



BUSINESSatOECD

# Shaping the values for a sustainable future

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Education for the fight  
against corruption

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# EXECUTIVE SUMMARY

Education and training are crucial tools in the fight against corruption. They can both raise awareness on prevalent values and their impact on society and shape the future by fostering universal societal norms amongst the young. The key international standards in this area, such as the OECD Anti-Bribery Convention, the OECD Public Integrity Recommendation, or the United Nations Convention against Corruption, all acknowledge the important role of education and training and call on governments to leverage them in their efforts to promote integrity. It is also recognized in the *Business at OECD Zero Corruption Manifesto*, in which principle number four (“Stimulating Responsible Business Conduct”) states that “developing a culture of integrity, transparency and ethics within any context, any entity, any government, any jurisdiction is vital”. For these reasons, the *Business at OECD* Anti-Corruption and Education Committees set out to explore how governments, the private sector, and civil society can better harness education and training towards this end.

This paper looks at education in the broad sense and sheds light on public and private initiatives leveraging both formal and informal education. It shows that including modules that raise awareness on the costs of corruption and the benefits of public integrity in primary, secondary, and tertiary education curricula can lead to tangible societal benefits in the medium to long-term. However, while there are numerous examples of schools and universities in OECD countries that already do so, approaches tend to be fragmented and often depend on the initiative of individual educational institutions. In the public sector, integrity training is shown to play an important role in addressing the demand side of bribery. Yet, whilst the OECD established important principles for ensuring that such training has an impact, monitoring remains limited. Finally, integrity training for new or newly promoted staff is a central element in the anti-corruption and compliance efforts of many companies. Some cooperate with business organizations, professional bodies, and civil society organizations, which are often crucial providers of relevant materials, tools and data and help disseminate best practices. These insights are complemented with 18 concrete examples of how companies and other relevant organizations apply education and training in practice to fight corruption.

Key success factors identified for integrity training include the regular provision of such training and contents that are tailored to the professional, cultural, and educational background of the target group as well as their legal environment and exposure to corruption risk. Whilst e-learning solutions help make training materials widely available, complementing them with in-person exchanges can increase their impact. Moreover, training contents should be regularly evaluated and updated. Yet, ensuring consistency over the long run can be challenging in the face of time and resource constraints. In addition, ensuring clear responsibilities and the effective coordination of efforts can be difficult, especially for entities operating in many countries. Finally, efforts need to be adapted to the specific integrity challenges a society faces to avoid undesired outcomes.

Against this backdrop, *Business at OECD* recommends that the OECD intensify its horizontal work on education and anti-corruption across multiple workstreams. It should collect qualitative and quantitative data on related efforts in its member states and leverage its convening power to help share best practices and monitor progress across its network. Moreover, it can foster collaboration between relevant government agencies, industry associations and companies to co-develop practical guidance on using training to foster integrity along the supply chain in certain high-risk sectors. OECD countries should support the efforts of companies to roll out integrity trainings by providing incentives, such as tax breaks for related expenses or access to accelerated or simplified administrative procedures. Integrity awards granted by governments to companies with successful anti-corruption programs could also play a meaningful role in this regard. Finally, ethics components should become a standard element of primary, secondary and tertiary education curricula across OECD countries.

# INTRODUCTION

Education can be a key tool in the promotion of integrity for both the public and the private sector. School systems that teach children about integrity from an early age can help establish behavioral norms and values for society. University and vocational training<sup>1</sup> curricula that integrate content on anti-corruption and integrity help equip citizens and future leaders with the knowledge, skills and behaviors to prevent and counter corrupt practices. Finally, trainings implemented by companies, public authorities and other organizations can promote and reinforce a culture of integrity and spread best practices on tackling corruption both within an organization and amongst its stakeholders.

The crucial role of education and training is recognized in key instruments on fighting corruption adopted by international organizations, such as the OECD Anti-Bribery Convention or the United Nations Convention against corruption. Whilst over the years many successful initiatives have been developed, the substantial amounts of investment necessary to reach the Sustainable Development Goals (SDGs) make it more urgent than ever to fully leverage the potential of education to ensure that no resources are wasted through corruption. The *Business at OECD* (BIAC) Anti-Corruption Committee acknowledged this need in its [zero corruption manifesto](#) (the Manifesto) launched in November 2022. The Manifesto sets out 10 guiding principles for translating the commitment of zero corruption into tangible action. Principle 4 – Stimulate Responsible Business Conduct – emphasizes that developing a culture of integrity, transparency, and ethics within any context, any entity, any government, any jurisdiction is vital. It highlights the central role of education and awareness raising in these efforts and calls on organizations to offer related training and guidance through their supply chains.

This paper is a means to operationalize Principle 4 of the Manifesto. Whilst there is abundant literature on the benefits education can bring to the fight against corruption, concrete examples of actions taken are limited, particularly with respect to the private sector. The paper aims to shed light on how companies and the public sector can leverage education in their anti-corruption efforts in practice and where they can cooperate more:

The paper is divided into three main parts. Part I introduces the topic and provides an overview of existing applications of education and training in efforts to fight corruption. For this, chapter 1.1. explains how education and the promotion of integrity are closely linked and how this is recognized in international conventions and standards. Chapter 1.2. dives into existing public and private sector approaches to integrating education in efforts to promote integrity. To do so, it looks at measures that institutions for primary, secondary, and tertiary education as well as public administrations and private companies take in this regard.

Part II draws conclusions from existing programs. They are derived from specific use cases received from members of the *Business at OECD* global network as well as contributions from members of its Anti-Corruption and Education Committees. To this end, the chapters 2.1. and 2.2. provide an overview of success factors and challenges for the use of education and training as a means to promote integrity. Chapter 2.3. presents recommendations on how the OECD and its member states can help maximize the impact of education and training measures on fighting corruption – both by leveraging their education systems and by supporting companies and relevant organizations.

Finally, Part III includes a selection of detailed examples, so-called use cases, of how companies and other public and private organizations apply education and training in their daily efforts to promote integrity.

<sup>1</sup>Vocational education and training is defined by UNESCO as “Learning which aims to acquire knowledge, know-how, information, values, skills and competences – either job-specific or transversal – required in specific occupations or more broadly on the labour market.” It includes retraining and upskilling and can take place in both formal and non-formal settings.

# PART I: STATE OF PLAY – HOW IS EDUCATION USED IN THE FIGHT AGAINST CORRUPTION

## 1.1. Interlinkages between education and integrity

### 1.1.1. The importance of public integrity

Corruption is one of the most corrosive issues our societies face. It wastes public resources, widens inequalities, undermines the rule of law, and leads to inefficient allocations of scarce resources, eroding long-term competitiveness. This breeds discontent amongst citizens, fosters political polarization, and reduces trust in business and public institutions. Whilst there is broad international agreement on the need to fight corruption, addressing such a multi-faceted phenomenon in practice has proved difficult. Approaches that are merely based on rules, stricter compliance, and tougher enforcement are not sufficient as they do not tackle the root causes of corruption, including but not limited to poverty, weak institutions and governance systems, or societal norms permissive of corrupt practices. Meaningful change thus requires a comprehensive, whole-of-society approach.

All societies are based on shared norms and values that define what sort of behavior is considered acceptable and guide the actions of individuals. Whilst some norms and values are firmly established, others change over time. Waste separation and recycling or wearing a seatbelt, for example, have increased over the years in OECD countries as their societies became more aware of the importance of road safety and environment protection. This change was partly due to awareness-raising efforts pursued by governments toward the public. Similarly, the promotion of public integrity – defined by the OECD as shared ethical values, principles and norms for upholding and prioritizing the public interest over private interests<sup>2</sup> – has increasingly been in the focus of public attention and can be a powerful means to reduce corruption in the long run.

<sup>2</sup>OECD (2017).

### 1.1.2. The importance of business integrity

Besides obvious ethical obligations and human rights considerations, there is a clear business case for fighting corruption. From a company perspective, preventing corruption is a critical component of risk management and business performance. Scandals, legal proceedings, or fines linked to corruption not only create significant financial damage for a company in the form of fines and penalties or legal costs, but also damage its reputation and can lead to debarment from government contracts and loss of trust from employees, customers and stakeholders. Equally, an environment of business integrity creates a positive organizational culture, and helps to recruit and retain talent, in addition to improving relationships with overall stakeholders including customers, investors, regulators and influencers.

At the market level, efforts to fight corruption are a prerequisite to ensuring fair competition and a level playing field for all. From a macroeconomic point of view, corruption - or a high perception thereof - undermines an enabling business environment and acts as a disincentive for people to invest and take risks, which ultimately hampers growth, innovation, and competitiveness. This shows in the fact that the worst performers in the corruption perception index usually also rank lowest in the [Human Development Index](#) of the United Nations Development Program.

It is thus in the best interest of companies to take measures that proactively deter, detect, and prevent corruption, both within their own organization and the stakeholders they engage with.

### 1.1.3. The role of education in promoting integrity

Everyone has a set of values, based on their family, social, cultural, religious, or political context. Education can both raise awareness on prevalent values and their impact and promote universal values. Therefore, education and training are cornerstones for building a culture of integrity in society.

They can serve as means to raise awareness of the devastating effects of corruption, reduce societal tolerance of corrupt practices and equip people with the knowledge and skills to recognize, prevent and resist corruption. Teaching young people about integrity has the potential to shape the future by shaping societal norms. For a meaningful change, however, a culture of integrity should be mainstreamed in relevant education modules amongst all age groups, and action needs to go beyond government and involve individuals, civil society organizations and companies.

All the key international conventions and standards on fighting corruption acknowledge the important role of education and training. For example, the *United Nations Convention Against Corruption* calls on signatories to promote education and training programs that enable civil servants to perform their functions with integrity and enhance their awareness of the risks of corruption inherent in the performance of these functions. It also urges governments to undertake public information activities and education programs that contribute to non-tolerance of corruption, including through school and university curricula. Its Chapter VI sets out a detailed list of issues that such trainings could deal with and encourages adherents to provide related technical assistance to other countries, particularly developing ones<sup>3</sup>.

The *OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions* recommends that adhering governments undertake awareness-raising and training initiatives in the public sector for the purpose of preventing and detecting foreign bribery, including through dedicated guidance. The importance of different kinds of training is further elaborated throughout the text of the Convention and the related recommendations. For example, Annex II of the *Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions* explicitly recommends that companies ensure effective periodic communication and documented training for all levels of the company on the company's ethics and compliance program or measures regarding foreign bribery, including for business partners. In this regard, business organizations and professional associations are encouraged to make training, prevention, due diligence, and other compliance tools available<sup>4</sup>. Many of the OECD Country Monitoring Reports that evaluate the compliance of signatories with the Convention advise adherents to make more use of awareness-raising measures and trainings to fight corruption.

Finally, three of the 13 recommendations set out in the *OECD Recommendation of the Council on Public Integrity* are directly related to education and training. All of them can be found in Part III of the recommendation, which calls on adherents to cultivate a culture of public integrity. To this end, Recommendation 5 states that governments should promote a whole society culture of public integrity, partnering with the private sector and civil society. This should include reducing tolerance of corruption in society through campaigns to promote civic education on public integrity, particularly in schools. Recommendation 6 – investing in integrity leadership – acknowledges the importance of delivering periodic training and guidance to public sector managers on public integrity issues. Finally, Recommendation 8 is specifically dedicated to providing sufficient information, training, guidance and advice to public officials throughout their careers on how to apply public integrity standards in the workplace<sup>5</sup>.

This paper follows the definition of education set out in the UNESCO International Standard Classification of Education. Thus, the following chapters will look at both the role of formal and non-formal education. UNESCO defines formal education as being “institutionalized, intentional and planned through public organizations and recognized private bodies, and – in their totality – constitute the formal education system of a country.” Non-formal education is defined as being “institutionalized, intentional and planned by an education provider.” It is an alternative and/or complement to formal education within the process of lifelong learning of individuals and can include training in a workplace to improve or adapt existing qualifications and skills<sup>6</sup>.

## 1.2. Initiatives to counter corruption through education

### 1.2.1. Application in the education sector

By leveraging their education system to raise awareness on the costs of corruption and benefits of public integrity, governments can reduce tolerance for corrupt practices in society. School systems that teach children about integrity from an early age can help establish strong behavioral norms and values. University and vocational training curricula that integrate content on anti-corruption and integrity help equip future decision makers with the knowledge, skills and behaviors to recognize

<sup>3</sup> UNODC (2004), *United Nations Convention against Corruption*, United Nations, New York, [https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf) (accessed on 18.07.2023).

<sup>4</sup> OECD (2021), *Convention on Combating Bribery of Foreign Public Officials in International Business Transactions – And related documents*, OECD, Paris, <https://www.oecd.org/daf/anti-bribery/oecd-anti-bribery-convention-booklet.pdf> (accessed on 18.07.2023).

<sup>5</sup> OECD (2017), *OECD Recommendation of the Council on Public Integrity*, OECD, Paris, <https://www.oecd.org/gov/ethics/OECD-Recommendation-Public-Integrity.pdf> (accessed on 18.07.2023).

<sup>6</sup> UNESCO (2011), *International Standard Classification of Education – ISCED 2011*, Quebec.

the value of public integrity, prevent and counter corrupt practices, and understand both the legal and economic consequences of non-compliance, for the individual and society at large.

Training the educators is a core component of any education for integrity program. Equipping them with course materials they can use can be helpful in this regard. Examples of such resource kits include the OECD Education for Integrity<sup>7</sup> brochure, which provides teachers with sample lesson plans and tasks for students as well as best practices from OECD countries. The United Nations Office on Drugs and Crime (UNODC) Global Resource for Anti-Corruption Education and Youth Empowerment (GRACE) also provides detailed lesson plans and materials in all official UN languages for teachers at primary and secondary schools.

As integrity is rooted in ethics, the following table, compiled by the Center for Curriculum Redesign, outlines a practical framework for defining ethics, along with the educational steps required to instill for ethical principles:

<b>Modern Emphasis</b>	<b>Definitions of Ethics</b> (synthesis of 100+ frameworks)	<b>Associated constructs</b>
Fairness Integrity Virtue	Identifying and describing ethical concepts, rights, and responsibilities	Decency, Authenticity, Genuineness, Benevolence, Humaneness, Respect, Justice, Equity, Fairness, Kindness, Altruism, Inclusiveness, Tolerance, Abnegation, Acceptance, Honesty, Truthfulness, Trustworthiness, Loyalty, Love, Helpfulness, Generosity, Charity, Devotion, Forgiveness, Belonging, Civic-Mindedness, Citizenship, Equality, Consideration
	Making ethical decisions and standing up for one's values	
	Understanding and showing compassion for the perspectives of others	
	Recognizing and revising one's personal moral compass	
	Contributing to the broader group or community	

## Primary and secondary education

Primary and secondary schools are key institutions for socializing young people to embrace their societies' legal, moral, and social norms. Countries that include public integrity in their school curricula typically integrate related modules into existing courses and/or provide support through dedicated materials that can be used at a time of the school's choosing. Lessons on public integrity can be linked to existing social science, literature or language classes or linked to modules that aim to achieve social change, such as citizenship education, character education, peace education, or human rights education, but other approaches exist too. In some countries, the relevant public integrity bodies deliver tailored, on-request training on public integrity in interested schools. After-school or holiday camp programs delivered in cooperation with relevant public bodies or civil society organizations are another possibility.<sup>9</sup>

The precise contents that can be taught depend on the age of the pupils. The UNODC GRACE program recommends taking a building block approach in this regard. At the primary level (aged 6-12), children should be taught basic civic values, such as integrity, respect, acceptance, and fairness, and skills, such as empathy, teamwork, critical thinking, and conflict resolution. For secondary-level pupils (aged 13-18), contents can be more specific, including the causes and effects of corruption, strategies to resist it, and the importance of denouncing it. For this, students should first be given a clear understanding of core concepts such as corruption, integrity, or the rule of law to avoid simplistic discussions that do not adequately shed light on the many grey zones in this area. Impact can be maximized by linking theoretical contents to actual ethical dilemmas through participatory methods such as group discussions, role plays or games.

<sup>8</sup> Center for Curriculum Redesign (2023), <https://curriculumredesign.org/framework/> (last accessed on 05 November 2023).

<sup>9</sup> U4 Anti-Corruption Resource Centre (2020), *Values education for public integrity: What works and what doesn't*, Chr. Michelsen Institute, Bergen, <https://www.u4.no/publications/values-education-for-public-integrity#global-good-practices-in-integrity-education-tertiary-level> (last accessed on 26.07.2023).

## Tertiary Education

As the final stage prior to peoples' entry into the workforce, tertiary education<sup>10</sup> provides an important opportunity to nurture the ethical minds and professional identity of citizens and future leaders. The UNESCO World Declaration on Higher Education for the Twenty-First Century states that training people in the values that form the basis of democratic citizenship is one of the core missions of higher education. Around the world, higher education institutions have adopted different approaches to ethics and anti-corruption teaching and training. In some cases, academic disciplines, such as law, teaching, medicine, public administration, and business, incorporate ethics components into their curricula. Some mainstream these topics across the curriculum, while others rely on specialized courses, guest lectures, conferences, workshops, ad hoc events, or experience-based learning programs.

The UNODC GRACE initiative supports these efforts in various ways. The GRACE Knowledge Hub offers various free, open-source materials that university lecturers and trainers can use in their academic courses and professional trainings to transmit knowledge on corruption-related issues. Furthermore, the UNODC Anti-Corruption Academic Network brings together more than 1,000 academics, researchers and experts interested in education and research on anti-corruption, integrity and ethics. It provides its members with a platform to exchange knowledge, materials and good practices to facilitate related teaching and research.

A unique institution in this area is the International Anti-Corruption Academy, which was founded in 2010 in partnership with UNODC, INTERPOL, the European Anti-Fraud Office (OLAF), and the Republic of Austria. This international organization based in Laxenburg, Austria, offers post-graduate master's programs in English and Spanish. Its courses are open both to government officials and professionals from the private sector and civil society. Since its creation, it has delivered and facilitated anti-corruption education and training for over 5000 professionals and practitioners from 168 countries.<sup>11</sup>

Whilst the goals, methods, and scope of ethics instruction at tertiary level differ, efforts are ongoing to develop a consensus. One example is the so-called Poznan Declaration adopted by the Compostela Group of Universities, the World University Consortium, and the World Academy of Art and Science in 2014. The declaration highlights that the educational system has been producing individuals equipped for pursuit

of narrow self-interest and calls on higher education to adopt a more holistic approach to ethics and integrity for all students. Amongst others, this should be done through:

- A cross-faculty approach to include ethics and anti-corruption education in all university curricula;
- Encouraging lecturers and professors to facilitate the incorporation of ethics issues in their classes;
- Emphasizing ethics as the cornerstone of professional identities, which set the boundaries of future acceptable behavior;
- Ensuring transparency, accountability, and impartiality in teaching, student recruitment, student assessment, and research, as well as in the award of degrees, employment, and promotions.

### 1.2.2. Application in public administrations

Integrity training plays an important role in addressing the demand side of bribery. Therefore, providing sufficient information, training, guidance, and timely advice for public officials to apply public integrity standards in the workplace is one of the core principles of the OECD Recommendation on Public Integrity. Such trainings typically aim at helping public officials recognize integrity issues when they arise and equip them with the knowledge and skills to manage them appropriately. They also help cultivate their commitment to carrying out public duties in the public interest. The OECD has four specific recommendations on how these efforts should be conducted:

- Providing public officials throughout their careers with clear and up-to-date information about the organization's policies, rules and administrative procedures relevant to maintaining high standards of public integrity;
- Offering induction and on-the-job integrity training to public officials throughout their careers in order to raise awareness and develop essential skills for the analysis of ethical dilemmas, and to make public integrity standards applicable and meaningful in their own personal contexts;
- Providing easily accessible formal and informal guidance and consultation mechanisms to help public officials apply public integrity standards in their daily work as well as to manage conflict-of-interest situations.

<sup>10</sup>The UNESCO defines tertiary education as all types of studies, training or training for research at the post-secondary level, provided by universities or other educational establishments that are approved as institutions of higher education by the competent State authorities.

<sup>11</sup>IACA (2023), *Who we are*, <https://www.iaca.int/who-we-are.html> (last accessed on 31.07.2023).

- Supporting officials in management positions in their role as ethical leaders by helping them develop appropriate judgement skills for situations involving public integrity risks through periodic training and guidance.

While the exact contents of related trainings depend on the specific context in a country, the OECD recommends including, at a minimum, module on integrity, administrative procedures (e.g. public procurement), rules and values, transparency and accountability instruments and measures/controls to manage integrity risks. Raising awareness on potential conflicts of interest and dilemmas involving GEH (gifts, entertainment & hospitality) is also important. The OECD itself leads by example on this by requiring every new staff member to sign the organization's code of conduct before their appointment. New officials then need to complete an online training that tests their understanding of these ethical values within three months of their arrival.<sup>12</sup>

### 1.2.3. Application in the private sector

Regulations against corruption typically encourage responsible conduct through a mix of incentives and sanctions designed to drive good practice. However, no state has the resources to police all corporate activity for potential violations. Even in robust enforcement environments, corporate compliance with anti-corruption legislation thus largely depends on the commitment of companies, and particularly their leadership. Company leaders are responsible for setting the right tone from the top, overseeing implementation of effective compliance programs, and ensuring that the necessary resources are made available. However, to be effective, anti-corruption policies and procedures must be communicated to employees and others acting on a company's behalf. For this, appropriate training, guidance materials and other communication and awareness-raising activities are key, both within the company and vis-à-vis suppliers and other stakeholders it works with.<sup>13</sup>

The OECD Good Practice Guidance on Internal Controls, Ethics, and Compliance recommends that companies take "measures designed to ensure periodic communication, and documented training for all levels of the company, on the company's ethics and compliance program or measures regarding foreign bribery, as well as, where appropriate, for subsidiaries."<sup>14</sup> In view of growing consumer demands and more stringent legislation on responsible business conduct, this recommendation has become more relevant than ever.

However, to ensure relevance and employee engagement, compliance trainings need to be interactive and tailored to specific groups of employees within an enterprise. While relevant groups vary from company to company, four groups can typically be identified:

- New employees: at the beginning of their appointment, they typically receive a more general training which can include content on the company's code of conduct, its values, and relevant legislation.
- Highly exposed roles and functions (e.g. dealing with public procurement, government relations, public affairs, sales/commercial account teams or supplier management): continuous and more specialized training (e.g. focusing on real cases) may be appropriate. This includes employees who move into highly exposed roles/functions and thus require targeted supplemental training.
- All employees: regular refreshers (e.g. speak up newsletters, compliance cafés), possibly through interactive trainings or discussions involving ethical dilemma situations, moral reminders.
- Senior management: inclusion of specific deliverables related to the promotion of integrity in reward systems, leadership coaching and mentorship, including on being an integrity role model, setting the right tone from the top, and fostering a strong speak-up culture.

In addition, trainings should be tailored and customized depending on the different geographies where the company operates (e.g., high risk jurisdictions), taking into account people's cultures and habits, to make them understandable and accessible.

Compliance should be embedded into the business processes, and employees at all levels should be involved. "Compliance Champions" should be appointed by operational unit leaders to raise awareness and assist the Compliance Office with the execution and implementation of the ethics and compliance program within their function or unit. The Compliance Champion is the liaison between the Compliance Office and their operational unit and helps promoting an active speak-up culture.

As an incentive, compliance and integrity performance indicators, along with the completion of relevant trainings, can be tied to an employee's promotion, salary increase, or bonus.

<sup>12</sup> OECD (2020). *OECD Public Integrity Handbook*, OECD Publishing, Paris.

<sup>13</sup> UNODC (2012), *The United Nations Convention against Corruption: A Resource Guide on State Measures for Strengthening Corporate Integrity*, New York.

<sup>14</sup> OECD (2010), *Good Practice Guidance on Internal Controls, Ethics, and Compliance*, Paris.

When feasible, it can be beneficial for companies to extend their education and training programs to third parties with which they have a business relationship, particularly direct suppliers and subcontractors. This may also involve publishing business principles that include references against corruption and making the business partners commit to conduct business in line with them; establishing compliance programs between companies and their third parties to assist them in building internal principles, including by sharing training materials; and communication programs aimed at disseminating a company's key compliance values and expectations on anti-corruption.

The due diligence expectations set out in an increasing number of international, regional, and national standards on responsible business conduct (RBC), including the OECD Guidelines for Multinational Enterprises for RBC, cover companies' entire supply and even value chains. Recognizing the complexity of supply chains, including supplies in anti-corruption training programs, where feasible, can make an important contribution to spreading good practices. It can thus prevent reputational and legal problems from arising and it can even stabilize a company's supply chain by reducing the risk that it has to switch suppliers. Moreover, it contributes to building stronger relationships, based on common values, with suppliers and other stakeholders.

Private companies also frequently cooperate with public entities and governments to leverage education in their anti-corruption efforts.

1. One example is the Compliance without Borders program implemented jointly by the OECD's Trust in Business initiative and the Basel Institute on Governance. The approach envisages the temporary secondment of compliance experts from private companies to state-owned enterprises to exchange best practices and build quality compliance systems and a culture of integrity. It focuses on all industries, particularly on exposed sectors such as information technology, infrastructure, pharmaceutical, energy and telecommunications.<sup>15</sup>
2. Another example is the UNODC Global Integrity Education project rolled out in Kenya, Mexico and Pakistan. It creates partnerships between academics and private sector practitioners, which jointly develop and implement integrity education programs in companies and universities.

Courses are complemented by internships in the private sector, during which students can gather first-hand experience of compliance and integrity issues.<sup>17</sup>

3. Finally, the [GAN Business Anti-Corruption Portal](#) offers free anti-corruption compliance and risk management resources, including e-learning and due diligence tools. These can be used and adapted for university education, post-graduate training, and further education for professionals.

#### **1.2.4. The role of business organizations, professional bodies and civil society organizations**

Business organizations, professional bodies, and civil society organizations are crucial providers of education, training and awareness-raising materials related to anti-corruption. Business organizations at national and international level have powerful networks that include companies of all sizes and across sectors. This helps them collect and spread best practices and organize impactful training programs and awareness-raising measures. Sectoral business associations represent businesses from a specific sector and can complement these activities through more targeted initiatives.

Professional bodies (e.g., professional accountancy organizations, bar associations, etc.) also play an important role in the education and training of their members on anti-corruption topics directly, as well as on instilling and enforcing codes of ethics on their members and future members. This has been recognized in the OECD Anti-Bribery Recommendation, which provides:

*Professional associations that exercise regulatory powers over certain professions may also play a significant role in adopting and implementing robust ethics standards for their members, including by setting out frameworks on actions to be taken by their members to prevent bribery or when confronted with suspected acts of foreign bribery and related offences committed by clients or employers.*

This education is often provided as part of the pre-qualification training and reinforced by ongoing continuing professional development membership requirements. Given the critical role that professionals play within or as advisers to business, and in the public sector, professional education and ethics are an important component of the anti-corruption education ecosystem.

<sup>15</sup> The Global Integrity Education project is funded by the Siemens Integrity Initiative with USD 1 million. It is helping companies promote integrity and level the playing field for a fair and transparent economic environment.

<sup>16</sup> OECD, *Compliance without borders*, <https://www.oecd.org/corporate/Compliance-Without-Borders-OECD-Basel-Institute-on-Governance.pdf> (last accessed on 1 August 2023).

<sup>17</sup> UNODC (2021), *UNODC works with academia and the private sector to foster business integrity*, <https://www.unodc.org/unodc/en/frontpage/2021/May/unodc-works-with-academia-and-the-private-sector-to-foster-business-integrity.html> (last accessed on 1 August 2023).



Finally, Civil Society Organizations provide a variety of tools and programs to foster integrity through education and training. Many of them are tailored to the needs of private companies and often they partner up with companies and business organizations. Transparency International, for example, offers trainings to sensitize companies' staff and leadership of integrity risks in their operations.<sup>18</sup> The organization also hosts an annual School on Integrity. This state-of-the-art anti-corruption and accountability training exposes future leaders to the latest developments in the field of anti-corruption and accountability and offers real opportunities to try and implement their ideas in practice.<sup>19</sup>

<sup>18</sup> Transparency International, Formation pour les entreprises, *Interventions en entreprise* - Transparency France International ([transparency-france.org](https://www.transparency-france.org)) (last accessed on 24 November 2024)

<sup>19</sup> UNODC (2012), *The United Nations Convention against Corruption: A Resource Guide on State Measures for Strengthening Corporate Integrity*, New York.

# PART II: SUCCESS FACTORS, CHALLENGES, AND POLICY RECOMMENDATIONS

In order to illustrate how companies and other relevant organizations deploy education and training concretely in their efforts to promote integrity, members of the *Business at OECD* global network were invited to submit use cases, which are set out in this part of the paper. The collection of use cases was supported by the following guiding questions:

- What are the top corruption risks that your organization faces?
- What are the main characteristics of your education and training initiatives to spread integrity and ethical standards within your organization?
- What results has the initiative achieved so far? What have been its the main success factors?
- Did you encounter any problems when rolling out your project?
- What measures could governments/the OECD take to support your efforts?

The use cases included in this paper originate from a wide variety of sectors, ranging from food and drink, electronics and telecommunications to e-commerce, medical technology, and accounting. Whilst most use cases were submitted by companies, some reflect the experience of professional bodies and business organizations. Examples of how universities and public training institutions integrate anti-corruption in their curricula are provided as well.

These use cases, complemented by desk research and contributions from the members of the Business at OECD Anti-Corruption and Education Committees, served as the basis for the identification of success factors as well as challenges in the deployment of education for anti-corruption purposes which are presented in the following sections. The use cases also helped develop the policy recommendations set out in this part. They include suggestions on how national governments and the OECD can help boost the synergies between education and the fight against corruption and how they can support companies in this regard.

The complete selection of use cases received is set out in the final part of this paper.

## 2.1. Success factors

The staff composition of an organization changes continuously as people join and leave or take up new roles in different parts of the same organization. Activities and risk factors change, too, over time. For this reason, training should be provided at regular intervals and with regularly updated contents to ensure long-term impact. For example, many companies have their employees undergo integrity training as soon as they join the organization or change their role and at regular intervals thereafter. The intervals and type of training provided also need to take into consideration the applicable legal requirements and overall risk assessment of the organization in order that, ultimately, staff is enabled to address relevant risks in a timely and efficient manner. Trainings can be complemented by periodically including integrity-related content in staff meetings, newsletters, and other staff engagement tools.

Regarding the training contents, a one-size fits all approach is seldomly sufficient. Instead, different staff categories may require different types of integrity training, whose content is tailored to their seniority level, role, risk exposure, cultural background, or education level. Innovative approaches to training that include interactive features can increase the impact and overall engagement rate. In some cases, a company's regional or local branches may be best placed to identify the concrete training needs of their staff. Digital tools and platforms can help make training materials available across the organization without a major logistical effort but should be complemented by in-person exchanges, especially where the staff does not have access to a personal laptop<sup>20</sup>. Furthermore, e-learning platforms allow organizations to better track and report on progress and implement appropriate corrective measures where needed. By regularly evaluating the impact of initiatives and the level of staff engagement, the quality of the training modules on offer can be maintained and improved over time.

<sup>20</sup> Examples of how digitalization can help to fight corruption, through more effective trainings and beyond, included in the 2022 *Business at OECD* publication "[Stepping up the game: digital technologies for the promotion of the fight against corruption – a business perspective](#)".

## 2.2. Challenges

Whilst education can be a powerful tool to fight corruption and promote integrity, there are a number of challenges and limitations that governments, companies and education institutions face in this context.

### Education sector:

Integrating content on public integrity in national education systems can be difficult in the face of academic independence and school curricula that run over many years. As school and university curricula are important transmitters of values, reforming them can be a cumbersome and politically charged process involving a multitude of stakeholders with competing priorities. Moreover, opportunities for and approaches to curriculum reform and the levels of cooperation between the education and anti-corruption bodies differ from country to country.

### Companies, public administrations and non-profit organizations:

Companies, public administrations and non-profit organizations also face different challenges when using education as a means to promote integrity amongst their staff. They include the following:

- It is difficult to devise innovative and interactive training formats and to dedicate sufficient time and resources to integrity capacity building and guidance over the long term.
- A dedicated integrity body or dedicated in-house personnel can help boost integrity amongst the staff of an organization. However, ensuring clear responsibilities for integrity and an effective coordination of the entities responsible for integrity training poses additional challenges.<sup>21</sup>
- Raising awareness about corruption needs to be carefully tailored to be impactful and avoid undesired outcomes. Perceptions of rampant corruption can increase apathy among citizens and reduce their motivation to uphold public integrity norms. Therefore, any efforts need to be adapted to the specific integrity challenges a society faces and sensationalizing the issue needs to be avoided. Rather, awareness raising efforts should offer tangible solutions for individuals to counter corruption.<sup>22</sup>

<sup>21</sup> OECD (2017).

<sup>22</sup> OECD (2020).

## 2.3. Recommendations to policymakers

National governments and the OECD can boost the role of their education systems in fostering integrity in the following ways:

- The incorporation of ethics components should be a standard component of primary, secondary and tertiary education curricula across OECD countries. OECD countries could collect and share best practices on the approaches taken in this regard to maximize the impact.
- The OECD created a list of Public Integrity Indicators and it regularly evaluates the performance of its member countries against them. In order to give due consideration to the critical role that education plays in fostering integrity in society, an additional indicator on “Fostering integrity through education and awareness raising measures” should be added, using the SMART method for calculation. This would help shed light on the activities that countries are taking in this area, promote the exchange of best practices, and facilitate tracking progress.
- When promoting education and training in the fight against corruption, public authorities should always consider who organizes and finances these educational programs to avoid conflicts of interest and integrity breaches. Transparency of publicly supported initiatives is key for this.

National governments and the OECD can support the business community’s efforts to use education and trainings as tools to promote integrity in the following ways:

- The public sector could support the efforts of companies to use trainings for building a culture of integrity in their organization by providing incentives, such as tax breaks for expenses related to such trainings or access to accelerated or simplified administrative procedures. In the same vein, financial support to tertiary education programs on anti-corruption could bring down their costs, making them accessible to more students.
- Integrity awards granted by governments to companies with successful anti-corruption measures and programs based on transparent criteria could play a meaningful role in supporting the efforts of companies in this regard. These awards should be given by regulators or tax authorities to companies that demonstrate a good example of ethics and integrity. They would incentivize the actors involved and help spread best practices without high costs.

Their impact would be even higher if they were granted by an international organization with widely recognized expertise in this area, such as the OECD. Such an award could be based on an internationally recognized certification scheme for ethical companies.

- Governments can foster collaboration between relevant government agencies, industry associations, and companies in their respective countries to collect and share best practices on how to use training for fighting corruption. Government agencies, business organizations and companies could also jointly develop practical guidance on using training to foster integrity along the supply chain in certain high-risk sectors.
- For trainings to be successful in countries with a high risk of corruption, it may not be sufficient to talk about the societal benefits of compliance. Instead, to change the mindset of individuals accustomed to corruption, it may be necessary to show them that it is in their best interest not to engage in acts of corruption, in addition to the obvious case of refraining from illegal acts. This can be done by confronting them with the fact that even though corruption may bring gains in the short run, risks are high in the long run. Showcasing the cost of corruption for doing business, e.g. in terms of cost, efficiency losses and a tilted playing field, can also be impactful in this regard.
- When engaging with companies that do so far not have a training program in place to promote integrity, it is important to emphasize the business opportunities such training could create for them, or the risks related to their core business that it could help address.
- The OECD should intensify its horizontal work across multiple workstreams, including public integrity, anti-corruption, education and other relevant areas. It can leverage its convening power to help share best practices and monitor progress across its network. BIAC stands ready to contribute to these efforts.
- Governments or (international) non-profit organizations can make their training material publicly available so that it can be used by other organizations, thereby avoiding the development of costly integrity and anti-bribery & corruption related training material.

# PART III: USE CASES FROM COMPANIES AND OTHER RELEVANT ORGANIZATIONS

This section includes concrete use cases collected from companies and other relevant organizations from across the global network of Business at OECD. They provide a snapshot of the many ways in which these organizations leverage education and training in their efforts to promote integrity. Of course, this list of examples is non exhaustive and does not claim to provide a complete picture of existing programs. The following use cases were obtained:

<b>Company/ Organization</b>	<b>Sector of activity</b>	<b>Education solution</b>
Amazon	E-commerce, cloud computing, online advertising, digital streaming, artificial intelligence	Compliance and ethics training for staff, suppliers, and commercial partners
AtkinsRéalis	Design, construction, engineering, project management	Compliance and integrity training for staff and relevant third parties
Autostrade per l'Italia	Construction and management of toll motorways	Compliance and ethics training and awareness raising for staff and suppliers
BRF	Agribusiness	Development of training materials for middle management; plain language integrity flyers; contribution to UNODC Coding4Integrity
Ericsson	Information and communication technology	Speak-up roadshow workshops; compliance and integrity training for staff; staff rotation programs for compliance teams
Nestlé Ecuador	Food and beverage	Building capabilities to recognize and counter corruption amongst university students; equipping suppliers with business integrity resources
Novartis	Pharmaceutical	E-learning resources and training for staff; participation in UNODC Education for Integrity Program and LAC Business Integrity Program

<b>Company/ Organization</b>	<b>Sector of activity</b>	<b>Education solution</b>
Panasonic	Electronics	Compliance and integrity training and awareness building measures for staff
Rolls Royce	Power and propulsion solutions for civil aerospace, defense, power systems and electronics	Combination of computer-based and facilitator-led compliance and integrity training for staff
Siemens	Industry, infrastructure, transport, healthcare	Promoting integrity through collective action, including with IACA, UNODC and B20
Snam	Energy infrastructure	Integrity online game; ESG training for suppliers
Center for International Private Enterprise (CIPE)	NGO strengthening democracy through private enterprise and market-oriented reform	Capacity building for risk management and compliance verification solutions for companies in emerging markets
International Chamber of Commerce (ICC) Austria	Chamber of commerce	Training on Commercial Approach to Anti-Corruption in high-risk countries
International Federation of Accountants (IFAC)	Professional body	Integrity training tools and resources for Professional Accountancy Organizations, individual accountants, and stakeholders
MedTech Europe	Trade association of medical technology industry	Conference Vetting System to assess compliance of third-party organized events with the association's code of conduct
Koalisi Anti Korupsi Indonesia (KAKI)	Private sector platform	Training and technical support for companies to spread effective anti-corruption compliance and ethics practices
Italian National School of Administration (SNA)	Public administration school	Trainings to increase ethical awareness and spreading a culture of integrity among public officials
Tor Vergata University	University	Specific master's program on anti-corruption



Amazon is an American multinational technology company focusing on e-commerce, cloud computing, online advertising, digital streaming, and artificial intelligence. It delivers to 130 countries around the world.

Amazon is constantly working to innovate and develop compliance tools that make it easier to deter, detect, and prevent corruption. Amazon conducts trainings for employees who interact most frequently with their third parties to ensure they are able to identify, mitigate, and escalate compliance and corruption risk as they expand operations and scale global infrastructure investments. Amazon's internal policies and programs are codified in their Code of Business Conduct & Ethics, which detail the company's centralized approach to driving compliance in its operations including through third-party due diligence programs. Its risk assessment programs enable the company to scale innovative compliance systems across its business and offer a variety of online and in-person trainings to counter corruption and advance Amazon compliance policies.

Amazon's senior leadership also supports and drives the compliance and ethics culture at Amazon by highlighting compliance policies at company all-hands meetings and supporting compliance investigations across the business. This commitment does not waver when faced with significant business opportunities. Global business leaders, with support from Amazon's executive leadership team, have implemented an annual goal to reach 100% completion of required online trainings on the company's Anti-Bribery Policy for its over 750,000 corporate employees around the world, with progress reviews conducted on at least a quarterly basis. Throughout its operations, with active support from business leaders, Amazon reports instances of fraud and misconduct to relevant officials and prioritizes robust anticorruption due diligence when evaluating potential acquisitions and other business partnerships.

Amazon and State, along with other U.S. government partners, will collaborate on shared priorities related to improving technological infrastructure to advance digital compliance systems, increasing transparency of cost and timing for local permits and licenses required to operate large-scale industrial facilities, and advancing multilateral frameworks, including the Indo-Pacific Economic Framework for Prosperity (IPEF) and the Asia Pacific Economic Cooperation (APEC), to increase government accountability for implementing anticorruption standards.

In addition, Amazon will seek opportunities through GPS to enhance collaboration with national governments on due diligence and local partner vetting programs, improve law enforcement against local bribery schemes, and increase resources within U.S. embassies to support compliance trainings for local commercial partners. As appropriate, Amazon is also prepared to leverage its proprietary compliance toolkits and trainings to support capacity building efforts for small and medium-sized businesses (SMBs) working to combat corruption.



# AtkinsRéalis

Headquartered in Canada, AtkinsRéalis, is a world-leading professional services project management company dedicated to engineering a better future for our planet and its people. They create sustainable solutions that connect people, data and technology to transform the world's infrastructure and energy systems. They deploy global capabilities locally to their clients and deliver unique end-to-end services across the whole life cycle of an asset including consulting, advisory & environmental services, intelligent networks & cybersecurity, design & engineering, procurement, project & construction management, operations & main-tenance, de-commissioning and capital. The breadth and depth of their capabilities are delivered to clients in key strategic sectors such as Engineering Services, Nuclear, Operations & Maintenance and Capital.

The Company has identified the following risk areas that it aims to mitigate through various initiatives and training:

- **People:** Being their most important asset but subject to conflicts of interest, bribery and behavioral risk. Other risks such as Modern Slavery and Human Rights abuses have also been identified and addressed.
- **Data:** Guarding against the risk of its misuse. Misuse of competitor or confidential information as well as anti-competitive practices are risks in this area and the Company has implemented strong measures to mitigate these appropriately, as well as pro – actively addressing the potential ethical risks of AI.
- **Geographies:** AtkinsRéalis does business around the world, potentially working or transacting in countries with a low Corruption Perception Index score. The Company ensures that its people are aware of the risks of doing business in higher risk environments.
- **Business structures:** It must ensure that any business model which it adopts, is both legal and ethical. It therefore must ensure that it knows the clients and suppliers with whom it is doing business with through proper due diligence.

To address risks, help employees develop their ethical reasoning skills and prepare for ethical challenges that they might face at work, the Company has developed Ethics Challenges. These real-world ethical dilemmas are presented to employees for discussion and resolution, within the framework of both online and offline training. This training is created, produced and delivered by their Integrity team. In 2022, the Company's over 31,000 Learning Management System users had access to 33 Integrity eLearning modules in up to

9 languages, for a total of over 72 modules. Out of these 33 eLearning modules, 16 were mandatory, depending on the employee's role. Some examples of training modules that AtkinsRéalis has available include:

- **Annual Code of Conduct Certification:** This helps everyone in the company to understand the code of the organization and the expectations of the organization regarding integrity matters. This training is mandatory.
- **Anti-corruption training:** This training is designed to help employees understand the risks of corruption and to develop skills for preventing and detecting corruption. This training is mandatory for certain roles with enhanced exposure to corruption risk such as Business Development and Government Relations.
- **Other mandatory Integrity eLearning modules:** AtkinsRéalis has various integrity modules (Gifts & Hospitality, Third Party Risk, Insider Trading, Antitrust, etc) for relevant roles.
- **Training for third parties:** This training, consisting of an online module on anti-corruption, is designed to help high-risk third parties understand the company's ethical standards and to develop skills for complying with these standards. This training is created and supported by TRACE International, a not-for-profit organization.
- **Other solutions:** For its temporary and contract workforce, the company ensures awareness of its Code of Conduct and values using onboarding presentations, posters, and monthly meetings. Pictograms have also been created to simplify and represent job specific requirements as per the company's Code especially for use on project sites.

The Company's efforts to train its workforce on integrity and anti-corruption have proved fruitful already, including:

- **Reduced risk of misconduct:** Employees who are trained on ethics and compliance are more likely to identify and avoid misconduct. This can lead to a reduction in the number of investigations, disciplinary actions, and legal disputes.
- **Improved employee morale and engagement:** Employees who feel that their company is committed to ethics and compliance are more likely to be satisfied and engaged in their work. This can lead to improved productivity and retention.
- **Enhanced reputation:** A strong reputation for ethics and compliance can make it easier

for companies to attract and retain customers, partners, and investors. AtkinsRéalis has been awarded the Compliance Leader Verification from the Ethisphere Institute.

While there are inevitable challenges in implementing multiple training programs in a company with global reach, AktinsRéalis continually strives to improve both the content and the mode of delivery of its training. Its integrity training team has deployed several ways of reaching different audiences, from live training to the gamification of several topics. The team has adopted a holistic, collaborative approach to the delivery of training that involves Integrity Officers, the Communications function and others to increase the Integrity footprint throughout the business. AtkinsRéalis continues to offer highly effective, people – centered training solutions to mitigate risk, as a vital part of its world – class Integrity Program.

## autostrade // per l'italia

Autostrade per l'Italia (ASPI) is one of Europe's leading concessionaries for the construction and management of toll motorways, with around 3,000 km of network in Italy. It is currently executing a strategic plan characterized by a significant investment and maintenance program, which generates an induced effect on the Italian economy of €65 billion, in order to strengthen the managed national highway infrastructures and to become an integrated operator in the field of sustainable mobility.

In this context, ASPI has traced its "integrity & compliance footprint" in its strategic plan by defining a specific program called "Next to Legality", which includes a set of solutions that aim at upgrading the internal control system.

The program is inspired by the global standards from the OECD, *Business at OECD (BIAC)*, the B20 and G20. It is implemented in a manner that considers the peculiarities of the local context according to the principle "think global act local" of the *Zero Corruption Manifesto* published by the *Business at OECD Anticorruption Committee*.

It includes a specific section dedicated to education and training initiatives to spread integrity and ethical standards within the organization, its supply chain, and in the community. This approach aims at developing a wide set of integrity and resilience skills integrated with the business operations, enabled by artificial intelligence and leveraging advanced stewardship initiatives and unconventional communication channels.

In summary, the scope of the Next to Legality education and training program is the following: **Business Integrity, Business Resilience, Continuous Monitoring** delivered through **Advanced Training**

### & Unconventional Communication.



### Education and training:

- Advanced training on Responsible Business Conduct in collaboration with the Sant'Anna School of Advanced Studies / Pisa:** The training program is tailored for ASPI Group Executives, Internal Control System Key Figures, Procurement Department employees and Project Managers. It is designed to equip individuals with specialized knowledge, skills, and strategies that go beyond the basic awareness of obligations and rules, in the broader perspective of a strong engagement on the values of legality and integrity.
- "Autostrade del Sapere" Corporate University and Academy:** as part of the high-level educational program for ASPI Group employees, focused on developing managerial, technical and cross-cutting competences, specific modules on integrity and ethical standards, held also by top management, have been defined.
- Managerial coaching and stewardship:** specific sessions held by the top management in charge of Business Integrity and Resilience, targeted to the key officers, managers, and critical roles of all ASPI Group companies in order to strengthen and enhance the culture of the Internal Control and Risk Management System, with a «Tone at

## The Top» approach.

4. **Interactive Anticorruption Behavioral Course:** virtual course to explain, through an interactive approach, the behaviors to be adopted by employees in practical cases of potential corruption. The course is mandatory and targeted to all ASPI Group personnel.
5. **Business continuity table-top simulation:** the simulation involves members of the company's crisis management team and it is aimed at preparing Business Continuity Agents to promptly execute their responsibilities, through brainstorming on different crisis scenarios. Results and recommendations from the simulation are formally documented and communicated.
6. **New hire onboardings:** every new entry receives a welcome pack including the main deliverables relating to ASPI Business Integrity and a list of compliance-related training programs to attend.
4. **Award programs:** event celebrating the results achieved within the Enterprise Risk Management process, strengthening risk culture and integration between business and values.
5. **Survey:** tool aimed at measuring and obtaining insights on the level of dissemination of risk culture in business activities and processes.
6. **Anticorruption Web Portal:** shared repository to enhance employee awareness of the ASPI's Antibribery Management System and to keep the map to date on new regulatory frameworks, relevant case-laws, etc..

## Lessons learnt:

In defining its anti-corruption education and training programs, ASPA has gained several insights: Firstly, the absence of specific government incentives, particularly incentives to use digital technologies (e.g., industry 4.0) for company anti-corruption efforts, limit compliance capacity, especially for SMEs. Secondly, it is crucial to seize the right moment, aligning Responsible Business Conduct initiatives with company deadlines to match the pace of business operations.

Moreover, the success of the company's training and awareness program depends on several factors. The first is knowledge exchange and practical exposure, which is achieved through public-private partnerships and active involvement in relevant OECD fora which is also key in ensuring the alignment of training contents with gold standards. Furthermore, sponsorship, endorsement, and active presence of top management during these initiatives are fundamental to convey the tone from the top. Finally, to enhance engagement, it is essential to design training content using the right mix of skills and capabilities, and consistent language that captures the attention of all management and relevant stakeholders. As a result, the creation of integrated project teams, equipped with integrity and resilience skills, ensures the delivery of effective business solutions that align with company targets.

## Communication and awareness-raising initiatives:

1. **Legality days:** events dedicated to the entire ASPI Group staff on integrity and ethical standards involving SMEs and key representatives of the business community.
2. **Legality Tree & Prism approach:** examples of brain-gut communication exposed in main areas of the headquarters and all local offices, visible to all employees and third parties in order to spread a Responsible Business Conduct culture and key deliverables (policy antifraud model, integrity pack, company top risks, etc.) by using QR Codes.
3. **Business Integrity & Resilience video pills:** short clips to disseminate relevant information, news and standards to ensure greater commitment and awareness of all employees.





Headquartered in Itajai, Brazil, BRF is one of the global leaders in the agribusiness sector. Its almost 100,000 employees based in 130 countries serve clients all around the globe. Considering the geographic spread of its operations, one of the company's top integrity risks is related to the onboarding of new staff and the engagement of middle management, many of whom initially lack awareness of the importance of integrity.

To address this issue, BRF has engaged in several initiatives. On the one hand, the company developed comprehensive training materials that its middle management can use for discussing the importance of integrity with their teams. Since two thirds of BRF's employees do not have direct access to corporate computers, the company printed and distributed the material across its main locations. This material typically consists of one-page documents written in simple and accessible language that explain the company's policies and procedures to all employees. New one-pagers are developed and distributed once per week, ensuring integrity is a continuous topic in the interactions between middle managers and their teams. Reflecting that BRF is in the food industry, these documents are called "Integrity Recipes".

One of the main challenges in developing and maintaining this initiative has been the need to simplify the language, considering the low education level of some employees, whilst bringing across the essential details of the company's policies and procedures. Development of simple language material, with continuous training should be very helpful to keep awareness and increase the engagement related to integrity matters. Feedback from employees suggests that these efforts have been successful: In line with its internal assessment processes, BRF evaluated the effectiveness of this

training material over 27 production plants, 20 distribution centers, and 22 sales branches. Results showed that 85% of the employees surveyed were favorable to this and similar integrity-enhancing initiatives and rated the integrity recipes as highly effective.

On the other hand, BRF contributed to the 2022 Coding4Integrity initiative in Brazil as one of the local partners of United Nations Office on Drugs and Crime (UNODC). The initiative was aimed at promoting the importance of integrity amongst younger generations by means of a two-day Hackathon. In this way it leveraged young people's skills and passion for digital innovation and social entrepreneurship to empower them to tangibly contribute to related discussions and ultimately work towards global efforts to strengthen business integrity. The participants in 2022 Hackathon were asked to develop an information and communication technology-based solution that addresses one of the following corruption-related challenges: gender-sensitive reporting – an essential tool to detect and prevent Corruption; transparency and accessibility at the service of small businesses – guiding small companies through the bidding process; or know your counterparts – enhancing access to information about business integrity. BRF contributed through both in kind donations, such as food and drinks, and through mentoring the project developers. The initiative was also recognized in the United Nations 2023 "Report of the Secretary-General on the Work of the Organization".

Whilst the practical applicability of the solutions developed during the Hackathon is limited, the educational effect was positive as it effectively raised awareness on ethical matters amongst the young participants.

# ERICSSON

Ericsson is one of the world's leading information and communication technology companies. It employs around 100,000 people and operates globally in more than 180 countries. Ericsson's strategy is to leverage its leadership in mobile networks to drive focused expansion in its enterprise segment, lead the industry with critical innovations, and capture strategic business opportunities.

With this high revenue generation potential, rapid expansion and innovation, complex governance structure, and interrelations between public and private sector components, the company faces many corruption-related risks in the telecommunications sector. These include risks of demands for bribery and kickbacks, especially in regions where interactions with government officials and corrupt practices are prevalent. To address these risks, Ericsson rolled out an extensive compliance program, where training initiatives play a critical role in spreading integrity and ethical standards within the company. The concrete formats vary depending on whether they focus on the company's leadership, all employees, or suppliers.

One example for the former are so-called speak up roadshow workshops conducted in multiple countries by Market Area Compliance teams with support from Ericsson's global Allegation Management Office. These workshops, which are mostly directed at leadership teams and middle management, focus on raising awareness on the company's allegation management end-to-end process and on promoting a speak up culture within the company. Each roadshow is tailored to the country where it is rolled out and takes one day. The company found it was very powerful to have representatives from group and local compliance provide different perspectives and, in particular, to have presenters from the Allegation Management Office describe in detail the allegation management process: from the compliance concern being raised initially, via the investigation, to the closure of a case following remediation for a substantiated Code of Business Ethics breach.

Generally, employees greatly appreciate the opportunity to ask questions about raising compliance concerns and many share their own experiences. The company saw an increase in allegations after such workshops, evidencing that the efforts are working well. The roadshows also allowed Ericsson to gain insight into differences in local customs and practices around speaking up. For example, in some countries, employees prefer speaking up in person rather than using Ericsson's anonymous platform. Knowing this helps the company ensure that there are enough local resources in the right places. Another example is "Leading for impact", a 15-week program with 4 virtual workshops of 60 minutes each,

which is part of Ericsson's Global & Leadership development programs. Implemented with the help of an external training company, it aims to help the company's managers apply best judgment and seek advice and support when facing difficult situations. This also involves role plays simulating ethical dilemma situations that participants need to recognize and address. Yet another program provides local leaders with the necessary skills and materials to conduct ethics and compliance-related dialogue and training sessions about Ericsson's Code of Business Conduct with their teams.

An example of training targeting all staff of the company is an engaging and entertaining e-learning and compliance course which all of Ericsson's employees need to complete. Instead of the 1-hour lecture-style video used previously, Ericsson now provides a 20-minute awareness film on an internal e-learning platform. It is based on real-life scenarios and made in cooperation with a film production agency. It is followed by a knowledge check that leads learners to a single resource point for all topic-related queries. This shorter course format not only improves the learner experience and focus on the key behavior change requirements within the organization, but also allows saving working time throughout the whole organization - a total of around 50,000 hours per course. Satisfaction scores and engagement rates amongst employees are high and the film received several international training awards.

Ericsson also has an internal Compliance Boost Program, which allows employees with four to ten years of experience to rotate onto the various Ericsson compliance teams for 12 months and then return to their previous roles. This allows selected employees to boost their career by developing important skills and competencies, while fostering the integration of compliance and integrity within the company.

Finally, Ericsson holds ethics and compliance awareness workshops on Ericsson's Code of Business Conduct with its clients and vendors, with a heightened focus on third parties doing business in high-risk countries as defined in terms of international corruption indices and Ericsson's internal methodology. These virtual workshops are held when Ericsson starts working with a new third party and repeated quarterly, on average.

The results of these initiatives are greater awareness and understanding of Ericsson's compliance program by all levels of management as well as employees more broadly. The trainings have helped break down silos, embed compliance awareness into the day-to-day business, and promote a speak-up culture. They also empower employees to become compliance ambassadors themselves, making them less dependent on their respective compliance office.



# Nestlé

Nestlé is the world's largest food and beverage company, operating in 188 countries, with more than 300 factories located in 77 of them. Its shares are publicly traded in Switzerland. Due to its global footprint and geographic diversification, Nestlé's global strategy to address bribery and corruption is further complemented by local initiatives that can be better tailored to the local risk landscape and reality. For example, Nestlé Ecuador created its Business Integrity Program (i.e., "Programa Empresarial para la Integridad") in 2019. The program promotes knowledge transfer to SMEs on preventing corruption and endorsing ethical behaviors throughout the company's value chain. It has two pillars:

The first pillar consists in building capabilities through dedicated sessions with university students. In 2023, for example, Nestlé Ecuador focused on training law students to become "champions" of its program and advocate against corruption. For this, 100 law students were trained in Quito and Guayaquil. To date, more than 500 students have been trained on the program and compliance more broadly.

The second pillar is focused on equipping SMEs with ready-to-use business integrity resources that were created leveraging the standards and ways of working of Transparency International and the International Chamber of Commerce, as well as the policies of Nestlé Ecuador. The resources include:

- An anticorruption policy template
- Legal clauses templates to prevent bribery and corruption
- A conflict-of-interest process template
- A risk assessment matrix
- An explanation of key terminology on anti-bribery and corruption

These digital, ready-to-use resources are provided free of charge and enable companies within its supply chain to create an anti-corruption program based on international anti-corruption standards. The process for promoting the program along the value chain is the following: first, an introductory workshop is organized with the representatives of interested companies. The interested company is then given access to the resources of the program, including digital tools. This is done via a simple infographic, which guides on the initial 7 steps to kick off the program, including a self-assessment.

Each resource includes a summary of the tool, the benefits of implementing the tool, and recommendations. The final step is to download an editable version of the resource, allowing each business to adapt each of them to their needs.

Since its creation in 2019, more than 150 companies as well as the Chambers of Industry in Quito and Guayaquil have been trained on the program and given access to its resources. The feedback received included that the resources are easy to use and fit the needs of businesses.

The most significant challenge Nestlé Ecuador faced when rolling out the program was the lack of resources to ensure its sustainable implementation in the long run. This meant that companies sometimes lacked incentives or rigor to implement the program fully over time. Nestlé is thus evaluating forming alliances with stakeholders, such as the Alliance for Integrity, a business-driven multi-stakeholder initiative, to create a continuous process that facilitates regular workshops within each company to guide them and monitor progress. Another challenge Nestlé faced was the difficulty of convincing SMEs of the importance of engaging in the program. Most SMEs in Ecuador are focused on their day-to-day business and their economic and operational growth. Therefore, many companies adopted this program only in response to a concrete risk situation rather than proactively.





Novartis is Swiss-based multinational pharmaceutical company present in more than 100 countries. As such, it needs to interact, inform, and work closely with stakeholders from across healthcare systems and beyond. These external stakeholders include Health Care Professionals (HCPs) and Health Care Organizations (HCOs), patients, wholesalers and distributors. Novartis is committed to do this in an ethical, responsible and transparent manner. This requires constantly finding new ways to expand patient access to its treatments and building trust with society.

The operating models and risk profiles Novartis faces across the countries it is active in are very diverse. Therefore, tailored training and education programs are required to ensure the company's policies and principles are globally understood and met. Based on this challenge Novartis has developed a training approach built on three pillars:

#### 1) General training approach

Novartis uses a web-based approach for delivering Ethics, Risk and Compliance (ERC) training globally. To select the topics, the Global ERC Training & Development team conducts an annual curriculum risk analysis. A data-driven approach is used to select e-training topics which apply to all or the majority of Novartis associates and will mitigate enterprise-wide risks. Multiple data sources (Enterprise Risk Management, Risk Assessment and Management, Central monitoring, SpeakUp, Audit) are used to perform a holistic analysis to identify top very high, high, and medium risks across these frameworks, which can be mitigated through learning solutions. As, in some countries, the applicable laws, regulations, and industry codes are stricter than the global standard, the trainings developed are easily adaptable and allow for incorporating information on additional local requirements.

The ERC organization in each country where Novartis is active is responsible for developing and implementing a targeted risk based local training plan on an annual basis. The local ERC training plan defines additional local trainings for internals and contractors, where applicable and in compliance with local laws and regulations, complementing the global compliance training curriculum and targeting local risks and training needs related to ERC topics.

This approach to ERC training has strengthened oversight and management of companywide ethics and compliance training. The centralized creation of training courses avoids the duplication of training development at a local level. In the same vein, translation and training assignment services are centralized to ensure efficiency and cost savings. Finally, training and education is provided in the moment of need and tailored to the operational responsibilities of our associates.

#### 2) In depth risk-based training approach

Novartis provides training on a continuous basis through a central repository of knowledge hosted within the IT system that operationalizes policy and handbook requirements. Educational and information nudges are also built in throughout the system and are made available when required. For this, an in-depth training portfolio for local implementation is centrally owned and maintained. The training topics and languages available are selected based on pre-identified risk areas (Funding, Events with HCPs, Public Official interactions, etc.). Available trainings are used by the local ERC organization to implement their local risk-based training plans in a plug and play fashion. Local training assignment via the company's Learning Management System is also managed as a centralized service provided from the global to the local ERC organization. Concrete examples include the following:

- *High-risk country support:* To support high-risk markets and build awareness on anti-bribery and corruption, Novartis, in collaboration with Richard Bistrong, developed an e-training course based on his experience as a senior sales executive and the consequences he faced for getting involved in corrupt business practices. In line with the company's innovative approach to how mandatory training is assigned, Novartis organized a centralized roll out of the training. For this, regional Compliance Officers were asked to nominate countries to be included in the scope of the launch. Over 40 countries were part of the roll out.
- *Global trainings content relevance:* To make its global ethics and compliance e-trainings relevant to the roles and needs of its associates, trainings are tailored to the specific profiles of employee groups, with content based on their roles and responsibilities.



In addition, Novartis allows associates to select from a series of application cases and only go through the one that is closest to their role.

- *Fit to Commit – gamified annual refresher training:* Novartis increased ethics and compliance training engagement by using a gamified concept including practical scenarios that cover multiple Code of Ethics commitments in a single training. For increased applicability, the training components use scenario-based content inspired directly from actual cases that occurred within the company. While the training's structural elements remain consistent, Novartis updates the themes and scenarios each year to keep the content relevant, aligned with current risks and engaging.
- *Why good people do bad things program:* This is an awareness program supporting the organization's journey toward a value-based culture. It is offered as a 3.5-hour session, both in classroom and virtual settings. Groups are typically between 10-20 associates. It is aimed at helping Novartis move from "unconscious unethical" to "unconscious ethical". This means fostering a culture where mistakes are acknowledged, discussed, and learned from, and where there is a clear sense of "walking the talk" from the top. It supports associates in identifying actions required to move from rules based compliance to value based compliance. Upon completing the program, associates sign a personal action contract.

### 3) Learning Beyond Novartis (LBN)

LBN delivers sustainable learning outside the company, helping key partners and networks build skills to strengthen healthcare systems and improve health outcomes. Novartis achieves this by integrating diverse voices across healthcare systems, policy networks, educational institutions, and commercial entities to co-evolve measurably impactful solutions. However, LBN is not covering anti-corruption yet.

#### A specific example – the cooperation of Novartis Mexico with UNODC

Novartis has been present in Mexico for more than 80 years. It directly employs more than 1,000 people in the country and generates an annual turnover of USD \$387 million. The main corruption risks in the country are related to the public

system of purchasing pharma products which involves frequent interactions with public officials. To tackle these risks, Novartis Mexico participated in the "Education for Integrity Program" together with the United Nations Office on Drugs and Crime (UNODC). This involved:

- Support to the implementation of ethics and integrity courses for students from different Universities such as Tecnológico de Monterrey and Universidad Panamericana. There, practical cases were lectured by Novartis Mexico professionals to turn students into integrity ambassadors by raising their awareness of ethical dilemmas they may face in their professional future and of how corruption impacts Mexican everyday life.
- Participation in an "Integrity Hackaton" where students in Mexico and Brazil created digital solutions to prevent corruption in their country.
- The possibility for students hired by the company to complete integrity and anti-corruption programs to boost their professional development.
- Presenting the company's experience of tackling corruption in Mexico to business representatives from Kenya and Pakistan
- Trainings in anti-bribery developed together with UNODC delivered to high-risk vendors of the company.

Moreover, Novartis staff participated as lecturers in the UNODC Program Business Integrity in Latin America and the Caribbean, showcasing the successful implementation of the Novartis compliance program.

The cooperation with UNODC as an independent organization was helpful to create commitment amongst staff and stakeholders and boost the impact and credibility of the company's measures.

# Panasonic

Panasonic Holdings Corporation is a business entity that has 523 consolidated subsidiaries and engages in development, production, sales, and service activities in related business fields as a comprehensive electronics manufacturer. Its scope consists of five main segments, including Lifestyle, Automotive, Connect, Industry, and Energy. The company's main sales markets include Japan and China as well as the Americas, Europe, Asia, but it is also active in other regions.

## Policy

The company has a comprehensive code of conduct entitled "Panasonic Group Code of Ethics & Compliance", the latest edition of which was adopted in April 2022. This Code encapsulates the company's revised Basic Business Philosophy and defines the commitments to be fulfilled by each company and employee within the Panasonic Group as they carry out the Group's business. It has been translated into 22 languages to ensure that it is understood by employees everywhere. The Code of Ethics & Compliance stipulates that Panasonic does not tolerate any acts of bribery or corruption in its relations with government officials or with other commercial business partners. Panasonic Group has also established dedicated "Guidelines for Anti-Bribery and Anti-Corruption" for its business partners, which require them to comply with all anti-corruption laws in their respective jurisdictions and not to engage in bribery, corruption, or other improprieties in connection with Panasonic Group's business.

## Training and Education

In 2019, the company adopted four sets of rules aiming to prevent bribery and corruption:

- Global Anti-Bribery / Anti-Corruption Policy
- Rules on Third-Party Intermediary Risk Management for Anti-Bribery / Anti-Corruption
- Rules on Gifts and Hospitality for Anti-Bribery / Anti-Corruption
- Rules on Conflicts of Interest

Based on these rules, Panasonic provides regular training to directors and employees who have contact with government officials in connection with their duties.

More broadly, Panasonic conducts training and awareness building measures on the Code of Ethics & Compliance and other compliance-related materials for all its employees through a variety of educational materials, including e-Learning, throughout the year. In addition, the company requires its employees to submit a written pledge to comply with the Code at the time of employment or when assuming a new position of director or officer withing the company. Furthermore, each of the relevant organizations including company's overseas offices conducts compliance-related training for relevant staff categories, according to the risks relevant to their businesses and regional characteristics.

Some concrete examples from recent years are set out below:

- In the fiscal year 2022 (ending in March 2023), Panasonic trained all Group employees on the Code of Ethics & Compliance to re-emphasize compliance. The company provided separate off-line training for employees who cannot take the e-Learning courses.
- In fiscal year 2021, Panasonic created and disseminated a compliance video based on lessons learned from an actual case so that employees could understand the importance of a "speak-up" culture.
- In the fiscal years 2018 and 2019, Panasonic created and disseminated compliance Manga comics on anti-bribery and anti-corruption to its employees.





Rolls-Royce develops and delivers complex power and propulsion solutions for safety critical applications in the air, at sea and on land. Sectors the company operates in are Civil Aerospace, Defense, Power Systems and Electrical.

Rolls-Royce considers appropriately tailored training and communications a key element of a well-designed ethics and compliance program. Each year Rolls-Royce runs a mandatory learning program, where a sample of Group Policies to cover is selected. The policies are chosen to focus on the prevention of bribery and corruption (e.g. facilitation payments, conflicts of interest, gifts and hospitality, confidential information). Rolls-Royce works with an external learning provider to develop the courses with the content mainly being developed by the area of the business responsible for the specific Group Policy.

Mandatory learning is delivered via a combination of computer-based learning (CBT) and facilitator-led learning. Completion rates across the Group are tracked via the automated and electronic learning platform where the learning material is deployed (e.g. Workday Leatro). A Mandatory Learning Governance Board meets regularly to monitor completion rates, reviews the circumstances relating to non-completion by managers, and determines the relevant actions.

In addition to the mandatory training for all employees, there is also dedicated training for exposed functions. Examples include Know Your Partner due diligence training for proposers or Anti-Bribery and corruption training for the sales and procurement functions. Rolls-Royce also provides dedicated training for its ethics & compliance teams. Examples include the Know Your Partner week, a learning and development program, and the local ethics advisers quarterly community of practice sessions, training, and annual conferences. Rolls-Royce also has a Leadership Toolkit, a digital platform providing a range of resources to managers to support them in leading their teams. Tools include resources around leading with care and supporting speaking up.

The company's annual mandatory learning program has been running in its current format since 2018, and engagement continues to be high. In 2022, 92% of all employees and 99.5% of all leaders completed all the mandatory learning courses by the deadline. Senior leaders show support for the company's ethics and compliance program in several ways.

For example, recording videos for use in Rolls Royce's Annual Speak Up Report, supporting campaigns such as Win Right Week, and acting as company sponsors of the Rolls Royce annual mandatory learning program.

To ensure the success of its training program over the years, the company had to address various challenges. On the one hand, making sure the content is available and translates well in all relevant languages across the group is not an easy task for a company with operations in more than 48 countries. Moreover, making related materials available and relevant to employees who do not have access to a computer (for example, shop floor employees) has also proven difficult. To continuously improve the performance of the program and keep it up to date, a lessons-learnt exercise is conducted each year following launch of the mandatory learning program with both the relevant group policy owners and the learning content service providers. Any feedback received from employees is also reviewed with the Mandatory learning governance board as part of the program.

# SIEMENS

Siemens AG (Berlin and Munich) is a technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In addition, Siemens holds a minority stake in Siemens Energy, a global leader in the transmission and generation of electrical power. As of September 30, 2022, the company had around 311,000 employees in over 190 countries worldwide.

Siemens shows zero tolerance toward any type of corruption and takes swift action when it occurs. Yet, compliance means much more than just adhering to laws and to the regulations set out in the Siemens Business Conduct Guidelines. Compliance forms the basis for all its decisions and activities, in line with the principle "only clean business is Siemens business".

Collective Action to fight corruption is the company's strategic response to the significant compliance risks it faces in numerous markets. Together with other companies, the public sector, non-governmental organizations, academia, and civil society, Siemens supports long-term initiatives on international level and on the ground. For this, the company enters into integrity and compliance pacts with its partners to promote clean business. Siemens is also deeply engaged with international organizations that promote responsible business practices and it actively supports the enactment of the United Nations Convention against Corruption and the OECD Anti-Bribery Convention. Since 2011, Siemens has been continuously involved in the relevant G20/B20 Task Forces.

The Siemens Integrity Initiative is the company's overarching program in this regard. The initiative supports organizations and projects that combat corruption and fraud through Collective Action as well as education and training in order to promote clean markets and fair competition. Since 2009, Siemens has committed over USD 120 million to 85 Collective Action projects in more than 50 countries. All projects have a clear focus and can demonstrate objective and measurable results with the potential for expansion and replication in the future.

## Siemens Integrity Initiative – Three Funding Rounds plus Golden Stretch Round support a sustainable Collective Action Network with 85 Projects and a total committed Funding of ~ USD 120 Million



# SIEMENS

Under the initiative, the company's Collective Action projects to promote responsible business conduct and integrity are positioned in many thematic anti-corruption areas. Activities include creating alliances, strengthening the rule of law, strengthening voluntary standards, creating incentives for good performers, developing curricula, capacity building, platforms for dialogue and knowledge sharing. Based on a strict governance and reporting process Siemens publishes a detailed periodic review of these projects in its [Annual Report](#).

Examples of projects funded under the Siemens Integrity Initiative include:

- [The International Anti-Corruption Academy \(IACA\)](#): Over three funding rounds IACA has developed 3 unique Master Degree Programmes and 1 certificate programme:
  - Master in Anti-Corruption (MACS)
  - International Master in Anti-Corruption Compliance and Collective Action (IMACC)
  - Master in Anti-Corruption and Diplomacy (MACD)
  - Anti-Corruption Collective Action Certificate (ACA)

To date, there have been ~ 5 100 graduates and more than 1 200 graduates and participants from Least Developed Countries and Emerging Markets covered through scholarships and fee waivers under the Siemens Integrity Initiative.

- [The United Nations Office on Drugs and Crime \(UNODC\)](#): After the launch of the Global Education Project in 2019, which focuses on Kenya, Mexico and Pakistan, more than 300 lecturers in 18 universities have been trained to deliver anti-corruption modules to students. Moreover, more than 28 000 students have been taught on the modules and now possess increased awareness of ethical issues and knowledge of how to prevent and fight corruption in the private sector.
- [B20 Collective Action Hub](#): Run by the Basel Institute on Governance and launched in 2013, this global resource center on anti-corruption offers a range of anti-corruption publications and tools, as well as a database of over 280 Collective Action initiatives and projects designed to raise standards of integrity and fair competition. Funding under the Siemens Integrity Initiative played a major role in allowing the center to be created and expanded over the years.

Thanks to the promotion of Collective Action under the Siemens Integrity Initiative, Collective Action has received wide recognition among international and regional organizations as well as government and private sector representatives over the past decade. References to the importance of Collective Action in fighting corruption have been embedded in the G20 / B20 process, and they are increasingly included in the national anti-corruption agendas of various governments.



Snam is an energy infrastructure company headquartered in Italy. It is committed to the energy transition using resources and energy sources compatible with environmental protection and progressive decarbonization. To this end, the company carries out its business activities with the aim of pursuing sustainable success through the creation of long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the company. Snam's corporate purpose is the direct and indirect exercise, in Italy and abroad, of regulated activities in the field of transport, dispatch, distribution, regasification and storage of hydrocarbons, and any other instrumental, ancillary or complementary activity.

In order to promote a culture of integrity within the company, Snam's Compliance & Business Integrity department conducts annual training sessions on the company's code of conduct for all its employees. In addition Snam has recently introduced innovative training methods on anti-corruption topics for its staff and suppliers. Two examples are set out below.

#### Snam City online game

Snam City is an online game specifically designed for the Snam Group as a tool to spread and strengthen the culture of compliance and business ethics that is an integral part of the company's values. The e-game, which focuses on compliance issues, is aimed at improving workers' knowledge of the company's Code of Ethics, its Anti-corruption Guidelines, the ISO 37001:2016 Certification it achieved in May 2023, as well as privacy matters. The game consists of three «neighborhoods» dedicated, respectively, to:

- The company's Code of Ethics;
- Anti-corruption and ISO 37001 Certification;
- Privacy.

Each "neighborhood" has 16 questions with three possible answers. Once the user has selected an answer, an explanatory text box with hints or additional information will pop up, depending on whether the answer is right or wrong.

The «neighborhood» dedicated to anti-corruption features specific questions dedicated to the core principles set out in Snam's Anti-Corruption Policy, Anti-Corruption Guidelines, reputational audits on third parties, ISO 37001 and provided by the Anti-Corruption Committee. Furthermore, the test includes some practical examples of lawful conduct in accordance with the company's procedures (e.g. with respect to the acceptance of gifts).

#### ESG Training for suppliers

Snam has always considered its suppliers as valuable partners. In 2023, in light of the growing relevance of ESG issues and the company's commitment to the dissemination of related values, the Group implemented a «video pills» training for its suppliers or potential suppliers. "Video pills" are short videos of around 20 minutes on different ESG issues. One of them is dedicated to Anti-corruption: It covers:

- i. A brief overview of Italian legislation and international best practices (e.g. ISO 37001);
- ii. Information on the commitment of Snam's Top Management and employees to the fight against corruption as well as relevant internal policies and safeguards (reputational audits, Ethical and Integrity Pact, predisposition of specific contractual clauses);
- iii. Snam's ethical culture in the management of its supply chain and the implementation of a multi-stakeholder engagement.

The "video pills" are available on the company's online «Suppliers Portal». At the end of each video session, participants need to answer a short questionnaire (4 questions, with 3 possible answers each).



The Center for International Private Enterprise (CIPE) is a business-oriented NGO working at the intersection of democracy, governance and economic development, partnering with business associations, think tanks, and other organizations to implement homegrown, private-sector solutions to local challenges. CIPE's mission is to strengthen democracy through private enterprise and market-oriented reform, fulfilling a vision of a world where democracy delivers the freedom and opportunity for all to prosper. Founded in 1983 and based in Washington, DC, CIPE is active in over 20 countries through its field offices and representatives, with a network of civil society and private sector partners in more than 70 countries. In nearly 40 years, CIPE has carried out close to 2,000 projects in over 100 countries. CIPE's core focus areas are Anti-Corruption and Ethics; Business Advocacy; Democratic Governance; Enterprise Ecosystems; Trade; and Women's Economic Empowerment. CIPE is an affiliate of the U.S. Chamber of Commerce and a core institute of the National Endowment for Democracy. Two examples of the work of CIPE's regional offices are set out below.

#### CIPE Africa – Ethics 1st initiative

Ethics 1st is a multistakeholder initiative led by CIPE that builds the capacity of companies in emerging markets, with a focus on Africa. Its efforts focus on standardizing business practices, developing sound corporate governance and business-integrity systems, and creating pathways for accountable and sustainable investment in the region. Companies that register with Ethics 1st demonstrate to global partners and counterparts their commitment to compliance and business ethics.

Ethics 1st offers risk management and compliance verification solutions through an innovative combination of a digital platform and a network of Africa-based compliance experts. The framework provides a customizable set of tools for companies and investors of all sizes, across economic sectors, and targeting various export and import markets. Companies receive a clear roadmap for compliance with all relevant global standards and national regulations, and their investors enjoy an assurance that the African supply chains and vendors covered comply.

African businesses that register on Ethics 1st have access to tailored capacity-building support and independent compliance assessment at a fraction of the market cost for this service, which makes them competitive and resilient. Each business is ranked green, silver, or gold based on the strength of its governance and business integrity systems. CIPE established a network of compliance professionals, the African Business Integrity Network (ABIN), to provide the necessary training, consulting, and coaching on compliance and risk management. The ABIN offers substantive and comprehensive programs for businesses to help them learn about internationally recognized standards of compliance and best practices and to develop adequate risk-management capacity for their local contexts and industry conditions. Both the Ethics 1st methodology and the ABIN training curriculum are developed by CIPE's in-house anti-corruption experts.

After building their capacity, companies listed on Ethics 1st can opt to undertake an independent verification of their ethical maturity. This verification process involves a two-step exercise which includes a comprehensive field audit and an anonymous review by an Ethics 1st advisory committee consisting of industry experts.

In the last two years, over 700 African businesses have signed up to use Ethics 1st as a standard to align their compliance capacity with globally recognized standards. The support provided by ABIN gives these businesses the capacity to understand the corruption risks they face and build effective mitigation systems to detect and prevent corruption. As creating a business case for anti-corruption compliance amongst local companies is the biggest challenge for this initiative, Ethics 1st combines training with access to better business opportunities through exposure to global value chains. As a result, CIPE has recorded an increase in demand for business integrity training from the business community in countries such as Nigeria, Kenya, Ghana, and South Africa.



### CIPE Colombia – Transparency in public procurement

The CIPE Colombia Office is implementing a project in Colombia, Ecuador, and Peru to promote transparency in public procurement. CIPE and its ally Ipsos CIPE started by surveying large, medium, and small entrepreneurs from different sectors of the three countries on the challenges of transparent public procurement. Then, CIPE and Ipsos trained groups of surveyed entrepreneurs in each country on different international standards and the CIPE Ethical Conduct & Business Integrity recommendations. Subsequently, using the minipublics methodology, the organizations and the entrepreneurs discussed the survey results and jointly defined roadmaps for each country with recommendations for governments and the private sector. Counting survey respondents and people trained, 2,200 entrepreneurs have so far been covered by the program.

In Colombia, the implementation of the road maps already started. Initially, the NGO *Transparencia por Colombia* trained entrepreneurs in Buenaventura, Cali and Cartagena on business ethics and public procurement, using real cases on which they must reflect on risks and measures that companies should take to solve them. In a second cycle, another CIPE ally, the ICESI University, will train entrepreneurs in public procurement, enabling them to take advantage of the opportunities that arise from contracting with government entities in a transparent environment. This training will be carried out in coordination with local chambers of commerce.

After the training, ICESI University and CIPE will develop proposals for the three cities' new local governments to design, adjust, and implement strategic sourcing processes that incorporate local micro, small and medium-sized enterprises. Likewise, the University will offer guides to generate public procurement control panels facilitating citizen oversight.





ICC Austria specializes in helping Austrian business go international. It helps companies with legal issues which arise when exporting goods and services, especially to countries outside the European Union. This includes support on export contracts, securing trade finance (L/Cs, Guarantees), dispute avoidance strategies & dispute settlement, commercial crime avoidance, as well as the prevention of corruption.

On the latter, ICC Austria coached exporters in higher risk countries on how to avoid corruption, ideally by not even being asked for a bribe. ICC shows strategies and communication possibilities, and offers ideas on how to change the mindset of presently corrupt business partners. In all this, the chamber takes a "Commercial Approach to Anti-Corruption" (as opposed to one focused on legal & compliance). The key message of this approach is "not being corrupt increases profits and reduces risks in the long-term."

This commercial approach takes into account that in countries with a high corruption risk most people have been socialized with corruption. They thus consider it as a normal part of working, doing business and earning money. The standard legal & compliance approach to tackle this is about telling people that corruption is a criminal offence that can bring them to jail. In high-corruption environments there often is a strong resistance to the effective implementation of anti-corruption measures as locals wonder how they can provide for their families without committing acts of corruption.

Therefore, the key idea of ICC Austria's "Commercial Approach to Anti-Corruption" is about telling people that, by avoiding corruption, they can both increase their profits and reduce their risks. The approach draws people's attention to the fact that, while earning money through corruption may be easy, keeping illegally gained earnings over one's lifetime is difficult. In this way, the approach of ICC Austria tries to leverage the self-interest of rational business actors in maximizing their profits to change the way they think about corruption. . This is achieved by extending the timeline their decisions are based on. It shifts the focus from participants' next quarterly profit to maximizing their income over a lifetime.

In all of this, to achieve meaningful impact and change the hearts and minds of presently corrupt individuals, it is important to speak "business language" – not a legalistic language.

Moreover, it is important to understand the longer-term goals, hopes and fears of those presently corrupt. When taking both into account, the success rate of measures aiming to effectively reduce corruption is higher.

ICC Austria's attendees at presentations are businesspeople, mainly from countries ranked as higher-risk countries by the Transparency International Corruption Perception Index. Their reaction to the "Commercial Approach to Anti-Corruption" is often curiosity – not antagonism. In many cases, the presentations created heated discussions between participants that likely continued long after the day of the training. The organizers of past events were local business and industry associations, ICC National Committees, the World Chamber Federation, local and international law firms, the Siemens Integrity Initiative, non-profit organizations as well as government ministries and international organizations, including the OSCE, EU, and the EBRD.





International  
Federation  
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The International Federation of Accountants (IFAC) is the global organization for the accountancy profession. Founded in 1977, IFAC has 180 members and associates in 135 jurisdictions, representing more than 3 million accountants in public practice, education, government service, industry, and commerce. The organization supports the development, adoption, and implementation of international standards for accounting education, ethics, and the public sector as well as audit and assurance. It supports three independent standard-setting boards, which establish international standards on ethics, auditing and assurance, and public sector accounting, as well as the International Panel for Accountancy Education, which maintains the global standards for accountancy education. It also issues guidance to professional accountants in small and medium business accounting practices.

IFAC recognizes that the global accountancy profession is well-positioned to identify and report corrupt practices and to promote transparency, accountability, and ethical behavior in financial reporting and corporate governance. To be able to play that role, accountants must, however, be equipped with the right tools to do so. Therefore, “Harnessing the Full Potential of Education and Professional Development” is the first pillar of IFAC’s Action Plan for fighting Corruption and Economic Crime, where the organization sets the tone for the global profession to have anti-corruption conversations with stakeholders at the international level. IFAC focuses on 3 main target groups for its Anti-Corruption education action: Professional Accountancy Organizations (PAOs); Policy makers and key stakeholders; and individual accountants.

#### Education for PAOs

Becoming a professional accountant today requires years of intensive study, practical experience, assessments, and qualifications through a PAO. To maximize the accountancy profession’s contribution to the fight against corruption and economic crime, it is crucial to best harness this journey to ensure that professional accountants have the skills and competences required to play their part. Therefore, IFAC encourages its member organizations to incorporate ethics, anti-corruption and anti-money laundering (AML) education into their curricula, professional development programs, and training courses for business leaders and public officials. In this context, IFAC recently produced a new tool to help professional accountancy organizations take leading roles in the anti-corruption fight in their jurisdictions:

Global Fight, Local Actions: Anti-Corruption Advocacy Workbook for PAOs equips PAOs and accountancy profession leaders with the background and framework to craft bespoke approaches and messages that best fit their jurisdiction and needs. At the regional and local level, PAOs have a critical role in setting the tone in their jurisdiction, emphasizing their role as committed partners with external stakeholders and being clear with their members about the importance of their public interest responsibility. This workbook provides a framework that PAOs can use to develop their own engagement plan for anti-corruption. It recommends stakeholders PAOs should engage, key messages, and practical tools to take these messages to stakeholders.

In addition, Connecting Your Educational Programming to Emerging Trends, is aimed to guide professional accountancy organizations in how they can act today to prepare their current and future members to seize opportunities presented by emerging trends using insights from the IFAC Professional Accountancy Organization Development and Advisory Group. These insights address four emerging trends, including anti-corruption efforts, that will help PAOs ensure their own and their members’ resilience, relevance, and adaptability today and into the future.

Through its work on Accountancy Education, IFAC provides a forum for its members to both share experiences and best practices to develop specialized qualifications and certifications related to corruption and other economic crime topics, and also to assist their members to develop the skills and competencies to combat them.

As part of its Action Plan, IFAC committed to conduct a **global stock-take** of the extent to which corruption and money laundering topics are part of pre-qualification training, assessments and continuing professional development in different jurisdictions worldwide. This data should serve as the foundation for further work with IFAC’s IPAE for better integration of corruption and economic crime topics into accountancy education.



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### Education for policymakers and other stakeholders

IFAC uses its policy and technical collateral to inform the discussion with global policymakers, standard-setters, law enforcement authorities, etc. One example is a joint publication with Transparency International UK and the World Economic Forum's Partnering Against Crime Initiative entitled Understanding Anti-Corruption Reporting. The paper looks at reporting standards, content and assurance practices, with a view to informing policymakers about sustainability reporting and highlights the urgent need for enhanced quality, reliability, and comparability in this area.

As IFAC believes a well-informed citizenry is one of the best defenses against economic crime, it has enhanced its participation in financial literacy initiatives such as the International Organization of Securities Commissions' (IOSCO) World Investor Week, the OECD International Network for Financial Education, as well as support for critical tax education and tax morale work by the OECD and others.

Events are also a very powerful awareness-raising and education tool to engage policymakers, regulators, standard-setters and educate them on the key issues impacting the profession: Therefore, IFAC regularly collaborates on joint events and webinars with business associations as well as international organizations, the European Commission, the European Parliament or the World Bank.

### Education for individual accountants

IFAC has developed a range of resources and initiatives to support anti-corruption efforts of individual accountants, including guidance on ethical behavior, anti-corruption and AML training programs, and initiatives to promote transparency and accountability. IFAC's key reference in this area is IESBA's International Code of Ethics for Professional Accountants, which sets out the ethical principles and requirements that professional accountants must adhere to. The Code includes provisions on integrity, objectivity, professional competence, confidentiality, and professional behavior, all of which are important in preventing and detecting corrupt practices.

IFAC also supports PAOs in educating individual professional accountants with resources like Exploring the IESBA Code and AML: The Basics developed collaboratively with ICAEW, (based on the FATF's Guidance for a Risk-Based Approach for the Accounting Profession), as well as the broader wealth of resources on the IFAC Knowledge Gateway. This includes supporting translations into additional languages and additional practical guides on relevant corruption and economic crime topics.



MedTech Europe is the European trade association representing the medical technology (“medtech”) industry including diagnostics, medical devices and digital health. Its members are national, European, and multinational companies as well as a network of national trade associations that research, develop, manufacture, distribute, and supply health-related technologies, services and solutions. The mission of the association is to promote a balanced policy environment that enables the medical technology industry to meet the growing healthcare needs and expectations of its stakeholders.

The importance of the relationship between MedTech companies and Healthcare Professionals (HCPs) / Healthcare Organisations (HCOs) is one of the major corruption risks for medtech companies. HCPs are at the same time co-developers, customers, partners and recipients of training and education measures funded by industry. Moreover, many HCPs are public officials. The potential of conflicts of interest is high and companies need to carefully manage these relationships to ensure the integrity of the industry.

As compliance with existing laws is not sufficient to protect the integrity and reputation of the industry, MedTech Europe decided to establish its own set of rules. This so-called MedTech Europe Code of Ethical Business Practice (“the Code”) became binding for all MedTech Europe Members on 1st January 2018. The Code regulates all aspects of the industry’s relationship with HCPs and HCOs, including how companies enforce that their sales and marketing third-party intermediaries behave ethically and professionally at all times.

In order to ensure compliance with the Code at a multi-company, international level, MedTech Europe developed different tools and trainings (e.g. videos, training materials for distributors in several languages), self-certification schemes, cooperation with universities (e.g. Sciences Po Paris, Seton Hall) as well as extensive outreach and communication.

One example for a specific program created under the Code is the so-called Conference Vetting System (CVS), a centralised decision-making system that promotes transparency and consistency across the industry in assessing risks associated with providing financial support to medical education events as industry actors. CVS, which was introduced in 2012, is an independently managed system which reviews the compliance of third-party organized events with the Code to determine whether it is appropriate for MedTech Europe member companies to provide

financial support or engage in commercial activities, such as booths, advertising, or satellite symposiums. Thanks to funding from the Siemens Integrity Initiative, the CVS system could be expanded to the Middle East and Africa, too.

The Code also led to a phasing-out by 2018 of direct sponsorship of HCPs attending Third-Party Organized Conferences as either delegates or Faculty. Moreover, it led to the introduction in 2017 of a controlled framework with stringent rules for indirect sponsorship of HCPs through educational grants. Grants are since made public on “Transparent MedTech”, a European centralized platform for MedTech companies to disclose publicly the financial support they provide to independent medical education.

Despite these successes, challenges remain to ensure that integrity initiatives are sufficiently resources and to reach the smaller players in the MedTech market. Small and medium enterprises are a large part of the MedTech industry but rarely Members of MedTech Europe. Therefore, MedTech Europe made substantial efforts to raise the awareness of SMEs, in close collaboration with its national member associations, of the integrity risks addressed by the Code and encourage them to incorporate ethical responsibility into their organizations to create a level playing field.



# KAKI

KOALISI  
ANTI  
KORUPSI  
INDONESIA

Koalisi Anti Korupsi Indonesia (KAKI), also known as Collective Action Coalition Against Corruption, is a platform for Indonesia's private sector to collectively create, adopt, and spread effective anti-corruption compliance and ethics practices. Its objectives are to uplift the compliance standards of private-sector companies, develop a critical mass of companies dedicated to clean and transparent business practices, and co-create change in public services to enhance efficiency, transparency, and accountability.

KAKI is a collaborative initiative developed by the Indonesian Institute for Corporate Directorship (IICD), the Center for International Private Enterprise (CIPE) and Indonesia's most prominent business associations. It is led by the KAKI Advisory Committee, which is composed of appointed representatives from Indonesian business associations and meets quarterly to review the coalition's activity and provide strategic guidance.

KAKI proactively invites companies active in Indonesia to join the coalition. By signing the KAKI Declaration of Intent, a company publicly commits to support ethical business, counter bribery and join KAKI as a member. After, new KAKI member companies have 6 months to conduct a self-assessment of their anti-corruption compliance and ethics program, with the possibility of additional time if necessary. Each member company measures its program against the principles set out in the 75-point KAKI Checklist. It then provides a completed version of the Checklist and supporting documentation to the KAKI Secretariat. The checklist is derived from the ISO37001, FCPA, UK Bribery Acts, and Indonesian Regulation on Anti-Corruption. The whole process of certification can take up to 18 months, including reviewing the self-assessment, and revising and completing the evidence for the checklist KAKI supports companies during all stages of the process, enabling them to adopt the standard through training sessions and technical support. KAKI also gets support from business associations in raising awareness of the importance of having anti-bribery management systems in place amongst their companies' members.

Companies that are part of the coalition take the initiative to curb corruption and promote a clean

business ecosystem – making the business sector a part of the solution to the problem of corruption. In consultation with the Indonesian Corruption Eradication Commission (KPK), a government agency established to prevent and fight corruption in the country, KAKI also develops anti-corruption compliance policies rooted in Indonesian legal requirements.

Over the past two years, KAKI has invited more than 50 companies to join the alliance; 14 companies have already signed on, 6 are in the process of certification and another 21 are in the process of joining. During this period, KAKI got coverage in major news outlets in Indonesia, including BeritaSatu, CNBC Indonesia, Kontan, Investor ID, and Manajemen Magazine. It was also officially recognized by the Indonesian Coordinating Minister for Economic Affairs and the Minister of Cooperatives and SMEs KAKI's. A Memorandum of Understanding is now being negotiated between KAKI and the Indonesian Anti-Corruption Authority KPK, and KAKI has been involved in different UN and B20 initiatives. In December 2022, KAKI won the Anti-Corruption Excellence Award 2022 organized by UNODC and ROLACC in Doha, Qatar, as the only business initiative among the winners.

Thanks to the prominence and reputation KAKI has built itself, along with continuous advocacy campaigns, the number of companies interested in joining keeps growing. Yet, as many Indonesian businesses still lack the resources and expertise to develop and implement anti-corruption programs, KAKI aims to scale up its anti-corruption training offer to cater for different sectors.

# SNA

The National School of Administration (Scuola Nazionale dell'Amministrazione – SNA) is the main stakeholder in Italy entrusted with the task of training civil servants. It is also the main provider of training in the field of the prevention of corruption in public administrations, training 5.000-6.000 officials every year.

Training activities at SNA are strongly committed to increase ethical awareness and spreading a culture of integrity among public officials. The trainings on offer are divided into more generalist and more specialist ones. General-level trainings are addressed to all civil servants to promote and share values of ethics and integrity. At the specialist level, trainings are more technical and specific, and access is generally restricted to officials working in risk areas (risk owners) and to anti-corruption managers (risk managers), with a focus on risk management techniques applied to preventing cases of corruption.

Apart from training, SNA is also engaged in research in the field of anticorruption and promotion of a culture of integrity. The research "Training for change – Open administration and innovative training models for the efficient implementation of whistleblowing as a tool of co-participation to processes identification, prevention and treatment of maladministration" is now in its final steps. Through a survey delivered to about 6000 civil servants, this project aims at highlighting the role of SNA's training related to perceptions of whistleblowing in Italy, as it is not yet fully rooted in Italian culture and legal practice.

As a member of the Italian Open Government Partnership community, SNA established a "Community of practice of anticorruption officers" in June 2022, in compliance with the Italian 5th National Action Plan for Open Government. The community of practice created a digital platform that gives participants the possibility to cooperate, share experiences and information, and discuss dilemmas that anticorruption officer may encounter in their professional lives. Furthermore, several workshops led by experts, academics and civil society organizations and aimed at creating good practices in the field of corruption prevention are available to the participants.

In one year of activity, the SNA Community of practice expanded significantly, amounting today to more than 200 participants. Over 30 events, workshops and dialogues have been offered, and an evaluation of the outcomes of the workshops concerning whistleblowing is currently in preparation. Participants, guided by experts, have also developed two specific good practice proposals on whistleblower protection. Moreover, the community of practice is developing an innovative training method considering anticorruption officials not only as the addressee of specific training, but as main agents of change. Finally, the community stimulated a discussion about updating and revising codes of conduct by including transparency registers, requirements to publish the agendas of decision makers and make accountability a core part of workplace culture. Thanks to its success, the SNA Community of practice has been inserted in the Compendium of good practice on public participation and anti-corruption education adopted by the G20 Anti-corruption Working Group in Bali in November 2022.

The main challenge for SNA in rolling out its projects is a certain cultural resistance among civil servants. Many of them consider anticorruption measures as mere obligations burdening their everyday work life, focusing on the formal, bureaucratic procedures and disregarding the role of prevention of corruption as a public value generator. For this reason, considering the transformative impact of training, SNA programs are strongly devoted to raising awareness and promoting good practices. As to the specific case of whistleblowing, SNA is trying to propose a new narrative, in order to overcome this cultural resistance, and to help civil servants understand the ethical value of reporting wrongdoings. On this issue, collaboration with civil society has proven to be very effective.



Tor Vergata University is a public research university located in Rome, Italy. It offers a wide range of academic programs, including undergraduate, graduate, and doctoral degrees across various disciplines such as economics, law, engineering, humanities, social sciences, and medicine.

The university offers a specific master's program in anti-corruption, aiming to enable leaders to guide the management of business entities and public administrations towards the common good, for the recovery and resilience of the Italian system. Its students develop a mindset capable of identifying, evaluating, and managing integrity risks.

The idea that promoting a culture of integrity is essential to fight corruption has been widely accepted for years. However, especially in university and post-university courses, there is often a lack of precise guidance on how to effectively implement such a culture. Whilst there is a desire for cultural change and an emphasis on the importance of individuals, the focus tends to be on individual tools without recognizing the need to integrate them into a cohesive system that aligns with the desired culture. Yet, it is through the combination of tools and individuals that a culture is disseminated. The proposition of the dedicated Master of Tor Vergata University thus is to begin by defining the type of culture that one wishes to promote and then develop tools and guide the behavior of individuals in a manner consistent with that culture.

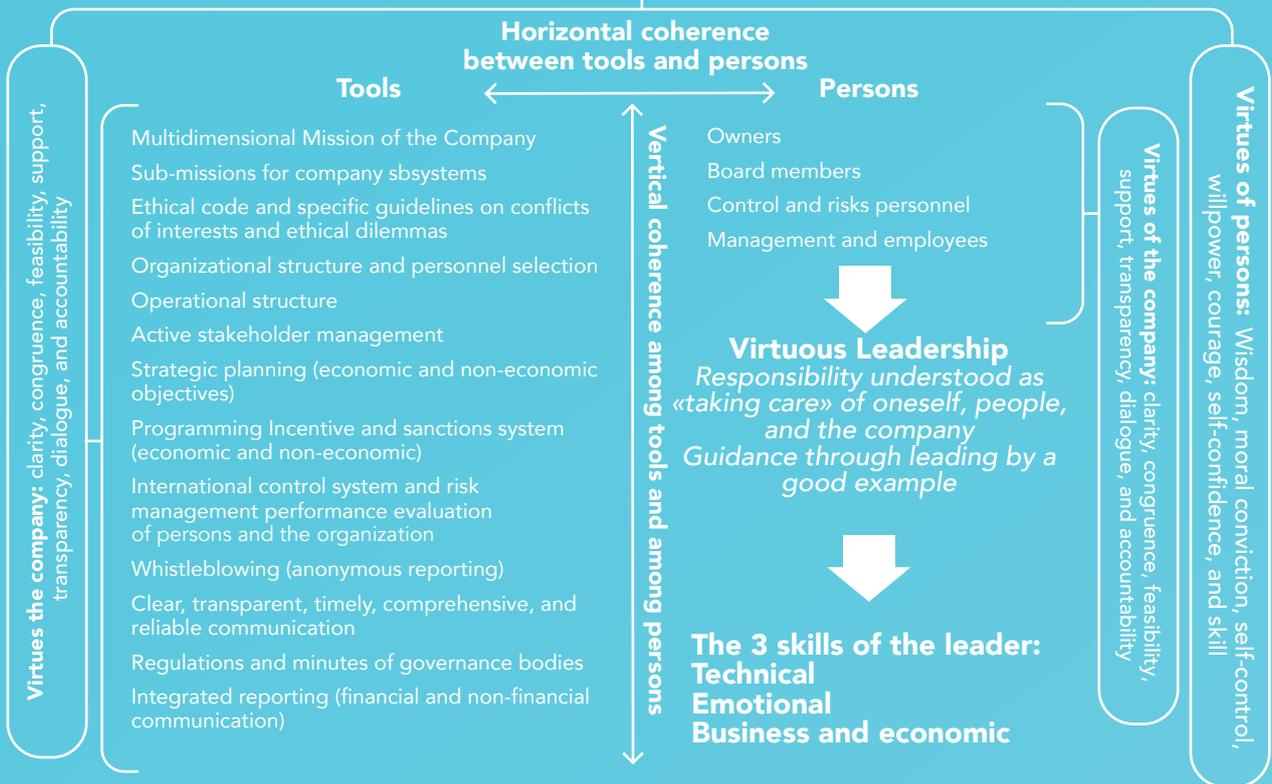
To achieve this goal, the master's program defines corruption as a deviation from the common good, due to poor governance and management. This encompasses any behavior that goes against (or does not promote) the primary interest of a company in contributing to the common good of its stakeholders and the community. As countering corruption requires leaders able to fight, especially in contexts where it is endemic, the program does not only foster its students' operational skill but it also promotes the virtues necessary for advocating change, such as empathy, wisdom, moral conviction, self-control, willpower, courage, and self-confidence. The managers from both the public and the private sector who teach in the Master are selected based on these virtues to provide concrete examples of how to turn words into actions, even in challenging contexts.

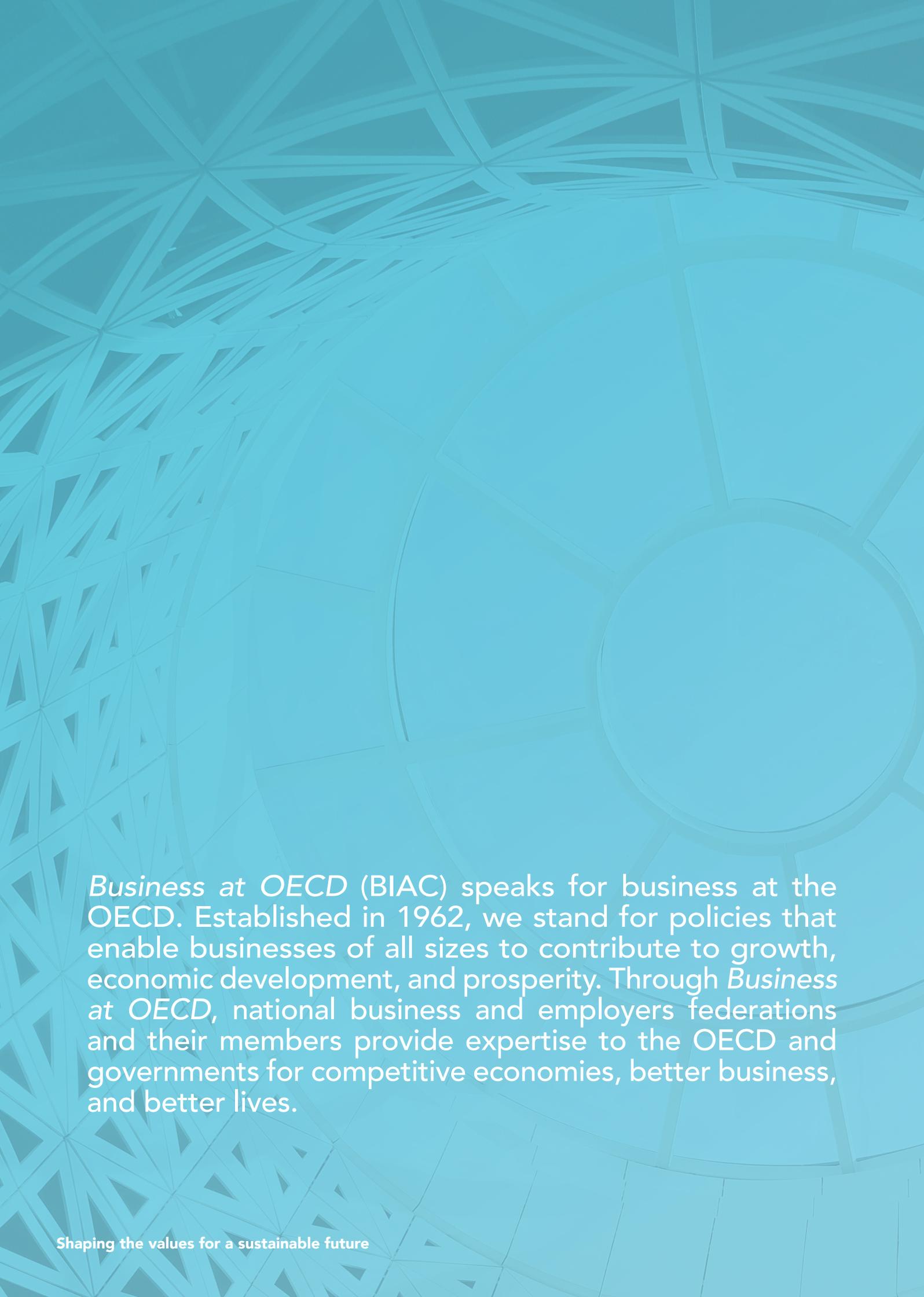
The curriculum of the master's program takes a multidisciplinary, cross sectoral approach and is aimed at striking a balance between theory and practice. The Master is taught at the Department of Economics and Finance of the Faculty of Economics, in collaboration with the Faculty of Law. The predominant disciplinary areas in the modules are business economics, law, political economy, psychology, sociology, philosophy, and statistics. These disciplines are fundamental to deeply understand human behavior, and why people are vulnerable to certain pressures and temptations. The program also includes case studies and project work. In order that students can apply what they have learned in their respective organizations, this project work is typically built around their respective organizational context.

The 12 modules of the program cover various thematic areas (e.g., integrity culture, conflict of interest, transparency), guided by one overarching theme: the SYSTEM FOR THE COMMON GOOD. This model stands out for its capacity to provide insights into how to guide organizations in promoting a culture that aims to reduce corrupt behavior. For example, there is one module entitled "People Matter," in which students hear testimonies from business leaders who have managed to change the organizational culture in environments considered impossible. At the end of each module, students are required to identify which aspects of the system for the common good were addressed in its lessons. This allows for an integrated view of the lessons and connects single parts to the common good system.

Thanks to this approach, the skills acquired in the master's program allowed some of its graduates to bring about significant change in the organization where they work. On the Master's website, the stories of some of these students are available: <https://masteranticorruzione.it/testimonianze/>

## THE SYSTEM FOR THE COMMON GOOD





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