

Mme Florence Jeanblanc-Risler,
Special Representative of the Director General of
The Treasury for International Affairs,
Ministry of Economy, Finance and Industry,
Republic of France.

Mr. Mochammad Jasin,
Vice-Chair,
Corruption Eradication Commission (KPK),
Republic of Indonesia.

25 August 2011

Dear Mme Jeanblanc-Risler and Mr. Jasin,

In February of this year we wrote to you welcoming the G20's Anti-Corruption Action Plan that was announced at the November 2010 Seoul Summit. We continue to support your work as a catalyst for global action against corruption, drawing on existing anti-corruption initiatives, in particular the United Nations Convention Against Corruption (UNCAC).

Since the Action Plan was released, the Arab Spring has highlighted the disastrous and destabilising impact of the abuse of entrusted power for personal gain. These events show the urgency of promoting good governance and transparency, recovering looted assets and bringing the corrupt to justice. The G20 is well placed to lead these efforts.

UNCAC provides a key framework for the fight against corruption and we are delighted to see that India has ratified the Convention and a number of G20 members have made new commitments to implement sections of the treaty. This should be recognised as an early success for the Working Group. If enabled, civil society could make an important contribution to the effective implementation of the Convention by making submissions to the onsite review teams and the Implementation Review Group. In addition, enhancing the transparency of the UNCAC review process by publishing the government focal points, review schedules, self-assessment checklists as well as full country reports would further improve its accountability. Ratification and implementation of UNCAC, combined with a participatory and transparent review mechanism which the G20 have committed to, are at the heart of what we believe is needed to fight corruption.

Beyond emphasising the broad need to implement UNCAC, we are writing to lay out what we think should be the key priorities of the Working Group as the Cannes summit draws closer. In selecting these areas we have drawn on the broader set of recommendations in our February letter.

- **Anti-bribery:** Implement and enforce laws criminalising foreign bribery and prohibiting off-book accounts by 1st January 2012 in accordance with the OECD Convention Against Bribery of Foreign Public Officials and UNCAC, and regularly report on the enforcement of these laws.

- **Denial of safe haven:** Deny entry and safe haven to corrupt government officials and business people in cases where the individual has been convicted of corruption offences or where there is credible evidence that they are involved in corruption. This should be subject to a fair and accessible appeals system for any excluded individual. A number of G20 members have already made steps to implement this.
- **Asset recovery:** Enact and implement a legal framework for asset recovery that makes it easier to freeze and return funds in cases where there is limited capacity in the country from where the assets were stolen, and in situations where it is difficult to bring prosecutions against corrupt officials, for example in circumstances such as death, flight, or absence of the perpetrator. This should include assets transferred to trusts and assets owned or used by political leaders still in office. As part of this G20 members should look at options of how to unilaterally freeze funds, for example by following the model recently implemented by Switzerland. In addition, G20 members should commit to effective judicial cooperation and create a fund to assist countries which have limited resources to carry out asset recovery actions. G20 members should ensure that frozen assets are swiftly transferred to escrow accounts managed by an independent party, for example the World Bank or the regional development banks.
- **Anti-money laundering:** As part of the next round of mutual evaluations, the Financial Action Task Force (FATF) should review in detail how well countries are implementing the FATF Standard and publically name those who are failing to do so effectively, including if necessary its own members. As part of this process countries should carry out an in-depth review of how their banks handle the risk associated with politically exposed customers, as the UK has just done,¹ and publish the results. FATF has been successful at ensuring that most countries in the world have implemented an anti-money laundering regime, but the next step is to ensure that it is being enforced effectively. This should be an integral part of the fourth round of FATF's mutual evaluations. In addition, G20 members should create mandatory national level registers or any other structure that discloses the beneficial ownership of companies and the beneficiary of trusts. This information should be shared with relevant investigative and judicial authorities both domestically and internationally.

As we have previously noted, we appreciate the Working Group's commitment to consult all relevant stakeholders and we are grateful for the continued outreach that many members of the Working Group have made to civil society groups and other stakeholders. As part of this ongoing dialogue we would welcome the opportunity to participate in a more formal dialogue with the Working Group. In line with the Working Group's commitment to accountability and consultation, we hope that the Group will publish its membership list, meeting agendas and progress report in full. We believe that the Working Group's report should be based on quantifiable and standardised criteria, should examine how each G20 member is implementing each point in the Seoul Action Plan and include a time frame and action plan for recommendations not yet met.

¹ The report revealed that the majority of Britain's banks are failing to do enough to identify corrupt money from abroad and that it is 'likely that some banks are handling the proceeds of corruption'. FSA, *Banks' management of high money-laundering risk situations*, June 2011.

We thank you for considering our recommendations and look forward to working with you. Should you have further questions, please do not hesitate to contact: Angela McClellan, Transparency International (+49-30 343 820 673 or amcclellan@transparency.org). or Robert Palmer, Global Witness (+44-20 7492 5860 or rpalmer@globalwitness.org).

Signed by,

Transparency International (on behalf of more than 90 National Chapters)	International
Global Witness	International
UNCAC coalition (represents 316 member organisations)	International
Caux Round Table	International
Eurodad	International
Global Financial Integrity	International
ONE	International

Africa Development Interchange Network	Cameroon
Instituto Mexicano para la Competitividad	Mexico
Global South Initiative	Nepal
Association for Accountancy & Business Affairs	United Kingdom
Tax Research	United Kingdom



UNCAC coalition members:

Organisation	Country	Organisation	Country
"Uluchay" Social-Economic Innovation Center	Azerbaijan	AMAN-Transparency Palestine	Palestine
5th Pillar	United States	American Bar Association Rule of Law Initiative	United States
ABDP	Burundi	American University's Washington College of Law	United States
Access Info Europe	Spain	Anti Corruption Coalition Uganda	Uganda
Actions for Genuine Democratic Alternatives (AGENDA)	Liberia	Anti Slavery International	United Kingdom
Africa Youth for Peace and Development	Sierra Leone	Anti-Corruption Trust of Southern Africa (ACT-Southern Africa)	Namibia
African Network for Environment and Economic Justice (ANEEJ)	Nigeria	Anti-Corruption Unit Cambodia	Cambodia
African Youth Empowerment	Nigeria	Arab office for law	Egypt
AfriCOG-Africa Centre for Open Governance	Kenya	Arab Thought Forum	-
Agape Foundation for Literacy @ Rural Development.	Nigeria	ARTICLE 19	United Kingdom
AICO - Arab organization for international organization	Egypt	Asociacion Civil por la Igualdad y la Justicia	Argentina
Aktion Finanzplatz Schweiz	Switzerland	Asociacion para una Sociedad mas Justa	Honduras
Alpha - Fundación de Estudios Estratégicos	Argentina	Asociacion Transparencia Bolivia	Bolivia
		Asociacion Transparencia y Libertad	Spain

Organisation	Country	Organisation	Country
Asociatia Romana pentru Transparenta	Romania	Human Rights	
Associação Contas Abertas	Brazil	Canadians For Accountability	Canada
Association Law Group (ALG)	USA	CCLP Worldwide	India
Association of Committees for Monitoring Parliamentarians and Elected Officials (TUMIKOM)	Turkey	CDA Innovations for Change	-
ATTAC Hungary	Hungary	Center for Economic and Social Development (CESD)	Azerbaijan
B P Mehta Foundation	India	Center for Egyptian Women's Legal Assistance	Egypt
Baholalao Integrity Safeguard Committee	Madagascar	Center for the Study of Democracy	Bulgaria
Bahrain Transparency Society	Bahrain	Center for Transparency & Accountability	Liberia
Bangladesh NGO Network for Radio and Communication	Bangladesh	Center Transparency International Russia	Russia
Batool Welfare Trust	Pakistan	Centre for Applied Sociology	India
Blossom Nigeria Project	Nigeria	Centre for Community Economics and Development Consultants Society (CECOEDECON)	India
BRAC University	Bangladesh	Centre for Law and Democracy	Canada
Bread for All	Switzerland	Centre for Public Policy Studies	Malasya
Buddhism and Social Development Association (BSDA)	Cambodia	Centro Ecuatoriano de Derecho Ambiental	Ecuador
Bunge la Mwananchi	Kenya	Cercle d'initiative Commune	Cameroon
Business for Integrity 2020	Philippines		
CAFOD	United Kingdom		
Cameroonian League for	Cameroon		

Organisation	Country	Organisation	Country
pour la recherché l'environnement et la Qualite (CICREQ)		CPI The Lebanese Center for Public Information	Lebanon
Cerdas Bangsa (Tangerang)	Indonesia	CRBM	Italy
Chile Transparente	Chile	Creative Union TORO - Transparency International National Contact in Ukraine	Ukraine
Chr. Michels Institute (CMI)	Norway	Criminologists Society of J&K	India
Christian Aid	United Kingdom	CRT	UK
CIDAC (Centre of Information and Data for Anti Corruption)	Indonesia	Development Dynamics	Nigeria
Citizens Forum	Zambia	Development Organization for Human Rights & Envieronment	Pakistan
CIVICUS	South Africa	DISCOVER	Pakistan
Civil Society Development Foundation	Hungary	Dochas	Ireland
Club-Journalists against Corruption	Bulgaria	Ecole nationale d'administration publique	Canada
Commonwealth Human Rights Initiative	India	Education on Human Rights Public Association	Azerbaijan
Community Empowerment NWFP, Pakistan	Pakistan	EHED Foundation	Pakistan
Community Research and Development Centre (CREDC)	Benin	Ehem Anticorruption Group - Society of Jesus	Philippines
Contraloría Ciudadana para la Rendición de Cuentas	Mexico	EITI - NGO's for Extractive Industries Transparency	Azerbaijan
Corporacion Ocasa	Colombia	ELSDA Institute	Indonesia
Corporación Transparencia por Colombia	Colombia	Equity Advocates	Nigeria
		Etica y Transparencia	Nicaragua
		ETRAC Foundation	India

Organisation	Country	Organisation	Country
Evangelical Fellowship of Sierra Leone	Sierra Leone	Communication Technology	
Evelio B. Javier Foundation, Incorporated	Philippines	Ghana Integrity Initiative	Ghana
Federation of Environmental and Ecological Diversity for Agricultural Revampment and Human Rights (FEEDAR & HR)	Cameroon	GINI - Governance Institutions Network International	Pakistan
Financial Intelligence Council	United States	Global Alliance Against Traffic in Women (GAATW)	Thailand
Forum Civil	Senegal	Global Financial Integrity	United States
Foundation for Development of Democratic Rights	Hungary	Global Network for Good Governance	Cameroon
Foundation for the Development of Sustainable Policy	Argentina	Global Network for Good Governance(GNGG)	CAMEROON
Foundation Open Society Institute - Macedonia	F.Y. Republic of Macedonia	Global Watch Group	-
Free World Foundation	Ghana	Global Witness	United Kingdom
Fundacion Mujeres en Igualdad	Argentina	Good Thinkers Organization for Human Development (GTOHD)	Pakistan
Fundacion Nacional para el Desarrollo (FUNDE)	El Salvador	Gram Bharati Samiti (GBS)	India
Fundacion Pro Acceso	Chile	Grass Root Anti-Corruption Awareness Network Initiative	Nigeria
Fundar, Centro de Analisis e Investigacion	Mexico	Groupe d'action de paix et de formation pour la transformation (GAPAFOT)	Central African Republic
GGs Institute of Information	INDIA	Grupo Civico Etica y Transparencia	Nicaragua
		Grupo de Mujeres de la Argentina - Foro de VIH MUJeres y Familia	Argentina
		Grupo de Trabajo Contra la	Peru

Organisation	Country	Organisation	Country
Corrupcion (GTCC) / Work Group against Corruption		Project (IAP)	
Guards of Earth and Vulnerable	Ghana	Indonesia Corruption Watch	Indonesia
Helio International	France	Instance nationale de protection des biens publics au maroc	Morocco
Helsinki Committee for Human Rights of the Republic of Macedonia	Macedonia	Institute of Governance Studies	Bangladesh
Heungsadan (Young Korean Academy) Transparency Movement	South Korea	Instituto Qualicidade	Brazil
Hills Program on Governance	United States	Integriteta-association for ethics in public service	Slovenia
Hoadedhdhoo Association for Development	Maldives	International Alliance of Women	Austria
Human Rights and Development Trust of Southern Africa	Zimbabwe	International Commission of Jurists	Switzerland
Human Rights Association for Community Development in Assuit	Egypt	International Trade Union Confederation	Belgium
Human Rights Trust Of Southern Africa	South Africa	Iraqi Center For Transparency and Corruption	Iraq
Humanus International	Cameroon	Iraqi Institute for Economic Reform	Iraq
Hungarian Africa Platform - Magyar Afrika Platform	Hungary	Islamic Relief Worldwide	United Kingdom
Hungarian Civil Liberties Union	Hungary	ISS (Institute of Security Studies)	South Africa
Image Composers	France	K-Monitor	Hungary
Independent Advocacy	Nigeria	K-Pact Council	Korea
		Kenya Tuitakayo: Citizens Coalition for Constitutional Culture (4Cs)	Kenya

Organisation	Country	Organisation	Country
Koyenum Immalah Foundation	Nigeria	Namibia Institute for Democracy (NID)	Namibia
Kurdistan AC Network	-	National Human Rights Coordination Body	Peru
Kuwait Transparency	Kuwait	National Law Reform Consortium	Indonesia
La Strada International	The Netherlands	Network Africa	-
Lalenok Ba Ema Hotu(LABEH)	Timor-Leste	NGO ArtIdea	Georgia
LEIP	Indonesia	NGO's Computer Literacy Shelter Welfare (nclsw)	Pakistan
Libertad en accion	Mexico	Nigeria Labour Congress	Nigeria
Life Line to Citizen (LL2C)	India	Nigeria youth environmental network	Nigeria
Ligue Congolaise de lutte contre la Corruption - LICOCO	Democratic Republic of Congo	NPA Nigeria	-
Luta Hamutuk	Timor Leste	Observatorio Hannah Arendt	Venezuela
MANS	Montenegro	Observatory on Social Surveillance - OBSERVA	Peru
MAPPI	-	OMETZ	Israel
Mauritius Council of Social Service (MACOSS)	Mauritius	Open Democracy Advice Centre	South Africa
MEERA Foundation	INDIA	Open Society Foundation (OSF)	Slovakia
Mexican Association for Rural and Urban Transformation	Mexico	Oyoun Centre for Studying and Developing Human Rights and Democracy	Egypt
Mitigating Endemic Democratic Problems	Australia	Oziveni, o.s.	Czech Republic
Moms Club International Nigeria	Nigeria	Pact	Cambodia
Mother Theresa Rural Development Society	India	Participacion Ciudadana	Dominican

Organisation	Country	Organisation	Country
	Republic	Public Investigation Bureau	Latvia
Partnership for Governance Reform / Kemitraan	Indonesia	Public Services International	-
Partnership for Social Development	Croatia	Public Services Labor Independent Confederation (PSLINK)	Philippines
Partnership for Transparency Fund	-	Publish What You Pay Nigeria	Nigeria
PDP Center	-	Rachad Movement	Algeria
People Against Drug Dependence & Ignorance (PADDI)	Nigeria	Rainbow Warriors Core Foundation	Aruba, Dutch Caribbean
PILDAT - Pakistan Institute of Legislative Development And Transparency	Pakistan	Raoul Wallenberg Institute	Sweden
Poder Ciudadano	Argentina	REPAOC	Senegal
Pragati, Koraput	India	Research Alliance for Development	Cameroon
ProDemos Public Union	Azerbaijan	Research and Training For Real Empowerment Ltd/Gte. (RESTORE)	Nigeria
Proetica	Peru	Rights Jessore	Bangladesh
Professionals for Humanity	Nigeria	Rural Educational Development & Welfare Organization	Pakistan
Programa Venezolano de Educación-Acción en Derechos Humanos (PROVEA)	Venezuela	Rural Studies Center	Egypt
Project on Organizing, Development, Education, and Research (PODER)	United States	S A Report	-
Proyecto de Transparencia e Integridad de USAID	Guatemala	Sahkar Social Welfare Association	Pakistan
Public Concern at Work	UK	Save Earth Nigeria	Nigeria
		Shaub For Democracy Cultuer Establishment	Iraq

Organisation	Country	Organisation	Country
Sherpa	France	The Jus Semper Global Alliance	United States
SNAPAP	Algeria	The National Center For Peace & Development	India
Social Watch India	India	Tiri	United Kingdom
Society for The Empowerment of People - STEP	Pakistan	Towards Transparency	Vietnam
Socio-Economic Rights & Accountability Project (SERAP)	Nigeria	Trade Union Elie Radu""	Romania
Solaris	United States	Trade Unions Congress (TUC)	United Kingdom
Solidarity Development Organisation	CAMEROON	Transparency International Kyrgyzstan	Kyrgyzstan
South Asian Network for Social & Agricultural Development (SANSAD)	India	Transnational Crime and Corruption Center	Georgia
Stat View International	Guinea	Transparencia Bolivia	Bolivia
Subhiksha Voluntary Organization	India	Transparencia Mexicana	Mexico
Tax Justice Network	United Kingdom	Transparencia Venezuela	Venezuela
Tearfund	United Kingdom	Transparency and Accountability Network	Philippines
Telapak	Indonesia	Transparency and Economic Development Initiatives	Nigeria
The Anti-Corruption Council of Ukraine	Ukraine	Transparency Azerbaijan	Azerbaijan
The Corner House	United Kingdom	Transparency in Nigeria	Nigeria
The Fight Against Corruption	South Africa	Transparency International Denmark	Denmark
The Jakarta Legal Aid Institute	Indonesia	Transparency International Armenia	Armenia
The Johanniter	Germany	Transparency International Australia	-

Organisation	Country	Organisation	Country
Transparency International Austria	Austria	Transparency International Korea	South Korea
Transparency International Bangladesh	Bangladesh	Transparency International Lithuania	Lithuania
Transparency International Canada	Canada	Transparency International Malaysia	Malaysia
Transparency International Chinese Taipei	Taiwan	Transparency International Netherlands	Netherlands
Transparency International Croatia	Croatia	Transparency International Pakistan	Pakistan
Transparency International Czech Republic	Czech Republic	Transparency International Palestine	Palestine
Transparency International Ecuador	Ecuador	Transparency International Philippines	Philippines
Transparency International Finland	Finland	Transparency International Russia	Russia
Transparency International Georgia	Georgia	Transparency International Rwanda	Rwanda
Transparency International Germany	Germany	Transparency International Sri Lanka	Sri Lanka
Transparency International India	India	Transparency International Sweden	Sweden
Transparency International Indonesia	Indonesia	Transparency International Switzerland	Switzerland
Transparency International Ireland	Ireland	Transparency International Turkey	Turkey
Transparency International Israel	Israel	Transparency International Uganda	Uganda
Transparency International Italia	Italy	Transparency International UK	-

Organisation	Country	Organisation	Country
Transparency International USA	United States	Water Governance Institute	Uganda
Transparency International Zambia	Zambia	Whistleblower-Netzwerk e.V.	Germany
Transparency International Zimbabwe	zimbabwe	Women Environment & Development Network (WEDEN)	Nigeria
Transparency Maroc	Morocco	Women Rights and Development Centre	Nigeria
Transparency Zero Corruption	F.Y. Republic of Macedonia	Women's Right to Education Programme (WREP)	Nigeria
Transparentnost Macedonia	F.Y. Republic of Macedonia	World Wildlife Fund UK	United Kingdom
Trinidad and Tobago Transparency Institute	Trinidad and Tobago	Yemen Polling Center	Yemen
U4 Anti-Corruption Resource Centre	Norway	Young Businessmen Association in Assuit	Egypt
Ummah Fi Salam	Philippines	Youth Alive! Kenya (YAK)	Kenya
UNDP Regional Centre Colombo	-	Youth Crime Watch of Niigeria	Nigeria
UNICORN - Trade Union Anti-Corruption Network	United Kingdom	Youth Education Forum	F.Y. Republic of Macedonia
Uniting Church in Australia	Australia	Youth Partnership for Peace and Development	Sierra Leone
Universidad Coherente	Peru	ZCC Nigeria	-
Uplifting Men and Youth in Africa (UMaY Africa)	Kenya	Zenu Network	Cameroon
Uruguay Transparente	Uruguay	Zero Corruption Coalition	Nigeria
Voice	Bangladesh		
VSO International	United Kingdom		