

2010 Annual Conference Report

Achieving Transparency: a Dialogue for Action



September 2010

Bergen, Norway



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The Task Force on Financial Integrity and Economic Development is a unique global coalition of civil society organizations, leading development economies and more than 50 governments working together to address inequalities in the financial system that penalize billions of people. Launched by Global Financial Integrity in January 2009, the Task Force advocates for greatly improved transparency and accountability in the global financial system.

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Introduction

epresentatives from civil society organizations and governments, policy makers, academics, and journalists gathered in Bergen, Norway September 28th and 29th, 2010, for the second annual conference of the Task Force on Financial Integrity and Economic Development.

The Task Force conference featured two-days of presentations, panels, and break-out sessions focusing on the establishment of implementable action items for achieving greater transparency and accountability in the global financial system. Most of the discussion centered around the Task Force's five recommendations for promoting greater transparency in the global financial system for the benefit of developing and, increasingly, developed countries:

- Automatic Exchange of Tax Information
- Curtailment of Trade Mispricing
- Country-by-Country Reporting of Profit and Taxes Paid by MNCs
- Disclosure of Beneficial Ownership of Financial Accounts
- Harmonization of Predicate Offenses under Anti-Money Laundering Laws

In an effort to facilitate a robust exchange of ideas, the 2010 conference also included "breakout sessions" to delve into more specific topics related to transparency and development. Breakouts featured experts on corruption, the G20, Africa, the Task Force's new Financial Integrity Index, a convention on transparency, economic data transparency, and an educational outreach program.

A series of keynote speakers added further depth to the conference. This year's speakers included Norwegian Minister Erik Solheim; illegal fishing expert Gunnar Stølsvik; Pierre Fallavier, a researcher on illicit flows in Afghanistan; Norwegian State Secretary Ingrid Fiskaa; and a special presentation by the Vice President of Guatemala, Dr. Rafael Espada.

This report includes a summary of all the presentations from the 2010 Task Force annual conference and concludes with priorities for 2011. We encourage you to visit the <u>Task Force website</u> to watch video and audio recordings of all the presentations from the 2010 conference and to learn more about the need for greater transparency in the global financial system.



Summary of presentations

Day One

Keynote speaker: Erik Solheim, Norwegian Minister of the Environment and International Development

Minister Solheim delivered the opening keynote remarks. The Minister noted that Norway was the only nation in the world to spend one percent of its GDP on development aid. While acknowledging the importance of development assistance, the Minister emphasized that even to achieve that, foreign aid "will never be a sufficient vehicle for economic development." He challenged conference participants to think about how Norway, and other developing countries, can adjust their aid policies to continue support economic development and at the same time stem capital outflows from aid-recipient countries.

Session I: Beneficial Ownership

Chaired by Anthea Lawson of Global Witness, the Beneficial Ownership panel addressed recent U.S. legislative developments on the issue of <u>beneficial ownership</u> and the broader context of why beneficial ownership knowledge is important. Beneficial ownership, she argued, is about establishing individual responsibility, so that people can be held to account by governments and the public for any illicit activities.

Panelist Elise Bean, from the U.S. Senate Permanent Subcommittee on Investigations, explained in detail how lack of beneficial ownership in the company formation process has enabled corrupt kleptocrats, crooked businessmen, and governments to misuse U.S. financial institutions for terrorism, money laundering, tax evasion, or other crimes.

Panelist Chip Poncy, from the U.S. Treasury Department, discussed the overall enforcement issues related to implementing more stringent beneficial ownership reporting and outlined what he described as the U.S.' "three pronged-approach" to the problem: (1) extract beneficial ownership from the company formation and legal entities creation process (Senate Bill 569); (2) strengthen and clarify the requirements for financial institutions to understand the beneficial ownership of the accounts that they open, and (3) harmonize U.S. policies with global reforms, practices to maximize efficacy and cooperation.

"I can't think of a more important issue [for] promoting transparency in the global financial system than understanding beneficial ownership."

- Chip Poncy, U.S. Treasury Department

Session II: Country-by-Country Reporting

The Country-by-Country panel emphasized the magnitude of the issue—70 percent of world trade is intragroup—the impact of trade mispricing and transfer pricing on developing countries, recent

"If there was ever a time for governments to know where their money is going, it is now." developments, and recommendations for moving the issue forward. Chair Richard Murphy addressed some of the technical elements of and dispelled claims against the practicality and implementation efficacy of <u>country-by-country reporting</u>. Mr. Murphy asserted that country-by-country reporting not only helps developing countries but <u>all countries</u>.

- Richard Murphy, Tax Research LLP Panelist Vanessa Herringshaw of Revenue Watch lauded the recent <u>Cardin-Lugar</u>
<u>Amendment</u> to the Dodd-Frank financial reform bill in the United States as a
significant gain for improving reporting in the extractive industries. She noted that the
bill would now have to be translated by the rule making process with an estimated

date for enforcement of 2012-2013. In moving ahead, Ms. Herringshaw identified listing, accounting, and sectoral and cross-sectoral approaches as key elements to holistic and effective reform.

<u>Keynote speaker: Ingrid Fiskaa, State Secretary,</u> Norwegian Ministry of Foreign Affairs

State Secretary Fiskaa addressed Task Force conference attendees over lunch on the first day of the conference. Ms. Fiskaa lauded growth and accomplishments of the Task Force noting that the Task Force is "becoming a global, and far-reaching entity, as it needs to be."

Ms. Fiskaa outlined Norwegian government initiatives that compliment the Task Force work including (1) establishment of a cross-ministerial working group and forum of vice ministers to address topics related to capital flows and development; (2) launch of a dialogue project to create more public debate on the issue of capital flows and transparency; and (3) creation of a five-year program to study tax havens, tax evasions, and the mobilization of tax revenue.

Breakout Session I

Financial Integrity/Honesty Index

During the first breakout session of the conference, Alex Cobham from Christian Aid unveiled a new research initiative underway to produce an index evaluating financial integrity based on four criteria: corporate financial integrity, beneficial ownership integrity, domestic beneficiary integrity, and integrity of international cooperation.

The purpose of the index will be to promote financial integrity as a global issue; draw together aspects of the problem, such as weak governance and deliberate and engineered financial secrecy; and measure more of the experience of how this impacts local people in their everyday lives.

Corrupt and Illicit - Solidifying the Linkage

Dr. François Valérian of Transparency International and Dr. Elizabeth Hart of the U4 Anti-Corruption project at the Chr. Michelson Institute held a session highlighting the role of corruption within the issue of illicit financial flows.

Legal corruption exists: individuals can find themselves on both sides of a deal without violating their domestic laws. Informal and opaque networks often advance their financial interests by using the discrepancy between what is formally condemned by law and most people would still consider unethical or immoral. Such behavior contributed to the 2008 global crisis. The financial planet is largely unified, but the legal planet is not, most of the law still being domestic. We as civil society organizations need to fight for the universal belief that no private practices should hurt public good. That belief is the foundation of the United Nations Convention against Corruption. Addressing contradictions between what governments say they do and what they actually do (or don't do) is one of our most pressing tasks.

The same is true of the contradictions within the private sector, where change is largely absent despite the signing of declarations and adopting of codes of conduct. One of our major challenges as a Task Force is to engage more with the business community. We advocate better value sharing in the absence of those who create that value. One of our main objectives in the year to come will be to find ways to better reach out to businesses and business organizations, such as WEF / PACI, UNGC, UNPRI or others.

Session III: Automatic Exchange of Tax Information

Panel chair David Spencer of the Tax Justice Network presented the case for the <u>automatic exchange</u> <u>of tax information</u> between nations, highlighting the link that illicit financial flows have to criminal activity. <u>Current OECD policy</u> that requires voluntary exchange of information only upon request is inadequate. The new US financial regulations requiring the international financial institutions to disclose US citizen's assets held abroad is a step in the right direction.

Stig Sollund from the Norwegian Ministry of Finance countered that the OECD has a multilateral convention facilitating the automatic exchange of tax information, and that the challenge now is drawing more countries into the conventions and assisting in the building of the institutional capacities necessary to handle such information.

"The ultimate test of what is feasible and obtainable is the will of each country."

Michel Aujean, a lawyer at Taj - Société d'avocats, spoke of the EU's experience, which ministry describes the importance of automatic exchange agreements while highlighting the necessity of harmonizing technical standards and definitions and encouraging the effective use of the information available. Mr. Aujean also noted that the U.S. does not collect info on bank deposits and interest paid on foreign, non-US treasury bonds.

- Stig Sollund, Norwegian Ministry of Finance

Breakout Session II

Progressing the G20

The second-round breakout session on "Progressing the G20" focused on the practicalities of attempting to get the Task Force's issues and recommendations onto the G20's agenda. Chair Robert Palmer (Global Witness) and panelists Dr. Jo Marie Griesgraber (New Rules for Global Finance) and Aldo Caliari (Rethinking Bretton Woods Project) argued that efforts need to be targeted, determining which member countries would be the most amenable or likely to be swayed by the Task Force's platform. Much of what can be done at a summit is set by the host country; the time to start addressing the next summit, which France will host in 2011, is now. It is also not too soon to begin outreach to Mexico, which will follow France. The Task Force's platform is widely applicable to many other issues that are currently getting attention. It will be imperative to draw as many groups together as possible, especially emphasizing the connections of illicit flows and development.

Millennium Development Goals

Chair Núria Molina (Eurodad) and Gail Hurley (United Nations Development Program (UNDP)) discussed the synergy between the agenda for the Millennium Development Goals (MDGs) and the Task Force's agenda for financial transparency. They pointed out that while MDG Goals 1-7 address the symptoms of poverty, MDG Goal 8, "A global partnership for development," addresses the underlying economic and financial imbalances, or the root causes of poverty. Thus Goal 8 offers an opportunity to combine the MDG development agenda with the agenda for financial transparency, the latter of which has not been fully exploited.

While the UNDP and other UN programs have taken steps to recognize the importance of illicit financial flows to the development agenda, action must to be taken to articulate the importance of this link. The opportunity to do so is two-fold. First, illicit capital undermines progress in development. Second, there is a development funding gap that is exacerbated by illicit capital flight and financial flows.

Keynote speaker: Hon. Dr. Rafael Espada, Vice President of Guatemala

Vice President, Dr. Rafael Espada explained his adoption of transparency as a primary theme of his Vice Presidency, starting with an understanding of the magnitude of Guatemala's loss of capital to trade mispricing, crime, and corruption.

The Vice President has promoted several reforms for greater transparency, including: The Freedom of Information Act (2008), Politically Exposed Persons Initiative (2009), Adherence to the Construction Sector Transparency Initiative (2009), Government Spending Surveillance Initiative (2010), Agreement with the United Nations Development Program Initiative (2010), establishment of the National Commission against Smuggling, and the National Commission Against Money Laundering.

The Vice President noted that 57 percent of the land in his country is owned by two percent of the population: "We are trying to work slowly and surely on the changes that we need to make."

The Vice President also highlighted the cooperation he has led with eight other Vice Presidents from the Latin American region on the areas of: transparency, financial reform, education, environmental reforms towards harmonization of reform.

Day Two

Keynote speaker: Gunnar Stølsvik, Head of Project, Norwegian national advisory group against organized IUU-fishing

Former Norwegian Coast Guard official Gunnar Stølsvik presented the issue of transnational crime in the fishing industry. IUU fishing is a nearly \$24 billion annual business, which amounts to about 140 million tons of fish caught illegally each year. The harmful impacts of this illicit activity include food security for impoverished coastal areas, pressure on fish stocks, loss of tax revenue, a distortion of the fish markets, and the creation of a black market for illegal fish.

Thus far IUU fishing has mainly been viewed as an issue of managing fish stocks, and the criminal side has been neglected. These ships are also known to be involved with human trafficking and the global drug trade, especially between Latin American and West Africa (and then on to European markets). In addition, the same methods used to launder the proceeds of IUU fishing are used to launder drug money and other illicit proceeds.

Tax havens and other non-cooperative jurisdictions facilitate this practice by taking the proceeds generated and by providing flags of convenience and impenetrable layers of secrecy for ship owners, thereby eliminating risk for engaging in IUU fishing. Greater transparency through the elimination of tax havens and the requirement of beneficial ownership information would go a long way towards tackling this issue.

Session IV: Predicate Offenses and the FATF

The panel on Anti-Money Laundering/Predicate Offenses and the Financial Action Task Force (FATF) addressed issues related to the harmonization of predicate offenses for money laundering, including tax evasion as a predicate offense, and the approach of the legal and accountancy field toward tax issues.

Panelist Lauren Pickett (Pickett and Associates) led the presentations by describing the differing roles of financial institutions and law enforcement in identifying and investigating suspicious financial transactions. Harmonization of predicate offenses would not change how financial institutions identified and evaluated suspicious activity, but it would give law enforcement a wider net with which to catch money launderers.

Daniel Thelesklaf (Basel Institute on Governance) cautioned against adopting an "all laws/crimes" approach to predicate offenses, favoring a well-defined "serious crimes" approach. He observed that some legal regimes made it illegal for women to own businesses, for independent newspapers to exist, etc. One of the main concerns today is that where predicate offenses are not harmonized, the illegal activity in one country can literally become the business model in another country.

Jack Blum (Tax Justice Network USA) continued this theme by presenting an example of a jurisdiction-shifting transaction and highlighting what he considers to be the biggest problem today: lawyers and accountants who assist clients in paying tax nowhere as a major portion of their activity and who believe that it is correct, it is proper and no questions can be raised about it. Adding tax evasion as a predicate offense for money laundering worldwide would also have the benefit of generating greater tax revenue for governments. Mr. Blum argued that it is critical to address, through ethical standards or law, the deleterious practices of the many lawyers and accountants who create and perpetuate tax avoidance and evasion plans.

Breakout Session III

Africa Initiative

Dr. Abdalla Hamdok from the UN Economic Commission for Africa (UNECA) began the discussing by summarizing the first year of the Task Force's Africa Initiative. Back in March (2010), Dr. Hamdok and Task Force Director Raymond Baker raised the issue of illicit flows in Africa at a meeting of African Union finance ministers in Lilongwe, Malawi. The AU has since tasked UNECA with investigating the issue further, and UNECA is looking into the possibility of establishing an Africa-wide commission on illicit financial flows at a high level. The goal of such a commission would be to develop a report and then bring it to a summit of African states.

Task Force Director Raymond Baker focused particular attention on the problem of <u>abusive transfer</u> <u>pricing</u> in Africa. Mr. Baker began his career in business in Nigeria in the 1960s where he learned first-hand how companies use abusive transfer pricing to pay bribes and shift profits abroad to avoid domestic taxes. Overall, Global Financial Integrity (of which Mr. Baker is also the director) has <u>estimated that \$850 billion in illicit money flowed out of Africa from 1970-2008</u>. The outflow for 2008 alone was \$80 billion, so the previous estimate is likely conservative. By a less conservative estimate, Africa may have lost upwards of \$1.8 trillion during this period.

Dr. Léonce Ndikumana from the African Development bank has been working on the issue of illicit financial flows in Africa with Dr. James Boyce (University of Massachusetts Amherst). Capital flight represents a huge untapped resource for development in Africa, but foreign aid is also still needed. Dr. Ndikumana expressed frustration with banks and politicians for their "willful blindness" when it comes to asset recovery and the beneficial owners of accounts. A collective effort is needed to stem the illicit capital flow from Africa and repatriate the money held in tax havens and secrecy jurisdictions.

Finally Chaïkou Diallo from the Guinean Ministry of Foreign Affairs and African Cooperation emphasized the importance of the issue of IFFs in Africa. Mr. Diallo expressed his support for an African Declaration on Illicit Financial Flows, and his government continues to support the Task Force, the African Union and others on this issue. Guinea looks forward to hosting the 2012 AU summit and will work with the Task Force to get IFFs on the summit's agenda.

Education Initiative/Program

Global Financial Integrity (GFI) Advisory Board Co-Chair and former Partner at PriceWaterhouseCoopers Krishen Mehta engaged conference participants in a discussion regarding the importance of an education initiative in the fight against IFFs. The goal of Task Force's Education Initiative will be to engage with the leaders of tomorrow to educate them on the current problem with illicit financial flows and how they can use transparency to avoid repeating the mistakes of past leaders.

Former senior bank executive and founder of the eStandards Foundation George Vojta was unable to attend at the last minute, but Mr. Mehta shared some thoughts Mr. Vojta had prepared. Mr. Vojta pointed out that the current financial crisis is caused by a dysfunction in the pool of human capital in which profits trump leadership. A solution to this crisis requires going beyond the symptoms and treating the underlying cause: insufficient transparency. Part of the problem is that business executives have coopted lawyers and accountants who would otherwise check the business' murky dealings.

Keynote speaker: Pierre Fallavier, Afghanistan Research and Evaluation Unit

During lunch on the second day of the conference, Pierre Fallavier discussed the perception of corruption in Afghanistan. Corruption is a major reason why the extremely poor remain poor in Afghanistan. Estimates of the amount of money lost to bribery in 2009 range from US\$700 million to US\$1 billion, while revenue losses due to tax evasion and bribery to avoid electricity and other infrastructure fees may be greater than the current budget of Afghanistan(!).

Until 2001, the international development community ignored corruption for the sake of maintaining political stability while international companies doing work in Afghanistan had little interest in curtailing the misuse of public funds from which these countries benefitted. Corruption has risen on the agenda of aid agencies, however, understanding local perceptions of corruption remains a major stumbling block to its curtailment. A recent study by the Afghanistan Research and Evaluation Unit breaks down local perceptions of corruption into four categories: petty corruption, grand corruption, institutional corruption, and locally unacceptable practices among the international community. These perceptions must be understood and incorporated into policy to effectively fight corruption in Afghanistan.

Session V: Trade Mispricing

The final Task Force recommendation up for discussion at the conference was the issue of trade mispricing, which chair Alex Cobham of Christian Aid deemed the biggest and most difficult issue thanks to unlimited potential instruments. In terms of scale, Task Force members Global Financial Integrity and Christian Aid estimate that tax losses from trade mispricing amount to \$160 billion per annum. This severe tax loss undermines good governance and development efforts in the Global South in particular.

Task Force Director Raymond Baker argued that very little in the way of new regulations are needed to curtail trade mispricing, as transparency would provide a built-in check on the system. Transfer pricing can be a legitimate business transaction, but it becomes illicit if the mechanism is abused to avoid VAT taxes or move money to eliminate profits in certain jurisdictions. Although an internationally-mandated solution is required to avoid loopholes, the OECD's "arm's-length principle" has not succeeded in curtailing trade mispricing. Instead the international community should push for greater transparency and availability of data on world prices to assist customs officers in determining if the price on an export or import invoice is the fair market value. Requiring banks and companies to sign off declaring the prices to be fair would bolster this effort by creating a potentially costly reputational risk. This will take considerable work over a sustained period, but creating a new system would be even more laborious and time consuming.

Breakout Session IV

Convention on Transparency

The recommendation for a convention on transparency comes from a June 2009 Norwegian Commission on Capital Flight from Developing Countries report on illicit financial flows from developing countries and tax havens. Norwegian Ministry of Foreign Affairs official and session chair Harald Tollan recognized that there are a number of other conventions already in place, but he argued that there is still a need for a new convention. The laws in tax havens and secrecy jurisdictions should not be permitted to undermine the tax collection and reporting laws in other countries.

Panelist Morten Eriksen, who works in the Economic Crime Unit of the Norwegian Police, argued that, based on his experience, the use of tax havens is increasing. Tax havens and secrecy jurisdictions have become the most well developed money laundering system in the world. Sometimes these jurisdictions

"The time has come to take action...not just in theory but in practice."

- Morten Eriksen, Economic Crime Unit of the Norwegian Police have cooperated with the Norwegian police to track the proceeds of crimes, but many times these areas have protected their clients instead of protecting the rule of law. The <u>OECD's system of information requests</u> has not been effective and should be supplemented by the convention on transparency. The way forward will be long; a convention is by no means a quick fix. These improper business practices and "treaty shopping" should not be tolerated.

Marios Obwana from the African Economic Research Council served as the third panelist and added to Mr. Eriksen's experiences with his own from Africa. He argued

that transparency is vital in order to fight corruption and promote good governance. Implementation of greater oversight has so far been lacking, thanks largely to weak institutions and political interference. On a positive note, the current trend in Africa towards greater regional integration could be used in the future to increase institutional capacity collectively. Political will, however, remains a series challenge.

Economic Transparency Initiative

During the final session of the 2010 annual conference, James Henry and Dev Kar discussed the importance of data availability on influencing policy. The movement of capital from the third world to tax havens has fuelled the accumulation of <u>offshore wealth</u>, which represents a significant source of potential (but lost) government revenue. The questions associated with the growth of tax havens are twofold: how much wealth is offshore, and what is the impact of offshore wealth on governments and ordinary people?

In order to answer these questions, data collected on offshore wealth must be made readily available to researchers and policymakers. Currently, data collected on these issues by the Bank of International Settlements is not publicly available, and other collectors of international data face problems of leveraging countries to collect and report this information. Action must be taken to improve both the collection and availability of data on offshore wealth, so that policymakers and the public can better understand the impact of tax havens on development, stability and prosperity.



Conclusion: Setting The Agenda For 2011

s the 2010 annual conference demonstrated, the Task Force has made a great deal of progress since it was initiated in January 2009. We have set the agenda for financial transparency with beneficial ownership, automatic tax information exchange, trade mispricing, country-by-country reporting, and harmonizing predicate offenses for anti-money laundering laws. We have also been successful introducing these recommendations to national and international press, and policymakers at the World Bank and the UN and other domestic and transnational governing bodies have begun using our lexicon. Having fairly firmly established the problem and the solutions, now we must focus our energy as a community on overcoming the roadblocks to implementing our recommendations.



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Central AfricanIndiaNigeriaRepublicItalyNorwayChileJapanPoland

Congo Jordan Sao Tome and Principe

Cote d'Ivoire Lebanon Saudi Arabia
Cyprus Liberia Senegal

Allied Organizations

5th Pillar (USA)

Aakar Trust (India)

Afghanistan Research and Evaluation Unit (Afghanistan)

Africa Centre for Open Governance (AfriCOG) (Kenya)

African Citizens Development Foundation (Nigeria)

African Monitor (South Africa)

African Network for Environment and Economic Justice (Nigeria)

African Solutions to African Problems (ASAP) (South Africa)

Anti Corruption Committee (India)

Article 19 (United Kingdom)

The Association on Third World Affairs (USA)

Bangladesh Enterprise Institute (Bangladesh)

BankTrack (The Netherlands)

Berne Declaration (Switzerland)

Brazilian Development Bank (Brazil)

Campagna per la Riforma della Banca Mondiale (Italy)

Campaign for America's Future (USA)

Catholic Agency For Overseas Development (CAFOD) (United Kingdom)

Center for Economic and Social Development (Azerbaijan)

Center for Peace and Development Initiatives (Pakistan)

Center for Research, Innovation and Training (CRIT) (Nepal)

Centre for Development Studies and Activities (India)

Centre for Transforming India (CFTI) (India)

Charities Aid Foundation India (CAF India) (India)

CIDSE (Belgium)

Development Action Group (DAG) (South Africa)

Dream A Dream (India)

Economic Justice Network (South Africa)

Edmund Rice International (Switzerland)

Empowerment Gateway (Portugal)

Empowerment Through
Research and Action (ETRAC)
Foundation (India)

eStandardsForum (USA)

Ethics Institute of South Africa (EthicSA) (South Africa)

Ethiopian Economic Association (Ethiopia)

Experts in Responsible Investment Solutions (EIRIS) (United Kingdom)

Fantsuam Foundation (Nigeria)

The Fight Against Corruption (South Africa)

Foreign Policy in Focus (FPIF) (USA)

Forum Syd (Sweden)

The Foundation for the Development of Africa (South Africa)

Global Concerns India (India)

Global Health Council (USA)

Global Network for Good Governance (Cameroon)

Gram Bharati Samiti (India)

HELIO International (France)

Hope for the Nations (Canada)

Indian Council for Research on International Economic Relations (ICRIER) (India)

Indo-Global Social Service Society (India)

Indonesia Corruption Watch (ICW) (Indonesia)

INSEC (Nepal)

Institute of Rural Research and Development (IRRAD) (India

Integrity Watch Afghanistan (Afghanistan)

Interfaith Center on Corporate Responsibility (USA)

International Trade Union Confederation (Belgium)

JOINT Liga de ONGs em Mocambique (Mozambique)

Kenya Anti-Corruption Commission (Kenya)

Kenya Debt Relief Network (Kenya)

Continued



Allied Organizations

LATINDADD (Peru)

The Lebanese Transparency Association (Lebanon)

Les Enfants D'Abord (Children First) (France)

Lokoj Institute (Bangladesh)

Malaysian Society for Transparency and Integrity (Malaysia)

MANS (Montenegro)

Maryknoll Office for Global Concerns (USA)

MediaGlobal (USA)

Missionary Oblates JPIC (USA)

New Economics Foundation (United Kingdom)

The Oakland Institute (USA)

Olive Leaf Foundation (South Africa)

Outreach International (USA)

Pakistani Institute of Legislative Development & Transparency (Pakistan)

Partnership For Transparency Fund (USA)

Partners in Change (India)

PRAGATI (India)

Praxis (India)

Profundo (The Netherlands)

Pro Public (Nepal)

Publish What You Fund (United Kingdom)

Research on Poverty Alleviation (*Tanzania*)

Revenue Watch Institute (USA)

Saath Charitable Trust (India)

SANGOCO (South Africa)

SHERPA (France)

Social Activities for Rural Development Society (SARDS) (India)

Social Development Network (Kenya)

Society for All Round Development (India)

Society to Uplift the Rural Economy (SURE) (India)

South Asia Alliance for Poverty Eradication (Nepal)

TANGO (Tanzania)

Tiri (United Kingdom)

Transnational Institute (The Netherlands)

Transparence International France (France)

Transparency Ethiopia (Ethiopia)

Transparency International Indonesia (Indonesia)

Transparency International Kenya (Kenya)

Transparency International Nepal (Nepal)

Transparency International Pakistan (Pakistan)

Transparency International Philippines (*Philippines*)

Transparency International Thailand (*Thailand*)

Transparency International Uganda (Uganda)

Transparency Maroc (Morocco)

Transparency Zero Corruption (Macedonia)

UniversalGiving (USA)

USAction (USA)

VOICE (Bangladesh)

World Business Academy (USA)

World Policy Institute (USA)

Youth Partnership for Peace and Development (Sierra Leone)

