, an area still recovering from a 20-year civil war. Photo: TI Papua New Guinea

## Special initiatives: stories, music and films for change

**Journalists for Transparency (J4T)** is a collective of over 80 journalists and storytellers who report on issues of transparency and corruption from around the world, supported by Transparency International. The collective's purpose is to inspire, enable and empower young journalists to do investigative work that exposes corruption and its devastating impact. In 2021, journalists supported through the initiative continued their investigations, including a book documenting corruption within refugee responses and migration routes.

**Fair Play** is a movement of thousands of young change-makers using the power of music to spark social change through events and concerts by local artists. The biannual Fair Play Live competition, run by Transparency International, screens music videos from young bands that focus on social justice issues. In 2021, previous winners performed at the UNGASS Youth Conference, viewed by over 4,000 people around the world.

**Films4Transparency** is a biannual film festival showcasing compelling films and documentaries that expose corruption and injustice, and inspire citizens to act against these issues. The festival takes place across the globe, connecting filmmakers and activists, and building a network that delivers positive social change. In 2021, it again hosted a special "Window for Transparency" session at the Latin American Human Rights Film Festival, and partnered with the Geneva Human Rights Film Festival to support the advocacy campaigns generated by eight new documentaries.

All three initiatives will come together again in December 2022, as part of our next International Anti-Corruption Conference.

Transparency International Zambia staff member Agnes Musamba sitting with students from School Anti-Corruption Clubs. Our chapter regularly interacts with these clubs, set up by the Zambian Anti-Corruption Commission, to engage and equip a new generation of corruption fighters. Photo: Transparency International Zambia







# CHANGING HOW WE WORK

## OUR COMMITMENTS TO DRIVING CHANGE

A new strategy means new ways of working. As the coordinating hub for over 100 independent chapters and contacts across the globe, the Transparency International Secretariat ensures that the whole movement can act together as one.

Under our *Strategy 2030: Holding Power to Account*, all this work is underpinned by a set of core commitments. We raise local voices to the global level, build critical partnerships and launch joint campaigns, and provide the support needed to fight corruption – when and where it occurs.

Photo: NASA / Unsplash

**STRATEGY 2021 – 2023**

Long-term agenda that stretches up to 10 years, including objectives and outcomes

STRATEGIC CYCLE 2021 – 2022

STRATEGIC CYCLE 2023 – 2026

STRATEGIC CYCLE 2027 – 2030

**Agile timeframes**

The new strategy is divided into three strategic cycles, so that we can be more flexible and adaptable. The Secretariat's Implementation Plan follows these same cycles.

**Connected global and national strategies**

A highly diverse movement of more than 100 national chapters and contacts requires significant alignment. While each chapter sets their own priorities based on the most serious corruption challenges in their country, the entire movement joins together under seven shared strategic objectives.

In 2021, the Secretariat focused on laying the right groundwork for this. Based on the Implementation Plan and Road Map for the first cycle (2021-2022), we developed an Annual Plan to translate our strategic ambitions into concrete operational actions for the year. We reviewed our organisational structure and processes to ensure they are fit-for-purpose for delivering our new strategic goals, and surveyed chapters around the world to map how their priorities contribute to the global strategy and inform coordinated action. We also launched a worldwide Strategy Hub, since visited by over 400 members of our movement to exchange information, resources, expertise and good practice.

**Effective coordination, advocacy and support**

2021 was a year of creating movement-wide conversations on specific themes, such as our "Dirty Money Exchanges". This was cemented through a new annual event dedicated to learning and planning for action, the Movement Summit. The first summit took place in September, with over 50 speakers and 250 participants from across our chapters and partners.

This has freed up our existing Annual Membership Meeting to focus on governance issues. The International Council – which acts as an independent expert advisory organ – is becoming a more active resource for the movement. The Board appointed one member of the International Council as a new Independent Member of the Board. Rules of Procedure were developed to clarify the distinct roles of the Board and the CEO. We have also embarked on a review of our chapter accreditation policy and agreements.

Our day-to-day support for chapters has continued, in addition to new rounds of

regional discussions and an "ideas generator" forum on corruption and COVID-19 responses. The Secretariat continued to coordinate a range of joint actions, from press statements to advocacy campaigns. We also successfully encouraged donors to fund work directly in Lebanon and Mexico – a localisation of funding which empowers chapters to fight corruption in their national contexts.

**40+**

**different nationalities represented among staff at the Transparency International Secretariat**

## Stronger partnerships and presence

With 96 national chapters, 4 chapters in formation and 13 national contacts, the scope of the global Transparency International network continues to be our main strength when it comes to effective and far-reaching action against corruption. At board level, we have begun developing a vision that expands our concept of national presence to cover new forms of collaboration, especially in volatile contexts where a full chapter may not be possible. This will encompass temporary partnerships, project-specific collaborations, media outreach and advocacy campaigns – so that we can more impactful, when and where it matters.

We also took several key steps at country level to increase our strategic presence. We are helping our US office evolve into an autonomous entity, with a view to achieving national chapter status in the future. In China, we have discredited our existing partner, giving us more opportunity to engage with new actors. In Fiji, which acts as a hub for regional and international organisations in the Pacific, our partnership transitioned into a national contact. In the Middle East, we have secured funds to work for the first time in Iraq, a post-conflict state and pivotal actor in the region.

## Principles and methods

Our new strategy commits us to being **inclusive and**

**intersectional** in all we do.

This means considering the inequalities – in factors such as age, origin, religion, gender, ethnicity, education or sexual orientation – that make some groups more vulnerable to corruption and discrimination. In 2021, we reviewed several core policies to reflect this principle – including our Child Protection Policy and our Policy on Sexual Abuse, Exploitation and Harassment – and Secretariat staff have received unconscious bias training. These efforts are starting to bear fruit. The 2021 staff survey found that 71 per cent of staff perceive the Secretariat to be an inclusive organisation – a major improvement from 42 per cent the previous year. To embed these principles in our work around the world,

## Expanding our presence through multi-country projects

One way in which the Secretariat supports the movement is through designing, fundraising for and managing multi-country projects. In 2021, we managed 42 projects in cooperation with 80 national chapters across five regions.

For example, through our “Indo-Pacific Partnership for Strong, Transparent, Responsive and Open Networks for Good Governance”, we supported our chapters and partners in 16 countries to push collectively for increased accountability from public and private institutions. In 2021, we engaged **nearly 26,000 people** through surveys and campaigns, sparking conversations about corruption and sharing information about rights. We specifically reached out to networks of young people, women, people living with disabilities and other groups particularly affected by corruption, to ensure their voices were heard. We also lobbied public institutions to adopt and action anti-corruption frameworks, and provided best-practice recommendations, particularly around procurement in the COVID-19 response.



we are generating research on the links between corruption and discrimination, and will roll out new project guidelines for mainstreaming gender and diversity in 2022.

We also commit to being **climate and environment conscious** in all our operations, and to help address corruption challenges associated with the climate crisis and natural resource issues. In 2021, we finalised our environmental policy, making it part of our staff code of conduct, and started work on measuring and reducing our annual carbon footprint. Through our climate integrity programme, we have maintained and developed important partnerships, and have begun to mainstream environmental considerations in key projects.

Being **evidence-based** is at the heart of all our work,

from advocacy to technical recommendations. We have developed new tools and methodologies for designing robust policies, while our flagship research products continue to be used across the movement. Our Helpdesk answered 99 requests for research support from the movement and our partners this year, resulting in the publication of 55 fully developed briefs for the [Anti-Corruption Knowledge Hub](#), on issues as varied as gender mainstreaming in UNCAC processes and non-conviction-based asset forfeiture. We also ensured that all relevant projects led by the Secretariat receive support for research design and data analysis.

Our *Global Integrity Monitor* has been accompanied by a new generation of tracking instruments to detect and counter risks and undue influence in political decision-making using

open data. We are also ramping up efforts to be more **tech-savvy**. In 2021, our focus has been on strengthening collaborative technology within the movement, including through bringing more chapters and colleagues onto our central IT platform and hosting the Movement Summit online. We also strengthened the cyber security of the Secretariat and our most exposed chapters.

In the coming years, we will use this internal foundation to look outward. New forms of technology can be used to hinder or enable corruption, and Transparency International needs to be a voice for good in this context.

Launched in March, our *SDG16 Spotlight Reporting Initiative* is just one example. Gathering data from 16 chapters, this online tool allows activists to check whether their country is meeting the



Participants at the 7-day Integrity School run by our chapter in Jordan in 2021 for young community activists from all across the country. Photo: Rasheed for Integrity and Transparency

## Key research products in 2021

- + January: *Corruption Perceptions Index 2020*
- + March: *Paying for Views: Solving Transparency and Accountability Risks in Political Advertising*
- + March: *Are EU Governments Taking Whistleblower Protection Seriously? Progress Report on Transposition of the EU Directive*
- + May: *The Right Incentives? The Risks of Undue Influence in Tax Policy*
- + May: *Access Denied? Availability and Accessibility of Beneficial Ownership Data in the European Union*
- + June: *Global Corruption Barometer - European Union 2021*
- + June: *Defying Exclusion: Stories and Insights on the Links between Discrimination and Corruption*
- + September: *For the Common Good or Private Interests? People's Views of Political Integrity in the European Union*
- + October: *Finding a Voice, Seeking Justice: The Barriers Women Face to Reporting Corruption in the European Union*
- + October: *Global Corruption Barometer - Pacific 2021*

anti-corruption targets agreed to under Sustainable Development Goal 16 – promoting peace and justice – and if not, to propose evidence-based solutions. From 2022, other countries will start adding their data to the tool. We have also begun identifying sources of funding to enable us to break new ground in research and policymaking, on topics including cryptocurrencies, blockchain technology for anti-corruption and micro-targeting in online political advertising.

We have also committed to be **protective of our people**. Direct threats against us are on the rise, along with restrictions on civic space and significant political upheavals. These threats forced us to cease operations in three countries in 2021, and to provide rapid support and incident

response for our movement and allies elsewhere.

Throughout 2021, we released 15 media statements in coordination with our chapters to support national chapters and contacts under threat, activating our social media profiles and website to apply pressure where needed. We supported 23 chapters and 3 partners with security advice, incident response and risk management. In the wake of the Pegasus spyware revelations, we issued security guidance on mobile phones to all our chapters and checked whether key staff had been potential targets.

We also finalised a security e-learning course, shared strategies to maintain operations in restricted environments, stepped up multifactor

authentication for online security and supported 27 chapters to deploy a new case management system for their Advocacy and Legal Advice Centres, to better protect sensitive information and extract meaningful data.

In 2021 we took crucial steps to foster a culture in which Transparency International and those representing us are **ethical and accountable**, to establish a safe, secure and inclusive working environment for all. We put in place the foundations of a new Integrity System, including an updated Code of Conduct and Violation Reporting Policy. External and internal webpages explaining the new framework are now available, including the channels available for reporting integrity violations. This will form the basis for further



developments in 2022 and beyond.

## Impact and learning

In 2021, we created a system to allow both the Secretariat and the movement to track progress towards our shared strategic objectives. We drafted a Monitoring, Evaluation and Learning Policy that outlines our approach, from Secretariat-led projects to national chapter strategies, and provides guidance on areas such as data collection processes and key roles and

responsibilities. The Secretariat also put in place biannual internal reviews to check progress, inform learning and produce reports. We established a movement-wide database with baseline data and have made plans for movement-wide progress reporting, which we will roll out in 2022. In addition to ongoing efforts to implement high-quality monitoring and evaluation frameworks for our projects and programmes, we also conducted reviews and commissioned independent evaluations of our work.



Spokespeople from Transparency International Spain prepare for an interview on the country's corruption ranking with Televisión Española. Photo: David Martínez / Transparency International Spain



# GOVERNANCE AND ORGANISATION



Transparency International is a German-based association with 101 members, comprised of 96 national chapters and 5 individual members. Our 4 national chapters in formation and 13 national contacts do not have membership status or voting rights.

Our highest decision-making body is the Annual Membership Meeting, where all our members come together to discuss critical issues, pass resolutions and elect our Chair and Vice-Chair. Members also elect the Board of Directors, Transparency International's central governing body.

Our International Council is a body of experts providing advice to the movement as a whole. Members of the council are appointed by the Board of Directors and can run for Chair, Vice-Chair and Board elections.

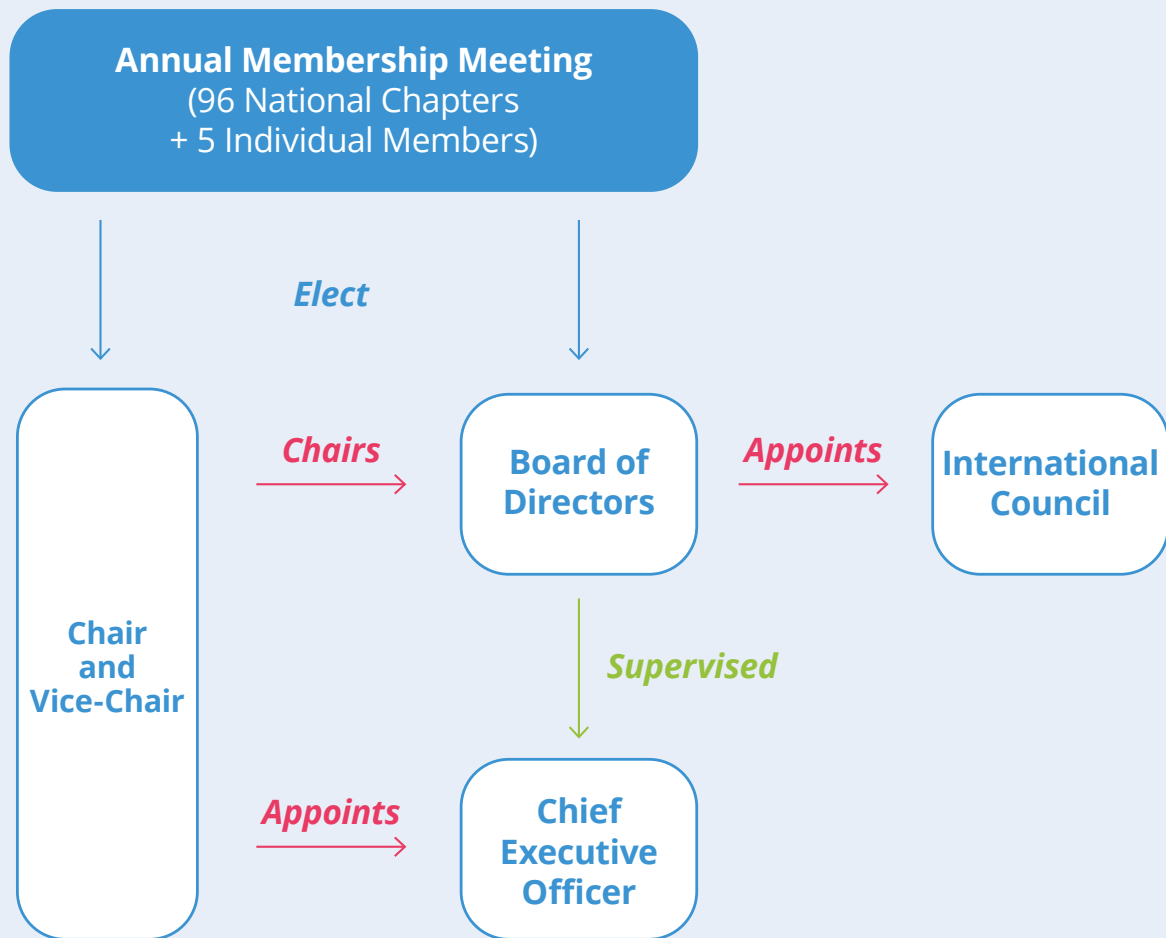
Our Chief Executive Officer oversees the operations of our offices in Berlin. From 2022 on, the Transparency International Washington Office is becoming an independent national chapter in the US.

In 2021, the Annual Membership Meeting elected three new Board Members – Dion Abdool, Eka Gigauri and Alberto Precht – and adopted two resolutions.

The first flagged that “democracy has been one of the victims of the pandemic”, noting that governments around the world continue to abuse executive powers and curtail civic freedoms under the guise of the COVID-19 public health emergency.

The second declared the fight against corruption incompatible with the abuse and neglect of fundamental human rights, as these undermine the sustainability of anti-corruption reforms. Our members also called on governments to fight corruption as a means of countering human rights abuses.

# TRANSPARENCY INTERNATIONAL'S GOVERNANCE STRUCTURE



Transparency International's Secretariat in Berlin.  
Photo: Max Kempter / Transparency International

# FINANCE

In 2021, we further professionalised the Transparency International Secretariat's financial management systems. A set of new policies extended the scope of our financial manual, including an important review of tax compliance systems, and we expanded our budgeting and mid-term financial planning tools. Below we present a summary of our income and expenditure for 2021.

## Income<sup>3</sup>

Our operating income in 2021 reached €17.4 million, a €5 million (22 per cent) decrease compared to 2020.

The reduction was mainly related to a €4.3 million (25 per cent) drop in restricted income – partly due to the effects of the pandemic, which slowed the inception of new projects, and partly to the delayed effects of limited internal capacity to fundraise for new grants. The fundraising team is now fully resourced and their efforts have already led to an increase in the size of the 2022 project portfolio.

Unrestricted income in 2021 decreased by €739,000 (14 per cent) compared to 2020, mostly due to the end of an

unrestricted grant from the Dutch government.

## Expenditure

Our operating expenditure in 2021 totalled €17.3 million, with a decrease of €5 million (22 per cent). This drop in expenditure is due to the same factors which lowered our income: a smaller portfolio of projects, the implementation of which has been partly delayed by the pandemic.

Transfers to partners decreased by €1.6 million to €7.5 million. However, their share of our total expenditure increased from 40 per cent to 43 per cent.

Other expenses decreased by €2.9 million (54 per cent) when compared to 2020, a year in

which large surveys for the *Global Corruption Barometer* significantly increased costs in this category. Travel costs remained minimal in 2021, due to pandemic-related restrictions.

Staff costs decreased by €435,000 in 2021 due to turnover, which had a more limited effect on staff costs in 2020.

<sup>3</sup> Numbers are provisional, due to an ongoing external and annual financial audit (to be completed by May 2022).

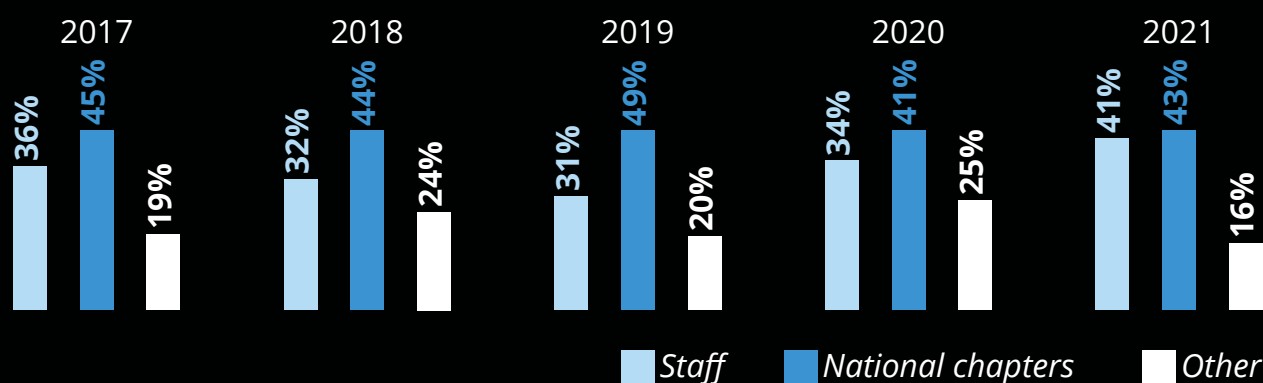


## CHANGES IN INCOME OVER TIME

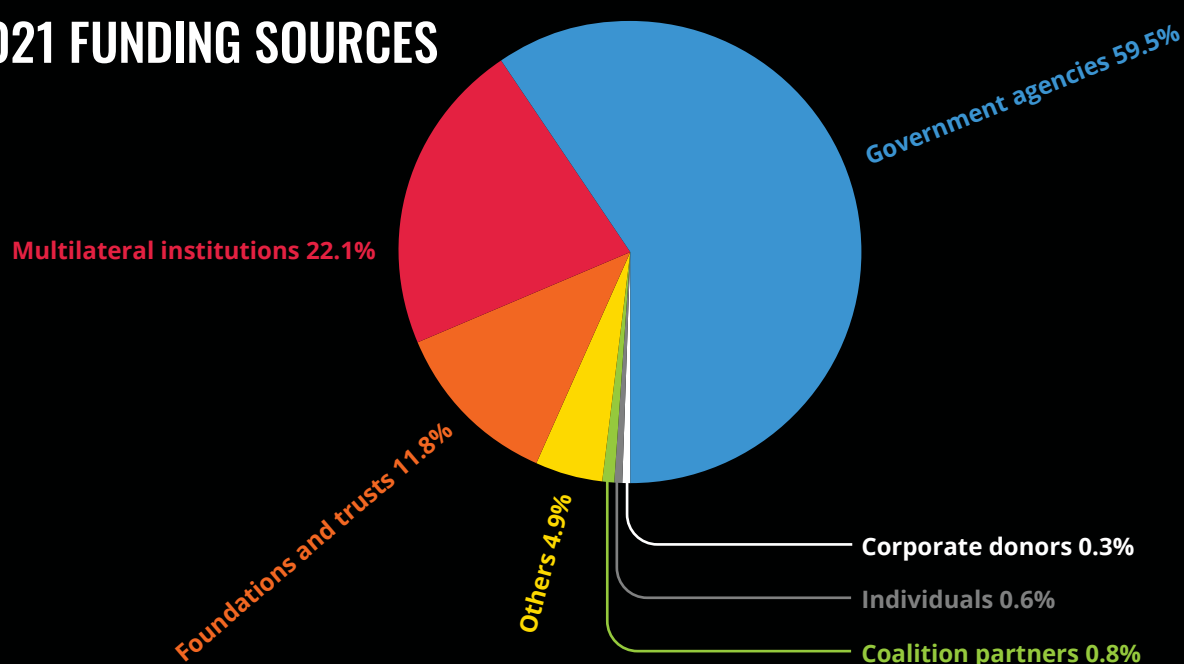
	2017	2018	2019	2020	2021
Unrestricted	3.6	2.7	4.3	5.4	4.7
Restricted	17.3	19.6	20.6	17	12.7
Other	0.1	0.4	0.1	< 0.1	< 0.1
Total	20.9	22.7	25	22.4	17.4

*Income in millions of Euros*

## CHANGES IN EXPENDITURE OVER TIME



## 2021 FUNDING SOURCES



# 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](mailto:fundraising@transparency.org). To make a gift today, please visit: [www.transparency.org/donate](http://www.transparency.org/donate).

## 2021 Donors

### Government agencies

- + Agence française de développement, France
- + Anti-Corruption Commission of Bhutan
- + Auswärtiges Amt, Germany
- + Bundesministerium für Umwelt, Naturschutz und nukleare Sicherheit und Verbraucherschutz, Germany
- + Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung, Germany
- + Department of Foreign Affairs and Trade, Australia
- + Department of Foreign Affairs, Trade and Development, Canada
- + Gesellschaft für Internationale Zusammenarbeit, Germany
- + Irish Aid
- + Ministère des Affaires Étrangères et du Développement International, France
- + Ministry of Foreign Affairs and Trade, New Zealand
- + Ministry of Foreign Affairs, Netherlands
- + Ministry of Foreign Affairs, Denmark
- + Ministry of Foreign Affairs, Taiwan
- + Swedish International Development Cooperation Agency
- + Swiss Agency for Development and Cooperation
- + US Department of State, United States
- + UK Foreign, Commonwealth and Development Office

## Multilateral institutions

- + European Bank for Reconstruction and Development
- + European Commission
- + United Nations Office on Drugs and Crime

## Foundations and trusts

- + BHP Foundation
- + FERN
- + Friedrich-Naumann-Stiftung für die Freiheit
- + John D. and Catherine T. MacArthur Foundation
- + King Baudouin Foundation
- + Luminate
- + Open Society Foundations
- + Sigrid Rausing Trust
- + Stichting Adessium

## Corporate donors

- + Siemens AG (Siemens Integrity Initiative)
- + Velik AB

## Coalition partners

- + Transparency International France
- + Transparency International UK

## Other donors

- + Christian Michelsen Institute
- + Financial Transparency Coalition
- + Global Witness
- + International Republican Institute
- + Journalism Development Network

## Individuals

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

- + Patrick Glennie\*
- + Rolf Hellenbrand\*
- + Johann P Jessen\*
- + Giovanna Longo\*
- + Nicolas Nemery\*

*\*Permission to publish name received*



# CREATE CHANGE WITH US

## ENGAGE

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Visit our website to learn more about our work in more than 100 countries and sign up for the latest news in the fight against corruption.

[transparency.org](https://transparency.org)

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Your donation will help us provide support to thousands of victims of corruption, develop new tools and research and hold governments and businesses to their promises. We want to build a fairer, more just world. With your help, we can.

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