



TRANSPARENCY INTERNATIONAL | USA

*Working to Strengthen Integrity, Enhance Transparency
and Combat Corruption in the United States and
Internationally*



2014 Annual Report

Foreword



In the past two decades, there has been substantial progress in the area of anti-corruption: “Corruption” is no longer a taboo subject for governments in the domestic and international discourse; following the leadership of Transparency International and its chapters, a widespread and talented network of non-governmental organizations have joined the global movement to combat corruption; the U.S. has seen increased enforcement of its anti-corruption laws; companies in the U.S. and abroad have made great strides in developing and implementing anti-corruption compliance programs and including integrity and transparency in their business plans. However, in spite of these great advancements, corruption continues to have a corrosive effect on society. It impedes economic growth and international development, undermines democratic institutions and the rule of law, and traps millions in poverty. Corruption also damages business: It distorts competition and presents serious legal, financial and reputational risks for companies.

Transparency International-USA (TI-USA) is the U.S. chapter of the world-wide network of nearly 100 non-profit, non-partisan Transparency International chapters to create change toward a world free of corruption. We work in collaboration with other TI national chapters, who bring local expertise and influence, the TI Secretariat, other non-governmental organizations, the private sector, labor and academia. TI-USA develops and implements targeted strategies to effectively combat corruption and enhance accountability and transparency in government, business and international organizations.

In 2014, domestically, TI-USA fostered and witnessed increased attention from U.S. government agencies to issues like beneficial ownership, and how anti-corruption and anti-money laundering compliance also safeguard U.S. financial systems and protect U.S. national security. We successfully advocated for the passage of the DATA Act, a law that will improve the federal government’s fiscal transparency. TI-USA also provided a key verification guidance to assist companies in ensuring that their compliance programs are effective. TI-USA brought together and encouraged U.S. corporate leaders to exchange views and improve transparency and compliance standards and goals for the private sector. Internationally, TI-USA continued to inform the global movement about enforcement of anti-corruption laws here in the United States, and promoted the adoption of strong anti-corruption priorities in the economic and development agendas of the U.S. Government and of the G20. TI-USA continued to ensure that international development lenders and agencies adopt and implement anti-corruption and transparency strategies and, more particularly, provided advice on the development of sound and transparent procurement policy and systems. We also partnered with TI-Rwanda on a procurement monitoring project using our Civil Society Procurement Monitoring Tool.

We are committed to setting higher goals for our impact and continuing to work with existing partnerships and forming new ones in the fight against corruption. We thank our current supporters and welcome new allies as we work to create a world free of corruption.

Claudia J. Dumas, President & CEO

TI-USA: A Force for Reform

Our Mission:

Transparency International-USA (TI-USA) works to strengthen integrity, enhance transparency and combat corruption in the United States and internationally.

Our Programmatic Priorities:

In implementing our mission, TI-USA focuses on the following priorities:

- ❖ The effective enforcement of global anti-corruption laws and standards;
- ❖ Increased integrity and strengthened anti-corruption standards and practices in the private sector;
- ❖ Greater transparency and integrity in U.S. governance; and
- ❖ Prevention of corruption in international development.

Our Work:

In 2014, TI-USA worked towards these goals by

- ❖ **Informing** rule-making and policy developments in U.S. and international organizations by presenting rigorous analyses and implementable recommendations;
- ❖ **Engaging and bringing together** leaders in government, business, labor, academia, and civil society;
- ❖ **Advocating** in writing through articles and social media; and
- ❖ **Public Speaking** to reach wider and diverse audiences.

This report highlights some key actions during 2014. We thank our supporters, listed at the end of this report, for their time, expertise and financial support.

The Effective Enforcement of Global Anti-Corruption

Laws and Standards



TI-USA promotes effective enforcement of international conventions and standards, and the inclusion of anti-bribery and transparency requirements in trade agreements. To enhance our efforts, TI-USA worked collaboratively with numerous civil society groups, as well as the TI Secretariat and TI national chapters. Our 2014 initiatives in this area include:

OECD Anti-Bribery Convention Enforcement

As in past years, TI-USA contributed to TI's annual progress report on the Enforcement of the OECD Anti-Bribery Convention, [Exporting Corruption – Assessing Enforcement of the OECD Convention on Combating Foreign Bribery](#). TI-USA, with pro bono assistance from Steptoe & Johnson, LLP, provided TI with statistics and information on U.S. enforcement actions (investigations and settlements) as well as information on major developments and recommendations for priority actions. Our analysis demonstrated that the U.S. was one of only four “active” enforcers of the OECD Anti-Bribery Convention.

To make the OECD Anti-Bribery Convention meaningful, there needs to be substantial enforcement in countries representing half of the world's exports. TI is planning to launch national advocacy campaigns in five countries in 2015: Chile, France, Italy, Netherlands and Sweden to develop the political support needed for increase in enforcement. TI-USA will continue to work with TI in promoting the national advocacy campaigns and in advocating for stronger enforcement of foreign bribery laws by all countries.



G20 Anti-Corruption Advocacy Work

Home to two-thirds of the world's population, the G20 are responsible for 80 per cent of world trade and more than 85 per cent of the world economy. Tackling corruption is crucial to the G20's goal of generating strong and balanced growth and establishing a safer and more sustainable economic framework.

G20 leaders established the Anti-Corruption Working Group in 2010 and tasked it with developing bi-annual G20 Anti-Corruption Action Plans and with reporting annually on the progress. In 2014, TI-USA worked with U.S. civil society organizations, TI and TI chapters to influence the agenda and outcome of G20 deliberations with respect to corruption issues and to advocate for implementation and enforcement of the [G20 2013-2014 Anti-Corruption Action Plan](#).

- ❖ TI-USA led the Anti-Corruption Policy Group of InterAction, an alliance of more than 180 U.S.-based non-government organizations. TI-USA drafted the Group's [Anti-Corruption Policy Brief](#), to provide prioritized recommendations for the G20 Anti-Corruption Working Group. These recommendations include: effective enforcement of international anti-corruption conventions; implementing effective anti-money laundering actions, including by Government agencies collecting beneficial ownership information upon incorporation; and increasing transparency in natural resource management.
- ❖ TI-USA led civil society's April discussions on anti-corruption issues with Clare Walsh, the Australian Chair of the G20 Development Working Group, to emphasize that anti-corruption efforts are crucial to the achievement of development goals.
- ❖ TI-USA contributed to TI letters and TI position papers on [denial of entry](#), [beneficial ownership transparency](#), [asset recovery](#), [natural resources transparency](#), and [whistleblower protection](#).
- ❖ TI-USA met several times with U.S. officials in the National Security Council of the White House, State Department and Treasury Department to discuss greater implementation of existing G20 commitments as well to provide recommendations for inclusion in the new G20 Action Plan.

Key successes as a result of TI and TI-USA advocacy

- ❖ The G20 adopted the [High Level Principles on Beneficial Ownership Transparency](#) in 2014, which was one of TI-USA's prioritized recommendations.
- ❖ The new [2015-16 G20 Anti-Corruption Action Plan](#) was adopted by the G20 leaders in November 2014 covering priority areas recommended by TI-USA such as: Beneficial ownership transparency, foreign bribery, international cooperation, and high risk sectors. For the first time it is accompanied by a detailed [Implementation Plan](#) which sets out the work-plan for the next two years including a list of deliverables.

- ❖ Each G20 country now publishes their [accountability reports](#) outlining what they have done to implement their commitments from previous years.

Unmask the Corrupt Campaign: Visa Denial and Beneficial Ownership



In August 2014, TI-USA participated in the launch of TI's first global campaign. The campaign, called "[Unmask the Corrupt](#)," is focused on ending impunity by closing identified international loopholes that permit impunity for kleptocrats and corrupt public officials. The campaign calls on governments around the world to require transparency for the beneficial

owners of corporations, deny visas to those engaged in corrupt activities, and require that sellers of luxury goods properly scrutinize their customers to screen out those who may be attempting to use the proceeds from their corrupt activities to purchase yachts, planes, performance automobiles, or other luxury items.

- ❖ As part of this new global initiative, TI-USA met with officials from the Departments of Justice, State and Treasury to urge action on increasing the transparency of beneficial owners of anonymous corporations and strengthening the procedures by which corrupt foreign officials are denied entry into the U.S.
- ❖ On July 30, the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) issued proposed rules to clarify and strengthen customer due diligence obligations of banks and other financial institutions and add a new requirement, that these entities know and verify the identities of the natural persons (beneficial owners) who own, control, and profit from the companies they service. The proposed rule represents an important step forward in closing loopholes in U.S. anti-money laundering laws. In October, TI-USA submitted [comments](#) to FinCEN to strengthen the definition of beneficial owner; ensure that financial institutions are required to take reasonable steps to verify beneficial owners; and ensure that beneficial ownership information is also collected on existing accounts by using a risk-based approach.

U.S. Trade Agreements

TI-USA strives to ensure that the strongest possible anti-corruption provisions are negotiated and maintained in U.S. investment and trade agreements. In 2014, TI-USA continued to advocate for strong anti-corruption language in the U.S.-EU Trans-Atlantic Trade and Investment Partnership (TTIP) and the Trans-Pacific Partnership (TPP):

- ❖ Building on suggested text that TI-USA provided on [TPP](#) and [TTIP](#), TI-USA met with officials from both the Office of the U.S. Trade Representative (USTR) and the European Commission to urge inclusion of strong anti-corruption and legal and regulatory transparency requirements, including for government procurement.
- ❖ TI-USA worked with TI-Brussels to seek similar support for TTIP. TI-Brussels, on behalf of TI-EU chapters, submitted a [letter](#) to the EU Commission in March seeking the same text that TI-USA suggested to USTR. TI-USA's Chairman Al Larson participated in a panel discussion with former WTO-Secretary General Pascal Lamy on the importance of including anti-corruption provisions in TTIP.
- ❖ With respect to TPP, TI-USA worked with TI-Malaysia on a [letter](#) and [press release](#) supporting inclusion of these provisions in TPP.



Increased Integrity and Strengthened Anti-corruption Standards and Practices in the Private Sector



TI-USA develops tools and publishes guidance on strengthening anti-corruption programs. Our organization also organizes exchanges with the private sector to increase awareness and promote the adoption of best practices. Some of TI-USA's activities in 2014 include the following:

Verifying Corporate Anti-Corruption Compliance

TI-USA released its report, [Verification of Corporate Anti-Corruption Compliance Programs](#). The report sets forth concrete recommendations for companies to use in evaluating their anti-corruption compliance programs. It is based on an in-depth examination of compliance verification practices and is intended to strengthen corporate anti-corruption compliance programs and to improve public credibility regarding their effectiveness.

TI-USA launched the report on July 24 with speakers from the private sector, TI-USA and the World Bank. The audience included compliance personnel from major corporations, development institutions and the U.S. Government, embassy representatives, academics, lawyers, accounting firms and non-profit organizations.



TI-USA also presented the report's findings and recommendations at:

- ❖ Basel Institute of Governance Integrity Conference, Switzerland - June 2014
- ❖ Transparency International-Chile seminars in Santiago and Concepción, Chile - July 2014
- ❖ Ethisphere webcast - Sept. 2014
- ❖ Momentum Group's Oil & Gas Anti-Corruption & Compliance Exchange, Texas - Sept. 2014

The report received wide media coverage in leading anti-corruption media outlets such as [Ethisphere](#), [Compliance Week](#), [Mainjustice.com](#), [the FCPA blog](#) and [the Global Anti-Corruption Blog](#).

The report is contributing to raising the standards of practice in corporate anti-corruption compliance programs. The Center for International Private Enterprise [stated](#) that the Report marks an important step towards a unified vision of what successful anti-corruption compliance

programs should look like. Many company compliance officers have expressed appreciation for the comprehensive and practical guidance provided. They have noted that the Report generated internal discussions on the importance of risk, assessments, verification and the extent of company efforts. It has also prompted discussion of the scope of corporate public reporting of anti-corruption programs and led to some companies improving their anti-corruption disclosure.

Corporate Forum

The Corporate Forum is designed to provide TI-USA corporate supporters with an opportunity to share views on emerging global issues and benchmark programs and practices with peers. More specifically, the Corporate Forum has provided updates on notable new cases and developments; briefings by agency officials; in-depth exchanges on approaches to complex compliance challenges; practical advice and recommendations from experts; and updates on TI-anti-corruption initiatives of importance to the private sector.

In 2014, TI-USA organized four meetings of its Corporate Forum. At these meetings:

- ❖ TI-USA brought together corporate leaders and Deputy Assistant Secretary of the Department of Commerce, Lynn Fischer Fox, to discuss anti-corruption provisions in trade agreements and the International Trade Administration's efforts to help U.S. businesses understand the requirements under the law and address challenges when exporting overseas.
- ❖ Mr. James M. Koukios, Assistant Chief of the Fraud Section, Criminal Division, of the Department of Justice was also invited to speak about the Department of Justice's enforcement strategies and approach.
- ❖ FCPA expert and former SEC official Richard Grime offered his insights on FCPA enforcement and interface with regulators.
- ❖ Experts from multinational companies described how they manage business partner relationships in China, Russia, Latin America and Africa and due diligence practices and challenges.
- ❖ Senior compliance officers from multinational companies and attendees explored, identified and prioritized the information and factors that compliance officers need to consider in deciding their annual compliance priorities.
- ❖ FCPA defense experts presented recent trends and lessons they learned based on their experience defending actions before the U.S. Department of Justice and the SEC.

Greater Transparency and Integrity in U.S. Governance



TI-USA works to increase government transparency and accountability, strengthen institutions, enable citizen oversight and ultimately ensure that U.S. federal, state and local governments are accountable to the public they serve. Following are some key actions TI-USA took in 2014:

Enhancing Public Oversight of Procurement

TI-USA seeks to advance procurement reforms around the globe with emphasis on field testing and promoting TI-USA's [Civil Society Procurement Monitoring Tool](#) (CSPM Tool) both domestically and internationally.

- ❖ In the United States, TI-USA finalized an arrangement with American University's School of International Service for four students to use the CSPM Tool to monitor procurement projects in Washington, D.C. and Arlington, VA.
- ❖ Internationally, TI-USA worked and will continue to collaborate with TI-Rwanda, which is using the CSPM Tool to monitor approximately 20 infrastructure projects in Rwanda. Thus far, the CSPM Tool has been useful in identifying instances in which procurement officials have not followed procurement regulations.
- ❖ In response to an OECD request for comments, TI-USA took the lead in drafting a series of recommendations presented by TI on the OECD's proposed public procurement recommendations. The TI submission, which was presented to the OECD in September, made specific recommendations on how to improve transparency, integrity, accountability, and public participation in public procurement processes.

Promoting Greater Fiscal Transparency in the United States

The Data Accountability and Transparency Act (DATA Act) became law in 2014. It is intended to improve fiscal transparency by requiring greater detail, accuracy and timeliness in federal government spending data. TI-USA played an active role during the implementation phase of the DATA Act by making presentations before United States government agencies arguing for clarity in federal contracting and grant-making. In particular, TI-USA has advocated for unique non-proprietary identifiers for both corporate parents and subsidiaries in federal contracting and grant-making.

Extractive Industries Transparency

TI-USA continued to participate as an alternate member of the U.S. Multi-Stakeholder Group (MSG) for the Extractive Industries Transparency Initiative (EITI). Under EITI, participating governments work with company and civil society representatives to produce annual reports that help citizens understand how the government manages its extractive sectors. Central to these annual reports is revenue reconciliation. The government reports royalties, bonuses, taxes, and other revenues it receives from companies and companies report the monies they pay to the government. This reconciliation or comparison of monies received and paid allows citizens to learn exactly how much the government earns from the extractives sector and may also help expose corruption if discrepancies are found between government and company data. The International Board of EITI accepted the U.S. candidacy application in March, and the MSG plans to issue its first report in December 2015.



Photo by [Brendan Biele](#)

In addition to our work on the U.S. EITI, TI-USA sent [a letter](#) to the U.S. Securities and Exchange Commission in June urging the SEC to publish in 2014 a proposed rule defining “project level reporting” for purposes of Section 1504 of the Dodd-Frank Act. Section 1504 of the Dodd-Frank Act directs the SEC to issue a rule requiring all U.S.-listed companies to report on all

monies they pay to governments on a project by project basis. Our letter noted the importance of transparency in combating corruption in the extractives sector, a growing worldwide movement toward transparency, and the importance of SEC action on the definition of project level reporting in order to facilitate consensus for U.S. EITI purposes.

Prevention of Corruption in International Development



TI-USA promotes more effective development by working with multilateral development banks, U.S. bilateral aid agencies and other organizations in order to favor the development and implementation of comprehensive transparency, anti-corruption, and risk-management policies in their operations and in projects and countries where they operate. In 2014, TI-USA worked toward this goal through the following activities:

World Bank Operations

In 2014, TI-USA participated in the World Bank's consultations on its proposed reforms to its procurement policies and its safeguards policies. With respect to procurement, we [urged](#) the Bank to make Bank-financed procurements more transparent, to strengthen anti-corruption policies, to allow for civil society monitoring of Bank-financed procurements, and to develop procurement capacity in borrower countries. On safeguards, we [urged](#) the Bank to ensure that it organized meaningful opportunities for public participation in the design and implementation of Bank-financed projects. Such opportunities should be open to all, including all civil society organizations, both inside and outside the borrower country.

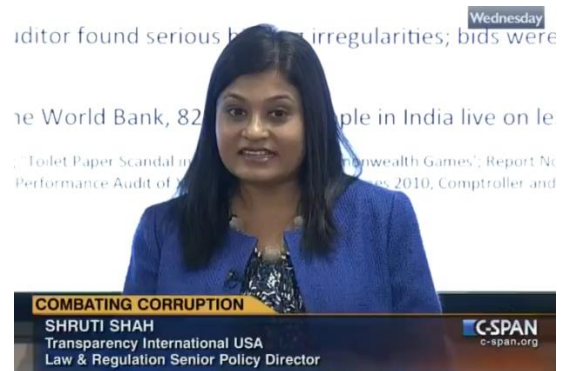
New Millenium Development Goals

TI-USA, in collaboration with TI, has advocated for a stand-alone governance goal in the Sustainable Development Goals (SDGs) being developed by the United Nations to replace the Millenium Development Goals in 2016. A stand-alone governance goal would increase global attention and resources to problems relating to governance including transparency, accountability, corruption, and public participation. As part of its advocacy for a governance goal, TI-USA co-signed with TI an advocacy letter, participated in a number of UN events on this subject, and met with U.S. delegates and State Department officials. The latest draft of proposed SDGs issued by the UN's working group includes targets for governance and anti-corruption under a larger goal of promoting peace and security.

Speaking Engagements

TI-USA's staff members have continued to raise TI-USA's visibility and contributions by speaking at the following forums, among many others:

- ❖ President and CEO Claudia Dumas was a panelist at the NYU Global Governance Roundtable: Building Ethical and Sustainable Global Companies, an event co-hosted by NYU Stern and NYU Law which featured TI-USA Director Benjamin Heineman as luncheon speaker.
- ❖ TI-USA Volunteer Laurie Sherman spoke at the Council of Foreign Relations workshop Governing Extractives on a Global Scale: Challenges and Opportunities.
- ❖ Shruti Shah, Senior Policy Director, was a panelist at an event organized by the State department on the link between human rights and corruption. The event was live streamed and shown in U.S. embassies around the work and was broadcast on CSPAN on September 6. The broadcast can be found [here](#).
- ❖ Daniel Dudis, Senior Policy Director, spoke at the Data Transparency Town Hall organized by the Department of the Treasury and OMB. This event was an opportunity for civil society and other stakeholders to provide input as to how the DATA Act should be implemented and was attended by approximately 200 people.



Spotlighting Integrity: 2014 Integrity Award Dinner

TI-USA's 2014 Integrity Award Dinner, recognizing leaders who have contributed to the fight against corruption, was held on December 3 in Washington, D.C.

TI-USA honored Sir James D. Wolfensohn with the TI-USA Integrity Award in recognition of his career as an early and forceful proponent of the international fight against corruption and his enduring contributions and legacy as President of the World Bank Group. Raytheon Company received the TI-USA Corporate Leadership Award for its commitment and contributions to the fight against corruption both internally and in cooperation with governments, other companies and non-profit organizations.

More than 325 leaders from civil society organizations, U.S. Government, business, and the international diplomatic community attended the award ceremony. Christine Lagarde, the Managing Director of the International Monetary Fund, attended to congratulate Sir James.

In accepting the award, Sir James noted "I am here really not just to accept the award -- which I am enormously grateful to be able to do--but to say to all of you at TI and many of you in this room who devote yourselves to this issue of corruption, that unfortunately corruption is alive and well. It requires tremendous attention and it is one of the key factors in terms of the effectiveness of development. And I think we are all very fortunate to have an organization like TI, which in civil society is taking a clear, unvarnished position in terms of its statement about what makes a better government, what makes for better lives, and what makes for a better humanity that we all strive for."

Jay B. Stephens, Senior Vice President and General Counsel, Raytheon Company, accepted the award on behalf of Raytheon. Mr. Stephens, in his comments, thanked Transparency International for its "thought leadership." He stated: "For us, it is important to have organizations like TI that can set standards; that can drive the debate; that can drive the discussion around what anti-corruption is, what transparency is. You give us something to strive for, something to understand, and I think really engage the larger community, particularly on the international stage."



From left to right: Jay Stephens, Senior Vice President and General Counsel of Raytheon; Claudia Dumas, President and CEO of Transparency International-USA; Huguette Labelle, Former Chair of Transparency International; Sir James, President of the World Bank Group from 1995 to 2005; and Alan Larson, TI-USA Chairman.

Contributors

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