

PRINCIPLES ON COMBATING CORRUPTION FOR **BUSINESS** **ASSOCIATIONS** **AND CHAMBERS** **OF COMMERCE**

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CENTER FOR INTERNATIONAL
PRIVATE ENTERPRISE



The Center for International Private Enterprise (CIPE) strengthens democracy around the globe through private enterprise and market-oriented reform. CIPE is one of the four core institutes of the National Endowment for Democracy and a non-profit affiliate of the U.S. Chamber of Commerce. CIPE works with local business associations, chambers of commerce, think tanks, universities and advocacy organizations to build civic institutions vital to a democratic society. CIPE is helping create the enabling environment for business to thrive. CIPE has extensive experience working with business leaders and policymakers to fight corruption and bolster democratic governance around the world.

The ICC World Chambers Federation (WCF) unites and serves the expansive network of more than 12,000 chambers of commerce that exist in almost every country around the world. As chambers influence the economic success of their countries, WCF works to strengthen and diversify their range of services; connect them to their international peers; facilitate the exchange of best practices and knowledge; and help them explore trade opportunities. The World Chambers Federation (WCF) was established at the International Chamber of Commerce (ICC) in 1951. WCF is a non-political, non-governmental body representing local, national, regional, bilateral, and transnational chambers of commerce and industry.

The Principles draw from the 2011 ICC Rules on Combating Corruption, freely available at <https://iccwbo.org/publication/icc-rules-on-combating-corruption/>.

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Outline

The 2018 edition of the Principles on Combating Corruption for Business Associations and Chambers of Commerce consists of three parts:

- **Part I**
Anti-Corruption Principles and Key Elements of an Association Compliance Programme
- **Part II**
Policies, Procedures, and Practices that Business Associations and Chambers of Commerce should enact to Support Compliance with these Anti-Corruption Principles
- **Part III**
Guidance on interactions with Stakeholders in accordance with these Principles

Preface

Corruption can take many forms. It is an insidious problem affecting individuals, communities, and businesses all over the world. Business associations and chambers of commerce, acting individually or in coalitions, can play an essential role in promoting integrity, good governance, and a level playing field across local, national, and international markets where their members operate. In order to play this role and deliver value to their members, business associations and chambers of commerce should commit to effective anti-corruption compliance programmes to prevent corruption in their own operations, build trust and serve as leaders of the business community, and with the goal of setting a high standard of integrity for their member enterprises to follow.

The Center for International Private Enterprise (CIPE) and the International Chamber of Commerce (ICC)'s World Chambers Federation (WCF) created these Principles to assist business associations and chambers of commerce in preventing, detecting, and mitigating corruption risks. CIPE and the ICC WCF drafted these Principles with the unique set of risks facing business organizations in mind, and with feedback from business associations, chambers of commerce, and association governance and anti-bribery experts from around the globe with an emphasis on emerging markets. The guidance provided in this publication is meant to assist business associations and chambers of commerce with compliance with these Principles and best practice rather than any particular anti-corruption law. These Principles complement the Governance Principles for Business Associations and Chambers of Commerce developed jointly by CIPE and WCF as well as the ICC Rules on Combating Corruption for Enterprises, and other guidance directed at businesses such as Transparency International's Business Principles for Countering Bribery.

CIPE and ICC WCF are committed to promoting ethical business practices and good governance for business organizations around the world and for their members—from multi-national companies to small and medium-sized enterprises. The Principles provide guidance on business ethics and anti-corruption compliance for all business membership organizations regardless of location, size, or membership model. These Principles are applicable to business organizations such as business associations, chambers of commerce, and federations of associations operating on the international, national, regional, and local levels that serve as trade bodies that represent the collective interest of their business members, whether individual entrepreneurs, companies, or organizations. The Principles are voluntary and implementation of an association compliance program should take a risk-based approach, where policies, procedures and controls are reasonable and proportional to the corruption risks faced by a given business association.

The business community plays an important role in the fight against corruption by creating an environment intolerant of bribery and illicit activity. Complying with these Principles allows business organizations to demonstrate their commitment to integrity, promote good governance and best practices in anti-corruption compliance to their members, and maintain credibility in the fight against corruption. CIPE and ICC WCF strive to support efforts by the business community to implement effective anti-corruption measures, and believe these Principles outline an effective association compliance programme for all types of business membership organizations. CIPE and ICC WCF work to provide timely and instructional tools for the business community, additional resources for combatting corruption can be found in the appendices and at www.cipe.org and www.iccwbo.org.

Introduction

The Principles on Combatting Corruption for Business Associations and Chambers of Commerce are:

- I. **Business Associations and Chambers of Commerce, including their directors, officers, and employees, will neither commit nor tolerate corruption in any form;**
- II. **Business Associations and Chambers of Commerce will implement an effective Association Compliance Programme to counter corruption.**

The Principles are intended as a method of self-regulation by business membership organisations (referred to as *Business Associations for the purpose of this document*), against the background of applicable national laws and key international legal instruments.

Their **voluntary** acceptance will promote high standards of integrity in interactions and transactions, whether between Business Associations and public bodies or between Business Associations and enterprises. These Principles play an important role in assisting Business Associations and by extension, their members, to comply with their legal obligations and with the numerous anti-corruption standards at the international level.

In order to comply with the Principles, Business Associations should implement an effective Association Compliance Programme as laid forth in this publication. As part of an Association's Compliance Programme, Business Associations should conduct periodic risk assessments of the business environment and adapt the programme accordingly. Business Associations can also benefit from collaborating with each other as well as with relevant international, regional and sectoral initiatives to promote the practices reflected in these Principles.

These Principles are of a general nature constituting good practice in business membership organisations. They reflect and should be read in accordance with the key international legal instruments listed in Appendix A and implemented in accordance with the local laws. Although these Principles are applicable to Business Associations of all sizes and sectors, the implementation should be appropriately adapted and scaled based on each association's risk assessment.

This publication consists of three parts. Part I states the Anti-Corruption Principles, provides a comprehensive definition of corruption, and outlines the key elements of an effective Association Compliance Programme. Part II lists Policies, Procedures, and Practices that Business Associations should enact to support compliance with these Principles. Part III offers guidance on interactions with key stakeholders, including an Association's Members, Third Parties, Customers, and Donors. Appendix A lists key international legal instruments devoted to anti-corruption. Appendix B lists CIPE and ICC resources that can assist a Business Association in following the Principles on Combating Corruption.

Definitions

For the purposes of these Principles, the term “**Business Association**” or “**Association**” means any business membership organization, chamber of commerce, or federation of associations acting as trade bodies that represent the collective interests of their member entities, whether individual entrepreneurs, companies, or organizations. It is recognized that trade bodies can take various forms and operate under different legal and regulatory mandates—mandatory, voluntary, and mixed.

The term “**Board of Directors**” or “**Board**” refers to the highest governing body—which may be voluntary or elected by the general assembly—with ultimate responsibility for the Business Association. The “**Chair**” of the Board of Directors is responsible for compliance by the Board with the Association’s by-laws and acts as a link between the Board and management. “**Directors**” refer to members of the Board.

The term “**Senior Officer**” refers to members of the Association’s executive management team, including a managing director, executive director, treasurer, or chief risk officer. Senior Officers typically manage the day to day operations of an Association and serve on or report directly to the Board of Directors. “**Staff**” refers to employees or volunteers of an Association that do not hold an executive management function.

The term “**Member**” refers to any fee-paying, constituent person or entity of a Business Association with voting rights, often referred to as part of the general assembly.

The term “**Customer**” applies to any entity or individual that purchases programs, goods or services from the Business Association for a fee.

The term “**Third Parties**” includes agents, subcontractors, consultants, suppliers, sales representatives, customs agents, resellers, lawyers, accountants or similar intermediaries, subject to the control, determining influence, or working on behalf of the Business Association.

The term “**Donor**” refers to an individual, organization, or foundation that provides a financial or nonfinancial contribution or donation to the Association.

The term “**Public Official**” refers to any officer or employee of, or any person working in an official capacity or exercising a public function for any government, ministry, department, enterprise, agency or instrumentality of a state.

The term “**Politically Exposed Person**” (PEP) refers to Political Officials and individuals who have been entrusted with prominent public functions, their immediate family members and close associates.

The term “**Government Entity**” refers to any agency, authority, or instrumentality of a state or any of its political subdivisions, owned—in part or full, or operated—in part or full, directly or indirectly by a government, its ministries, agencies, municipalities, etc. at the supranational, federal, local, or municipal level, including state owned enterprises (SOEs) and multi-governmental consortia.

PART I: Anti-Corruption Principles and Key Elements of an Association Compliance Programme

PRINCIPLE I: Business Associations, including their Directors, officers, and employees will neither commit nor tolerate corruption in any form.

“Corruption” or “Corrupt Practices” as used in these Principles shall include Bribery, Extortion or Solicitation, Trading in Influence, Fraud, and the Laundering of proceeds of these practices.

- a) **Bribery** is the offering, promising, giving, authorizing or accepting of any undue pecuniary or other advantage to, by or for any person in order to obtain or retain a business related or other improper advantage or influence e.g. in connection with public or private procurement contract awards, permits, taxation, customs, judicial and legislative proceedings.

The **bribe** can take a variety of forms: cash, company shares, inside information, sexual or other favours, entertainment, employment or, indeed, the mere promise of a benefit in the future.

- b) **Extortion or Solicitation** is the demanding of a bribe, whether or not coupled with a threat if the demand is refused.

- c) **Trading in Influence** is the direct or indirect offering or solicitation of an undue advantage in order to exert an improper, real, or supposed influence with a view of obtaining an undue advantage for the original instigator of the act or for any other person or entity.

Improper **influence** includes any attempt at obtaining an undue advantage in internal voting, bidding, and the formal decision process taken by a general assembly of an Association, Confederation of Associations or its Board of Directors.

- d) **Fraud** is wrongful or criminal deception intended to result in financial or personal gain.

- e) **Laundering the proceeds of the corrupt practices** mentioned above is concealing or disguising the illicit origin, source, location, disposition, movement or ownership of property, knowing that such property is the proceeds of a crime.

Business Associations will prohibit Corrupt Practices at all times, whether these practices are engaged in directly or through Third Parties, in relation to:

- a Public Official or Politically Exposed Person at the international, national or local level,
- a political party, party official or candidate to political office,
- a Director, officer or employee of an Association, and
- a private individual, organisation, enterprise or its Directors, officers, or employees.

PRINCIPLE II: Business Associations will implement an effective Association Compliance Programme to counter corruption.

Elements of an effective Association Compliance Programme

Business Associations should implement an effective Association Compliance Programme adapted to the Business Association's particular circumstances, including its size and the results of a periodically conducted risk assessment, with the aim of preventing, detecting, and remedying corruption while promoting a culture of integrity.

The *success* of these Principles will depend on the ***tone at the top***. There should be a clear message from the Chair of the Board of Directors and the Chief Executive Officer of the Business Association that Corruption is prohibited and an Association Compliance Programme will be implemented and enforced.

A Business Association should include the following elements to establish an effective Association Compliance Programme—adapted based on size, risks, governance policies, and local laws:

- a) **Core compliance policies.** The Board of Directors should review and approve the following policies, which should be clearly articulated, visible, and binding for all Directors, officers, employees, and Third Parties foreign and domestic:
 - **Anti-corruption/ anti-bribery policy and code of conduct** prohibiting Association Board, personnel and Third Parties from engaging in or enabling Corrupt Practices in all their forms. The policy should clearly state its scope (applicability), define prohibited practices, and outline disciplinary actions to address violations. This may also cover the policy to prevent conflicts of interest and the policy on gifts and hospitality.
 - **Whistleblower Policy** protecting those who report misconduct from retaliation. All bona fide reports should be investigated. The policy should be accompanied by procedures or channels per the ICC's *Guidelines on Whistleblowing* (Appendix B) for responding to and addressing reported incidents of Corrupt Practices. These procedures should allow for raising concerns, seeking advice or reporting in good faith established or soundly suspected violations to a designated senior officer and a designated Board Member. The Board and Senior Officers should act upon reported or detected violations by taking appropriate corrective action and disciplinary measures, and considering making appropriate public disclosures of the enforcement of the Association's Whistleblower policy;
 - **Procurement Policy** ensuring fair and competitive bidding in accordance with accepted business standards and to the extent possible in a transparent manner. All procurement by the Business Association is performed in compliance with a Board approved Procurement Policy.
 - **Finance and Accounting Policy** (see Part II).
- b) **Compliance function.** The Board should appoint one or more senior officers (full or part-time) to oversee and coordinate the Association Compliance Programme with an adequate level of resources, authority and independence, reporting periodically

to the Audit Committee of the Board of Directors or other body with ultimate responsibility for the Association. The size and structure of a compliance function will vary depending on the size of a Business Association and its risk profile. A large organization may have dedicated compliance staff while a small one may designate a Board Member or a senior officer to serve as an ethics and compliance lead. The Association should ensure the compliance lead has compliance experience or receives periodic compliance training.

Duties of this function include: duly documented periodical training of Directors and employees on the anti-corruption/anti-bribery policy and known corruption risks—organisations may also choose to provide this service to Third parties as appropriate; exercising appropriate due diligence in the selection of Directors, officers, employees, Members, and Third Parties, in particular those who may present a risk of corruption; monitoring the effectiveness of a compliance program (in cooperation with internal audit where applicable); receiving, investigating, and addressing whistleblower reports. The ultimate responsibility for compliance oversight and delegation of specific compliance-related duties rests with the Board of Directors.

- c) **Risk assessment and mitigation.** The Board of Directors, or the relevant committee thereof (such as an Audit Committee), should conduct periodic risk assessments and independent reviews of corruption risks, the Association's compliance with these Principles, and recommend corrective measures or policies, as necessary.
- d) **Continuous improvement of the Programme.** The Board of Directors, relying on reports from the compliance function and Senior Management should periodically review the effectiveness of the Association Compliance Programme and mandate improvements based on identified needs. If a major change occurs internally or externally, adjustments can be made with an Ad Hoc Proceeding.

Part II: Policies, Procedures, and Practices to Support Compliance with Anti-Corruption Principles

Business Associations, as part of their efforts to comply with these Principles, should enact policies that address risks faced by the organization. They can be either incorporated as sections of the anti-corruption/anti-bribery policy or drafted as separate policies. These policies should be accompanied by detailed procedures to guide implementation.

Finance and Accounting

Business Associations should ensure that:

- a) their internal governance practices reflect the *Governance Principles for Business Associations and Chambers of Commerce* (see Appendix B);
- b) they establish and maintain proper systems of control and reporting, including independent auditing;
- c) all financial transactions are adequately identified and properly and fairly recorded in appropriate books and accounting records; that are available for inspection by the Board of Directors, as well as by auditors;
- d) cash payments or payments in kind are monitored; that they are not used as substitutes for bribes; only small cash payments made from petty cash should be permitted;
- e) the Board of Directors reviews all dues and non-dues revenues;
- f) no bookkeeping or other relevant documents are intentionally destroyed earlier than permitted by law;
- g) material matters including the financial situation, performance, membership, and governance is disclosed to appropriate authorities, as mandated by local law.

Conflicts of Interest

Business Associations should monitor and manage conflicts of interest of the Association's Directors, officers, and employees. Conflicts of interests may arise when the private interests of an individual or of his/her close relatives, friends or business contacts diverge from those of the Business Association.

Directors, officers, and employees should be required to disclose to the Board of Directors whether they, directly or indirectly, or on behalf of Third Parties, have a material interest in any transaction or matter directly affecting the Business Association. These situations should be disclosed and, wherever possible, avoided because they can affect an individual's judgment in the performance of his/her duties and responsibilities. Business Associations should adopt a Conflict of Interest Policy and request and review conflict of interest disclosures from Board members; closely monitor and regulate actual or potential conflicts of interests or the appearance thereof, and should not take advantage of conflicts of interests of others. Moreover, Business Associations should encourage their

Members to adopt a conflict of interest policy (see ICC Guidelines on Conflicts of Interest in Appendix B).

Current Public Officials should be excluded from employment by the Business Association. Additionally, if the contemplated activity or employment of a former Public Official relates directly to the functions held or supervised during their tenure, they shall not be hired or engaged in any capacity before a reasonable period has elapsed, after their leaving office, in accordance with local laws.

Customs Certifications

- a) Business Associations should exercise caution and provide guidance and training to Senior Officers, staff, and Members regarding the customs certifications process to ensure compliance with local laws and applicable data privacy and protection obligations.

Political Contributions

- b) A Business Association's by-laws and activities should be in compliance with all local laws governing political contributions and consistently enforced;
- c) In countries that lack a clear legal framework governing political contributions, a Business Association's governance framework should ensure that an Association's Board of Directors remains politically impartial and should prohibit in the by-laws or similar governance documents any contributions to political parties, party officials, and candidates.

Charitable Contributions and Sponsorships

- a) Business Associations should take measures within their power to ensure that charitable contributions and sponsorships are not used as a subterfuge for corruption or fraud. Charitable contributions and sponsorships should be transparent and in accordance with applicable law.
- b) Business Associations should establish a clear policy, with reasonable controls and procedures to ensure that improper charitable contributions are not made by their staff or Board of Directors. Such controls and procedures should include, but not be limited to, due diligence of the beneficiaries and third parties involved (if any) and tiered approvals of the contributions. Special care should be exercised in reviewing contributions to organizations in which Public Officials or Politically Exposed Persons are involved.

Patronage

Business Associations, with confederation structures in particular, should take measures to ensure that internal patronage, donations, or influence by a Member or Customer, do not create conflicts of interest or reputational risk to the Association, its operations or Members.

Gifts and Hospitality

Business Associations should establish procedures covering the offer or receipt of gifts and hospitality to Public Officials and other individuals or entities, in order to ensure that such arrangements (a) comply with national law and applicable international instruments; (b) are limited to reasonable and *bona fide* expenditures; (c) do not improperly affect, or might be perceived as improperly affecting the recipient's independence of judgement towards the giver(s); (d) are not contrary to the known provisions of the recipient's code of conduct; and (e) are neither offered nor received too frequently nor at an inappropriate time (see the ICC Guidelines on Gifts and Hospitality in Appendix B) .

Facilitation Payments

Facilitation payments are unofficial, improper, small payments made to a low-level official to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment is legally entitled. Facilitation payments are prohibited in most jurisdictions.

Business Associations should not make such facilitation payments, but it is recognized that they may be confronted with exigent circumstances, in which the making of a facilitation payment can hardly be avoided, such as duress or when the health, security or safety of the Business Association's employees are at risk. When a facilitation payment is made under such circumstances, such payment shall be accurately accounted for in the Business Association's books and accounting records and be reported to the relevant body or individual in charge of the Association's Anti-Corruption Compliance Programme.

Human Resources

Business Associations should ensure that:

- a) human resources practices, including recruitment, promotion, training, performance evaluation, remuneration, recognition and business ethics in general, reflect these Principles and mandate the review of business ethics competencies in the appraisal and promotion of staff;
- b) all employees receive guidance and adhere to a code of conduct that promotes ethics, integrity, fairness, respect, and personal conduct in accordance with local labour laws;
- c) no employee will suffer retaliation or discriminatory or disciplinary action for reporting in good faith violations or soundly suspected violations of the Business Association's anti-corruption policy or for refusing to engage in corruption;
- d) all Directors, officers, and employees sign and reaffirm the Association's Code of Conduct on an annual basis;
- e) key personnel in areas subject to high corruption risk should be trained and evaluated regularly; regular rotation of such personnel should be considered;
- f) a designated staff member should conduct anti-corruption training, monitor and evaluate risks, and provide guidance to the Business Association, its Board of Directors, and committees.

Membership

Business Associations should ensure that:

- a) membership practices, including recruitment, reflect these Principles;
- b) dues for Membership and ‘fee for service’ programs and services, including the criteria for division of membership tiers are transparent to Members, there are no “off the books” or secret accounts and no documents may be issued which do not fairly and accurately record the transactions to which they relate or its relation to a particular Member;
- c) their membership agreements allow for the suspension of membership of any Member or individual, should the Business Association have good faith concern that the Member, an individual or their agents are conducting activities in violation of applicable anti-corruption laws, or these Principles;
- d) any disciplinary action as a result of an ethics violation by Members is clearly prescribed and uniformly enforced.

Arbitration

Business Associations should ensure that:

- a) in all cases in which the Business Association participates in national or international arbitral tribunals, it shall act fairly and impartially and ensure that each party has a reasonable opportunity to present its case;
- b) they conduct their arbitration duties in accordance with applicable governance standards, including the ICC International Court of Arbitration articles or local laws.

Certification, Verification, and Assurance

Business Associations should consider an independent evaluation of their Association Compliance Programme by seeking external certification, verification or assurance.

Part III: Interactions with stakeholders in accordance with these Principles

*As part of implementing an effective Association Compliance Programme, with respect to interactions and transactions with stakeholders, Business Associations should review (i) the **Governance Principles for Business Associations and Chambers of Commerce** (Appendix B); and (ii) adhere to the following guidance:*

Members

With respect to their Members Business Associations should lead by example. Business Associations should encourage good governance and anti-corruption measures, and should:

- encourage Members not to engage in nor tolerate any act of corruption;
- encourage Members to implement the core anti-corruption policies and supporting policies, procedures, and practices;
- not use Members as a conduit for any corrupt practice;
- consider anti-corruption measures implemented by a Member when accepting or renewing membership;
- include in membership agreements a provision allowing a Business Association to suspend or terminate the relationship if it has a good faith concern that a Member has acted in violation of applicable anti-corruption laws, and has made no attempts at addressing the compliance gaps;
- support collective action, such as anti-corruption pacts regarding specific projects or anti-corruption long term initiatives with other Business Associations, enterprises, or the broader business community;
- inform Members of all laws prohibiting price fixing and anti-trust behaviour including the restriction of production, sales, outputs, or any form of collusion.

Third Parties

With respect to Third Parties, Business Associations should act in accordance with the **ICC Guidelines on Agents, Intermediaries, and Other Third Parties** (Appendix B). Third Parties work for the benefit of the Association, including in connection to marketing or sales, the negotiation of contracts, the obtaining of licenses, permits or other authorizations, Associations should:

- instruct Third Parties neither to engage nor tolerate that they engage in any act of corruption;
- not use Third Parties as a conduit for any corrupt practice;
- maintain adequate oversight and in particular maintain a record of the company's name, terms of engagement, and payments to and from the Third Party;

- › hire Third Parties only to the extent appropriate for the conduct of the Business Association in accordance with the Principles;
- › include a contractual clause reserving the right to request an audit of the Third Party's books and accounting records by an independent auditor to verify compliance with these Principles;
- › include in contracts with Third Parties a provision allowing it to suspend or terminate the relationship if it has a unilateral good faith concern that a Third Party has acted in violation of applicable anti-corruption laws;
- › not pay Third Parties more than an appropriate remuneration for their legitimate services.

Customers

With respect to Customers, Business Associations should:

- › not use Customers as a conduit for any corrupt practice;
- › only offer programs and services to Customers within the regular conduct of the Association's 'fee for service' activities.

Donors

With respect to Donors, Business Associations should:

- › not use donations or grant funds for any corrupt practices;
- › adhere to these Principles when executing donor agreements, programs, and projects.

Government Entities

With respect to Government Entities, Business Associations should:

- › not use Government Entities as a conduit for any corrupt practice;
- › remain neutral and impartial when deciding whether to or upon entering into transactions with Government Entities;
- › conduct public policy advocacy for, on behalf of, or to a Government Entity consistent with the organization's by-laws and in accordance with local laws and these Principles.

Appendix A

Key International Legal Instruments

Global Instruments

- › United Nations Convention against Transnational Organized Crime (UNTOC)
https://www.unodc.org/documents/middleeastandnorthafrica/organised-crime/UNITED_NATIONS_CONVENTION_AGAINST_TRANSNATIONAL_ORGANIZED_CRIME_AND_THE_PROTOCOLS_THERETO.pdf
- › United Nations Convention against Transnational Organized Crime (UNTOC)
<http://www.unodc.org/documents/treaties/UNTOC/Publications/TOC%20Convention/TOCebook-e.pdf>
- › OECD Convention on the Bribery of Foreign Public Officials in International Business Transactions (OECD Convention)
https://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf
- › OECD Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions, including Annex II Good Practice Guidance on Internal Controls, Ethics and Compliance
<https://www.oecd.org/corruption/anti-bribery/OECD-Anti-Bribery-Recommendation-ENG.pdf>
- › Ethics & Compliance Initiative providing guidance on creating a meaningful code of ethics and code of conduct for business
<http://www.ethics.org/resources/free-toolkit/toolkit-glossary>
- › World Bank Group Integrity Compliance Guidelines
<https://wallensteinlawgroup.com/wp-content/uploads/2017/12/WBG-Integrity-Compliance-Guidelines-full.pdf>
- › ISO 37001:2016 Anti-bribery management systems
<https://www.iso.org/obp/ui/#iso:std:iso:37001:ed-1:v1:en>

Africa

- › African Union Convention on Preventing and Combating Corruption (AU Convention)
https://au.int/sites/default/files/treaties/36382-treaty-0028_-_african_union_convention_on_preventing_and_combating_corruption_e.pdf
- › Southern African Development Community Protocol against Corruption (SADC Protocol)
https://www.sadc.int/files/7913/5292/8361/Protocol_Against_Corruption2001.pdf
- › Economic Community of West African States Protocol on the Fight against Corruption (ECOWAS Protocol)
https://eos.cartercenter.org/uploads/document_file/path/406/ECOWAS_Protocol_on_Corruption.pdf

Americas

Inter-American Convention against Corruption (OAS Convention) <http://www.oas.org/juridico/english/treaties/b-58.html>

Asia and Pacific region

- ADB-OECD Action Plan for Asia-Pacific (Action Plan)
<https://www.oecd.org/site/adboecdanti-corruptioninitiative/meetingsandconferences/35021642.pdf>

Europe

- Council of Europe Criminal Law Convention
<http://conventions.coe.int/treaty/en/Treaties/Html/173.htm>
- Council of Europe Civil Law Convention
<http://conventions.coe.int/treaty/en/treaties/html/174.htm>
- Resolution of the Committee of Ministers of the Council of Europe: Agreement Establishing the Group of States against Corruption
<http://conventions.coe.int/Treaty/EN/PartialAgr/Html/Greco9905.htm>
- Resolution of the Committee of Ministers of the Council of Europe: Twenty Guiding Principles for the Fight against Corruption
<https://rm.coe.int/16806cc17c>
- European Union Convention on the Protection of the Communities' Financial Interests and the Fight against Corruption and two related Protocols
https://ec.europa.eu/anti-fraud/sites/antifraud/files/docs/body/rep_comm_2000_en.pdf
- European Union Convention on the Fight against Corruption involving officials of the European Communities or officials of Member States
<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A41997A0625%2801%29>

Appendix B

Further ICC and CIPE Instruments to Combat Corruption and Improve Corporate Governance

To provide further guidance on the implementation of these Principles, CIPE and the ICC Commission on Corporate Responsibility and Anti-Corruption have published:

“Governance Principles for Business Associations and Chambers of Commerce” (http://www.cipe.org/sites/default/files/publication-docs/governancePrinciples_060911.pdf)

This guide covers good governance principles for membership-based, non-profit organizations to inform policies, institutions, mechanisms, and practices by which an organization is directed, controlled and meets its responsibilities to dues-paying members.

“Business Associations for the 21st Century”

<http://www.cipe.org/vba/business-associations-guidebook/>

This tool is a management guide developed by CIPE to help build stronger business associations, effective advocacy strategies, and a favourable business environment.

The ICC Business Integrity Compendium

<https://iccwbo.org/publication/icc-business-integrity-compendium-2017/>

This is a one-stop shop of ICC’s online anti-corruption resources.

ICC Ethics and Compliance Training Handbook

<http://store.iccwbo.org/icc-ethics-and-compliance-training-handbook>

The ICC Commission on Corporate Responsibility and Anti-Corruption is constantly developing anti-corruption tools and guidelines. The following guidelines are available on the website of the ICC Commission on Corporate Responsibility and Anti-corruption (<http://www.iccwbo.org/About-ICC/Policy-Commissions/Corporate-Responsibility-Anti-corruption/>):

➤ ICC Guidelines on Whistleblowing

<http://www.iccwbo.org/advocacy-codes-and-rules/areas-of-work/corporate-responsibility-and-anti-corruption/whistleblowing/>

➤ ICC Guidelines on Conflicts of Interest in Enterprises

<https://iccwbo.org/publication/icc-guidelines-conflicts-interest-enterprises/>

➤ ICC Guidelines on Agents, Intermediaries and Other Third Parties

<http://www.iccwbo.org/advocacy-codes-and-rules/areas-of-work/corporate-responsibility-and-anti-corruption/ICC-Third-Party-Guidelines/>

➤ The ICC Guidelines on Gifts and Hospitality

<https://iccwbo.org/publication/icc-guidelines-on-gifts-and-hospitality/>

The ICC, the United Nations Global Compact, the World Economic Forum and Transparency International have issued RESIST, Resisting Extortion and Solicitation in International Transactions, A Company Tool for Employee Training (<http://www.iccwbo.org/products-and-services/fighting-commercial-crime/resist/>).

We invite all Business Associations and Chambers of Commerce around the world to send us any examples of their anti-corruption policies with a view to create and publish a digital compendium of best practices to be published by CIPE and ICC WCF. Please write to us at: wcf@iccwbo.org and communications@cipe.org

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