TRANSPARENCY INTERNATIONAL ACCOUNTABLE NOW REPORT | 2019

TABLE OF CONTENT

STATEMENT FROM THE INTERIM CHIEF EXECUTIVE OFFICER ON COMMITMENT TO ACCOUNTABILITY AND MAJOR CHANGES

Transparency International (TI) has been working to end corruption, worldwide, since 1993. We seek to stop corruption by holding those in power to account for their actions. Accountability is fundamental to our mission, values, principles, and strategy, and we strive to be accountable to those we work with.

In 2019, we leveraged the Transparency International Movement's expertise to advance key objectives under our 2020 Strategy and its priority areas: people and partners; prevention, enforcement and justice; and a strong movement. We provided insight into corruption and ensured that it was a high-profile topic in news outlets and on social media platforms throughout the world. Our Advocacy and Legal Advice Centres in 58 countries provided free and confidential legal advice to witnesses and victims of corruption. Mobile centres in Latin America and Sub-Saharan Africa travelled to hard-to-reach communities to receive citizen's complaints. In addition, for the first time, our Global Corruption Barometer included gender-specific questions that revealed the impact of corruption on women in Latin America, the Caribbean, the Middle East and North Africa.

United action with civil society organisations increased our impact with governments and with international organisations. For example, we had an active role in the Civil 20 (C20), one of the official Engagement Groups of the G20, in 2019. We acted as international chair of the C20 Anti-Corruption Working Group, leading its discussions and the preparation of policy papers. Following sustained pressure and expert guidance from TI, the European Union adopted a directive on whistleblower protection in October 2019, with many of our recommendations included. Our advocacy ensured that golden visas will now be monitored as part of the EU's supranational risk assessment. Transparency International also secured an appraisal of recommendations on beneficial ownership transparency in the Financial Action Task Force's (FATF) strategic review.

As we near the end of this strategy cycle (2016-2020), we began to prepare for the next strategic cycle. Throughout 2019, our consultation with the Movement focused on our Vision 2030 exercise and a governance review. Because of this review, at the 2019 Annual Membership Meeting, the Movement agreed to a number of important governance changes, including the creation of a new International Council comprised of up to 60 external experts who will support TI's objectives and activities.

Together with Accountable Now, we stand committed to fighting corruption and holding those in power to account.

Daniel Eriksson

Interim Chief Executive Officer

CLUSTER A: WHAT WE HAVE ACHIEVED

A. THE IMPACT WE ACHIEVE

1. What are your mission statement and your theory of change? Please provide a brief overview.
Our mission is to stop corruption and promote transparency, accountability, and integrity at all levels and across all sectors of society. Our vision is a world in which government, politics, business, civil society, and the daily lives of people are free of corruption.

In 2015, we developed a five-year strategy which sets out our collective ambition for the years 2016-2020. Together against Corruption: Transparency International Strategy 2020 is a strategy by and for the Transparency International (TI) movement. Together against Corruption draws on a wide and inclusive consultation process across the TI movement and key stakeholders in 2014 and 2015. Using surveys, meetings, interviews, and written inputs, we evaluated our context, our organisation and our achievements. All told, we had more than 1000 contributions from within TI and 500 from outside our movement, drawing on the worlds of government, international organisations, business, and civil society.

While the Strategy gives direction to the work of the entire TI Movement, at the level of the TI Secretariat (TI-S) our work is guided by a 5-year TI-S Implementation Plan (2016-2020) which describes our contribution to the TI Strategy. The implementation plan provides a road map for the Secretariat's work over the years 2016-2020 and specifies how it will focus its efforts to help the Movement achieve its collective ambition in the three priority areas of the Strategy 2020: 1) People and Partners; 2) Prevention, Enforcement and Justice and 3) Strong Movement. The nine areas the Secretariat contributes to are:

- **People and Partners**
  - Support the creation of safe mechanisms for victims and witnesses of corruption to denounce corruption and seek redress.
  - Support chapters' efforts to create public demand for accountability.
  - Lead in the promotion of civil society space for our anti-corruption activists.
- **Prevention, Enforcement and Justice**
  - Lead a TI movement-wide initiative in the area of Money in Politics (MiP).
  - Set global standards for business integrity, with special focus on the banking sector.
  - Lead the TI movement in a global effort to end impunity for Grand Corruption.
- **Strong Movement**
  - Advance our collective understanding about what works to stop corruption and support our TI global priorities with action-oriented research.
  - Support the development and sharing of best governance and organisational standards and practices across the TI Movement.
  - Lead on strengthening TI's presence in Brazil, China, India, and the United States, in global and regional advocacy hubs, and in locations where crisis demands immediate action.

In our Impact Monitoring Approach we describe our main areas of change and how the various components together create the pathways to achieve change.

Policy and institutional change. The ultimate aim is to ensure that intergovernmental institutions, governments, political parties and businesses have all the necessary mechanisms, policies or laws in place to redress and prevent corruption, sanction corrupt behaviour, and promote good governance. **Behaviour change**. The ultimate aim is that individuals, communities, civil society organisations and social movements act systemically to promote global good governance and prevent corruption.

The impact matrix describes the various components that together create the pathways to achieve change and the desired impact. However, context matters: in some cases raising awareness is a big achievement in itself, but in others it falls short of the impact that could be possible given the context.

Additionally, the various components are interconnected and build on each other. This means that there can be different ways of achieving change that do not necessarily follow a straight and ordinal path.

Policy and Institutional Change
Theory of Change: Intergovernmental institutions, governments, political parties and businesses that are exposed to Transparency International anti-corruption messages, sensitised to the issues and made aware of possible solutions change their institutional processes and policies (including standards, laws, amendments) in order to be more transparent and accountable.

Behaviour Change
Theory of change: Individuals, communities, civil society organisations and social movements that are exposed to Transparency International's anti-corruption messages, sensitised to the issues and made aware of possible solutions increasingly move from seeking redress for personal/community-based grievances, toward engaging systematically in preventing or addressing corruption nationally and globally.

2. **What are your key strategic indicators for success and how do you involve your stakeholders in developing them?**
    In our global strategy, the Transparency International Movement made a commitment to provide accountability to all stakeholders and to learn from what works and does not work in stopping corruption. To support this goal, TI adopted an approach to monitoring impact for anti-corruption

work, which informs and forms the backdrop of our annual reporting. The approach is highly participatory – it requires and actively promotes the involvement of both internal and external stakeholders and constituents. The below photos show examples of how an impact mapping using the impact matrix can look like.
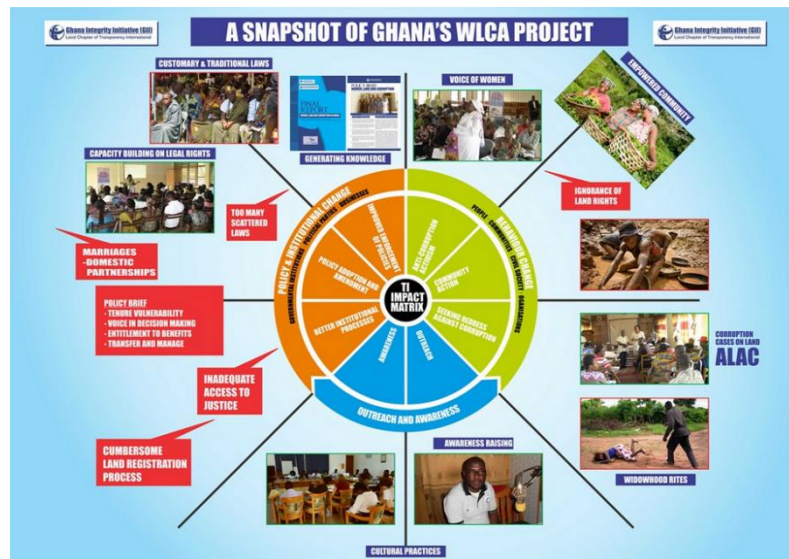
Image: TI Ghana
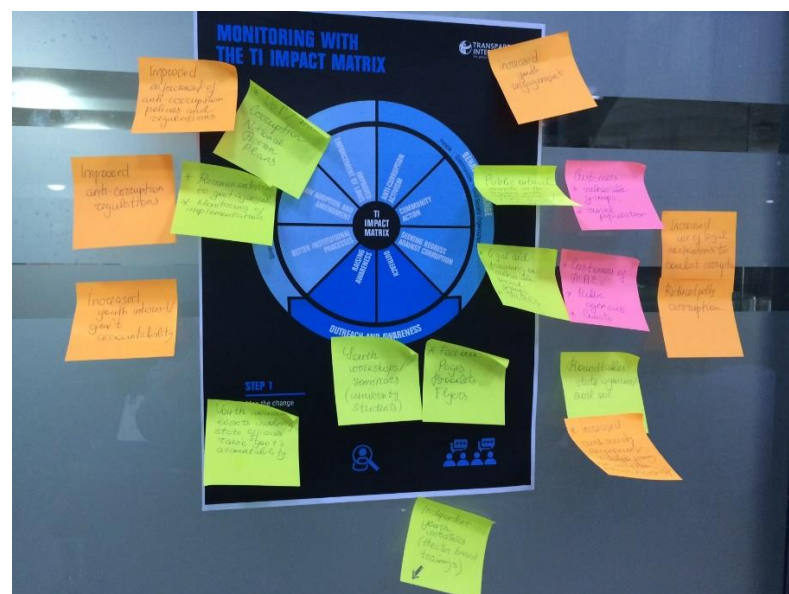
Photo: TI Georgia

TI's work is guided by the TI Strategy, based on which the Secretariat develops annual implementation plans. The annual implementation plan (can be shared upon request) describes the priorities and objectives for the current year and specifies organisational indicators by which TI can measure its success. TI's annual planning and semi-annual reporting system allows assessments on the progress made against the annual implementation plans and informs learning and accountability reports. Every year, TI-S compiles an annual implementation report (available upon request) to inform partners and stakeholders of the work done and impact achieved in the previous year.

3. What progress has been achieved and difficulties encountered against these indicators over the reporting period?

We monitor progress made against the indicators from the annual plans in our semi-annual reporting systems. A summary of progress made is described in our annual implementation reports (available upon request). These are some of the highlights from the 2019 annual report:

+ Following sustained pressure and expert guidance from Transparency International, the European Union (EU) adopted a directive on whistleblower protection in October 2019. Many of our recommendations were included in the agreed text.
+ In Panama, our Chapter significantly advanced the implementation of their Open Government Partnership (OGP) commitment to develop a citizen observatory of the judiciary.
+ TI Maldives secured over US$1.16 million from the government to compensate and house citizens who had been forcibly relocated.
+ We ensured golden visas will now be monitored as part of the European Commission's supranational risk assessment.
+ The Palestinian government adopted the country's first whistleblower protection system following advocacy from our Chapter
+ Our Democratic Republic of Congo and Ghana Chapters reached 33,405 people with anti-corruption awareness-raising

The 2019 annual report includes challenges too, such as:

− Uneven advocacy capacity across the Movement, which hinders the work occasionally.
− Lack of agility and flexibility to respond to changes in the environment as well as the insights generated through learning.
− Projectisation of some of chapters' advocacy work, resulting in significant time and financial constraints.

4. Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?

At the Annual Membership Meeting (AMM) 2019, TI members agreed on significant governance changes. The changes included a) the expiry of Individual Membership to strengthen the corporate members of TI, namely the TI National Chapters (NCs), b) the dissolution of the Advisory Council and the establishment of the International Council (IC). This new body can advise all bodies and entities of the association. IC members can run for Board of Directors and Executive elections. Furthermore, the Board of Directors can co-opt up to two IC members to diversify and strengthen the expertise of the Board.

B. POSITIVE RESULTS ARE SUSTAINED

1. **What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?**
   TI-S has invested heavily in resourcing the fundraising function. The Fundraising Team has been expanded and it was decided to manage some of the fundraising tasks as well as external and internal communication through "Salesforce" starting in 2020.

   In most cases our work is not funded through unrestricted funds. Sustainability is therefore a challenge because it often depends on funding continuity. To limit risks, we aim at aligning our project work with the long-term vision of the TI Strategy, we invest in fundraising to ensure continuity, and we ensure institutional memory is kept throughout several project cycles through the knowledge management systems.

   When implementing projects and programs, those are usually through local organisations who make sure to include stakeholders – it is almost always an element to raise their capacities. Our learning products (research reports, materials, trainings, etc.) are free and available through our websites and other platforms. Our interventions are designed in a way to last beyond project durations: for example, through policy changes, reforms, etc. Many of our actions aim at equipping stakeholders (including communities) so that they know better their rights and can play an active role in demanding accountability.

2. **What lessons have been learned in this period? How have the lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?**
   Innovation and learning are important to TI. Besides the ongoing monitoring of our work, TI regularly conducts learning reviews and independent evaluations to assess the effectiveness of our projects and programmes, and to improve our learning and internal accountability processes. A notable example of the evaluations that took place in 2018 included the Mid-Term Review of the TI Strategy 2020. A governance review in 2019 resulted into governance recommendations which were voted upon at the AMM 2019 (see A4 above).
   TI-S undertakes regular internal review sessions around proposal development, strategic partnerships, and donor relations. The results are fed into larger review processes and inform discussion from the Team Managers group through to the teams.

C. WE LEAD BY EXAMPLE

1. **How does your organisation demonstrate excellence on your strategic priorities?**
   We continuously aim to build innovative partnerships and work in close collaboration with peers and other key stakeholders. Only a few examples can be listed here. For instance, in 2019 the Secretariat and TI national Chapters had a range of successes with the G20 ACWG. Additionally, we implemented a successful G20 communications strategy, including the publication of blogs, public campaigns and attending the G20 Summit Media Centre in Buenos Aires in November.
   We also remained the secretariat of the UN Convention against Corruption coalition, coordinating key activities of the 350 organisations that are part of it.
   United action with civil society organisations (CSOs) increased our impact with governments and with international organisations, like the International Monetary Fund (IMF). On the IMF specifically, we informed its anticorruption approach, namely in relation to beneficial ownership registers and aid modalities. We also appeared on IMF and World Bank panels to provide anticorruption recommendations on these topics.
   As part of the Global Anti-Corruption Consortium, we partnered with investigative journalists to expose corruption and use data on it for advocacy campaigns.

2. **What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?**
   In 2019, we secured 3,834 unique A-grade media mentions worldwide and 3.36 million visitors to the website. We also built newsletter subscribers to around 43,500 and social media followers to approximately 834,000.
   Transparency International is a member of the International Civil Society Centre. Transparency International attends regularly conferences of Pro Bono Brokers such as A4ID and PilNet. At its International Anti-Corruption Conference, peer-NGOs from the sector are gathering to discuss recent trends and developments of good governance and anti-corruption. Transparency International is publishing its Corruption Perceptions Index (CPI) and Exporting Corruption Report annually. The CPI is widely used in both the practitioner and academic world. The Global Corruption Barometer (GCB) is published every two years and focusses on a region for which corruption is statistically measured by interviews.

3. **How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?**
   Transparency International is committed to the protection of human rights, to uphold diversity and to apply standards equally. The commitment goes beyond what is already demanded from statutory rules. Inclusiveness, protection of human rights as well as promotion of women's rights and gender equality are reflected in our Umbrella Statement as well as in the TI-S Code of Conduct, the TI-S Whistleblowing Policy, and further policies such as the TI-S PSEAH.

   In its project work TI has identified several vulnerable groups such as women and their link to corruption and land. Diversity is one of the areas the Board is focussing on and this is being formalized through developing a competency-diversity-matrix for both, the Board of Directors, and the International Council. The Board of Directors is evaluating the diversity of its composition on an annual basis.

TI-S aspires to secure equal opportunities, fair and equal treatment for every single person who works at TI-S, regardless of age, gender, race, ethnicity, physical ability, religion, belief, sexual orientation, or other aspects of one's identity. TI-S employees stem from 45+ countries and a taskforce on gender is contributing to policy development. To support the mainstreaming of gender and diversity principles into the organisation's policies/processes and procedures and to complement key aspects of the TI-S Code of Conduct, TI-S has created a "Gender & Diversity" Policy. In addition, TI-S seeks regular feedback from staff, including questions related to inclusiveness, through its regular staff surveys. As part of the TI-S integrity system, TI-S has a fulltime "Integrity Officer".

TI is committed to the protection of human and women rights in its programmatic work. Our 2018 AMM resolution for example commits the movement to advocate for the recognition of sextortion as a form of corruption, the collection and publication of gender disaggregated data on the impact of corruption on women and men and recognises the need to mainstream a gender perspective in anti-corruption programmes and policies.

To support targeted advocacy efforts, we focused on generating evidence on the linkages between gender, marginalisation and corruption. We have established strategic partnerships with regional and international organisations engaged in advancing women's rights such as UN Women Latin America or the International Association of Women Judges. We have also targeted regional and global bodies, including EC, G20, IMF, UNCAC and Open Government Partnership (OGP) to more regional bodies such as APEC, ASEAN and the African Union with our advocacy efforts and call to mainstream anti-corruption in their actions promoting gender equity and women's empowerment, to adopt a gender inclusive and gender sensitive approach to fighting corruption; to recognise gendered forms of corruption, particularly sextortion; to mainstream gender considerations and to collect disaggregated data on gendered forms of corruption and their impact on women.

As part of our mainstreaming efforts, we are also increasingly and more systematically assessing the impact of corruption on women and men in our global programmes, with the generation and analysis of gender disaggregated data and the compilation of reports, papers and studies on gender and corruption. As part of our Global Corruption Barometer, we conducted a gender analysis of GCB findings in Africa, Latin America and Mena.

4. **How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?**
The Umbrella Statement which is applicable to all TI entities and staff is demanding a collegial approach. The TI Charter is expressively including all sectors of society to work jointly on our mission. TI is submitting proposals with partner organisations and usually exchanges on key events and developments with similar NGOs.

In 2014 we introduced our approach to [monitoring impact for anti-corruption work](). The approach consists of two complementary elements: a matrix to support participatory impact-oriented monitoring in projects and programmes; and a limited number of impact assessments that provide in-depth insights on relevant topics and trends identified through the ongoing monitoring. The approach is highly participatory – it requires and actively promotes the involvement of both internal and external stakeholders and constituents. During planning processes and in monitoring

meetings we ask ourselves who benefited from our work and whether there were (or are to be expected) any negative or unintended consequences.

Another example of how we protect victims and witnesses of corruption is by enabling them to safely report corruption through the GlobaLeaks online reporting platform. The new Advocacy and Legal Advice Center (ALAC) digital platforms are secure and allow for anonymous reporting and completely confidential 2-way communication between the reporting person/whistleblower and the TI lawyer working for the ALAC. We also developed guidance to help TI chapters create safe reporting questionnaires and we conducted a session on sharing good practices about client outreach in the Latin American regional ALAC meeting, which included outreach to remote areas and vulnerable communities.

We disaggregate data where possible, for example on the thousands of complaints received by our ALACs and on the Global Corruption Barometer results. This is key to understanding better how women and men perceive and are affected by corruption. Our policy and research products have also contributed to building and sharing more knowledge in this area of work, including a topic guide that provides an overview of the linkages between gender and corruption.

At the country level, mobile ALACs and other outreach methods have been extremely valuable to make sure that we engage with as many people as possible, regardless of their location, gender, or disability status. Mobile ALACs reach out to citizens to collect corruption-related complaints, and therefore provide opportunities for more vulnerable or rural populations to voice their concerns. TI National Chapters also make more targeted efforts to reach out to women, e.g. in the Middle East & North Africa region, where networks of women leaders have been set up.

5. **How do you demonstrate responsible stewardship for the environment?**
In 2010, the Transparency International Green Task Force - TIGRE had been set up at TI-S as a voluntary task force responsible for TI's environmental reporting. The taskforce had stopped being functional for some years until, in 2019, it was successfully revived. TIGRE aims at integrating environmental concerns into all decision making, promoting environmental awareness among staff, and reducing waste and pollution, seeking to continually improve our environmental performance. As one of the biggest concerns is air travel, the taskforce measures our CO_2 emissions and sets reduction goals of 5% a year. Through the new Sustainable Travel Policy (Annex 2) and the introduction of new flight limitations and protocols, staff is made more aware of our environmental impact.

In addition, TI-S has made efforts to reduce the carbon footprint of its office activities in Berlin. Initiatives include:
- a functioning waste recycling system
- a pure nature tariff energy supply
- movement sensor light systems, neon light tubes being replaced with LED energy saving tubes on a rolling basis
- appliances being selected taking into consideration low energy consumption and professional recycling of old appliance
- maintenance of white ware and replacement options
- modified printing system to reduce paper consumption, selection of paper is met by several factors such as environmentally friendly and decent sources
- office and cleaning material is selected by favouring vendors with green products
- energy saving mode at coffee machines, microwaves, and air conditioners

CLUSTER B: OUR APPROACH TO CHANGE

D. KEY STAKEHOLDERS ARE IDENTIFIED WITH GREAT CARE

1. **Please list your key stakeholders. What process do you use to identify them?**
   Each project has its own detailed analysis and process to do so. From a very high-level point of view these are the main external stakeholders: institutional donors, private corporate donors, private individual donors, press, corrupt individuals and corporates, CPI and other tools users, prosecutors and other institutions investigating corruption, pro bono networks, peer-NGOs, research institutes, investigative journalists.

2. **How do you ensure you reach out to those who are impacted or concerned by your work?**
   We do not have one standardised process for involvement of affected stakeholder groups, and every project and programme is different. However, participatory, and accountable project design, implementation, monitoring and evaluation practices are highly encouraged.
   The ALACs are our most relevant people engagement mechanism and provide people affected by corruption the opportunity to inform the focus of our work. The ALACs can be contacted through diverse channels. Some TI National Chapters organise mobile ALACs to reach out to people in communities.
   One of our regular research products, the Global Corruption Barometer, is a representative public opinion survey on corruption conducted in more than 100 countries worldwide.
   We promote the involvement of both internal and external stakeholders and constituents as part of trainings on our Impact Monitoring Approach (IMA). The approach is highly participatory. For example, M&E findings are required to be validated by external stakeholders. Further, we suggest collecting evidence for our impact claims by seeking stakeholders' views, for example by organising semi-structured interviews with project partners and targeted stakeholders, focus group discussions with beneficiaries or other stakeholders and feedback surveys.
   Besides the ongoing monitoring of our work, TI regularly conducts learning reviews and independent evaluations to assess the effectiveness of our projects and programmes, and to improve our learning and internal accountability processes. It is standard to engage and interview external stakeholders as part of these evaluations. The exact groups to be interviewed are decided on by the independent external evaluators.

3. **How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?**
   Driving forces for identifying key stakeholders are the Strategy 2030 and the respective implementation plan applicable to individual campaigns and strategies in specific areas. The criteria and prioritisation for relationships are based on our shared priorities, guiding principles, relevance and the potential added value.

   Under the direction of the Board, TI-S and the Board's Membership Accreditation Committee (MAC) run a transparent and collaborative "accreditation process"
   - to establish a partnership between local individuals or organisations and TI;
   - to ensure that chapters continue to uphold the values and principles of the movement and
   - to assure/achieve a movement of strong, effective and accountable National Chapters.

   Chapters are accredited according to a set of objective standards in three stages: from National Contact, to National Chapter in Formation and finally to fully accredited National Chapter status.

Fully accredited National Chapters go through a review process every three years, aimed at ensuring continuous compliance with our standards and strengthening the work of the Chapters. To be a member of the TI movement, a National Chapter must (for a more comprehensive list of requirements, see the Accreditation Policy):

- demonstrate its determination, diligence and competence to combat corruption in its own country/ territorial entity;
- adopt and accept the Umbrella Statement and continuously act in accordance with it;

Where weaknesses are identified, at any time, they should be addressed jointly and constructively, with a primary view to strengthening the position of the National Chapter and thus of the Movement as a whole. In instances where a Chapter's performance continually falls short of the standards, the Chapter may voluntarily withdraw or face dis-accreditation or suspension from the movement.

E. WE LISTEN TO, INVOLVE AND EMPOWER STAKEHOLDERS

1. **What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?**
The TI Strategy 2020 draws on a wide and inclusive consultation process across the TI Movement and external key stakeholders in 2014 and 2015. Using surveys, meetings, interviews, and written inputs, we evaluated our context, our organisation, and our achievements. We had more than 1000 contributions from within TI and 500 from outside our Movement, drawing on the worlds of government, international organisations, business and civil society. Multi-country projects have their own processes of involving key stakeholders in planning, monitoring and evaluations. It is standard practice that, as part of project evaluations, the external consultants interview not only internal, but also relevant external stakeholders. The evaluation results including the recommendations are discussed with TI-S teams and national chapters to decide which of them can be implemented in future projects and programmes.

For internal stakeholders, feedback is gathered via surveys. An annual Board of Directors self-evaluation is shared with the Movement and consultation of the TI Movement takes place on all major decisions, may it be the Strategy 2020, the new Strategy 2030, Governance Changes, and Investigations.

At TI-S, there is an annual staff survey, and the Works Council engages regularly with staff and management. As the elected representatives of staff, the Works Council enters into collective agreements with the employer on behalf of staff. TI-S is also offering more formal ways of providing feedback or submitting complaints via Team Managers, Human Resources, the Integrity Officer, and an external Ombudsman.

Each Annual Membership Meeting ("AMM") is followed by a survey which evaluates the feedback of AMM participants and serves as input for further improvement of the meeting.

2. **What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?**
For internal processes, the organisation is consulting with its members on all issues which are relevant to the whole Movement such as the TI Strategy 2030 or any Governance Changes. In terms of joint advocacy, fundraising and communication, this is based on Donations Policies as well as the Ethical Advocacy Policy. However, the main coordination work is done via undocumented processes between key internal stakeholders such as TI members, offices and subsidiaries.

Stakeholder engagement is a core aspect of proposal development and project/programme implementation. TI regularly consult with chapters, donors and other partners to exchange ideas, findings and learnings across all our work. This does not take one form of activity. Examples include initial consultation with chapters to develop proposal concepts and planning through workshops, questionnaires, and other tools of engagement. We also provide Q&A sessions for donors on specific organisational and programmatic topics, as well as regular 1-1 check-ins. Another example comes from our project work and project methodologies, where in-country projects are developed with local partners (not restricted to chapters but also other CSOs, local networks, the academic community, etc.) to ensure proposed interventions are relevant, feasible and do no harm to local communities.

3. **What are the main likes/dislikes you have received from key stakeholders? How, specifically, have you reacted to their feedback?**

We make the best efforts to react to feedback from all stakeholders. This happens on small and big issues and is based on a constant and regular exchange with our Movement, donors, partners, and other stakeholders.

Transparency International's Secretariat started 2019 amid an ongoing organisational change process, which commenced in mid-2018 with the aim of reinstalling management structures. This change process led to increased staff turnover and other internal challenges, which culminated in an article being published in The Guardian that raised serious allegations relating to organisational behaviours, culture, and management at the Secretariat. As a response, the Board of Directors commissioned an independent investigation and encouraged additional wellbeing options to be offered to staff to support the recently strengthened integrity infrastructure. Transparency International continues to work openly and honestly with staff to review current practices, address all issues identified, and take any action necessary to prevent issues happening in future. Transparency International's staff are the heart of our organisation. Safeguarding staff wellbeing is our top priority, and the Board of Directors and management will continue to work hard to ensure we are following international best practices – of the kind that Transparency International itself promotes.

4. **How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention? (You may skip this question if you have addressed it in your response to B. 1)**

The accreditation process gives an indication as to how National Chapters improve their organisational capacities. In addition, we regularly conduct training evaluations at the end of capacity building activities. For example, with regards to MEL trainings we occasionally follow up months or years later to see how the learning is being implemented by training participants.

F. OUR ADVOCACY WORK ADDRESSES THE ROOT CAUSES OF PROBLEMS

1. **How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?**
   Understanding the context, causes, and consequences of the problem we want to solve is a key element of our advocacy strategies.
   To reach our contextual understanding, we engage with a wide variety of stakeholders (civil society, governments, business and international organization representatives). This engagement takes different forms, from email exchanges to in person meetings and phone calls. We also work with investigative journalists around the world to leverage breaking stories as opportunities to drive policy change and legal accountability - providing us with direct evidence of the problems we wish to address in real time (https://www.transparency.org/en/news/the-impact-of-the-azerbaijani-laundromat).
   Our continuous monitoring of these global spaces also allow us to identify key advocacy opportunities and policy outcomes, such as the inclusion of a gender dimension in the G20 High Level Principles on Whistleblowing (https://www.transparency.org/en/news/four-ways-the-g20-can-take-the-lead-on-anti-corruption).

   For the last 25 years, TI has committed to use an evidence-based approach to our global advocacy efforts. With our flagship tools such as the CPI and the GCB as well as a range of research methodologies and tools, we have established a strong reputation for measuring corruption and substantiating our advocacy asks with evidence.
   In 2019, with our GCB, we have collected data from ordinary citizens on their views and experience of corruption in MENA, Latin America and Africa. For the first time, we have used the GCB survey to collect data on sextortion in MENA and Latin America to support our recommendations for governments to recognise and address sextortion as a gendered form of corruption.
   With our report published in 2019 "Who is behind the wheels? Fixing the global standards on company ownership", we have collected the necessary evidence to support our call for reforming global standards on beneficial ownership transparency.
   Through our Helpdesk services, we provide our global network of National Chapters and U4 partner agencies with the evidence they need when they need it to inform their anti-corruption interventions. In 2019, we have answered more than 110 Helpdesk queries, resulting in the production of 53 fully developed answers synthetizing the state of knowledge on topical issues on a demand-driven basis, which are routinely published and disseminated to a wider audience of anti-corruption practitioners on our Anti-Corruption Knowledge hub.
   We also collect and use evidence for holding governments and organisations accountable for their anti-corruption pledges.

2. **How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?**
   Our advocacy strategies involve stakeholders throughout the different stages of the process. As a global coalition, we also work closely together with our National Chapters to ensure that their views are included in our global advocacy strategies. This involvement may take different approaches depending the timeline and advocacy strategy to be implemented, but it general includes phone calls, email exchange, meetings, through which we are able to exchange ideas, better understand the problem, brainstorm on potential solutions, coordinate actions and evaluate the results. With our Chapters, in addition to the methods above, we also use our internal communication channels.

As a result of this process we are able to implement joint advocacy activities with different stakeholders, which are supported by CSOs from different parts of the world (https://www.transparency.org/en/press/g20-hundreds-of-civil-society-organizations-pledge-to-avoid-saudi-arabia-le). For example, in 2018 we published a report together with Global Witness on European Golden visa schemes (https://www.transparency.org/en/publications/golden-visas). This analysis led to extensive advocacy work, placing the issue firmly on the radar of EU policymakers. Most recently, Cyprus has paused its visa scheme after investigative journalists revealed that corrupt individuals were using it to gain access to the European financial system, as we had warned in 2018 (https://www.transparency.org/en/press/cyprus-axes-corruption-plagued-golden-passports-scheme). Finally, as a result of our advocacy strategies several of our policy asks are implemented by major global forums (https://voices.transparency.org/four-anti-corruption-takeaways-from-the-2019-g20-summit-463cccba2607) and at the national level.

To the extent possible, we prioritise a stakeholder engagement approach to our research tools, allowing stakeholders to share their views and validate the findings of our research. This is the case of methodologies used for the IACC monitor, our National Integrity studies or Business Integrity Country Assessment studies.

G. WE ARE TRANSPARENT, INVITE DIALOGUE AND PROTECT STAKEHOLDERS' SAFETY

1. **Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible by your key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.**

   Most relevant information is at this link: https://www.transparency.org/en/the-organisation#how-were-funded including information on our governance, charter, the integrity system, and our institutional relationships. With regards to financial information, the sub-section How We're Funded includes:
   - Budget: https://www.transparency.org/en/the-organisation/our-operating-budget;
   - Annual Audited Financial Reports: https://www.transparency.org/en/the-organisation/audited-financial-reports;
   - List of donors: https://www.transparency.org/en/the-organisation/who-supports-us.

   We also share our evaluation reports on the website https://www.transparency.org/en/the-organisation/evaluations

2. **What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.**

   TI-S has a standard compensation system in place to ensure consistent pay practices. All employees fall under the same system and we do not differentiate between internationally and locally hired employees. 2019 Salary Scales have been provided. NB that grade IV was discontinued years back so as of 2019 grade 5 was the highest. The gender gap between average salaries of females and males is approx. €3,396 gross yearly, men earning more. This calculation includes two outliers from a previous compensation system. When removing outliers, the gap is €1,897 gross yearly. We have actively considered gender factors in the development of the compensation system which was launched in March 2020. The average monthly salary of the lowest earner (Grade 1) is €2,492 compared to an average monthly salary of €7,709 for the highest earners (grade 5). The top 5 (grade 5) gross, monthly salaries in 2019 were: €7,225; €7,264; €8,282; €9,000; €9292. As of 2020 the compensation system has been updated with the support of the Works Council (Staff Representation body) (which was underway in 2019). The system aims to align similar roles to ensure consistent pay practices. Consideration in the development was given to gender factors.

   TI-S has a standard compensation system in place to ensure consistent pay practices. All employees fall under the same system and we do not differentiate between internationally and locally hired employees. 2019 Salary Scales have been provided. NB that grade IV was discontinued years back so as of 2019 grade 5 was the highest. The gender gap between average salaries of females and males is approx. €3,396 gross yearly, men earning more. This calculation includes two outliers from a previous compensation system. When removing outliers, the gap is €1,897 gross yearly. The average monthly salary of the lowest earner (Grade 1) is €2,492 compared to an average monthly salary of €7,709 for the highest earners (grade 5). The top 5 (grade 5) gross, monthly salaries in 2019 were: €7,225; €7,264; €8,282; €9,000; €9,292. A new compensation system is being developed with the support of the Works Council (launch in March 2020). The new systems aligns similar roles to ensure consistent pay practices.

3. **How do you ensure privacy rights and protect personal data?**
    Yes, the privacy policy is on the TI website under https://www.transparency.org/en/privacy TI is working continuously on the improvement of this policy to keep pace with the statutory developments. In addition, there is a data protection statement for staff and a policy for individual donors. The latter one is not yet in effect.

4. **Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.**
    TI's donations policy requires that all donations exceeding €1,000 are individually disclosed in our annual audited financial statements. The five largest donors in 2019 were: DfID - Department for International Development – UK (€4,373,807); European Commission (€4,042,911); Swedish International Development Cooperation (€1,947,143); and BHP Foundation (€1,904,449).

CLUSTER C: WHAT WE DO INTERNALLY

H. STAFF AND VOLUNTEERS ARE ENABLED TO DO THEIR BEST

1. **Provide evidence that recruitment and employment is fair and transparent.**
   TI-S has Recruitment Guidelines which ensure that recruitment processes are fair and consistent. Available employee statistics (see Annex 1).

   The TI-S Recruitment Guidelines set out both process as well as roles and responsibilities of the various stakeholders involved to ensure consistent, fair and accountable recruitment and selection processes. Selection processes typically involve several colleagues in interviewing panels to allow for a diversity of different perspectives to inform the hiring decision of hiring managers who are typically the Team Managers of the hiring team in question. The process is organised from beginning to end by the recruitment specialist of the Human Resources Team in line with the Recruitment Guidelines and in close coordination with all stakeholders involved (including also the TI-S Works Council with codetermination rights in hiring processes).

2. **What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?**
   TI-S has a Learning & Development Policy; however, initiatives will always be adapted to be in line with the given budget for a year.
   I. Learning and Development Opportunities: In 2018 – 2019 we have put an increased focus on providing relevant learning and development opportunities based on organisational needs with several organisation-wide trainings; team manager trainings; as well as team and individual trainings. Feedback on all trainings is consistently positive with an average rating of 4 or above (5 being the highest rate).
   II. Organization-wide trainings: Leadership Programme for all staff – 3 half-day workshops attended by all staff. Understanding Service Leadership in shaping the organisational culture; Developing effective teams; Giving and receiving feedback; Decision-making, and skills and tools to build consensus and achieve win-win solutions; Working collaboratively, managing conflict effectively and building trust with others.
   III. Getting Things Done® (GTD) - A personal productivity and workflow management system - it redefines the way life and work are being approached and allows to improve efficiency, creativity, and memory by focusing on the right things at the right time. 91 staff participated since launch in 2018; Offered to all new staff on a continuous basis every year, as well as review sessions; In 2020 we were planning to pilot GTD Level 2 which focusses on collaboration however this has been postponed also due to the Pandemic.
   IV. Moral Judgement Training - Based on the recommendations of Governance & Integrity International (integrity system consultants), this training is for all staff, including leadership, as well as the Board. It focuses on moral deliberations and will support the implementation of the Integrity System, particularly the Moral Learning Process component.
   V. Team Trainings. Several trainings/workshops were organised based on the needs identified by teams and Team Managers in 2018 & 2019: Storytelling, Public Speaking (Fundamentals and Advanced), MS Project, SQL and Databases, Team Building/Communication, Negotiations Skills, Presentation Skills, Phone Skills and Communication, Video Making Skills,

Gamification, Facilitation Skills (Fundamentals and Advanced), Dealing with Sexual harassment cases at the workplace (workshop for all staff and HR)

VI. Leadership Programme for Team Managers. In addition to the Leadership Programme for all staff, Team Managers have received additional training on topics such as: Team Development, Building Trust, Facilitating Others, Collective Decision Making, Coaching

VII. Individual Activities: Language courses, Online Courses (Gender Mainstreaming, Public Speaking, Difficult conversations, Developing original ideas, Design Thinking for Innovation), Participation in relevant external events /conventions, Data Camp licenses

3. **How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?**

TI-S has a comprehensive Health & Safety System in place which is also in line with relevant German legal requirements like having external experts (Health & Safety Specialist and Company Doctor) contracted and conducting 3-4 Health and Safety committee meetings with all relevant stakeholders and experts per year. New staff are inducted on German Health & safety requirements and existing staff receive a regular refresher training. TI-S has also several specifically trained First Aiders and Fire Wardens as well as internal Health & Safety Focal points in place. In addition, TI-S is offering staff access to the PME Employee Assistance Programme (Launched in 2018) and can provide access to an external counselling and coaching contact on demand. As independent entities National Chapters are responsible for complying with their local regulation on safe work.

All events organised by TI-S (i.e. workshops, webinars, Annual Membership Meetings) have a 0-Tolerance for Harassment policy. Anti-Harassment Contact Points and a Review Panel are established ahead of the meetings and participants are highly encouraged to reach out in case of witnessing or experiencing any form of harassment.

TI has a SAFE phone number available to the entire movement in case of emergencies. In addition, travel of staff members is coordinated together with the Safety Manager.

1. **How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?**
   TI is mainly funded through grants and donations from governments, multilaterals, and foundations, with a small amount of individual and corporate income. There are a range of TI-S and TI policies that cover fundraising, and TI-S is currently in the process of a full policy review which will update our policies to ensure they are in line with best practice, and to fill any potential gaps. One of the key policies is the TI Donations Policy & Guidelines and we have a due diligence process for each donor (see Due Diligence Template in Annex 3).
   TI works with donors who have a clear commitment to the action-based programme required to deliver a world free of corruption. The commitments to the anti-corruption agenda fall within the strategic or tactical priorities of the different donor groups (governments and foundations in particular).

2. **How is progress continually monitored against strategic objectives, and resources re-allocated to optimise impact?**
   The organization approves their annual budget prior to the beginning of the fiscal year and monitors resource allocation on an ongoing basis. Detailed reports are reviewed monthly.
   Small variances within a given cost center may be addressed by reallocations operated by the project manager in consultation with the project accountant. New hires and changes in staff remuneration are administered by HR based on a detailed clearance process. On a quarterly basis, in case larger deviations are noted in the overall organizational finances, Team Managers proceed to reallocate the budget by identifying overall envelopes and investment targets; proposals are called from the teams and an expert panel is in charge to prioritize investments based on set criteria. The criteria used to re-allocate budgets included a) the timeline of the spending, b) the type of resources financed (staff costs vs. one-off costs), the amount and strategic relevance.

3. **How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period. What are your plans to improve?**
   The organization has a robust internal control environment to minimize risk of fraud and corruption. Financial statements are compiled under International Financial Reporting Standards (IFRS) and audited on a yearly basis. Processes exist to ensure independence of the auditor.
   Finance staff includes qualified accountants, affiliated to major international charters, such as Association of Chartered Certified Accountants (ACCA) and South African Institute of Chartered Accountants (SAICA).

   The internal control environment is formalized and includes a financial manual, a detailed delegation of authority policy and an internal control matrix which are actively enforced. The organizations finances are operated through an established Enterprise resource planning (ERP) system, Microsoft NAV.

   Detailed trainings to minimize the risk of fraud and corruption are developed internally, including provisions to guide reporting and investigation of concrete cases of corruption. Trainings are provided also to project partners.
   Risk management is an established practice in the organization. The risk management system follows the COSO methodology and the Audit and Risk Committee of the Board, which meets

quarterly, is actively updated on developments in organizational risks. Moreover, routines are developed to make sure financial risks at the project partner level, including fraud and other internal control failures, are monitored and managed, especially when sub-granting is involved. These processes, known as C-FRA, has been developed in response to previous incidents and is improved based on a continuous learning from data gathered in the field.

The process of the mentioned investigations is outlined in the policies themselves. The Integrity Officer keeps a record of all cases may they be pending or closed.

J. GOVERNANCE PROCESSES MAXIMISE ACCOUNTABILITY

1. **What is your governance structure and what policies/practices guide replacing and recruiting new trustees/board members?**
The organisation consists of the following organs: Executive (Chair and Vice-Chair), Managing Director, Board of Directors, International Council and the Membership Meeting. The organisation is an association which means that it has corporate and individual members gathering in the highest decision body called the Membership Meeting.

   Board Members as well as the Executive are elected by the Membership Meeting for a term of three years. They may run for two adjacent three-year terms. If they want to have a third term there has to be a cooling-off period of at least one year after the second term. The Board of Directors consists of the Executive (Chair and Vice-Chair), ordinary Board Members elected by the Membership Meeting, and two co-opted Board Members from the International Council.

2. **How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?**
The Board has established an Audit Committee which is doing an annual risk assessment. Furthermore, the Audit Committee ensures compliance with finance regulation and reporting standards. A Finance Committee is assisting in doing an Annual Budget and providing a Budget Estimate to the Membership.

   Within the Integrity System the Board Ethics Committee plays an important role. The Committee is following up on cases involving the Managing Director, Members of the Board of Directors, Chair and/or Vice-Chair as well as complaints from TI Members (National Chapters and Individual Members). The [terms of references of the Board Ethics Committee](#) have been updated recently.

   The main role of the Board Ethics Committee is to advise the Board of Directors and the entire TI Movement on principles, structures and processes for the highest standard of ethical conduct in the activities of Transparency International. That includes
   - Monitoring, evaluating and reviewing the performance of TI's integrity systems
   - Receiving, monitoring and advising on the annual plan and periodic reports of the TI-S Integrity Officer,
   - Advising the Board on any questions escalated to it by the Integrity Officer for the resolution of ethics and integrity matters;
   - Ensuring the maintenance and appropriate transparency of declarations of interests (financial and non-financial) by Members of the Board, Individual Members, and members of the boards of directors or equivalent governance bodies of National Chapters, as required by TI policies.

   An overview of pending and solved cases is annually presented to the Membership Meeting. The Board of Directors does currently not play an active role in resource allocation. The Board of Directors is overseeing the work of the Managing Director via regular meetings and updates usually provided monthly or quarterly.

3. What processes and mechanisms does your organisation have in place to handle external complaints including those relating to unacceptable conduct of your staff, volunteers, or partner organisations? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

There is no public overview of pending or solved cases. All policies related to complaints - except the Grievance Policy - are accessible on the TI website under https://www.transparency.org/en/the-organisation/ethics-integrity as well as in the TI intranet. External publication of case data is planned in the long run, most likely starting in the first cycle of the new Strategy 2030.

4. How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

As part of the TI-S Integrity System which is led by the Integrity Officer there are several relevant policies (e.g., TI-S Code of Conduct, TI-S Whistleblower Policy) in place to ensure complaints or suspected violations for example of the Code of Conduct can be addressed appropriately using the accurate channels and that reporting persons and also survivors are protected appropriately. In addition, HR has a Grievance Policy which is also handed over to every employee with the HR Manual. This policy has been developed to ensure employees and managers are aware of the TI-S policy regarding grievances and to provide a framework for resolving them formally when informal attempts prove insufficient. The (currently annual) employee staff survey is also asking employees questions on the topic and reporting suspected violations.

External publication of case data is planned in the long run, most likely starting in the first cycle of the new Strategy 2030.

5. How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?

Complainants have at any point the power to determine whether they want to file a complaint anonymously or not. TI is not publishing any complaint's data which may help identifying the complainant. In addition, complainants may choose to report to a registered lawyer, the external whistleblowing point, who has legal privileges. For details refer to the TI-S Code of Conduct and the TI-S Whistleblowing Policy.

K. LEADERSHIP IS DEDICATED TO FULFILLING THE 12 COMMITMENTS

1. **How is the governing body and management held accountable for fulfilling their strategic promises including on accountability?**
The Board is conducting an annual self-evaluation and is bound by its report to the Membership Meeting. The Managing Director is reporting regularly to the Board of Directors. Both, the Board of Directors and Managing Director are reporting once per year to the Membership Meeting. Performance of the Team Managers is assessed as for every staff via annual objectives which are evaluated.

2. **What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?**
This area of work requires improvement. Participatory mechanisms will be used to discuss feedback received to this and future reports.
Once per year, a comprehensive staff survey is conducted, and the findings are shared and discussed with all staff. Regular team meetings ensure that staff get the opportunity to provide their feedback on organisational issues. In addition, all-staff meetings are organised regularly to discuss relevant topics or to allow management to share information and answer questions.

   The Governance & Legal team is also seeking feedback from Membership Meeting participants including staff. Their regular input helps improving the Annual Membership Meeting.

3. **What is your accountability report's scope of coverage? Are you reporting for the whole organisation or just the international secretariat? For secretariats of international federations, on which issues of accountability (or relating to Accountable Now's 12 commitments) do your members report to you on, and with what frequency? Where there is no routine reporting, how do you use your coordinating functions to elevate attention to accountability issues throughout your federation?**
The description is related to the organisation in Berlin named Transparency International e. V. including its office in Washington D.C. USA. The related but independent entities are TI EU and Friends of Transparency International. TI is demanding that its National Chapters comply with local laws as well as the TI Charter, TI Umbrella Statement, TI Conflict of Interest Policy, and the Accreditation Agreement. Content related to operational areas such as Human Resources, Office Management and the Integrity System refers to TI-S activities and policies only.

ANNEX 1: EMPLOYEE METRICS

Employee Metrics							
Year	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	Dec-19
Number of Staff	181	157	147	118	115	107	115
of which Interns and Temps	15	7	7	7	6	5	5
average Grade		3	3	3	3	3	3
average years at TI	4.0	4.9	6.0	5.8	5.8	6.0	5.0
average age	37.0	37.6	39.3	37.6	37.6	38.0	38.0
female %	59.7	59.2	59.2	48.3	62.6	60.7	57.4
male %	40.3	40.1	40.8	51.7	37.4	39.3	42.6
	2018	2019					
# of Nationalities	37.0	42.0					
of which are non European	24.0	22.0					
of which are European	13.0	20.0					

ANNEX 2: SUSTAINABLE TRAVEL POLICY

-

TRANSPARENCY
INTERNATIONAL
the global coalition against corruption

BUSINESS TRAVEL POLICY
ISSUED BY: Finance
APPLICABLE TO: Finance
LAST UPDATED: 09 Oct 2020
DATE OF NEXT REVIEW: 09 Oct 2021
VERSION: 1.0

SUSTAINABLE TRAVEL POLICY

1. INTRODUCTION & PURPOSE

The purpose is to provide a clear process pertaining to the approval and reimbursement of travel performed on behalf of TI-S, making sure accountability, value for money, environmental sustainability and personal safety are duly considered.

2. SCOPE

This policy is for all individuals being funded by TI-S for business travel. This includes TI-S staff, TI Board members, Chapter representatives, volunteers, and consultants. In this policy we refer to "travel" meaning a trip made for business purposes (whether it be within Berlin or another location). It does not include travel to and from home to the office.

3. POLICY STATEMENT

Approval

All travel and associated costs must be approved before any bookings are made. Approval is requested through the HR management system, HR Works, by entering the trip in the relevant section. When entering the trip, an employee must include details on destination and an estimate of the maximum expenditure for each expense line (e.g. mode of transport, hotel, etc.). They also must fill out a Travel SAFE form and forward it to the approving Team Manager to be included with their HR Works request.

Travel must comply with organizational standards on employee safety, environmental sustainability and value for money (VFM) as defined in the **Sustainable Travel Manual.** Failure to comply with VFM, security and sustainability guidelines may result in denial of

BUSINESS TRAVEL POLICY
ISSUED BY: Finance
APPLICABLE TO: Finance
LAST UPDATED: 09 Oct 2020
DATE OF NEXT REVIEW: 09 Oct 2021
VERSION: 1.0

approval or, if noted ex-post, in reduced or nil reimbursement of certain expenditure items. Travel insurance is required for all trips and automatically provided where the traveller uses the one-time use credit card or one of the travel agency listed in the Manual. In instances where travel is paid for by a third party, a Travel Request is still required through HR Works (even if there is no cost to TI). This allows Finance-Travel to ensure proper travel insurance is provided to our staff.

Team Managers provide approval to the request after considering several factors, including security. Team Managers provide approval within 5 working days. The employee can finalize their bookings only upon approval.

Eligible expenditure

Costs for travel (flights/trains/coaches) to and from the destination as well as the accommodations are paid for by TI-S directly (via credit card or the use of the travel agency). Any air, train, or coach fares for business travel not purchased using a listed travel agent or a TI credit card, where TI-S is covering the cost, will not be reimbursed.

Other travel costs (i.e. transit to and from hotel and workshop) are reimbursed upon return from travel. For subsistence, per diems are recognized based on standard rates. For further detail on eligible expenditure please review the **Sustainable Travel Manual**.

Reimbursement process

Within two weeks of returning from a trip, the traveller must submit receipts along with the TCR reimbursement form, by dropping them in the Finance in-tray. Additionally, they need to fill in the Back to Office Report Form on Office 365. Finance processes the reimbursement in a maximum of 10 working days when documentation is complete, compliant and approved. In case the traveller fails to submit complete and compliant documentation for 60 days from the end of the trip, per diems will not be paid.

TI-S may issue corporate credit cards in order to finance travel costs. Staff planning to travel more than 5 times over a 12 months period are required to obtain a corporate credit

BUSINESS TRAVEL POLICY
ISSUED BY: Finance
APPLICABLE TO: Finance
LAST UPDATED: 09 Oct 2020
DATE OF NEXT REVIEW: 09 Oct 2021
VERSION: 1.0

card. Staff using railway transportation more than 5 times over a 12 months period are required to use a Bahn card, reimbursed by TI-S.

4. EXCEPTIONS TO THE POLICY

In case of emergency, including healthcare emergencies, the MD, in consultation with Human Resources and SAFE, may suspend the application of this policy and apply special processes tailored to the conditions.
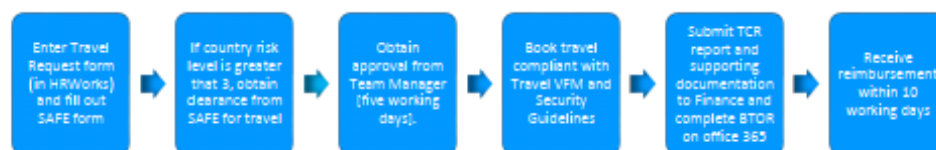
If the traveller cannot fill out the appropriate documentation within the required time, they must request an extension to the Head of Finance, indicating how circumstances make it impossible to comply with the policy.

If the VFM guidelines cannot be complied with, a meeting will be held with Finance-Travel before travel is approved to ascertain the validity of the exception and to see other options that might allow for the compliance of the guidelines.

If safety and environmental sustainability guidelines cannot be complied with for a given trip, but performance of the trip is still deemed necessary, authorization by the CAO is deemed necessary.

If a traveller does not obtain a corporate credit card or Bahn card, and travels 5 times within a 12 month period, they may be denied approval of further travel until the relevant card is issued.

5. PROCESS

Enter Travel Request form (in HRWorks) and fill out SAFE form ▶ If country risk level is greater that 3, obtain clearance from SAFE for travel ▶ Obtain approval from Team Manager (five working days). ▶ Book travel compliant with Travel VFM and Security Guidelines ▶ Submit TCR report and supporting documentation to Finance and complete BTOR on office 365 ▶ Receive reimbursement within 10 working days

6. RELATED DOCUMENTS & ADDITONAL INFORMATION

Travel Authorization Request form (in HRWorks)

BUSINESS TRAVEL POLICY
ISSUED BY: Finance
APPLICABLE TO: Finance
LAST UPDATED: 09 Oct 2020
DATE OF NEXT REVIEW: 09 Oct 2021
VERSION: 1.0

Sustainable Travel Manual

TCR reimbursement form

SAFE Form (In Office 365)

Back To Office Report (BTOR) (In Office 365)

7. REVISION HISTORY

VERSION	DATE	SUMMARY OF CHANGES	AUTHOR
1.0	23 September 2020	New draft Policy	CL - Finance
1.1	9 October 2020	Final review	AG - Finance

ANNEX 3: DUE DILIGENCE TEMPLATE

Due Diligence Express: Foundation

Integrity Commitments

Sectoral issues

Does the partner sector or area of work pose any reputational risks for TI?

Current Transparency International affiliation

Anti-Corruption Commitments

Does the partner communicate a commitment to anti-corruption?

Policies & Procedures

Has the partner committed to an anti-corruption programme

Reporting

Does the partner report its corruption performance?

Additional Memberships

Does the partner participate in any sustainability networks?

Additional Information

Corruption Risk

Source: News search

Convictions

Confirmed incidents of corruption

Accusations

Prominent accusations that affect the partner's reputation

Additional Information

FDR Recommendation

Disclaimer:

The author does not assume any responsibility for the correctness of this information. All Information provided in this document has been found on the Internet.

Confidentiality:

Please handle this report confidential and do not transfer it to any third parties.