

CORPORATE RISK MANAGEMENT & ETHICAL LEADERSHIP

ANTI-CORRUPTION COLLECTIVE ACTION (AC CA)
PLAYBOOK TRAINING



ANTI-CORRUPTION

EXECUTIVE SUMMARY

Corporate risk management and ethical leadership are pivotal in fostering an environment conducive to anti-corruption collective action initiatives. Ethical leaders within organizations set the tone from the top and establish robust frameworks that prioritize integrity and transparency. Through effective risk management practices, such leaders proactively identify and mitigate corruption risks, thereby safeguarding the organization's reputation and sustainability. Moreover, they champion collective action approaches that bring together industry peers, governmental bodies, and civil society to combat corruption collaboratively. By promoting a culture of compliance and accountability, ethical leaders ensure that anti-corruption initiatives are not merely reactive measures but integral components of the corporate strategy. This holistic approach not only enhances corporate governance but also strengthens the broader socio-economic fabric by fostering trust and promoting fair business practices.

Collective Action is born out of companies' need to foster more ethical, transparent, and less corrupt business environments while mitigating potential business risks. Collective Action is evolving toward a "hybrid co-regulation." Formal regulation efforts at a global and national level have increasingly been complemented by self-regulation efforts stemming from proactive cooperation between business actors from diverse sectors - this often includes the participation of corporates, public sector, civil society organization, academic and research institutions and many more. These complementary approaches have reinforced one another, creating positive synergies that are required from businesses in the context of the 2030 Agenda for Sustainable Development.

Businesses and societies face complex corruption challenges daily around the world, and Collective Action is a key approach to slowing the scale of this issue. Multi-stakeholder partnerships are indispensable to effectively tackle and solve the perennial sustainable development problems outlined in SDG 17. It is not only about individually avoiding and mitigating the risks, pitfalls, and likely costs of corruption such as legal or financial, but above all seizing the opportunities and associated benefits of a robust culture of integrity that is fostered and implemented collectively by a committed group of like-minded stakeholders/organizations.

Collective Action fosters ethical, transparent, and less corrupt business environments and complements formal regulation with proactive cooperation among business actors, civil society, and the public sector. This approach helps address corruption challenges and promotes a culture of integrity within businesses and society.

The workshop on Corporate Risk Management and Ethical Leadership cum Anti-Corruption Collective Action (AC CA) Playbook Training organized by UN Global Compact Network India (UN GCNI) in knowledge partnership with PHD Chamber of Commerce and Industry (PHDCCI) on 22 May 2024 emphasized on the role of corporate risk management and ethical leadership in mitigating corruption while AC CA Playbook, launched in June 2021 by United Nations Global Compact (UNGC), training provided a practical roadmap for implementing AC CA and emphasize the role of Multi-stakeholders partnership in achieving Sustainable Development Goals (SDG17).

The workshop explored approaches to collective action, including public-private partnerships and multi-stakeholder initiatives to combat corruption from across the sectors. Participants were guided on conducting risk assessments to identify and mitigate corruption vulnerabilities and the importance of establishing strong compliance and ethics programs. Networking opportunities foster collaboration among participants for future anti-corruption initiatives. Techniques for monitoring and evaluating anti-corruption measures are also covered.

The workshop equipped participants with the necessary knowledge, skills, and strategies to combat corruption through collective action. It includes a comprehensive overview of corruption, its various forms, causes, and consequences. Around 40 senior-level representatives from Public and Private sectors, Pharmaceuticals, Healthcare organizations and MSME in Healthcare business participated in this workshop cum AC CA training programme.

Inaugural Address by Mr. Ratnesh Jha, Executive Director, UN Global Compact Network India

Honourable Guests, Distinguished Participants, Ladies and Gentlemen,

On behalf of UN Global Compact Network India, in collaboration with the PHD Chamber of Commerce and Industry, it is my privilege to extend a warm welcome to each one of you to this important workshop on Corporate Risk Management and Ethical Leadership, along with training on Anti-Corruption Collective Action strategies.

Today marks a significant step forward as we gather here to deliberate on topics that are not only critical to the success of our organizations but also essential for upholding the highest standards of corporate governance and ethics. We are honored to have with us esteemed guests who are leaders in their respective fields.

Together, we have gathered here with a shared commitment to explore innovative strategies for mitigating risks, promoting ethical leadership, and advancing collective action against corruption. The Anti-Corruption Collective Action playbook that will be discussed today represents a proactive approach to addressing challenges that transcend organizational boundaries.

As we embark on this journey of learning and collaboration, I encourage each of you to actively engage in the discussions, share your experiences, and contribute to shaping the future of ethical business practices. Let us seize this opportunity to build networks, foster partnerships, and strengthen our resolve to create workplaces where integrity and transparency thrive.

I extend my gratitude to all participants, our distinguished guests, and our partners at PHDCCI for their unwavering support and commitment to this initiative. Together, let us pave the way for a corporate landscape where ethical leadership and anti-corruption efforts serve as cornerstones of sustainable development and societal well-being.



Special Address by Chief Guest Mr. Ashutosh Shukla, Head of Corporate Affairs at Jackson Group

Honorable Organizers, Esteemed Guests, and Distinguished Participants,

It is indeed a privilege and an honour to address you today at this significant workshop on Corporate Risk Management and Ethical Leadership, alongside the training on Anti-Corruption Collective Action Playbook/strategies. I extend my heartfelt gratitude to the UN Global Compact Network India especially Dr. Somnath Singh for his action and leadership in organizing this crucial initiative, in collaboration with the esteemed PHD Chamber of Commerce and Industry.

In today's global business environment, the imperatives of corporate governance, ethical leadership, and combating corruption have never been more pressing. These issues not only define the reputation and sustainability of our organizations but also shape the broader societal trust in businesses as responsible stakeholders.

The Anti-Corruption Collective Action playbook that we are here to discuss represents a pivotal tool in our collective efforts to foster transparency and integrity across sectors. It underscores the importance of collaboration among businesses, governments, and civil society in addressing systemic challenges and promoting a level playing field.

As Head of Corporate Affairs at Jackson Group, I have witnessed firsthand the transformative power of ethical leadership and proactive risk management in safeguarding organizational integrity. Today, I urge each of you to seize this opportunity to delve into practical strategies and best practices that can be applied within our respective organizations.

Let us use this platform not only to learn from experts and each other but also to commit ourselves to action. Together, we can build a business environment where ethical conduct is non-negotiable, and where anti-corruption initiatives are integral to our corporate strategies.

I look forward to engaging with you all in fruitful discussions and collaborative efforts toward a future where responsible business practices set the standard for sustainable development and inclusive growth.



Concluding Remarks by Mr. Ashish Mohan Wig, Chair of the HR IR Committee at PHDCCI

Ladies and Gentlemen,

As we come to the close of this inaugural session of our workshop on Corporate Risk Management and Ethical Leadership, in conjunction with the training on Anti-Corruption Collective Action Playbook/strategies, I am filled with optimism and gratitude for the insightful discussions and contributions from our esteemed guests and participants.

Today, we have laid a solid foundation for exploring the critical intersections of risk management, ethical leadership, and collective action against corruption. The expertise shared by Mr. Ashutosh Shukla, Head of Corporate Affairs at Jackson Group, and other distinguished speakers has illuminated pathways for enhancing transparency and accountability within our organizations.

The Anti-Corruption Collective Action playbook that has been presented is not merely a document; it represents a call to action. It calls upon us to collaborate across sectors, to innovate in our approaches, and to uphold the highest standards of integrity in all facets of our operations.

As Chair/Co-Chair of the HR IR Committee at PHDCCI, I emphasize the importance of embedding ethical principles into our organizational DNA. Ethics and compliance are not just checkboxes; they are integral to sustainable business practices that build trust with stakeholders and contribute positively to society.

I urge each of you to carry forward the insights gained today and to champion these principles within your respective spheres of influence. Let us continue to engage actively, to learn from one another, and to forge partnerships that drive meaningful change.

In closing, I extend my sincere thanks to the UN Global Compact Network India for organizing this workshop. I also express gratitude to all participants for their valuable contributions and commitment to advancing ethical leadership and anti-corruption efforts.

Let us move forward with determination and purpose, knowing that together, we can create a business environment where integrity thrives and where ethical leadership paves the way for a brighter future.



TECHNICAL SESSION

Setting the tone for the workshop: Dr. Somnath Singh

As we embark on this workshop on Corporate Risk Management and Ethical Leadership, coupled with training on Anti-Corruption Collective Action Playbook/strategies, we are setting the stage for a transformative dialogue. We aim to delve deep into the intricacies of risk management, ethical governance, and collective action against corruption. Through this program, we aspire to equip participants with practical tools and insights to navigate complex ethical dilemmas and mitigate organizational risks effectively. We anticipate robust discussions, collaborative learning, and the exchange of best practices that will empower each participant to drive positive change within their respective organizations. Together, we will explore innovative approaches that not only ensure compliance with regulations but also uphold the highest standards of integrity and accountability. By fostering a culture of ethical leadership and collective action, we aim to pave the way for sustainable business practices that contribute to societal well-being and inclusive growth.



In addition, he shared his views and encouraged the participants to why there is a need for collective action for all sectors to combat corruption.

Corruption is a global issue that cannot be tackled by one country or one actor/sector alone - It requires a multilateral response that takes the form of a whole-of-society approach. All stakeholders must act collectively to tackle corruption effectively.”

Corruption remains one of the greatest obstacles to economic and social development - It undermines the 2030 Agenda for Sustainable Development, distorts markets and disproportionately affects the most vulnerable among us. Collective Action is important to advance business integrity and achieve a more transparent global economy.

The Fight against corruption is a clear business case for companies - Collective Action is important to advance integrity and achieve a level playing field for all market actors/Players.

AC CA seeks to complement regulation whenever it is absent, not enforced properly, or not enforced at all.

Companies are realizing that they cannot individually tackle systemic corruption risks and the related challenges.

Collective Action is born out of companies' need to foster more ethical, transparent, and less corrupt business environments while mitigating potential business risks.

Collective Action is evolving toward a “hybrid co-regulation”. This often includes the participation of civil society, the public sector, and other organizations.

Last, he briefly shared saying the expectation for this workshop and Anti-Corruption Collective Action Playbook Training would likely be to equip participants with the necessary knowledge, skills, and strategies to effectively combat corruption through collective action. The participants have the opportunity to learn

Understanding of Corruption: A comprehensive overview of what corruption entails, including its various forms, causes, and consequences.

Legal Framework: Insight into the legal frameworks and international conventions related to anti-corruption efforts, such as the United Nations Convention against Corruption (UNCAC).

Collective Action Strategies: Exploration of different approaches to collective action against corruption, including public-private partnerships, multi-stakeholder initiatives, and industry-specific collaborations.

Best Practices: Examination of successful case studies and best practices from around the world where collective action has effectively tackled corruption.

Risk Assessment and Mitigation: Guidance on conducting risk assessments to identify corruption vulnerabilities within organizations or sectors, and strategies for mitigating these risks.

Compliance and Ethics: Emphasis on the importance of establishing strong compliance and ethics programs to prevent corruption, including training employees and developing codes of conduct.

Networking and Collaboration: Opportunities for networking and collaboration with other participants, fostering partnerships for future anti-corruption initiatives.

Monitoring and Evaluation: Techniques for monitoring and evaluating the effectiveness of anti-corruption measures and adjusting strategies accordingly.

Overall, participants can expect to come away from the workshop with a deeper understanding of the complexities of corruption and the tools and strategies needed to engage in effective collective action to combat it.

The Expert Trainers

Krishnendu Biswas, Head of Ethics and Compliance at Takeda Biopharmaceuticals India

Corporate Compliance Risks and Ethical Leadership and its link with Anti-Corruption Collective Action (AC CA)

Corporate compliance risks and ethical leadership are intricately linked to the effectiveness of Anti-Corruption Collective Action initiatives. In today's global business landscape, organizations face multifaceted compliance challenges that demand a proactive approach to risk management. Ethical leadership sets the tone at the top, emphasizing values such as transparency, integrity, and accountability throughout the organization. By embedding these principles into corporate culture, leaders not only mitigate compliance risks but also cultivate a commitment to ethical conduct among employees and stakeholders. Anti-Corruption Collective Action plays a crucial role in this framework by fostering collaboration among businesses, government entities, and civil society to address systemic corruption issues collectively. Together, these efforts reinforce corporate governance frameworks, promote fair business practices, and contribute to sustainable economic development by enhancing trust and confidence in business operations.

Further, he drew attention to and equipped the participants with the following important core components of corporate compliance risk management and its link to the Anti-Corruption Collective Action.



Core Components of Corporate Compliance Risk Management

- **Risk Assessment:** Regularly evaluating potential areas of risk related to corruption and non-compliance
- **Policy Development:** Creating robust anti-corruption policies and procedures.
- **Training and Awareness:** Ensuring employees are trained on compliance and anti-corruption measures.
- **Monitoring and Auditing:** Continuous monitoring and auditing of processes to detect and prevent corruption.
- **Reporting Mechanisms:** Establishing clear channels for reporting suspicious activities or breaches.

The connection between corporate compliance risk management and Anti-Corruption Collective Action

- **Collaborative Approach:** Encourages collective action among corporations to establish industry-wide compliance standards.
- **Shared Best Practices:** Facilitates sharing of best practices and resources for more effective risk management.
- **Unified Voice:** Strengthens the collective voice in advocating for policy changes and stronger anti-corruption laws.

Arya Dev, Assistant Manager, UN Global Compact Network India

Introduction to the AC CA Playbook

The AC CA Playbook builds upon resources developed by the UN Global Compact as part of multiyear projects/programs implemented under the First and Second Funding Rounds of the Siemens Integrity Initiative (SII). Further research was conducted using publications and resources from strategic partners and leading organizations in the field. A series of consultations were conducted with Global Compact Local Networks representatives and the AC CA Working Group to receive feedback and tailor the Playbook to meet geographic, cultural, and other important considerations relevant to their business environment so that this AC CA playbook can be useful enough for all the sectors to identify and mitigate corruption challenges.

The Playbook was launched at the UNGC Leaders' Summit in June 2021 in an International high-level session. From there, it was professionally translated into Spanish, French, Arabic, and Portuguese.

Ultimately this Playbook aims to mainstream the understanding and uptake of Collective Action among Global Compact Local Networks, businesses, and other relevant stakeholders. Further, two sessions on the train-the-trainers workshop on the Playbook for Local Networks were organized by UNGC in June 2022 which helped develop the Anti-Corruption Collective Action Playbook. Now this Anti-Corruption Collective Action Playbook is being used by the Local Networks of the UN Global Compact (UNGC) especially those who partnered with UNGC to strengthen and scale up AC CA under the Siemens Integrity Initiative.

[Anti-Corruption Collective Action Playbook](#)



Professor Ms. Rukaiya Joshi, Visiting Faculty at MKES Mumbai/India

Introduction to Anti-Corruption Collective Action



1. What is Anti-Corruption Collective Action:

Collective Action is a collaborative and sustained process of cooperation between stakeholders. It increases the impact and credibility of individual action, brings vulnerable individual players into an alliance of like-minded organizations, and levels the playing field between competitors.

Collective Action is a flexible, dynamic tool:

- Short-term to long-term initiatives.
- Voluntary to formal, externally monitored initiatives.
- Issue-driven or conceived as ongoing platforms.
- Exclusively private sector-based or hybrid models.
- Top-down vs. “bottom-up” approaches.
- Aimed at institutional-level changes.
- Capacity-building initiatives.
- Global or local.
- Analogic or digitally oriented.
- Focused exclusively on tackling anti-corruption issues or focused on “connecting the dots” between corruption and its negative impacts on other sustainability-related issues.

2. Why – Anti-Corruption Collective Action

- AC CA seeks to complement regulation whenever it is absent, not enforced properly, or not enforced at all.
- Companies are realizing that they cannot individually tackle systemic corruption risks and the related challenges. It is either too costly or too risky for them, or it might provide an undue advantage to other business actors who are not playing the game in a fair, ethical way.
- Collective Action is born out of companies’ need to foster more ethical, transparent, and less corrupt business environments while mitigating potential business risks.

3. Types of Anti-Corruption Collective Action



Beyond the specific type chosen...

- Collective Action always involves a higher level of collaboration and cooperation among companies and other potential stakeholders that goes beyond the specific type chosen.
- Collective Action also goes beyond internal policies and procedures and external actions that merely communicate what individual companies do.
- It is not about individual companies' discussing what they are doing about corruption, but rather a sustained, collective endeavour — ideally, with a shared vision — in which clear strategies and goals have been set to create impactful changes in the business environment.

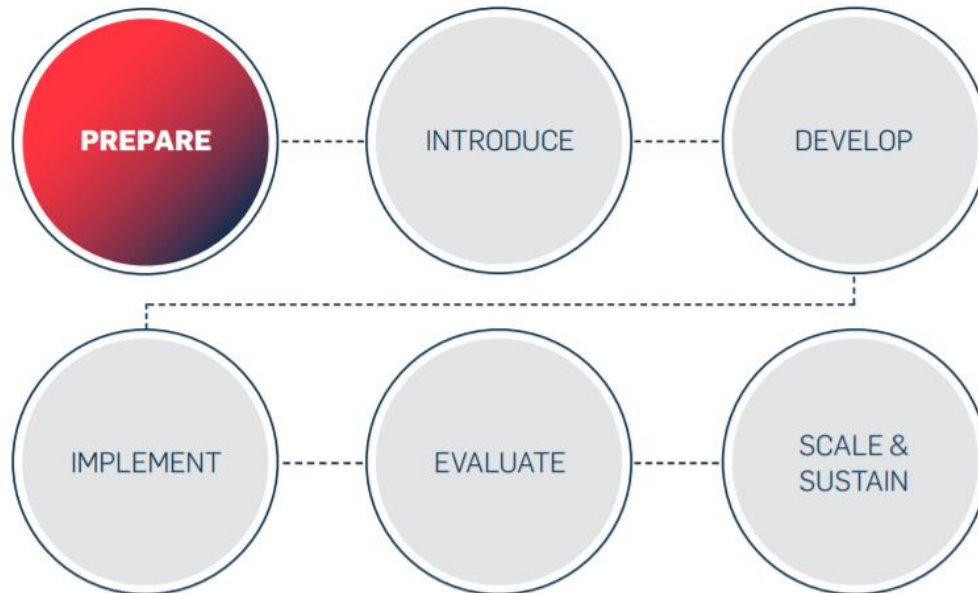
Anti-Corruption Collective Action Playbook and its six steps:

A general six-step process with multiple alternatives:

- The steps to develop, implement, and sustain a Collective Action will vary by type, local context, number and types of stakeholders, and identified corruption risks, among other factors.
- Nevertheless, a general sequence can serve as guidance to understand the Collective Action methodology.
- While the process framework was developed to enable UN Global Compact Local Networks to initiate and/or facilitate Collective Action initiatives with their business

participants, the principles and steps apply to other actors engaging in Collective Action.

- The framework may be adapted to achieve desired results and impact.



1. The Collective Action Process – *Prepare*

- Identify the Roles in the Collective Action Process (e.g., Initiator, Facilitator, Participant, Monitor, Host/Anchor, and Administrator).
- Select the Facilitators.
- Follow a Single Sector or Multi-Sector Approach.
- Explore Potential Initiatives.
- Identify, Prioritize, and Engage Stakeholders.
- Perform Preliminary Desk Research and Interviews.
- Comply with Anti-Trust/ Competition Law and Other Local Laws and Regulations.
- Planning for Meetings and Logistics.

How to identify good Facilitators:

Assess and Analyse....

- Do they have the ability to serve as a neutral third party?
- Do they have expertise in the local context, industry/ business context, and Collective Action?
- Do they possess knowledge of how to effectively manage different stakeholders?
- Can they negotiate and prioritize inputs to reach a common goal?
- Are they experienced in conducting research and holding interviews to gain insightful information?
- Do they possess strong communication skills and the ability to remain patient and adapt to diverse group dynamics?

2. The Collective Action Process – *Introduce*

- Familiarize Participants with Anti-Corruption Collective Action through a Training Workshop
- Look for Opportunities for Collective Action through a Risks and Opportunities Workshop
- Discuss the Governance and Decision-Making Process (e.g., Steering, Advisory and Technical Committee)

Key Activities

Training Workshop	Risk and Opportunities Workshop
<ul style="list-style-type: none"> • Introduce Collective Action as an approach to advancing transparency and anti-corruption. • Discuss the process, procedures, and challenges of establishing a Collective Action, including anti-trust aspects. • Jointly analyze existing Collective Action initiatives. • Set the foundation for future workshops where opportunities for starting tangible Collective Action initiatives will be identified. • Before holding a Training Workshop, the Facilitator and/or trainer may find it useful to review existing background resources and materials developed by the UN Global Compact, the UN Global Compact Local Networks, the Basel Institute on Governance, the World Bank, etc. 	<ul style="list-style-type: none"> • Discuss anti-corruption challenges and opportunities via a corruption risk assessment. • The risk assessment involves gaining an understanding of the corruption landscape in the country (inc., corruption-related laws and regulations currently in place and how they are enforced); it looks at what processes pose risks to business integrity (e.g., obtaining licenses, contract bidding and paying taxes), and who the relevant actors are from the public and private sectors. It also looks at how companies are currently implementing anti-corruption ethics and compliance programs. • Highlight the importance of Collective Action to advance the fight against corruption and the achievement of the SDGs. • To complement the Risks and Opportunities Workshop, it may be beneficial to conduct desk research. If desk research does not provide sufficient information in a thematic area, interviews may also be conducted.

3. The Collective Action Process – *Develop*

- Narrow down Potential Collective Action Activities – May be carried out as “Collaboration Labs”
- Design the Collective Action - After the “Collaboration Labs”, the next series of workshops focuses on the selection and design of the Collective Action. With a flexible structure, the “Incubation Labs” can focus on developing a concept note and a subsequent roadmap towards the Collective Action

- Draft and Signing the Collective Action Agreement

4. The Collective Action Process – *Implement*

- Set up Monitoring and Enforcement Mechanisms
- Train Employees and Stakeholders in the Value Chain
- Share Good Practices

Key features:

- Implementation is the anticipated next step after designing the Collective Action and building a comprehensive roadmap.
- Implementation will be dependent on the type and size of the Collective Action, and other factors.
- It may be necessary to obtain external funding or gain the support of additional influential stakeholders.
- Some key activities in implementation include setting up monitoring and enforcement mechanisms, training employees and stakeholders in the value chain, and sharing best practices

Monitoring: The range of possible monitoring systems extends from softer, internally based mechanisms to harder, externally based ones; from self-assessments to third-party external monitoring. They might also include mutual self-assessments and other systems that combine elements from previous approaches.

Training: Training should be continuous and delivered not only to employees of the participating organization — especially to those employees most directly impacted — but also to third parties along the value chain. Employing an inductive approach to training can be beneficial: rather than merely studying rules and ethical codes, an inductive approach discusses real-world ethical dilemmas arising from business cases.

Sharing: A solid communications strategy is essential to keep stakeholders informed about the progress of the initiative at each of its stages.

5. The Collective Action Process – *Evaluate*

- Develop practical and efficient evaluations that most accurately measure the outcomes and impact
- Agree upon desired outcomes (short-term) and impact (long-term) of the initiative to drive the inputs, activities, and outputs
- Select key performance indicators (KPIs) to measure the progress towards achieving the desired results, generally following the widely known SMART model to develop the indicators
- Set baselines and gather data on indicators
- Report and share the accumulated findings to demonstrate accountability of the initiative

Monitoring and evaluation are other critical component for Collective Action not only in keeping track of progress but also in measuring and assessing short-term and long-term changes.

Key features:

- It is important to first consider the distinctions among monitoring, evaluation, and impact evaluation.
- While monitoring is an ongoing process of obtaining feedback on how well the initiative and its activities are complying with its agreed principles and objectives, an evaluation is a way of measuring the efficiency of an initiative.
- Impact evaluation is a type of evaluation that involves understanding the nature of the change that has taken place, including any negative or unintended consequences.

6. The Collective Action Process – *Scale & Sustain*

- Scale up the Initiative
- Address Financial Sustainability
- Maintain Stakeholder Engagement
- Sustain the Governance System and Administrative Support

Future of Collective Action

- Beyond “Analogic” Collective Action
- Bring in New Stakeholders
- “Connect the Dots” Approaches

Key features:

- Collective Action is no longer optional but an indispensable approach to address these global challenges. It has to be embedded in the way companies operate for them to become accountable companies and create enabling ecosystems.
- These three trends further accelerate the evolution towards multi-stakeholder Anti-Corruption Collective Action in line with what SDG 17 states — an established, generalized approach to tackle systemic risks and opportunities centered on the fight against corruption, but also extending towards other interconnected sustainable development risks and challenges.
- Increasingly, Collective Action is becoming the standard way of finding solutions to these enduring problems, replacing sporadic, scattered efforts from stakeholder groups here and there. Either out of somewhat voluntary or mandatory frameworks and standards, Collective Action is becoming mainstream.

Krishnendu Biswas, Head of Ethics and Compliance at Takeda Biopharmaceuticals India



➤ Deep Dive – **Making the first move as an Initiator**

Who/Skills

- First Mover - A key stakeholder actor: GCNI members /participants, companies, business associations, NGOs, Governmental entities, business schools, or public sector organizations.
- Champion – Long-standing commitment and in-depth experience with the fight against corruption; may have already organized, participated, or fostered awareness of Collective Action.
- In specific cases, has clarity on the type of Collective Action to be pursued.
- Influencer - Good reputation with integrity and capacity to convince and bring parties on board.
- Reaches out to potential stakeholders, convenes an exploratory first meeting, and selects the Facilitator.
- Short-term role – Usually converts to Funder, Anchor, Facilitator or Participant.
- Helps in drafting preliminary concept notes.

Incentives

- For MNCs - brings them together with other MNE peers and local and SME companies to collaborate and level the business playing field.
- For PSUs – their size and influence help interconnection and integration into the economic and business fabric. They gain traction from other key business and non-business stakeholders.
- For public or governmental agency - motivated to establish a specific Integrity Pact for a large project in a sensitive sector that seeks to attract both local and foreign companies' participation.
- For academic/research center or NGO - pursuing an anti-corruption agenda, having identified Collective Action as the potential right approach to further advance it in a specific country or region.
- For business associations – may have gone through a scandal and/or addressing issues related to corruption in a specific sector or region.

Challenges

- Time- and resource-intensive than it appeared at the moment the initial idea first emerged.
- A reputational risk if the initiative does not work smoothly, or if there are problems/conflicts between participants; can diminish the chances of success in re-launching an initiative of this kind at another moment.
- Can be seen as a promotional or marketing effort, especially when the Initiator is an MNE or a large local company, by other business peers in highly competitive sectors and geographies.
- Assure other invited stakeholders of their previous and current existing credentials regarding anti-corruption and integrity and their involvement in Collective Action efforts.
- Also responsible for guaranteeing the neutrality of the Facilitator.

➤ Deep Dive – **Leading as a Facilitator**

Who/What

- Strategic party in charge of coordinating the deployment of the initiative and the work of all participants.
- Usually selected by the Initiator.
- Aids the Initiator in defining the right participating members, assessing different participants' profiles, their compliance policies, and previous participations in similar efforts.
- Can decide on due diligence of some or all the potential participating members.
- Helps in identifying the corruption risks and type of Collective Action to be pursued.
- Must be a neutral party — an “honest broker” with a strong knowledge of the business environment and sectors involved.
- Can be a GCNI, a business chamber or association, an NGO, a think tank, an academic center, or by individual recognized for his or her expertise and experience in the field.
- Starts by conducting a workshop with the initial group of interested participants — usually “primary” participant stakeholders.
- Functions as the main coordinator, sometimes as administrator/host.
- Aware of social, economic, and political conditions; can present a tentative Collective Action conceptual proposal for discussion with all participating members.
- Helps in establishing a permanent working group and governance structure (e.g., Steering, Advisory, or Technical Committee: depending on the size and number of members).
- Organizes subsequent follow-up workshops, such as the Collaboration and Incubation Labs, to progressively agree on the content and main roadmap of the Collective Action initiative.
- Should ideally have experience in project management; and have enough knowledge of anti-trust/competition laws to ensure they are not violated by the initiative or any of the members during the initiative.
- Continue coordination and implementation of the activities after the Agreement is signed, communicating its content and outcomes to the general public and the media.
- Ensure participants have substitutes or deputies for a seamless workflow.
- Starts involving and inviting additional participant stakeholders from business but also “secondary” participant stakeholders from civil society as well as from the public sector.
- Ongoing participation, typically the “last man standing”.

Skills

- A strong personal and professional integrity with no current or potential conflicts of interest.
- Deep experience of how to effectively manage different stakeholder participants and their (often conflicting) interests and expectations.
- Effective negotiation and communication skills. Stakeholders of different types, sizes, and origins frequently speak different “languages” and have different dynamics.
- Need to understand incentives for each participating member and how to process feedback without losing sight of the larger goal at stake — reaching a joint agreement among all parties.

- Realistic in management of resources; flexible, at the same time firm, in management of members. The goal is to UNITE for a common cause.
- Facilitators must also display authority and leadership when ensuring participants equally and sustainably devote time, resources, and efforts to undertake the initiative.
- Power to sanction or exclude a participant from the initiative in cases of non-compliance through an Ethics Committee or similar body, and the power to decide an external Monitor or Auditor if needed.
- Keep in mind that they are Mediators, not Actors.

Incentives

- Depends on the type of organization they are or represent.
- For academic, research, or think tank - gaining knowledge about the dynamics of such Collective Action efforts and putting into practice models that have been developed elsewhere.
- For business or chamber association - gain recognition and enhance its reputation by being actively involved in developing Collective Action to benefit all of its members.
- For recognized leaders from business and civil society – an opportunity to put into practice their accumulated experience and deep knowledge of the field, to “give back”.
- For NGOs and CSOs - access to in-house information from the participants and other stakeholders; also helps them participate in high-profile initiatives, providing more exposure.

Challenges

- Unable to reach common ground or consensus among participating members regarding a common vision for the initiative, or to make them agree on main objectives and effectively implement them.
- Disagreements and conflicts among participating members or Co-Facilitators, including non-compliance with stated norms and rules.
- Needs to balance the time allotted to coordinating the initiative alongside more administrative tasks.
- Always has to be neutral, and cannot be perceived as biased, or “leaning” toward specific stakeholder parties or groups (especially the Initiator).
- Build trust and maintain the confidence of the participating members at all times.
- Securing participation from a sufficient, varied, and representative number of participants either in the initial phases or at later stages.
- The facilitator can always leave the initiative if convinced that many of the participants are involved only for public relations, “whitewashing” or pursuing hidden agendas.

➤ Deep Dive – **Engaging as a Participant**

Who/What

- Key protagonists/change-makers.
- Like-minded organizations.
- “Primary” participant stakeholders: business organizations such as MNCs, subsidiaries of MNCs operating in specific geographies, and local large companies (including PSUs and MSMEs). Usually early stages.

- “Secondary” participant stakeholders: non-business actors including NGOs, public sector and/or government agencies, and international organizations, among others. Typically, later stages.
- They form the crux of the initiative and are involved in the doing as well as governing.
- Various kinds of motivation to join. MNCs, for example, may be following leniency agreements or wanting to expand their robust internal compliances with their vendors, supply chain, etc.
- Their exit can be of three types – by default on conclusion of the initiative, voluntary at any time they lose faith or there is vision change, and non-voluntary in case of non-compliance.

Skills

- Bring their anti-corruption best practices, knowledge, and tools to the collective effort, together with their expertise and human resources from their Compliance, Legal, Enterprise Risk Management, Procurement, and other relevant related teams.
- Bring leadership and know-how (CXOs)
- MNCs bring their global and regional experience and expertise, including state-of-the-art compliance tools, and experience with multiple global anti-corruption standards, laws, and regulations.
- Large local companies, including PSUs, bring their specific experience dealing with local, idiosyncratic business, social, and political environments and a deeper knowledge of the local MSME clusters.
- MSMEs want to be aligned with current compliance requirements so they can become selected as suppliers, providers, distributors, etc.
- NGOs contribute to identifying key issues to be tackled by the initiative, planning activities, and developing tools, mainly through contextualizing and connecting the negative impacts of corruption to other key economic, social, and sustainable development issues.
- International organizations bring technical knowledge and capacity-building resources as well as their global or regional influence. Can also be a source of funding.

Incentives

- Need to level the playing field to improve business conditions.
- Avoiding the legal, financial, and reputational cost of non-compliance with anti-corruption laws and regulations – especially MNCs that are or might be subject to stricter standards globally.
- Being proactive also shows public commitment to the cause of fighting corruption.
- For MSMEs, gaining knowledge from other companies, ensuring regulatory compliance, and meeting the requirements to qualify as suppliers for other companies.
- Civil society, needs to promote an anti-corruption agenda that creates a new culture of business transparency and integrity in the context of larger interconnected societal goals.
- For public sector organizations, promoting and strengthening the rule of law, including multistakeholder dialogues and collaboration on public policy strategies. Also to establish effective procurement systems, increase citizen trust, and encourage domestic and foreign investors.
- For NGOs, the chance to work alongside to bring change rather than the traditional route of confrontation.

Challenges

- Negative image, especially for large companies that lack experience or knowledge of Collective Action or do not have comprehensive internal compliance policies and programmes.
- Fear of perceived “whitewashing” by businesses that do not have the highest integrity credentials.
- Fear of losing business, especially contracts with the public sector, whenever they operate in high-risk and challenging business environments and geographies.
- Reluctance to cooperate with competitors due to lack of trust and a highly competitive business environment.
- There could also be concerns about anti-trust issues that might arise out of a Collective Action.
- In the case of MSMEs, additional issue of lack of resources and high costs of participation.
- NGOs are reluctant to participate in initiatives alongside business actors, due to their traditional approach of adversarial or confrontational anti-corruption campaigns.
- Research and academic centers and think tanks may consider their professional independence compromised by participating alongside the business sector.
- A lack of resources and capacity to join and contribute adds to the hesitation.
- Public sector organizations, though may have the legal mandate, may suffer from a lack of interest or political will.
- Public agencies are often not prone to implementing long-term significant changes. A very small contribution may not be conducive to systemic changes, limiting the work and impact of the initiative.
- Irregular participation or discontinuance/abandonment due to changes in management, vision, or priorities of organizations.

➤ Deep Dive – **Serving as a Monitor**

Who/Action/Skills

- A Monitor is an independent, third-party expert.
- May be an individual, NGO, research, or academic center.
- Supervises whether participants of these “enforceable” initiatives are compliant with agreed norms and rules.
- Also assesses progress on the evolution of the Collective Action.
- Must be free of conflicts of interest, trusted by all stakeholders, and credible.
- Can be paid by the customer (governmental entity or company) in the case of Integrity Pacts or funders of the specific initiative.
- The Monitor participates in all relevant meetings of the Collective Action at all project stages, receives tender documents for review, participates in all written exchanges and communications, and issues a final report documenting the tender process (in Integrity Pacts) and relevant decisions.
- Can apply sanctions in the case of a violation or infringement of certain norms or rules, including exclusions, financial penalties, and other disciplinary measures.
- External Monitors can also highlight issues in public, seek remediation, and finally resign from the initiative if they see no positive solution. They further must inform law enforcement bodies.

- As a measure of last resort, the Monitor can decide and correspondingly announce that it will withdraw from the initiative if its integrity cannot be guaranteed.
- Auditor, generally called in the case of Certifying Business Coalitions. An external Auditor might be an independent accounting or auditing individual/firm or a recognized and trusted third-party expert.
- As part of the certification process, external Auditors are called in to perform the auditing work that will independently verify whether participating members have taken required actions and effectively implemented the agreed principles, policies, and other compliance tools.

Dr. Somnath Singh, Deputy Director, UN Global Compact Network India

Dr. Somnath Singh further moderated the open discussion on the current corruption issues and the strategies to address them. Also, he listed the key takeaways and plans for strengthening Anti-Corruption Collective Action.



Roundtable Discussion: Issues discussed and addressed

- How is the local business environment and what are the main corruption challenges?
- Which are the main drivers and incentives to develop Collective Action initiatives?
- Identify the stakeholders who would be potentially interested.
- Which types of Collective Action initiatives are better tailored to the identified corruption risks and stakeholders?
- Would you follow all the AC Playbook's Collective Action steps, skip or merge some of them, or add new ones to the process that perhaps are missing?
- Additional funding sources for Collective Action initiatives?



Key Takeaways and Impact

1. **Enhanced Awareness:** Participants from diverse sectors, including corporate, business associations, pharmaceuticals, and healthcare, gained a deeper understanding of the compliance risks specific to their industries and the importance of ethical leadership in mitigating these risks.
2. **Collaborative Strategies:** The workshop fostered collaboration among stakeholders from different sectors towards implementing Anti-Corruption Collective Action strategies. This collaborative approach is essential for addressing corruption challenges that span across industries.
3. **Best Practices Exchange:** Participants shared best practices and case studies on effective risk management and ethical leadership, providing valuable insights that can be adapted and implemented within their organizations.
4. **Practical Tools and Resources:** The Anti-Corruption Collective Action playbook provided practical tools and resources for participants to integrate into their compliance and governance frameworks, enhancing their ability to combat corruption effectively.
5. **Networking and Partnerships:** The workshop facilitated networking opportunities, enabling participants to forge partnerships with peers, industry experts, and civil society organizations committed to ethical business practices and anti-corruption efforts.
6. **Commitment to Continuous Improvement:** Participants left the workshop with a renewed commitment to continuously improve their compliance programs, strengthen ethical leadership, and contribute actively to collective actions against corruption.
7. **Impact on Organizational Culture:** The emphasis on ethical leadership and collective action is expected to positively influence organizational cultures, fostering a stronger commitment to integrity, transparency, and accountability across sectors.
8. **Long-term Sustainability:** By integrating learnings from the workshop, organizations can strengthen their resilience against compliance risks, build trust with stakeholders, and contribute to sustainable economic growth in their respective sectors.

These key takeaways not only benefitted individual participants but also contributed to broader societal goals of promoting ethical business practices and combating corruption at all levels of society.

At the end of the workshop, the participants gave assurance to.....

- Develop and strengthen collaboration and partnership with UN GCNI.
- Join the AC CA Working Group of UN GCNI.
- Help UN GCNI in the dissemination of the AC CA playbook so that diverse sectors can benefit from suggested steps and approaches.
- Share declaration for strengthening ethical business practices and integrity within organization/s and supply chains etc.

ABOUT UN GCNI

The Global Compact Network India (UN GCNI) was formed in 2000 and registered as a non-profit society in November 2003 to function as the Indian Local Network of the UN Global Compact (UNGC), New York. UN GCNI is the first Local Network established with full legal recognition.

As the UNGC's local arm, UN GCNI has been acting as a country-level platform that provides support to Indian businesses, academic institutions, and civil society organizations towards strengthening responsible business practices in India by incorporating the Global Compact principles into their strategies, policies, and procedures and establishing a culture of integrity by catalyzing action through Sustainable Development Goals (SDGs). GCNI encourages its member companies/participants to uphold their ethical practices and responsibilities to Business, people, and the planet.

UN GCNI provides a platform for dialogue and communication and facilitates systematic policy initiatives for strengthening Governance, Ethics, and Transparency in business. UN GCNI brings in diverse stakeholders on a common platform to deliberate upon challenges, exchange best practices, and make policy recommendations to promote responsible business standards, across various sectors. UN GCNI has aligned its mandate around UNGC's 10th Principle and SDGs.

UN GCNI has emerged as the largest Corporate Sustainability Initiative in India and globally with pan-India membership of over 500 leading business and non-business participants/members.



GLIMPSE FROM THE WORKSHOP AND TRAINING



