



FIRST MONITORING REPORT
OF THE G20 ANTI-CORRUPTION WORKING GROUP TO G20 LEADERS
ON INDIVIDUAL AND COLLECTIVE PROGRESS MADE BY G20 COUNTRIES
IN THE IMPLEMENTATION OF THE SEOUL ACTION PLAN

INTRODUCTION

1. **In November 2010, G20 Leaders adopted an Action Plan to ensure that the G20 ‘leads by example’ in the fight against corruption.** The G20 Anti-Corruption Working Group (hereafter ‘the Working Group’) was tasked with the implementation of this Action Plan and to respond to the call from Leaders at the Seoul Summit for ‘reports, agreed within the working group, on individual and collective progresses made by G20 countries in the implementation of the Action Plan to be submitted on an annual basis to the G20 Leaders for the duration of the Action Plan with a first monitoring report for Leaders at the next Summit in France.’
2. The report is based on both **progress made by G20 countries and work taken forward by the Working Group.** The first section of this Report provides **an assessment of the collective progress made by the Working Group and the G20** in the implementation of the Action Plan and signals what further work is required. The second section highlights some specific examples of **significant individual country progress** that the Working Group agreed should be recognised. A snap shot of individual country progress against the main aspects of the Action Plan, based on the responses provided to a questionnaire, can also be found at the end of the report. The third section of the Report draws out **a set of recommendations for consideration by Leaders** to ensure that G20 countries continue to make positive progress against the Action Plan.
3. The World Bank, OECD, UNODC, IMF and FATF, as well as the WTO have provided valuable technical advice to the Working Group to support the progress outlined in this report. The Co-chairs of the Working Group have also received useful input and suggestions on an informal basis from relevant non-governmental organisations.

I. GENERAL COLLECTIVE ASSESSMENT OF PROGRESS MADE SINCE SEOUL

4. The Working Group has met four times (twice in Indonesia and twice in France), with a number of conference calls in-between. Members also participated in the conference ‘Joining Forces Against Corruption: G20 Business and Governments’, on 27-28 April 2011 in Paris, organised by the French Presidency of the G20 and the OECD, with support from the UNODC.
5. Members agreed to operate on the basis of the following **four principles**:
 - i. to stick to the Action Plan;
 - ii. to focus on concrete actions;
 - iii. to avoid duplication; and
 - iv. to be realistic about what could be achieved in terms of timeframe and resources, including to only focus on actions that could be delivered within a 2 year time frame.

Key areas of progress

6. The following is an assessment of the collective progress made by the Working Group and the G20 countries in the implementation of the main areas of the Action Plan and what further work remains to be done in the following four areas: 'The implementation of the international legislative framework', 'National measures to prevent and combat corruption', 'International cooperation' and 'public-private partnerships'.

➤ The implementation of the international legislative framework

Action points 1 and 2 of the Action Plan relate to the commitment made by G20 leaders to ratify or accede, and fully implement UNCAC as soon as possible and to adopt and enforce laws and other measures against international bribery, and by 2012, on a voluntary basis, to have more active engagement with the OECD Working Group on Bribery, with a view to the future ratification of the OECD Convention.

7. **Seventeen G20 countries have ratified and implemented UNCAC; fifteen are party to and have implemented the OECD Anti-Bribery Convention.** One country has become a full member of the OECD Anti-bribery Working Group (OECD WGB) in 2011, while three others have regularly participated in its activities. G20 Countries have also continued to participate in the UNCAC and OECD peer review processes. Six G20 countries have now undergone an UNCAC review and those still outstanding are scheduled to take place by 2014. Fifteen G20 countries have undergone Phase 1 and Phase 2 OECD reviews. Ten have undergone the Phase 3 reviews evaluating their foreign bribery framework and enforcement efforts.
8. However, **whilst progress has undoubtedly been made in the past year, there is still more to be done.** The Working Group agreed, as a priority, to 1) ensure that those countries that have not already done so, fully ratify and implement the UNCAC Convention and adopt legislation combatting international bribery, 2) foster more active engagement within the OECD WGB by countries that are not already party to the OECD Convention, with a view to future ratification, and 3) ensure that the implementation and enforcement of the conventions are effectively reviewed. It was discussed whether those countries that have not done so already could commit to a deadline to this end at the Cannes Summit. All G20 countries will continue to encourage both G20 and non-G20 countries to make progress in this area.
9. **The Working Group has also taken further action to support the effective implementation of the UNCAC and OECD conventions.** The Working Group has encouraged G20 countries to participate in technical assistance and awareness seminars/events. The UNODC and the OECD provided details of their workshops and conferences on best practices and technical assistance on the implementation of the conventions. Indeed, several G20 countries have partnered with international organisations to jointly host events. For example, the OECD and KPK (Indonesia's Anti-Corruption Authority) jointly hosted a Conference on Combatting Foreign Bribery in international Business Transactions on 10-11 May 2011, and the OECD, Asian Development Bank and Indian Government jointly hosted a similar Conference on 27-30 September 2011.
10. **The Working Group also discussed an assessment of the first round of UNCAC Reviews and looked at ways to strengthen them further.** In particular, the Working Group agreed that G20 countries should lead by example in these reviews by enhancing transparency and inclusivity, through considering the voluntary options in accordance with the Terms of Reference of the Mechanism.

11. Finally, with regards to the fight against foreign bribery, the Working Group agreed that, in addition to legislative and enforcement efforts, those who do not already do so, should commit to engage more actively within the OECD WGB meetings, and participate in OECD workshops and seminars.

➤ **National measures to prevent and combat corruption**

Action points 3, 7, 8 and 9 of the G20 Anti-Corruption Action Plan relate to the commitments made by leaders to implement domestic measures to prevent and combat corruption. This includes the implementation of measures relating to: preventing and combating money laundering; protecting whistleblowers in the public and private sector; strengthening the effective functioning of national anti-corruption authorities; and promoting integrity in the public sector.

12. Preventing corrupt officials from accessing the global financial system and from laundering the proceeds of corruption is critical to the fight against corruption. **G20 members have worked actively with FATF to emphasize the importance of Anti Money Laundering tools**, with the first FATF Experts Meeting on Corruption taking place on 27th February 2011 in Paris, bringing together both AML and anti-corruption experts for the first time. G20 members also welcome FATF work on ‘typologies’ on the laundering of the proceeds of corruption, its efforts to identify those jurisdictions with strategic AML deficiencies and its on-going work to identify best practices and devise guidance on anti-corruption. The Working Group also supports the adoption by the FATF of its comprehensive work plan on anti-corruption, and commends the agreed proposals for implementation by G20 members and international organisations. The on-going revision of the FATF Standards provides a key opportunity to step up international efforts, in particular on beneficial ownership, politically exposed persons, confiscation, international cooperation, and the inclusion of the UNCAC standards into the FATF recommendations. It will be important for G20 Leaders to step-up their political support to ensure that an ambitious revision of the FATF Recommendations is agreed by no later than February 2012.
13. **G20 countries have committed to enact and implement whistleblower protection rules by the end of 2012.** Thirteen G20 countries already have relevant whistleblower protection legislation in place for the private sector, and fourteen for the public sector. Many countries are in the process of strengthening existing whistleblower protection measures or introducing legislation. In order to support the development and implementation of legislation in all G20 countries by the end of 2012, the Working Group asked the OECD to elaborate a study of whistleblower protection legislation and enforcement mechanisms, a compendium of best practices, and suggest a set of guiding principles for legislation.
14. **Anti-corruption bodies or enforcement authorities (ACAs) are critical for the effective implementation of anti-corruption policies.** The Working Group has based its work on a study from the World Bank on anti-corruption authorities which identifies key requisites for a more effective functioning of ACAs, and their policy implications. This includes the endorsement of a set of best practices for the effective functioning of ACAs identified by the World Bank. One critical lesson is that **strong and sustained political support for these bodies from leadership to middle management is essential for them to be effective and operate free of undue influence.**
15. Finally, G20 Leaders have committed ‘**to promote integrity, transparency, accountability and the prevention of corruption, in the public sector, including the management of public finances**’. However, the Action Plan does not flesh out in detail what concrete action this entails. On the back of advice from the international organisations, the Working Group has agreed that in order to progress the G20 should make commitments in three areas: **Promoting the integrity, honesty and accountability of all public officials; adopting fair and transparent government procurement systems; and committing to fiscal and**

budgetary transparency. Specific commitments for Leaders to consider are outlined in Section III of this report.

➤ **International cooperation**

Action points 4, 5 and 6 of the G20 Anti-Corruption Action Plan relate to the commitments made by G20 Leaders to strengthen international cooperation to:

- deny entry and safe haven in G20 jurisdictions to corrupt officials and those who corrupt them;
- promote the UNCAC provisions and the signing of bilateral and multilateral treaties relating to extradition, mutual legal assistance and asset recovery;
- support the recovery of the proceeds of corruption stowed abroad; and
- ensure that the International organisations operate with transparency, high ethical standards, effective internal safe guards and the highest standard of integrity.

16. With a view to developing a cooperative framework to deny entry and safe haven to corrupt officials, **the Working Group has carried out a review of existing practices and barriers to the denial of entry of corrupt officials into G20 countries.** However, the legal basis and enforcement of these powers differ greatly across G20 members and coordination between national governments is not sufficient enough to make this an effective deterrent from corrupt practices by individuals operating on a global scale. As a result, the group has agreed to develop **a set of common principles for national measures to deny entry to corrupt officials for discussion in early 2012.** The implementation of these principles at the national level, in accordance with each country's own legislative framework, should provide the foundation for a stronger international framework for the denial of entry and safe haven of corrupt officials.
17. In the areas of extradition and mutual legal assistance, the Working Group has been pursuing progress on two fronts: 1) **a self-assessment of the capacity of G20 countries to undertake successful extradition and mutual legal assistance with other G20 members in corruption matters.** As a result the Working Group is reviewing priority areas of action, and potential innovations, to strengthen such capacity and facilitate international cooperation; and 2) the Group is now producing **a G20 step-by-step guide** (based on existing work in other fora) **to mutual legal assistance to support improved international cooperation against corruption.**
18. International cooperation to support the recovery of the proceeds of corruption has been a subject of particular interest in 2011, even more so in relation to recent events in the MENA region. The Working Group has made progress on a number of fronts **to strengthen the G20 capacity to carry out and support successful asset recovery.** The Working Group has looked at operational mechanisms to support effective asset recovery. With the support of the World Bank and UNODC, contact points were designated for i) StAR/Interpol, ii) UNCAC Asset Recovery and iii) UNCAC Central Authority Notification, ensuring that the names and contact details of these people are readily accessible to all those who require them. **This will help ensure that there are clear and effective channels for international cooperation on asset recovery.**
19. However, inadequate national measures and weak international cooperation continue to raise barriers to effective asset recovery. Building on the work of the StAR initiative as well as the review of G20 members' capacity to trace corrupt assets, **the Working Group agreed on the key elements of an effective framework and a set of principles for asset recovery to be implemented by G20 members.**
20. Finally, the integrity of the international organisations and their operations is a significant contribution to the fight against corruption. **The Working Group welcomed the launch of the Multilateral Development Banks' cross-debarment database,** which publically lists all companies ineligible to be awarded an MDB contract for the periods indicated because they have been sanctioned under their fraud and corruption policy. More broadly, in order to ensure the integrity of the international organisations, **the Working Group has also supported the UN Institutional Integrity Initiative.** The co-chairs of the Working Group

have written to the UN on behalf of the G20, calling on the UN to push forward this initiative and to promote wider implementation. The Working Group has also expressed its support for current World Bank exercise to benchmark IO ethics offices.

➤ **Public-private partnerships**

Recognizing the pivotal role that the private sector plays in the fight against corruption, the G20 Leaders called for a strengthened partnership between the public and the private sector for jointly developing and implementing initiatives to fight corruption.

21. **The Conference on *Joining Forces against Corruption: G20 Business and Government*, co-organised by the G20 French Presidency and the OECD, with the support of UNODC**, on 27-28 April 2011 in Paris, provided, for the first time, a platform for high-level executives and government officials of all G20 countries to examine best practices and other forms of business engagement in combating corruption and to consider how G20 businesses could share their on-going efforts. All G20 members were represented at this conference.
22. This dialogue with the private sector has helped to identify a number of priority areas where G20 countries and businesses can work better together to fight corruption. Issues discussed included: supporting the collection of **more easily accessible guidance and compliance tools for businesses; supporting and implementing sectoral initiatives such as the Extractive Industries Transparency Initiative (EITI)** and the promotion of other initiatives in sensitive sectors, such as CoST in the construction sector; putting in place more reliable government systems that **reward good behaviour and voluntary disclosure by businesses; streamlining the public procurement system**; and the need for a **continuous dialogue between the public and private sector**. The G20 Business Summit (B20) will provide the opportunity to further discuss these issues through a pledge by companies to complement G20 efforts to fight corruption.

II. SPECIFIC EXAMPLES OF INDIVIDUAL COUNTRY PROGRESS MADE SINCE SEOUL

Since the adoption of the Seoul Action Plan, significant progress has been made, in particular in respect of the adoption of legislation, in the following G20 countries:

- **China** amended its criminal code in February 2011 introducing foreign bribery as an offence. It has also hosted in cooperation with the OECD a technical seminar to discuss the establishment of a foreign bribery offence (October 2010) and has participated in several meetings of the WGB. A second seminar is currently in preparation that will focus on international cooperation against foreign bribery.
- **In the EU**, an anti-corruption package was adopted by the European Commission in June 2011, through which an EU anti-corruption reporting mechanism was set up, for periodic evaluation of EU Member States' efforts against corruption, including through further compliance with regional and international commitments.
- **India** has ratified UNCAC on 1 May 2011. As part of its implementation package of UNCAC, it has introduced a bill in Parliament criminalizing foreign bribery in March 2011. As a member of the ADB/OECD Anti-Corruption Initiative for Asia and the Pacific, it hosted the 16th Steering Group meeting and 7th Regional Conference of the ADB/OECD Initiative co-organised with the OECD in September 2011.

- **The Republic of Korea** enacted a law protecting whistleblowers in the private sector which entered into force on 30 September 2011.
- **Russia**, enacted a new legislation, improving the public governance in counteracting corruption in criminalizing foreign bribery, including intermediation in bribery. Russia is now a full participant in the OECD WGB and is expected to adhere to the Convention soon.
- **Saudi Arabia** established in May 2011 a National Anti-corruption Commission to deal with all forms of financial and administrative corruption. It has been invited to attend the 2011 December plenary meetings of the OECD WGB.
- **The United Kingdom's** Bribery Act, which modernized and strengthened its foreign bribery offence, entered into force on 1 July 2011. This followed the issuance of the official guidance for the private sector on procedures that commercial organisations can put in place to prevent bribery on their behalf.
- **The United States'** Dodd-Frank Act (January 2010) requires resource extraction issuers to disclose information relating to payments made by the issuer, or by a subsidiary, to a foreign government for the purpose of the commercial development of oil, natural gas, or minerals, aimed at improving the effectiveness of transparency in specific areas and established whistleblower protection in the private sector.
- Important steps have also been taken in **other countries** with a view to strengthening anti-corruption efforts. This includes: the introduction of a bill to address misconduct and accountability in the judiciary and an ombudsman law in **India**; the drafting of a new anticorruption law , including a foreign bribery offence, the enactment of a new anti money laundering legislation which entered into force in July 2011, and the successful organisation of an international conference with the OECD on the bribery of foreign public officials in **Indonesia**; the establishment of a multi-agency Criminal Assets Confiscation Taskforce in **Australia**; the establishment of an anti-corruption task team and a special anti-corruption unit in **South Africa**; the conclusion of MLA treaties and an amendment to anti-money laundering legislation in **Japan**; a bill introducing corporate liability and the enactment of a new anti-money laundering legislation which entered into force in June 2011 in **Argentina**; the proposal of a new law for enhancing the transparency of political party finance and election campaigns and an ombudsman law in **Turkey**; and, the introduction of bills to strengthen money laundering and counter terrorist financing efforts and to protect whistleblowers in the private sector in **Mexico**.

III. KEY RECOMMENDATIONS TO THE LEADERS

To ensure the effective implementation of the G20 Anti-Corruption Action Plan and encourage further progress and action to combat corruption, promote market integrity and support a clean business environment, the Working Group recommends that Leaders consider the following commitments for adoption at the Cannes Summit:

1. **In order to lead by example in the fight against corruption through the ratification and implementation of international anti-corruption conventions and the adoption of legislation criminalizing foreign bribery, G20 members:**
 - Commit to accelerate, in accordance with the commitments of the Action Plan, their efforts to ratify and fully implement the UNCAC, with a view to doing so as soon as possible.

- Commit to lead by example in ensuring the transparency and inclusivity of UNCAC reviews by considering the voluntary options in accordance with the Terms of Reference of the Mechanism.
- Commit to enact and proactively implement, and enforce legislation criminalizing foreign bribery by end 2012.
- Commit to engage within the OECD Working Group on Bribery by actively participating in its plenary meetings and jointly hosting conferences and seminars with the OECD, with a view to adhering to the OECD Convention.

2. In order to ensure that G20 countries have the relevant ‘toolbox’ of measures to fight impunity and deter illicit financial flows and the movement of persons linked to corruption in the areas of anti-money laundering, denial of entry, asset recovery, whistleblower protection and strengthened anti-corruption authorities, G20 members:

- Fully support the on-going work of the FATF on the synergies between AML/CFT and anti-corruption efforts, in particular joint meetings of FATF and G20 Anti-Corruption experts, the identification of jurisdictions with strategic AML/CFT deficiencies and look forward to the revision of the FATF recommendations on issues such as customer due diligence, beneficial ownership, transparency in cross-border wire transfers, enhanced due diligence measures on “politically exposed persons”, and the inclusion of the UNCAC standards into the FATF recommendations by February 2012. As well as calling on the FATF to present the new set of recommendations to Leaders at their next Summit, so that G20 members can commit to full, effective and consistent implementation.
- Develop with a view to adopting a set of principles relating to the denial of entry and safe havens for corrupt officials and during 2012 consider how to promote their implementation by all G20 members.
- Adopt the key elements of an effective framework and set of principles for asset recovery.
- Support the compendium of best practices and guiding principles for whistleblower protection legislation, prepared by the OECD, as a reference for enacting and reviewing, as necessary, whistleblower protection rules by the end of 2012.
- Pledge to support fully the important work of anticorruption bodies and authorities involved in combating corruption. Such bodies, in our countries and abroad, must be free from the undue influence or threat of government or non-government actors, should be provided proper independence and adequate resources to accomplish their tasks, and should operate within a clearly defined institutional framework. G20 Leaders will use their voices, coordinating where possible, to express concern when such freedom from undue influence is curtailed, and will encourage initiatives to build the capacity of anticorruption bodies and authorities, to capture knowledge about the factors that enable their effectiveness, and to foster cooperation among them.

3. In order to promote integrity, transparency and accountability in public sector work to prevent corruption, promote good governance and ensure that public resources achieve their intended purposes, G20 members:

Promote the integrity, honesty and accountability of all public officials, in particular:

- promote education and training on ethical behaviour and the prevention of corruption in the public sector;
- establish and enforce relevant codes of conduct (e.g. on conflicts of interest, the receipt of gifts);
- adopt and implement financial and asset disclosure systems for relevant officials to prevent, identify and appropriately manage conflicts of interest.

Adopt fair and transparent government procurement systems, in particular:

- consistent with UNCAC Article 9, and taking into account, where appropriate, the OECD Recommendation on Enhancing Integrity in Public Procurement, ensure that their public procurement systems are fair and transparent by:
 - o systematically publishing all relevant, non-confidential, information relating to the entire procurement process;
 - o emphasizing a competitive bidding process that allows all qualified bidders to submit bids.
 - o allowing bidders sufficient time to prepare and submit their tenders, taking into consideration the complexity of the intended procurement;
 - o using objective and predetermined criteria for public procurement decisions, and making these criteria available to the public;
 - o establishing a clear chain of responsibility and accountability for the procurement process, and ensuring that the officials involved meet high professional standards of knowledge, skills and integrity;
 - o establishing an effective system of domestic review and monitoring of public procurement, including effective challenge procedures;
 - o establishing procedures that allow for the suspension of private sector entities involved in corrupt practices from participation in public tenders.

These principles could also be implemented by parties to the WTO Government Procurement Agreement through the relevant non market access provisions of the Agreement.

Commit to fiscal and budgetary transparency, in particular:

- publish their budgets in a timely, comprehensive and reliable way, ensuring that the content is accessible and understandable to the general public.
- allow for the publication of relevant International Financial Institutions' reports on G20 country's public sector finances when authorised by the country.
- adopt good practices in fiscal transparency, consistent with the principles of clarity of roles and responsibilities, open budget processes, public availability of information, and assurance of integrity, in line with the IMF Code of Good Practices on Fiscal Transparency.

To ensure the effective implementation of these commitments, G20 countries will:

- assist G20 governments in implementing the above measures with capacity building and technical assistance from the IMF, World Bank, UNODC and OECD where appropriate;
- endeavour to make use of the relevant IMF fiscal transparency ROSC assessment, World Bank public financial management, procurement and governance reviews, UNCAC Gap and Compliance Analysis and OECD Integrity Review, encouraging the publication of any final report from such assessments when authorised by the country.

4. In order to strengthen the partnership between the public and the private sector for jointly developing and implementing initiatives to fight corruption, G20 members:

- Welcome the engagement of the private sector and their commitment to strengthen their efforts in the fight against corruption. In particular, we look forward to the outcome of their work to be finalized by the Cannes Summit, including their call to build on the Seoul Action Plan, to strengthen and formalize the on-going dialogue between the public and private sector, and to come forward with a multi-year program of innovative proposals.
- Strengthen the commitment to support or implement initiatives such as EITI and CoST and encourage companies in the extractive industry to disclose their payments to governments in countries where they operate.

- Acknowledge and look forward to the on-going work by the OECD, World Bank, UNODC and other relevant organisations to bring together existing guidelines and related material on private sector anti-corruption compliance in one, easily accessible, location.
- Call for engagement between the G20 and the private sector on an annual basis, based on the model of the Conference ‘Joining Forces against Corruption: G20 Business and Governments’, co-organised by the French Presidency of the G20 and the OECD, with the support of UNODC, held in Paris on 27-28 April 2011.

5. In order to further strengthen international cooperation, G20 members:

- Call for the elaboration of a G20 Step-by-Step Guide to mutual legal assistance for endorsement by Leaders at the next Summit.
- Agree to further promote the use of UNCAC as a basis for extradition, mutual legal assistance and asset recovery, and offer technical assistance where needed and to encourage the use, and promote the understanding of bilateral and multilateral treaties on extradition, mutual legal assistance and asset recovery.
- Support the World Bank and UNODC Stolen Assets Recovery Initiative, and call for G20 governments to take additional concrete steps to further its impact and other asset recovery efforts, by fully supporting and initiating all legal action aimed at tracing, freezing, confiscating and ultimately recovering and returning stolen assets in line with the UNCAC, including assets transferred to opaque legal entities and stolen assets owned or used by political leaders still in office.
- Endorse the establishment of contact points for asset recovery, welcome the network of asset recovery focal points supported by StAR and Interpol, and ask for further work to be done to further improve channels of communication and international cooperation for asset recovery, extradition and mutual legal assistance, where necessary.
- Call on the international organisations to fully implement UN Institutional Integrity Initiative (III) and find ways to ensure its widest possible implementation.

6. Call for progress on all of these fronts to continue to be maintained and for all efforts to be made to fully and consistently implement the commitments of the Action Plan by the end of 2012 within the two year time frame and consider further action to effectively combat corruption. For that purpose, reports, agreed within the working group, on individual and collective progresses made by G20 countries in the implementation of the Action Plan will continue to be submitted on an annual basis to the G20 Leaders for the duration of this Action Plan. The Anti-Corruption Working Group will prepare a monitoring report in 2012 for the Leaders during the Mexican Presidency of the G20.

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First Monitoring Report

		Aus.	Arg.	Brz.	Can.	Chn.	Fr.	Ger.	India	Indo.	It.	Jpn.	Kor.	Mex	Rus	Saf.	SAr.	Spa.	Tur.	UK	US	
UNCAC	Ratification and accession	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	X	✓	✓	✓	✓	X	✓	✓	✓	✓	
	UNCAC review (nb all UNCAC Parties with 'x' have reviews scheduled in the next 3 years)	X	✓	X	X	X	✓		X	✓	X		X	✓	X	X	X	✓	✓	X	✓	
	Past and scheduled reviews	Publication	✓	✓	✓	✓	X	✓		✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
		Civil Society involvement	✓	✓	✓	✓	X	✓		✓	✓	✓	✓	✓	✓	X	✓	✓		✓	✓	✓
		Country visits by review team	✓	X	✓	✓	X	✓		✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
	Party to other anticorruption instruments (regional or other)	✓	✓	✓	✓	✓	✓	✓	X	X	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	
	Criminalization of domestic bribery	Active	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
		Passive	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Criminalization of private sector bribery	Active	✓	X	X	✓	✓	✓	✓	X	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
		Passive	✓	X	X	✓	✓	✓	✓	X	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓
	Corporate liability	✓	X	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	Liability for failure to prevent corruption by senior management	✓	X	X	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	X	✓	✓	X	✓	✓	✓	✓
Public access to enforcement information	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	
Foreign Bribery	Criminalization	✓	✓	✓	✓	✓	✓	✓	X	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Party to OECD ABC	✓	✓	✓	✓	X	✓	✓	X	X	✓	✓	✓	✓	X	✓	X	✓	✓	✓	✓	
	OECD peer reviews	✓	✓	✓	✓	X	✓	✓	X	X	✓	✓	✓	✓	X	✓	X	✓	✓	✓	✓	
	Participation in OECD WGB	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Hosting events with OECD on foreign bribery	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	X	X	✓	✓	✓	
AML and Corruption	Member of FATF or FATF style body	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	FATF or FSRB mutual evaluation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Public access to evaluation assessment	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Follow-up to R5 (due diligence)	X	X	X	X	✓	X	✓	X	✓	✓	✓	✓	✓	X	X		✓	X	✓	✓	
Denial of entry	Power to refuse visa or entry for corruption related offences (CRO)	✓	✓	✓	✓	✓	X	✓	X	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Power to refuse visa or entry without conviction based on corruption related	✓	✓	X	✓	✓	X	✓	X	✓	X	X	✓	✓	X	✓	✓	✓	✓	✓	✓	
	Instances of refusal for corruption or associated offences	✓		X	✓	✓	X		✓	X	X		X	X	X	✓		✓	✓	✓	✓	

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First Monitoring Report

		Aus.	Arg.	Brz.	Can.	Chn.	Fr.	Ger.	India	Indo.	It.	Jap.	Kor.	Mex	Rus	SAf.	SAr.	Spa.	Tur.	UK	US	
International Cooperation	Prompt and effective MLA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Instances of use of UNCAC as basis for MLA or extradition	✓	✓	X	X		X		X	✓			X	X	✓	X		✓	✓	X	✓	
	CRO basis for extradition	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
Asset Recovery	CRO predicate for money laundering	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	Measures to identify and trace proceeds of CRO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	Measures to freeze proceeds of CRO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	Measures to confiscate proceeds of CRO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Measures and policies to return stolen assets	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	X	✓	✓	✓	✓	
	Establishment of channels for MLA and other int'l coop.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	Participation in multilateral networks	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Legislation for protection of whistleblower	In the private sector	✓	X	X	✓	✓	✓	X	X	✓	X	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	
	In the public sector	✓	X	X	✓	✓	X	✓	X	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Strengthening ACAs	Existence of specialized authorities	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Functions of ACAs	1)prevention		✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
		2) research and coordination		✓	✓	X	✓	✓		✓	✓	✓	X	✓	✓	✓	✓	X	✓	✓	✓	X
		3)investigation		✓	✓	✓	✓	X		✓	✓	X	✓	✓	✓	✓	✓	X	✓	✓	✓	✓
		4)prosecution		✓	X	✓	✓	X		✓	✓	✓	✓	X	✓	✓	✓	X	✓	X	✓	✓
		5) asset recovery		X	X	✓	✓	X		✓	X	X	X	X	✓	✓	✓	X	✓	X	✓	✓
Public sector integrity	Codes of conduct for public officials (PO)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Training of PO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Mandatory reporting by PO for alleged acts of corruption	✓	✓	✓	X	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
	Measures to prevent conflicts of interest	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	X	✓	✓	✓	✓	
	Asset disclosure by PO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	
	Measures for integrity of public procurement	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	Legal right to public access to government information	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	
	UNCAC Gap and Compliance analysis undergone or requested	✓	X	X	X		X	X	X	✓	✓	X	X	X	X	X	X	X	X	✓	X	X
	OECD Integrity Review	X	X	✓	X		X	X	X	X	X		X	✓	X	X	X	X	X	X	X	X
Public private partnerships	Participation in other anti-corruption initiatives	✓	✓	✓	✓		✓	✓	✓		✓	✓			✓	✓		✓	✓	✓	✓	