



# Transformational Governance Tool

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## Overview

Transformational Governance is a principles-based approach – not a new legal concept – that calls on businesses to be more accountable, ethical, inclusive and transparent as a driver to responsible conduct, enhanced ESG performance and strengthened public institutions, laws and systems. This means fostering a culture of integrity, fairness and inclusion beyond legal formality – asking not just what is legal but what is right.

This self-assessment tool provides a framework for you to engage with and apply the principles of Transformational Governance. It is structured in a way that allows you to assess your business' status quo on the spectrum of Transformational Governance, both with regard to its own operations, as well as in relation to its business partners, suppliers and downstream activities. It also considers your company's engagement and collaboration with external stakeholders to strengthen peaceful, just and inclusive societies. For each area of Transformational Governance, the tool contains a set of criteria allowing you to get a detailed understanding of any key gaps in your current approach as well as opportunities to further strengthen your policies and procedures, mapped against relevant SDG 16 targets. It also contains recommendations on potential next steps going forward, as well as selected resources and additional guidance to support your company in transforming your governance, both internally and in the communities where your company operates.

## Topics & Questions in the Tool

### 1. Ethical Leadership

Does your business embrace ethical leadership principles to foster a strong culture of integrity that ensures more inclusive, accountable and transparent governance?

- No, our business has not yet progressed significantly on its journey toward a strong culture of ethical leadership, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.
  - Some of our country offices or business units have taken steps, such as joining UNGC activities on Transformational Governance.
  - None of the above.



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- Yes, our business seeks to establish a strong culture of ethical leadership:
  - We ensure that the principles of good governance are adhered to at all levels of the organization, including board and management oversight, and across all personnel based in jurisdictions beyond the location of corporate headquarters.
  - We ensure that nomination and selection processes for executive, non-executive and senior management roles are consultative and inclusive.
  - We ensure that governance and decision-making processes are inclusive and, where appropriate, consultative, including with employees and their representatives, NGOs and investors.
  - We have taken steps to clearly communicate a zero-tolerance approach to corruption and bribery from the CEO/Board and throughout the business' operations and relationships.
  - We engage with local perspectives and voices in developing, emerging, fragile and/or (post-)conflict countries, including with a view to combating corruption, preserving natural resources and respecting human rights.

## 2. **Incorporate of ESG into Governance Decision Making**

Does your business incorporate ESG factors into the company's core decision-making and governance processes?

- No, our business has not yet taken steps to integrate ESG factors into core company decision-making or governance, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.
  - Specific ESG issues are increasingly considered by senior decision-makers, including the Board, in key operational and strategic discussions on an as-needed basis.
  - None of the above.
- Yes, our business actively integrates ESG factors into core company decision-making:
  - We have taken steps to develop processes - including data collection and/or risk assessments - to better account for ESG factors in our



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operations, but have encountered one or more challenges with their execution.

- The company has an overarching ESG framework or sustainability policy which governs the company's approach to investment, operations, risk management, stakeholder engagement, environmental stewardship, anti-corruption and respect for human rights.
- We ensure that global governance considerations are incorporated where relevant into our risk management approach, including enterprise, global, political or ESG risk, particularly in developing, emerging, fragile and/or (post-)conflict countries, with the objective of identifying, reporting, mitigating and monitoring any such exposure.
- There is a function at the senior leadership level designed to ensure ESG policy commitments are disseminated across all roles and functions in the business.
- There are policies or other measures (e.g. company by-laws, and training for Board members on integration of ESG issues in company decision-making) to ensure ESG commitments are present on the board-level agenda of the company.
- We have a defined process or function to review all new investments, business operations or new business relationships in light of legal requirements and the company's own ESG commitments.
- We ensure that robust and risk-based human rights, environmental and anti-corruption due diligence processes are applied throughout our business' own operations and supply chain.
- We ensure that any risk of abuse, exploitation, trafficking or other acts of violence against children, especially through child labour, are captured as part of a robust human rights risk assessment and due diligence throughout our business' own operations and supply chain.
- We have processes aimed at complying with industry-specific international standards and commitments that address the nexus of conflict, corruption and governance.
- The company sets measurable goals linked to ESG performance areas and reports on them publicly.



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- There are individual performance targets set for key functions towards achieving ESG commitments or other forms of incentivization of employees towards ESG goals.
- We have a process to review and assess progress towards our company's ESG commitments at least annually.

### 3. **Effective Grievance Mechanisms and Access to Remedy**

Does your business provide effective grievance mechanisms for workers, communities and other parties affected by your business' operations, and provide access to remedy for these parties?

- No, our business has not yet taken steps to implement an effective grievance mechanism or provide access to remedy, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.
  - We have an internal whistleblower mechanism.
  - None of the above.
- Yes, our business is working to implement an effective grievance mechanism and provide access to remedy for workers, communities and other parties affected by our business' operations:
  - We are working to develop an internal grievance mechanism through which employees and external parties can report concerns regarding any adverse business conduct.
  - We have developed a grievance mechanism but is not actively used or is in an early stage of implementation.
  - We have developed and implemented, and continue to monitor and adequately resource, an internal grievance mechanism through which employees and external parties can report concerns regarding any adverse business conduct.
  - This mechanism also provides for the possibility of anonymous grievances.
  - The grievance mechanism includes providing access to effective remedy for adversely affected parties.
  - Where we become aware of harm that was caused by our own operations, we seek to remediate this harm as appropriate. Where we become aware



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of harm that was caused by one of our business partners or further down in our supply chain, we use our leverage to encourage others to remediate the harm.

- We collaborate with relevant authorities in remediation of particularly severe issues, such as child labour, forced labour or human trafficking.
- In deciding on appropriate remediation, we seek to take into account the views of those affected and what they would consider appropriate remedy (e.g. prevention of further harm, apology, compensation, etc.).
- We encourage engagement with relevant stakeholders in relation to our grievance mechanism, such as environmental / human rights / anti-corruption organizations, employees and / or trade unions.
- The design and implementation of the grievance mechanism ensures protection against retaliation for complainants, including those reporting any adverse business, client or supplier conduct relating to IFF, human trafficking or other forms of organized crime.
- Internal investigations and disciplinary procedures associated with the implementation of the grievance mechanism are aligned with the principles of organizational justice and due process.
- Any instances of abuse, exploitation or any form of violence against children or abuse, exploitation or trafficking against migrants or undocumented persons reported to the mechanism are appropriately investigated and resolved and are also reported to the relevant authorities as required by law.

#### 4. **Education and Training**

Does your business support its staff by providing training on topics related to Transformational Governance, such as anti-corruption, legal compliance, safeguarding, human rights and environment, inclusion and diversity, grievances and whistleblowing, responsible lobbying and community relations?

- No, our business does not yet provide training to all staff on key Transformational Governance issues, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.



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- We are starting to provide training on some issues, or to some staff (such as senior leadership).
- Yes, our business provides training to all staff on key Transformational Governance issues, recognising that Transformational Governance is a cross-functional approach and hence training is relevant for all staff:
  - We provide training that creates awareness of and respect for the rule of law, including local laws and international norms, and incorporates respect for access to information and protection of fundamental freedoms.
  - We provide training for employees that promotes diversity and inclusion and equal opportunity at all levels of the business.
  - We provide training for employees that promotes accountability and transparency, and measure performance on these qualities.
  - We provide training that creates awareness to identify and mitigate IFF, human trafficking and other forms of organized crime, including as they relate specifically to the business and/or function and consistent with local laws and international standards.
  - We provide training that creates awareness to identify and mitigate bribery and corruption relevant to business and/or function, and consistent with local laws and international standards
  - We provide training that creates awareness of and respect for local perspectives and voices, particularly those in developing, emerging, fragile and/or (post-)conflict countries where the business has an interest, including senior staff.
  - We provide training for all employees on the possible forms and risks of: violence against children, forced labor and violence within the workplace and in the communities in which we operate.

### 5. Protecting Vulnerable Workers and Communities

Does your business protect the most vulnerable workers and community members from harm by ensuring effective safeguarding measures?

- No, our business does not yet put in place effective safeguards to protect vulnerable workers and community members, but:
  - We are interested in learning more.



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- We plan to take steps in this area in the next year.
- We have some policies and procedures in place in relation to particular groups of vulnerable people and / or in specific jurisdictions.
- None of the above.
- Yes, our business puts in place effective safeguards to protect vulnerable workers and community members:
  - We promote inclusive hiring and employment practices that support workforce diversity, equity and inclusion.
  - We have adopted a zero-tolerance approach from CEO/Board level and throughout the business relating to all forms of workplace violence (e.g. bullying, sexual harassment) and all forms of violence outside of the organization (e.g. through any arrangements, conduct or relationships with third parties).
  - We have adopted a zero-tolerance approach against abuse, exploitation, trafficking or other forms of violence against children within our business' operations, products and services and throughout our supply chains.
  - We have adopted a zero-tolerance approach against any form of human trafficking or forced labor within a business' operations, products and services and throughout our supply chains.
  - We have established standards that ensure children are protected against any harm that may be directly linked to business activities and/or that the business may cause or contribute to.
  - We have established standards that ensure against any harm that a business may cause or contribute to with respect to exploiting vulnerable individuals with no legal identity and/or the confiscation of passports or similar documentation.
  - We provide decent work and a living wage to existing and prospective employees. (Such minimum standards can promote economic opportunity and stability and promote prosperity, particularly in conditions where this otherwise does not exist.)
  - We ensure non-retaliation and sufficient security protection for certain employees (such as trade unionists) whose security may be at risk in conflict zones or other high-risk contexts.



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- We have implemented policies (e.g. in relation to employee use of social media) that seek to address hate crime and speech.

### 6. **Prevention of Corruption**

Does your business foster a culture of integrity and to prevent corruption through the implementation of robust, transparent and accountable governance frameworks, including ethics and compliance programmes?

- No, our business has not yet taken proactive steps to implement robust, transparent and accountable governance frameworks to support a culture of integrity, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.
  - We have defined policies and procedures in place in specific (high-risk) jurisdictions.
  - None of the above.
- Yes, our business has implemented measures to establish robust, transparent and accountable governance frameworks to support a culture of integrity:
  - We ensure that any risks related to bribery and corruption are accurately identified, reported, effectively mitigated and monitored. Compliance is expected with any national/regional legislation and, wherever possible, other international standards and voluntary benchmarks or frameworks.
  - We implement robust anti-corruption compliance and ethics programmes across functions, operations and stakeholder relations, including engagement with public officials, and incorporate ethical conduct into performance management frameworks.
  - We implement robust anti-corruption due diligence across functions, operations and stakeholders, including client transactions and supplier relationships.
  - We engage in heightened due diligence where the risk of financial crime is categorically high and where our standard due diligence raises red flags during the course of a given transaction. We review triggers for heightened due diligence on a regular basis and update processes accordingly.





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- We have established a system for obtaining and retaining beneficial owner information and addressing non-disclosure. Our system includes robust "Know your customer / counterparty" policies and processes.

### 7. Integration of ESG Factors in Business Relationships with Third Parties (Suppliers and Contractors)

Does your business build responsible partnerships by integrating ESG considerations in its business relationships with third parties?

- No, our business has not yet taken steps to fully integrate ESG considerations in business relationships with third parties, but:
  - We are interested in learning more.
  - Some units of our business have made progress on integrating ESG factors into supply chain and contractor management.
  - We apply a heightened ESG risk management approach in certain supply chains / service provider contracts.
  - None of the above.
- Yes, our business has taken steps to integrate ESG considerations in business relationships with third parties:
  - We have developed requirements for our core suppliers and contractors that promote accountability and transparency, such as in relation to compliance with applicable laws, the prohibition of any form of corruption or encouraging the implementation of effective grievance mechanisms.
  - We have developed processes to monitor our suppliers' and contractors' conformance to our ESG requirements.
  - We have developed requirements for our core suppliers and contractors that promote diversity, inclusion and equal opportunity.
  - All our contracts with suppliers and contractors include anti-corruption clauses.
  - We have a process or function designated to monitor ESG risks and anticipate challenges that could materialize in countries or regions in which suppliers or contractors operate.
  - We are building the human rights and ESG capabilities of our suppliers and contractors (e.g. through training, provision of guidance materials, other technical support).



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- We require our suppliers and contractors to adopt a zero-tolerance approach relating to i) all forms of workplace violence, ii) all forms of abuse, exploitation, trafficking or other forms of violence against children and iii) any form of human trafficking or forced labor, and these expectations are included as contractual requirements for core suppliers.
- Suppliers and contractors are required to report regularly on risks in relation to i) all forms of workplace violence ii) all forms of abuse, exploitation, trafficking or other forms of violence against children and iii) any form of human trafficking or forced labor.
- We implement robust anti-corruption, environment and human rights due diligence in relation to all suppliers and contractors, including heightened human rights risk assessment and due diligence in the case of high-risk supply chain and contractor contexts.
- We have adopted contractual requirements for suppliers and contractors that commit them to not doing business with any supplier or contractor that is participating in, funding or profiting from armed conflict and/or mass atrocity violence, either directly or indirectly (e.g. through next-tier suppliers). Suppliers and contractors are required to promptly inform on imminent or ongoing armed conflicts or mass atrocity violence where the company does business.

### 8. Human Rights Due Diligence

Does your company embed respect for human rights in its culture and operations, including business relationships and supply chains?

- No, our business has not yet taken steps to fully embed human rights throughout our operations, supply chains or other business relationships, but:
  - We are interested in learning more.
  - Some units of the business have made progress towards embedding human rights.
  - We have developed a policy/commitment but have not yet achieved its full implementation.
  - None of the above.
- Yes, our company has taken steps to fully embed human rights throughout our operations, supply chains or other business relationships:



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- We have developed and publicly disclosed a human rights policy that outlines the company's commitment to respecting human rights in its operations, and in relation to its suppliers and contractors.
- We conduct human rights due diligence in relation to our direct operations and our supply chain (where relevant) to identify, assess, and address potential and actual human rights risks and impacts.
- Our human rights due diligence process involves engaging with stakeholders, investigating risks and potential impacts, and implementing appropriate mitigation and/or remediation measures to address adverse impacts.
- We provide human rights training to relevant functions, especially those involved in procurement, contractor/supply chain management, legal counsel, compliance and human resources.
- Human rights due diligence processes include a particular focus on child labour and forced labour in supplier and contractor workplaces.
- We have an accessible, effective and trusted mechanism to receive human rights grievances from workers, local communities, and other stakeholders.
- We carry out heightened human rights due diligence in conflict-affected areas, incl. assessing how our activities might impact conflict dynamics.

### 9. **Reporting and Disclosure**

Does your business enhance accountability and transparency of its operations by meaningful public reporting?

- No, our business has not yet taken steps to enhance its public reporting in order to improve transparency of operations, but:
  - We are interested in learning more.
  - We plan to take steps in this area in the next year.
  - None of the above.
- Yes, our business has taken steps to enhance its public reporting in order to improve transparency of operations:
  - We have begun the process but this is at an early stage.
  - We report on compliance with national legislation and regulatory frameworks and in line with relevant international standards.



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- We report on and/or communicate business action and results across sustainability targets, and SDG16 in particular, when appropriate.
- We disclose where stakeholder consultation is used to support our identification and management of ESG risks and opportunities, including but not limited to risk assessment and due diligence activities.
- We disclose the composition of executive and non-executive bodies including factors such as competencies, gender, minority groups and other stakeholder representation.
- We report to stakeholders on the outcomes of internal investigations into cases of corruption or illicit financial activity involving company personnel.
- We report publicly on efforts to ensure business integrity and control of corruption, including training efforts.
- We have a mechanism by which stakeholders can access our whistleblowing or other reporting channel to report suspected instances of corruption or illicit financial practices.
- We disclose all interactions with public agencies and their officials, including lobbying and consultation.
- We include diversity composition and gender pay gaps at all levels of the business in public disclosures in order to provide greater transparency and promote action.
- We report on risks with respect to child labour, illicit financial flows, human trafficking and exposure to other forms of organized crime, as well as migrants or undocumented persons. Such efforts include compliance with any national and regional legislation and, wherever possible, other international standards and voluntary benchmarks or frameworks.
- We support Government monitoring and reporting efforts on SDG16 and we seek to encourage our business partners and stakeholders to do so too.

### **10. Peace**

Does your business endeavor to support social cohesion and peacebuilding, including actions that extend beyond core business operations?



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- No, we do not take any specific steps towards peacebuilding beyond our normal business operations:
  - We are interested in learning more.
  - We have not identified any opportunities beyond our normal business opportunities to contribute to peacebuilding.
- Yes, we take action in support of peacebuilding efforts, including when this is not a core feature of our business:
  - We have made attempts, but have encountered one or more obstacles to progress.
  - We have a process to identify potential risks and impacts of business activities on conflict dynamics in regions where the company operates, including through direct investment, indirect financing and engagement with business partners.
  - We engage with local communities, civil society organizations, and other stakeholders to understand their needs, concerns, and priorities related to peace and stability.
  - We have social investment or development projects aimed at creating economic opportunities and social progress in areas affected by conflict.
  - In locations recovering from past armed conflict or mass atrocity violence, suppliers and contractors are required to have a plan in place to promote the use of local products and/or workforce consistent with fair labor practices.
  - We conduct enhanced due diligence in relation to contractors or suppliers operating in conflict zones. We avoid dealing with potential partners engaged in or benefiting from conflict or violence.
  - We have, participate in, or contribute to processes aimed at conflict resolution or mediating conflict.
  - We advocate with Government and policy-makers for laws and regulatory measures that ensure peace or promote peaceable solutions to conflict or social unrest.
  - We train and sensitize our staff and our stakeholders on peace and conflict resolution.
  - We provide support, through humanitarian assistance, to areas beset by conflict or social unrest.



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## 11. Responsible Taxation Practices

Does your company embrace responsible taxation practices, contributing to an enabling environment for peace, justice and strong institutions?

- No, our company has not yet reviewed its taxation practices in light of its impact on society and public/civic institutions:
  - We are interested in learning more.
  - We have made a commitment. But this is not yet fully implemented.
  - We have explored this possibility but have encountered one or more obstacles to progressing.
  - None of the above.
- Yes, the company has taken steps to account for the impact of its taxation practices on society and public/civic institutions:
  - We have adopted and published a policy governing responsible taxation practices and report transparently on the company's tax payment practices.
  - We have a process to verify full compliance with tax laws and regulations in every jurisdiction where the company operates.
  - We have an express policy commitment to not engage in tax evasion or aggressive tax avoidance schemes.
  - We take steps to minimize business we, our subsidiaries, or our business partners conduct in known tax havens.
  - There is a process to monitor tax obligations and the company's fulfillment of tax requirements in all jurisdictions where the company or its business partners operate.
  - We engage with Government and regulatory authorities to promote fair and responsible tax policies. We participate in transparency codes or commitment frameworks.
  - We work towards greater transparency over our beneficial ownership and disclose ownership information to relevant authorities, in line with applicable standards and regulation.



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### 12. Rule of Law

Does your company take steps to understand and address how its actions may support or impede the rule of law in communities where it operates?

- No, our company has not yet reviewed the impact of its business practices on the rule of law:
  - We are interested in learning more.
  - We have made a commitment. But this is not yet fully implemented.
  - We have explored this possibility but have encountered one or more obstacles to progressing.
  - None of the above.
- Yes, the company has taken steps to account for the impact of its business practices on the rule of law in communities where it operates and has identified opportunities where it could improve:
  - We have a policy or code of conduct requiring full compliance with applicable laws and regulations in every jurisdiction where the company operates.
  - The company requires business partners to comply with all applicable laws and regulations in every jurisdiction where they operate.
  - We raise awareness of ethical and transparent conduct throughout the organization.
  - We provide training to employees, third-party business partners (suppliers and contractors), and stakeholders about legal compliance and judicial and non-judicial grievance mechanisms.
  - We engage with Government And regulatory authorities to advocate for strengthening the rule of law and ensuring a level playing field for business. We participate in transparency codes or commitment frameworks
  - We facilitate access to legal remedy through the justice system for employees and stakeholders impacted by the business' activities. Internal grievance mechanisms facilitate rather than supplant access to justice through formal legal processes.



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### 13. Stakeholder Engagement and Community Relations

Does your business strive to build and maintain constructive stakeholder and community relations, including meaningful engagement?

- No, our business as a whole has not started to conduct meaningful stakeholder and community engagement, but:
  - We are interested in learning more
  - Some units of our business have made progress on meaningful stakeholder and community engagement
  - We have had a limited number of successful stakeholder and community engagement initiatives or projects, but not yet at scale
  - None of the above.
- Yes, our business conducts meaningful stakeholder and community engagement, including consultation where appropriate:
  - We have attempted to do so, though accessing stakeholders and gaining their trust is a barrier to engaging stakeholders.
  - We have identified our key stakeholders.
  - We encourage engagement with sustainability organizations and networks, employees and trade unions.
  - We use stakeholder consultation - including direct rightsholder engagement - to support our identification and management of ESG risks and opportunities, including but not limited to risk assessment and due diligence activities.
  - We create space within our workplaces and / or in community settings where people from different cultures and religions can meet, discuss and cooperate to promote intercultural and interreligious understanding.
  - We undertake stakeholder mapping to identify political institutions, civil society leaders and other stakeholders in order to understand and address the nexus of conflict, corruption and governance.
  - We support efforts to educate communities and other stakeholders on the possible forms of, and settings where i) instances of violence against children can occur, ii) on the possible forms of, and settings where, instances of IFF, human trafficking and organized crime can occur, and iii) on the possible forms of, and settings where, abuse exploitation or trafficking of migrants and undocumented persons may occur.





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- We support efforts to educate communities and other stakeholders on the possible forms of bribery and corruption.
- We collaborate with civil society organizations and local/national governments to develop career pathways and work placement opportunities for youth and other vulnerable populations to help alleviate civil or social unrest and/or reduce the risk of being drawn/forced into a violent conflict situation.
- We support capacity building for civil society organizations and human rights defenders to undertake their work.

### **14. Collective Action and Partnership with Civil Society**

Does your business partner with others and engage in collective action to contribute to the creation of an enabling environment for transformational governance, including at sectoral level?

- No, our business does not yet engage in collective action and partnerships to support the creation of an enabling environment for transformational governance, but:
  - We are interested in learning more.
  - Some units of our business have initiated partnerships or collective action.
  - We have initiated a limited number of pilot projects, but not yet at scale.
  - None of the above.
- Yes, our business engages in collective action and partnerships with the UN Global Compact, business associations, and civil society organizations to support the creation of an enabling environment for transformational governance:
  - We have begun, but we want to do more.
  - We participate in collective action to strengthen ethical business practices through such mechanisms as business coalitions, declarations, integrity pacts or principles-based initiatives.
  - We participate in collective action to empower businesses of all sizes to adopt conflict-sensitive practices and/or reduce violence, including collective action to build resilience to manmade disasters.



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- We participate in collective action to support the strengthening of the rule of law in a given jurisdiction. These efforts may include supporting the right to peaceful assembly or opposing discrimination against a marginalized group.
- We share best practices across borders and industries, including via participation in working groups, and help peers overcome implementation barriers or transform entrenched, ineffective practices; share relevant information about clients, subject to legal and professional obligations; look for mutually beneficial opportunities for public-private collaboration and collective action.
- We participate in collective action to raise awareness of and eliminate all forms of violence against children including, but not limited to, child labour within business operations and relationships.
- We participate in collective action to raise awareness and actively address any actual or potential abuse, exploitation or trafficking of migrants and undocumented persons within business operations and relationships.
- We participate in collective action to build a coalition of support for more responsive, inclusive and participatory representation that is more reflective of society.
- We participate in collective action to promote and protect civic participation and access to information in a given jurisdiction.

### **15. Advocacy and Influence Including Responsible Lobbying**

Does your company create a culture of responsible political engagement, using its influence to strengthen global cooperation and support solutions to common challenges?

- No, our business is still on a journey towards responsible exercise of influence, but:
  - We are interested in learning more.
  - We have senior commitment to responsible exercise of influence.
  - We are considering developing policies and procedures to improve our responsible exercise of influence.
  - None of the above.



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- Yes, our business exercises its influence responsibly:
  - We promote and support the development of and/or adherence to legal and voluntary frameworks that serve to protect and respect children's rights, such as the Children's Principles and commit to the End Child Labour Pledge.
  - We promote and support advocacy efforts that call for the development of and/or adherence to legal frameworks that protect and respect the rule of law, including supporting regulation that promotes clean and responsible business and investment practices, fair labor practices and respect for human rights and environmental protection.
  - We promote and support the enactment and enforcement of robust national and international legal frameworks that seek to eliminate corrupt practices and stress the advantages for corruption-free business environments that attract foreign direct investment.
  - We promote and support advocacy efforts that call for greater effectiveness, accountability and transparency in public and private institutions.
  - We promote and support advocacy efforts to address systemic issues and empower individuals with respect to access to education, finance, housing and employment.
  - We promote and support the strengthening of global cooperation and inclusive multilateralism and adoption of robust international frameworks that level the playing field between governments and businesses in addressing global, regional and national challenges.
  - We promote and support the development of and/or adherence to legal and voluntary frameworks that serve to bring people out of the informal economy and to have access to a legal identity, including advocacy for the enactment and enforcement of laws to eliminate abuse, exploitation and trafficking of marginalized persons and migrants.
  - We promote and support advocacy efforts that call for the development of and/or adherence to legal frameworks that serve to protect and respect civic freedoms and promote access to/freedom of information, including support for human rights defenders under constant threat.



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- We do not make political/campaign financial contributions and/or lobbying for conditions that favor business interests over societal interests, in line with applicable legislation.
- We have a transparent policy and approach in relation to donations, which sets out our approach to disclosing donations, protocols and thresholds regarding donations, and levels of approval required.
- We do not take action that serves to undermine access to/freedom of information and fundamental freedoms, including lobbying Governments to develop laws/regulations that favor the business but hinder the environment, human rights or transparency.

### **16. Cooperation and Partnerships on Shared Challenges**

Does your business foster partnerships with municipal, national or international authorities on shared challenges, including engagement with the UN?

- No, our business does not yet cooperate with municipal, national or international authorities on shared challenges, but:
  - We are interested in learning more.
  - Some units have started engaging with municipal, national or international authorities on shared challenges.
  - We are considering / developing a more structured approach to cooperating with authorities on shared challenges.
  - None of the above.
- Yes, our business cooperates with municipal, national or international authorities on shared challenges:
  - We provide expertise and / or technical resources (as appropriate) to assist the UN, Governments and civil society to develop and implement a birth registration and legal identification system.
  - We partner with law enforcement agencies and civil society organizations to identify, apprehend and prosecute any suspected perpetrators of abuse, exploitation or trafficking of migrants and undocumented individuals.
  - We lend expertise and / or technical resources (as appropriate) in building the capacity and necessary infrastructure of local/national governments to provide access to the internet.



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- We engage with the UN, other multilateral organizations and business/industry associations to raise awareness and actively tackle all forms of IFF, human trafficking and organized crime.
- We engage with the UN, other multilateral organizations and business/industry associations to raise awareness and counter all forms of corruption, including bribery and extortion.
- We engage with the UN, other multilateral organizations, international business/industry associations or MSIs on systemic challenges including the climate crisis, social inequality and the rise in disinformation, especially in terms of how they affect developing countries.
- We support the development or strengthening of accountable, effective and inclusive institutions that foster a successful transition to a post-conflict society, including heightened attention to access to remedy and transitional justice.
- We work with law enforcement agencies and civil society organizations to identify, apprehend and prosecute any suspected perpetrators of abuse, exploitation, trafficking or any other acts of violence against children.
- We work with law enforcement agencies and civil society organizations to identify, apprehend and prosecute any suspected perpetrators of corrupt practices, IFF, human trafficking or organized crime and in the recovery of stolen assets.
- We lend expertise in building the capacity of local/national governments to administer the rule of law and improve access to justice.
- We lend expertise and resources to build the capacity of local governments to develop, implement and enforce laws and regulations to combat corruption in all its forms.
- We lend expertise in building the capacity and necessary infrastructure of local/national governments to be more effective, accountable and transparent including e-governance.
- We lend expertise in building the capacity and infrastructure of local/national governments to encourage diverse representation at all levels of commercial and political participation.
- We lend expertise and / or technical resources (as appropriate) to build the capacity of international, regional and national governance institutions



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to address global challenges, particularly where the business community may have unique capabilities to scale innovation and be consistent with respect for accountability, integrity and transparency and respect for people and planet.