

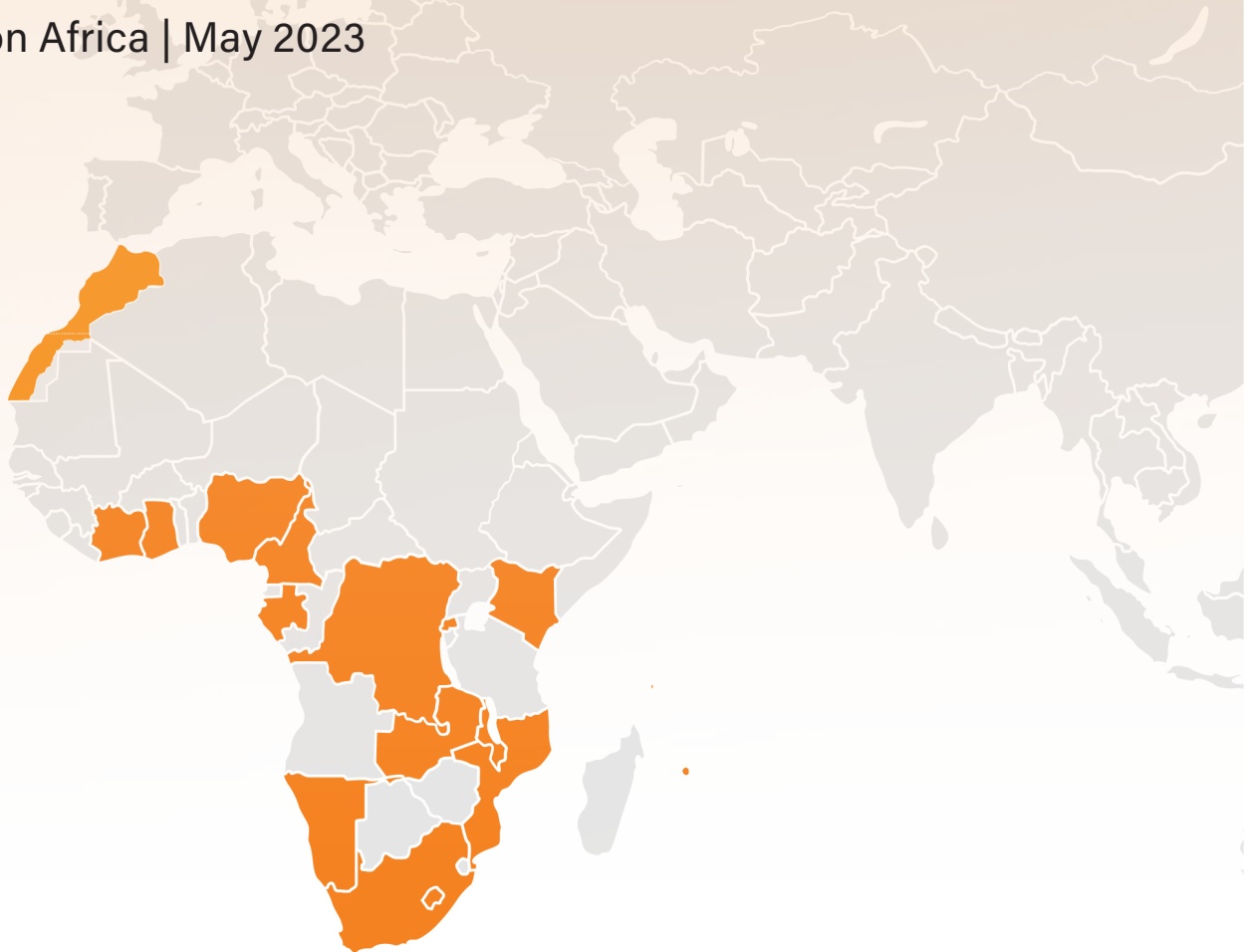



A practical guide for national anti-corruption agencies

Engaging the private sector in Collective Action against corruption

EDITION 2

Focus on Africa | May 2023



 Examples of governments engaging the private sector in Collective Action described in this guide.

Can you help fill in the map with examples from your country or anti-corruption agency?

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About this guidance

This guidance seeks to capture and explore the innovative approaches that African governments have developed to address the demand and supply sides of corruption more effectively and sustainably. It is designed to help government institutions, in particular national anti-corruption agencies, engage with the private sector more effectively to prevent corruption.

This document highlights good practices identified through interviews, desk research and a 2021 Southern African Development Community (SADC) training on "Emerging anti-corruption issues and private-sector engagement for SADC anti-corruption agencies".

Africa offers many examples of innovative, unique and context-sensitive approaches to engage the private sector in anti-corruption efforts. Ghana's National Anti-Corruption Action Plan, for instance, offers an award scheme and is looking into providing tax benefits to companies that enforce anti-corruption measures and demonstrate leadership in the fight against corruption. Other agencies and governments in the region, such as Morocco, are currently discussing implementing a reward system for compliant companies that can be considered when companies bid for public tenders.

These examples demonstrate how African governments proactively seek to tackle corruption and collaborate with the private sector.

From the initiatives captured, three common strategic approaches can be identified to underpin effective and impactful engagement:

- **Raising awareness**, guiding and working with the private sector to more effectively address corruption risks.
- **Identifying and providing incentives** to companies investing in their compliance programmes.
- **Demonstrating leadership** by actively participating in Collective Action and public-private partnerships.

This document is a follow-up of a [practical global guide published in July 2022](#).

This is a living document which will be amended regularly to include new examples of good practices as they become available to continue the discussion around government and private-sector engagement on issues of corruption. If you are interested in finding out more about existing initiatives and approaches, or would like to propose additional examples to be included in the guidance, please contact scarlet.wannenwetsch@baselgovernance.org or liza.young@baselgovernance.org.

Acknowledgements and sharing

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The Basel Institute's participation in developing these guidelines is funded by the Siemens Integrity Initiative.

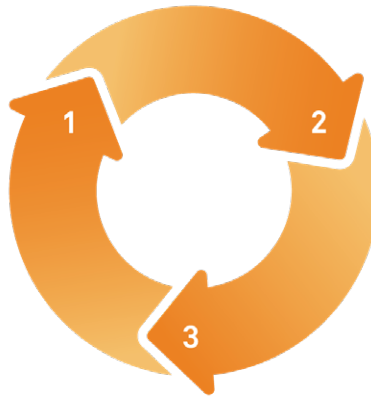
The logo for Siemens, consisting of the word "SIEMENS" in a bold, teal, sans-serif font.

Three ways governments are engaging with the private sector to prevent corruption

1 Raise awareness,

guide and work with the private sector to more effectively address corruption risks

- Raise awareness and build capacity in the private sector
- Set up events and sustained engagement platforms focusing on the private sector
- Engage the private sector in developing national anti-corruption strategies



2 Support and incentivise

the private sector to engage in corruption prevention activities and initiatives

- Praise and encourage compliant companies that demonstrate high standards of integrity
- Create and develop tangible business benefits for companies investing in compliance
- Support and acknowledge compliance certification initiatives

3 Demonstrate leadership

by becoming an active participant in Collective Action

- Develop and implement integrity tools to address corruption in high-risk sectors
- Become an active member and take a leadership role in Collective Action initiatives
- Foster compliance in state-owned enterprises by engaging in Collective Action and partnering with the private sector

Why is it important for governments to engage with the private sector?

The African Union's Agenda 2063, also known as "The Africa We Want", seeks to achieve inclusive and sustainable development by creating a conducive climate for the African private sector. To this end, the African Continental Free Trade Area (AfCFTA) offers a significant opportunity to turn words into action and stimulate economic growth. However, corruption remains a challenge that could hinder the agreement's full potential.

The private sector helps to create jobs and prosperity, drives technical innovation and fosters entrepreneurship. Companies large and small therefore play an important role to prevent and reduce corruption in the markets where they operate. So involving the private sector in the promotion of ethical business practices is crucial to promote a culture of integrity and ensure a level playing field between competitors.

Anti-corruption agencies can play an essential part in incentivising, raising awareness and supporting companies to engage in multi-stakeholder activities to more proactively address corruption and work with other stakeholders to bring common strategic goals to life.

What is anti-corruption Collective Action?

Collective Action brings companies from the same sector or different industry sectors together with other parties, such as government and/or civil society, to:

- **tackle** shared problems of corruption;
- **raise** standards of business integrity; and/or
- **level** the playing field between competitors.

Anti-corruption Collective Action involves collaboration, cooperation and a willingness to tackle a common corruption risk. Trust and a commitment to work together also characterise Collective Action. The approach can take many forms and uses a variety of tools.

A multi-stakeholder Collective Action approach to address corruption is acknowledged as good practice in numerous African National Anti-Corruption Strategies and international standard-setting documents such as the African Development Bank [Integrity Compliance Guidelines](#), the United Nations Convention Against Corruption (UNCAC), and more recently in the updated 2021 OECD anti-bribery recommendations.

By supporting and engaging with the private sector, governments can demonstrate a proactive approach to addressing bribery. Across the globe, Collective Action initiatives have catalysed changes to laws, reduced red tape and changed operating practices by both government agencies and companies. By working together, governments, civil society and the private sector can promote a culture of integrity, build trust in the markets, and ensure that trade and investment activities are conducted fairly and transparently. This can stabilise local markets, strengthen competition and attract foreign investment. Initiatives have also helped to shape the development of international regulatory standards in particular industry sectors, such as infrastructure, extractives and transports.

For more comprehensive information about Collective Action, including a database of initiatives around the world, see the B20 Collective Action Hub at www.collective-action.com. This global go-to centre for anti-corruption Collective Action is developed and maintained by the Basel Institute on Governance. It includes a free [helpdesk](#) service for specific questions on anti-corruption Collective Action.

How can anti-corruption agencies engage with the private sector?

1. Raise awareness, guide and work with the private sector to more effectively address corruption risks

Anti-corruption agencies play a vital role in guiding the private sector in the application of anti-corruption rules and regulations. Transparent and open communication helps manage expectations on both sides and enables the private sector to translate these requirements effectively into internal policies and procedures.

Being responsive to the needs of companies and tailoring the support accordingly is an important next step to capacitate companies on their journey to build and implement resilient anti-corruption compliance programmes. This can be achieved by developing and delivering tailored training and guidance based on the areas of interest and risk identified together with the private sector.

Once the tailored training and tools are in place, agencies are well positioned to work towards evolving these training engagements into long-standing engagement platforms, offering opportunities for discussion and facilitating dialogue between private and public entities.

1.1 Raising awareness and building capacity in the private sector

One effective way to improve the private sector's implementation of integrity standards is by building capacity and raising awareness of national, international and regional anti-corruption regulations. Written guidance documents such as codes of conduct – preferably co-developed – can offer practical support and can easily be adapted to cover specific risks and sectors depending on the context and anti-corruption environment.

Risk-focused trainings and guidance

Effective risk-focused trainings and guidance are essential components of the fight against corruption. By providing targeted guidance on specific high-risk areas, companies can better understand and address corruption risks.

Zambia's Public Procurement Authority (ZPPA), for example, offers workshops for companies to better address corruption risks associated with public tenders and procurement processes. The ZPPA is currently working on translating the outcomes of these trainings into a Business Integrity Toolkit (BIPT) to enhance transparency and integrity in public procurement and complement training.

Similarly, Malawi's National Construction Industry Policy helps guide companies to strengthen their corporate governance systems as a way to promote integrity in procurement and address corruption in the private sector.

Sector-specific trainings and guidance

Sector-specific trainings can be an effective way to bring new industries into the anti-corruption conversation. An example of such an approach is the sectoral workshop organised by the Gabonese Ministry on Good Governance and Fight Against Corruption in May 2021. This workshop was specifically targeted at the National Order of Chartered Accountants and focused on the existing anti-corruption mechanisms in Gabon.

As part of a partnership between the Moroccan National Authority for Probity, Prevention and Fight Against Corruption and financial-sector regulators, Morocco developed a guide for financial sector authorities to implement their anti-corruption compliance programme. The launch of this Guide followed a series of capacity building activities for the financial sector.

→ Good practice

Setting up training activities and awareness raising events tailored to the private sector – be it general, sectoral or thematic – allows companies to better understand national, regional and international anti-corruption compliance standards and guidelines, and be more able to adapt to and implement them. Applying a two-pronged approach also allows public authorities to better understand the private sector's views on corruption, which is essential to fighting corruption efficiently and holistically.

Providing tailored guidance for the private sector enables companies to better adapt and comply with national, regional and international anti-corruption regulations and standards. It also strengthens and facilitates ownership of the anti-corruption compliance programmes that companies implement.

1.2 Setting up sustained engagement platforms with the private sector

Setting up sustained dialogue platforms provides an opportunity for the public and the private sector to come together to find common language and ideas to fight corruption – the foundation of any successful Collective Action or multi-stakeholder initiative.

Examples of public-private engagement platforms

Convening engagement platforms that bring together the public and the private sectors is a great way to start a first cross-cutting dialogue on all manners anti-corruption and build synergies. Providing a stage and letting the private sector co-lead the discussions can greatly encourage ownership of the platform and foster trust.

In 2013, the Independent Commission Against Corruption (ICAC) of Mauritius set up a Public-Private Platform Against Corruption which aims to foster interaction between the public and the private sectors. Business Mauritius, an association of over 1200 local businesses, is the co-chair. The Platform comprises a subcommittee on Business Integrity which offers tailored trainings and specific guidance to the private sector. Various recommendations made by the Platform have been implemented in the public sector and in private-sector organisations, and have contributed to consolidating the overall national anti-corruption landscape.

Civil society organisations also play a pivotal role in initiating and facilitating such engagement platforms to help raise awareness, convene different stakeholder groups and avoid antitrust issues.

Opportunity

The Coalition for Organisational Integrity offers a valuable opportunity for governments to collaborate with the private sector to exchange and identify good practices on business integrity.

Led by the Ethics Institute, the Coalition gathers businesses and public entities to improve procurement and strengthen engagement between businesses and the public sector. The Coalition combines best-practice sharing sessions, capacity building for individuals and large-scale anti-corruption trainings for SMEs. Free of charge, the members of this platform meet on a quarterly basis for best practice and networking sessions.

Sector-specific engagement platforms

Adding a sector-specific dimension to the discussions can increase their impact.

In South Africa, the Special Investigating Unit facilitated the establishment of the Health Sector Anti-Corruption Forum and the Infrastructure Build Anti-Corruption Forum. These multi-stakeholder fora comprise law enforcement institutions, civil society organisations, industry regulators and the representatives of the relevant business sector. They serve as platforms where allegations pertaining

to the two sectors are reported, assessed and then allocated to the party best suited to investigate. Each forum reviews performance reports at each quarterly meeting to monitor the progress of the investigations.

Regional engagement platforms

National anti-corruption agencies can also endorse and or take part in international and/or pan-African Collective Action engagement platforms, such as the Business Action Against Corruption (BAAC).

The BAAC model seeks to find common ground between the interests of businesses, civil society and government, with the aim of building co-operative strategies to reduce corruption. So far, the BAAC has been endorsed by Botswana, Cameroon, DRC, Ghana, Lesotho, Malawi, Nigeria, South Africa, Tanzania and Zambia. In Lesotho, the BAAC draws its membership strictly from the business community.

→ Good practice

Facilitating public-private dialogue through multi-stakeholder engagement platforms lays the foundation for the collaborative development of tools and standards to promote business integrity and supports companies in implementing their anti-corruption compliance systems.

It also allows government institutions to identify existing gaps, prioritise activities and establish collaborative approaches to better address the risks identified in specific sectors, such as health and construction.

Lastly, it helps to develop a more sustained, mutually beneficial and future-looking dialogue with the private sector.

☆ Success story from Kenya

15 representatives of key sectors regularly come together to develop and implement common action plans in Kenya through the [Kenya Leadership and Integrity Forum \(KLIF\)](#).

The KLIF is coordinated by the Kenya Ethics and Anti-Corruption Commission (EACC) and provides a framework through which private and public sector actors tackle corruption collectively. All those implementing the Kenya Integrity Plan develop annual action plans and reports to assess their performance and measure their anti-corruption activities' impact.

The Forum was very vocal in advocating for the passing of the [Bribery Act of 2017](#), which recognises the responsibility of companies with regards to bribery and requires private entities to have in place procedures for the prevention of bribery.

The Bribery Act also confers on the EACC the mandate to assist private entities to develop and put in place procedures to prevent bribery.

1.3 Developing National Anti-Corruption Strategies

Providing structured private-sector input in the development and implementation of National Anti-Corruption Strategies

Providing the possibility for structured private-sector input in the development and implementation of a National Anti-Corruption Strategy can be set up in different ways.

On the one hand, governments can and should consult the private sector to collect input and expectations regarding national anti-corruption efforts. By means of illustration, while developing its National Anti-Corruption Strategy in 2020, the South African anti-corruption authority held national and provincial consultations with 26 business entities and umbrella bodies. The Government also launched a communication campaign for companies and civil society to provide their input electronically.

To ensure an impactful process overall, governments should also consider giving the private sector a clear and prominent role in the implementation phase of the National Anti-Corruption Strategy as well. For instance, the [Moroccan Anti-Corruption National Strategy](#) recognises the General Confederation of Moroccan Enterprises as the Coordinator of its "business integrity" pillar. It is the only non-governmental entity to be charged with the coordination and implementation of a standalone pillar.

→ Good practice

Setting up structured mechanisms for the private sector to play a proactive role in the development of the National Anti-Corruption Strategy brings more buy-in from private companies. It also allows for greater public-private collaboration and dialogue. Having the private sector as an implementing partner also fosters ownership of the strategy.

Promoting and establishing Collective Action as the standard engagement tool under the National Anti-Corruption Strategies

Integrating private-sector Collective Action activities within strategic and standard-setting documents such as National Anti-Corruption Strategies can foster a sense of shared responsibility and encourage collaboration amongst stakeholders. Cameroon, Namibia, Malawi and South Africa have all included Collective Action in their strategies as a standard engagement tool to fight corruption more effectively.

South Africa, for example, is taking a risk-based sectoral approach to Collective Action in its strategy. The strategy proposes that businesses join forces with industry peers and other stakeholders to scale up anti-corruption efforts in high-risk sectors, such as infrastructure and risks in state-owned entities. The strategy also establishes cross-sectoral Integrity Pacts¹ as a means to enhance business integrity in large procurement contracts.

Malawi's Anti-Corruption Bureau (ACB) also identifies Collective Action activities as a way to achieve sustainable and strategic engagement of the private sector in the fight against corruption. While Malawi's first National Anti-Corruption Strategy focused on the role of the government, the revised strategy in 2019 includes Collective Action as the tool of engagement. It also establishes the development of Collective Action initiatives with a specific and visible role for the ACB, such as Integrity Pacts and the High Level Reporting Mechanism.²

1 Read more on Integrity Pacts in Section 4.3.

2 Read more on the High Level Reporting Mechanism in Section 4.3.

→ Good practice

In order to actively and effectively promote Collective Action as a norm, it is important to identify concrete Collective Action tools and approaches that can help implement key commitments of National Anti-Corruption Strategies. This should also include government-led tools such as the High Level Reporting Mechanism and Integrity Pacts to demonstrate the government's commitment to work and collaborate with the private sector.

An essential part of trust building and developing common anti-corruption initiatives is to identify the ground rules for working together. Collective Action offers a flexible framework which focuses on the private sector within a multi-stakeholder approach. Having one engagement format – Collective Action – can help to manage all stakeholders' expectations. It can also secure sustainable buy-in that extends beyond one initiative, and even one National Anti-Corruption Strategy cycle.

2. Support and incentivise the private sector to engage in corruption prevention activities and initiatives

Anti-corruption agencies should actively incentivise and motivate the private sector to engage in or to develop innovative corruption prevention initiatives. This involves shifting the focus from penalties for non-compliance to incentives for companies that are investing in their anti-corruption compliance.

This section highlights the importance of including a “name and praise” approach in a corruption prevention strategy to promote positive role models in the private sector and incentivise engagement in business integrity initiatives.

2.1 Integrity Awards

In 2021, the Ivorian Ministry for the Promotion of Good Governance, Capacity Building and Anti-Corruption launched the Anti-Corruption and Good Governance Awards. The awards recognise people or legal entities who have distinguished themselves through an action that has greatly contributed to the promotion of good governance and to the fight against corruption. These two new awards are part of the wider Excellency Awards campaign launched by the Ivorian President in 2013.

→ **Good practice:**

Praising and encouraging compliant companies can inspire other companies within the same sector to better implement and communicate about their compliance programmes. By publicly valuing “anti-corruption champions”, anti-corruption agencies can shed light on companies that demonstrate high standards and inspire other companies to reach the same standard.

2.2 Supporting compliance certification initiatives

There are a number of examples of country- and sector-specific Collective Action initiatives that have developed a tailored compliance certification for businesses. Companies that sign up are typically trained and audited as part of the certification process on the compliance standards that have been developed through a collaborative approach.

For example, Nigeria’s Corporate Governance Rating System (CGRS), a joint initiative between the Nigeria Stock Exchange and the Convention on Business Integrity in Nigeria, lists directors that have passed the CGRS Fiduciary Awareness Certification Test on an “honour roll” on its website. The Securities and Exchange Commission of Nigeria later made it compulsory for all companies listing on the premium board to get a CGRS certification. This helped to drive demand for companies to sign up to this initiative.

→ **Good practice**

Encouraging certification Collective Action initiatives is an efficient way to incentivise private companies to uphold and implement anti-corruption national, regional or international regulations. It can also add to the pressure on those missing from the list.

 **Food for thought**

Certification models can help governments incentivise companies to comply with anti-corruption standards and regulations. Below are two inspiring examples from Africa and beyond:

Scorecard certification

Mauritius is working on a certification model using a scorecard for listed companies which comply with the Code of Corporate Governance. The aim of this scorecard is to reinforce the Code and provide clarity on how to implement it. It is also a way to get discussions going on internal corporate governance practices at the board level.

Pró-Ética certification

In Brazil, the Comptroller General has developed a certification programme called Pró-Ética, which publicly acknowledges the voluntary integrity measures adopted by companies. The programme has been running since 2010 and allows Brazilian companies to send in their evaluation questionnaires on an annual basis. The questionnaire identifies the commitment, activities and steps taken by the companies to implement measures aimed at preventing, detecting and remediating acts of corruption and fraud. If the company successfully passes the evaluation phase, it is awarded the title of Pró-Ética company.

2.3 Connecting access to credit and investments with anti-corruption compliance

Offering incentives to private companies that are demonstrating their commitment to addressing their corruption risks can be an effective way to start changing the culture business integrity.

Morocco, for example, is looking into providing financial incentives for companies that comply with anti-corruption regulations, such as favourable rates and bonus points to access public contracts.

Ghana is also looking into providing incentives for the private sector that enforce anti-corruption provisions through tax cuts.

→ Good practice:

Offering tangible business benefits is key to fighting corruption. Incentives to join an anti-corruption Collective Action initiative might not be the same from all stakeholders. When it comes to the private sector, demonstrating positive outcomes such as widening access to business opportunities and attracting foreign customers and investors (through a CGRS model, for example) is considered good practice.

3. Demonstrate leadership by becoming an active participant in Collective Action

Governments can and should demonstrate leadership in the pursuit of a more inclusive approach to fighting corruption. Becoming an active member of a multistakeholder initiative demonstrates commitment and can spark momentum within the private sector to engage in Collective Action.

Engagement is particularly vital and impactful in areas where interaction between governments and the private sectors is inevitable, such as processes in public procurement, licensing and cross-border trade.

This section follows up on Section 1 and outlines success stories of governments taking on a leading role in Collective Action initiatives, even beyond what it mentioned in their National Anti-Corruption Strategies.

3.1 Integrity Pacts

Integrity Pacts are a flexible tool that can help make public procurement more transparent and fairer and reduce the risk of corruption. An Integrity Pact is usually an agreement between a government procurement authority and bidding companies. Tailored to each tender and country, it commits all parties to refrain from bribery, corruption or collusion. An Integrity Pact typically involves an independent monitor and a clear process for reporting, resolving and sanctioning integrity issues.

Kenya, Rwanda, South Africa and Zambia have all implemented several Integrity Pacts in public tenders over the years. These have mainly pertained to the infrastructure (such as water sanitation projects) and construction sectors, both at local and national levels. Togo is currently looking into implementing Integrity Pacts as part of its revised anti-corruption strategy of 2023.

→ Good practice

For many countries, corruption in public procurement is a major concern which requires additional integrity measures to be implemented. The Integrity Pact is one example of an integrity tool available for anti-corruption and procurement authorities. The tool was developed by Transparency International in the mid-1990s and has been implemented in more than 32 countries and 160 major public tenders.

3.2 High Level Reporting Mechanism (HLRM)

The HLRM is designed as an early warning system of anti-competitive and corruption business practices in public tenders. It offers a fast, independent and effective way to address bribe solicitation in public tenders – but without undermining existing legal processes or law enforcement. It is independent and authoritative and aims to find practical solutions to defuse potential corruption-related issues before they become a matter for the judicial authorities. Alerts of potential issues are raised through secure, easily accessible channels which are subsequently communicated to a designated independent panel of experts.

Following the expert analysis of the alert, taking into consideration all necessary information, the panel seeks a transparent resolution through open discussion and mediation. The aim is to ensure the issue is resolved with minimal loss of time and money, so that the project can continue smoothly.

The mechanism is designed to be tailored to each country and project. It is developed in collaboration with representatives of the public sector, business and civil society to ensure it meets the needs of all stakeholders involved.

The HLRM has been implemented in Colombia and Argentina, and there are current discussions in Malawi to implement an HLRM.

→ Good practice

Accusations of corruption in public works projects lead to delays, costly legal actions and a loss of credibility, not just for those involved in the project but for the government as a whole. The HLRM offers governments a practical early detection tool to identify potential issues during the tendering phase before they manifest as corruption or unfair business practices.

☆ Success stories of governments engaging in Collective Action initiatives

CoST - Infrastructure Transparency Initiative Malawi

Jointly led by representatives of the government, the private sector and civil society organisations, under the umbrella of the CoST Infrastructure Transparency Initiative (CoST), [CoST Malawi](#) is a successful example of a multistakeholder initiative which aims to combat corruption and promote integrity in public infrastructure projects. In 2021, the President of Malawi agreed to become a CoST Malawi Champion, making him a key supporter of this Collective Action initiative.

Fisheries Transparency Initiative

The [Fisheries Transparency Initiative \(FiTI\)](#), based in the Seychelles, is the first global transparency initiative with their headquarters in Africa.

The FiTI Standard on transparency is the outcome of extensive discussions spanning over two years by members of the FiTI International Advisory Group, which includes representatives from governments, the private sector and civil society groups. Under the FiTI Standard, countries must produce regular reports to demonstrate whether the 12 transparency requirements have been fulfilled.

Maritime Anti-Corruption Network

In 2012, the [Maritime Anti-Corruption Network \(MACN\)](#) formalised a cooperation with the United Nations Development Programme and the Nigerian government, launching its first Collective Action initiative in [Nigeria](#). MACN is a global business network working towards a maritime industry free of corruption that enables fair trade. The project has received high-level support from the Nigerian Presidency, first through the approval of harmonised port call and vessel clearance procedures, and secondly through the Vice-President's participation in the launch event of the Port Service Support Portal and Grievance Mechanism.

💡 Opportunity

Fostering compliance in state-owned enterprises: the Compliance without Borders project

State-owned enterprises (SOEs) play a leading role in many core industries throughout Africa and as such should demonstrate leadership in the fight against corruption.

Compliance without Borders offers compliance officers in SOEs the opportunity to receive free mentoring by private-sector compliance experts. The project is jointly supported by the Basel Institute on Governance and the OECD. It is open to SOEs that would like to build their internal compliance capacities.

→ **Good practice**

Governments can demonstrate leadership by incorporating Collective Action into the compliance programmes of their SOEs. This helps to ensure SOEs are engaging in sectoral or country-wide anti-corruption initiatives, as is recommended by the OECD in their Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises. Exchanging experience and mentorship with compliance officers from the private sector through the Compliance without Borders project can help SOEs to build capacity