



**GRI Level C reporting template for NGOs**



Reporting Period: 1 January to 31 December 2011

**Name of organization: Transparency International e.V.**

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**Information on numbering:** All sections in the boxes are taken directly from the original English version of the NGO Sector Supplement and the original reference numbers and page number appear in parenthesis. The NGO Sector Supplement is available for free downloading at [www.globalreporting.org](http://www.globalreporting.org)



## 1 Strategy and Analysis

### 1.1 Statement from the most senior decision-maker of the organization. [GRI NGOSS: p. 25]

Corruption distorts human development, discredits government, hampers economic growth, and compromises free and fair trade around the world. It leads to the mismanagement of our planet's most precious resources, undermines progress towards the Millennium Development Goals, fuels wars and prevents state-building, erodes sustainability and denies future generations a fair chance.

Transparency International, a global movement with affiliates in more than 100 countries, has committed itself to promoting transparency, accountability and integrity at all levels and across all sectors of society to end impunity and stop the devastating impact of corruption.

From Tunisia to Russia, extraordinary developments around the world have constantly reminded us throughout 2011 of the crucial role of Civil Society in supporting minorities and holding the powerful to account. At the same time the legitimacy of our sector may, in the last 20 years, never have been questioned so hard by the forces that it challenges. Against this background, the accountability imperative is critical to help secure Civil Society's ability to operate.

At Transparency International, our institutional commitment to accountability is more than a resolve. Accountability is indeed about living up to our name, our very *raison d'être*, at all times, with unwavering dedication.

As a signatory to the International NGO Accountability Charter, Transparency International Secretariat (TI-S) is presenting with this document its second report in application for a Global Reporting Initiative NGO Sector Supplement level C.

In follow-up to the adoption of a 5-year strategy for our global movement in late 2010, 2011 was a year where TI-S sought to accelerate its efforts on many fronts, as reflected in this report in its institutional dimension<sup>1</sup>.

Initiated in 2011 subsequent to the approval of our 2015 Strategy, the important work towards mainstreaming *Monitoring, Evaluation and Learning* into all our operations could in the same year not yet bear the fruits so relevant to many aspects of this report. It is indeed central to our accountability and future efficiency. Beyond the challenge of a meaningful impact measurement framework, making substantial progress in enhancing our diversity and decreasing our environmental impact are areas where we also want to make clear progress in the next two years.

The framework of this report helps us to have a broader understanding of how we work and of our direct or indirect impact. We are looking forward to further improving our performance with the support of this tool and the feedback of the Independent Review Panel.



John de Swardt,  
Managing Director

<sup>1</sup> A digest of our main *operational* achievements in 2011 can be found in the Executive Summary (pp 1 to 3) of our 2011 Implementation Report:  
[http://www.transparency.org/files/content/ourorganisation/2011\\_TI-S\\_ImplementationReport\\_EN.pdf](http://www.transparency.org/files/content/ourorganisation/2011_TI-S_ImplementationReport_EN.pdf)



## 2. Organizational Profile

### 2.1 Name of the organization. [GRI NGOSS: p. 26]

Transparency International e.V.

### 2.2 Primary activities (e.g., advocacy, social marketing, research, service provision, capacity building, humanitarian assistance, etc.). Indicate how these activities relate to the organization's mission and primary strategic goals (e.g., on poverty reduction, environment, human rights, etc.). [GRI NGOSS: p. 26]

TI's mission is to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society. TI-S' prime activities revolve around:

- **Supporting TI National Chapters** around the globe in executing targeted programmes in a variety of areas, including corruption monitoring, diagnostics and analysis, engagement of private sector, public sector reform, support to victims and witnesses of corruption, transparency in forestry and natural resources, promotion of conventions and transparency in basic services. In 2010/11 TI-S has focused increasingly on the capacity development of our National Chapters through the Institutional Network Strengthening Programme, a cornerstone of the 2015 Implementation Plan.
- **Research and Knowledge Sharing:** Measuring, analysing and developing solutions to corruption risk in the public and private sectors in countries across the globe. 2010 has seen a greater push for the creation and improvement of tools for governments and institutions as practical solutions to common problems. Knowledge sharing within the Movement, to identify and propagate best practice from the chapters' work, has been a key driver of our work in the past year.
- **International Advocacy and Campaigning:** as the leading voice fighting for a world free from corruption internationally, TI-S seeks to highlight the corrosive effects of corruption in all spheres of public life and the private sector, as well as promote efforts for change
- **Governance:** Maintenance and service of the governance and architecture of the global movement of National Chapters; including support to the International Board of Directors and organising the Annual Members Meeting, bringing together representatives of our global network of chapters

The strategic dimension of the above-outlined work is described in the TI-S Implementation Plan 2015

([http://www.transparency.org/whoweare/organisation/implementation\\_plan\\_for\\_strategy\\_2015/0/](http://www.transparency.org/whoweare/organisation/implementation_plan_for_strategy_2015/0/)) which outlines our 6 Key Programmes and 5 Key Support Services. It was developed on the basis of the TI Strategy 2015 as approved by the TI Annual Membership Meeting in November 2010 and which identifies 6 Strategic Priorities, to which the above outlined work contribute:

- People standing up to corruption (SP1)
- Institutions: Institutions becoming responsible, accountable and transparent (SP2)
- Laws: More effective enforcement of comprehensive, effective and fair legal frameworks- *no impunity for corruption* (SP3)
- Values: Integrity, transparency and accountability are practised with solidarity and courage in all aspects of public and business life (SP4)
- Network: Strengthened ability to work together (SP5)
- Impact: Enhanced responsiveness, presence, performance and impact at all levels (SP6)

The full TI 2015 Strategy can be downloaded at:

[http://www.transparency.org/whoweare/organisation/strategy\\_2015/0/](http://www.transparency.org/whoweare/organisation/strategy_2015/0/)



### 2.3 Operational structure of the organisation, including national offices, sections, branches, field offices, main divisions, operating companies, subsidiaries, and joint ventures. [GRI NGOSS: p. 26]

Transparency International e.V. is **the International Secretariat** (TI-S) of Transparency International (TI). ([www.transparency.org](http://www.transparency.org))

It operates on behalf of and reports to the **international Board of Directors** of TI which is composed of 12 individuals elected for three-year terms by the TI Annual Membership Meeting. ([http://www.transparency.org/whoweare/organisation/board\\_of\\_directors/1/](http://www.transparency.org/whoweare/organisation/board_of_directors/1/))

**The Annual Membership Meeting** is the ultimate decision-taking body in TI and consists of representatives from accredited National Chapters and of Individual Members.

**TI National Chapters** (NCs) are the highly independent and locally-based and governed NGOs that decide upon their own priorities. Our Chapters are accredited according to a set of objective standards in three stages: from National Contact to National Chapter in formation and finally to fully accredited National Chapter Status. They are the local expert and the prime interlocutors of TI-Secretariat in their respective countries.

TI's **Individual Members** (IMs) are anti-corruption activists of international standing who contribute their international perspective and expertise to the strategic and policy decision of the Annual Membership Meeting, of the Board, and to the work of TI-S and of Chapters. TI also benefits from the contribution of a network of volunteer senior advisers.

(Find our NC Accreditation and IM Appointment Policy at:

[http://www.transparency.org/whoweare/accountability/national\\_chapter\\_accreditation\\_and\\_individual\\_member\\_appointment\\_policy/0/](http://www.transparency.org/whoweare/accountability/national_chapter_accreditation_and_individual_member_appointment_policy/0/))

TI-S has also established in Brussels a **Liaison Office to the European Union** which is locally registered but reports to the International Secretariat in its operational capacity.

<http://www.transparencyinternational.eu/>)

### 2.4 Location of organization's headquarters. [GRI NGOSS: p. 26]

Alt-Moabit 96, 10559 Berlin, Germany

### 2.5 Number of countries where the organization operates. [GRI NGOSS: p. 26]

As stated in 2.3 above, our involvement at national level takes place through our local independent affiliates in 109 countries. For details of our list of Chapters as of 31 December 2011, please see p.79 of the TI Annual Report, as downloadable at

<http://www.transparency.org/whatwedo/publications/doc/ar/>

### 2.6 Nature of ownership and legal form. [GRI NGOSS: p. 26]

The legal form of TI-S is that of a 'registered society' with the Charter Court Berlin, Charlottenburg, Germany (*eingetragener Verein or e.V., registration number: VR 13598 B*). As such it has no owner but Members and is represented in judicial and extra-judicial matters by our Chair or our Vice-Chair (forming the Executive). They appoint a Managing Director to represent them in all usual matters up to a value of EUR 250,000.

As per German law, TI-S is recognised as a not-for-profit entity, subject to a review by the tax authorities on a triennial basis.

### 2.7 Target audience and affected stakeholders. [GRI NGOSS: p. 26]

The work of Transparency International ultimately aims to induce systemic change to combat the pernicious effect of corruption on the lives men, women and children in nations across the globe.



For the purpose of this report, TI-Secretariat's primary stakeholders are our local affiliates in 109 countries (in the form of our National Chapters and National Contacts) as well as Intergovernmental organisations, businesses operating internationally, our donors, and peer international Civil Society organisations.

**2.8 Scale of the reporting organization. [GRI NGOSS: p. 26]**

Direct beneficiaries: Network of National Chapters and local affiliates in 109 countries on all continents.  
 Employees: 132  
 Volunteers: 14 Senior Advisors  
 28 Individual Members  
 Total income: EUR 20,305,827  
 Total Assets: EUR 17,930,637  
 As per pp 3-5 of TI-S audited Financial Statements (following the International Financial Reporting Standards- IFRS) can be found at [http://www.transparency.org/whoweare/accountability/audited\\_financial\\_reports\\_with\\_independent\\_auditors\\_report/1/](http://www.transparency.org/whoweare/accountability/audited_financial_reports_with_independent_auditors_report/1/)  
 Detailed information about the scope and scale of our activities can be found in this report under Indicator 7.

**2.9 Significant changes during the reporting period regarding size, structure, or ownership. [GRI NGOSS: p. 26]**

In 2011, TI-Secretariat witnessed a budget increase of 33% (from EUR 15 million in 2010 to EUR 20 million in 2011).

On 2 July 2011, the TI Board of Directors approved a five-year Implementation Plan which outlines TI-Secretariat's contribution to realising TI's global Strategy (Strategy 2015). This Implementation Plan has two purposes:

- It seeks to provide a clear direction for Secretariat priorities, resource allocation and management decisions until 2015.
- It aims to provide a clear framework against which the Secretariat can be held accountable by the Movement and external stakeholders.

**2.10 Awards received in the reporting period. [GRI NGOSS: p. 26]**

- Creativity International awards 2011 – Gold award
- HOW International Design Awards 2011 – Merit award

**3. Report Parameters**

**Report Profile**

**3.1 Reporting period (e.g., fiscal/calendar year) for information provided. [GRI NGOSS: p. 26]**

Information provided in this report refers the calendar 2011 which is also our financial year.

**3.2 Date of most recent previous report (if any). [GRI NGOSS: p. 26]**

20 September 2011 (GRI Report for 2010)



### 3.3 Reporting cycle (annual, biennial, etc.). [GRI NGOSS: p. 26]

Annual

### 3.4 Contact point for questions regarding the report or its contents. [GRI NGOSS: p. 26]

Stan Cutzach,  
Governance Manager,  
scutzach@transparency.org, Tel: +49-30 34 38 20 652

## Report Scope and Boundary

### 3.5 Process for defining report content. [GRI NGOSS: p. 26]

The scope of the Report was determined to be consistent that of our IFRS Audited financial statement.(

[http://www.transparency.org/whoweare/accountability/audited\\_financial\\_reports\\_with\\_independent\\_auditors\\_report/1/](http://www.transparency.org/whoweare/accountability/audited_financial_reports_with_independent_auditors_report/1/))

It was prepared to provide relevant and comparable information over time and with peer NGOs, so as to help assess and guide our work

### 3.6 Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance. [GRI NGOSS: p. 26]

The Report focuses on the structure, governance, finances, and activities of the international secretariat of TI (TI-S).

### 3.7 State any specific limitations on the scope or boundary of the report. [GRI NGOSS: p. 26]

The Report does not include the work and capacities of TI National Chapters around the globe, nor those of the Transparency International Liaison Office to the European Union.

### 3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations. [GRI NGOSS: p. 27]

No joint ventures, subsidiaries or outsourced operations are reported upon in this document.

### 3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods). [GRI NGOSS: p. 27]

As noted in our GRI Report for 2010, there used to be a difference between the Statement of Comprehensive Income in the Financial Statements and the budget reported in our Annual Report. This was caused by a deferred income and comprised the "Changes in accrued disbursements" as was explained in our financial statements for 2010 on page 12, note 3 (b) paragraph 5-6:

*Payments to project partners are initially recorded as receivables under Advances to National Chapters or Coalition Partners, or, if third parties are involved, as Advances to other parties as project outlays. Related Donor contributions are not recognised as income until TI-S receives evidence of expenditure in the form of project audit reports,*



*original receipts, or any other proof as required by the relevant contract; instead, they are reported as Liabilities to Donors in the Statement of Financial Position. Advances to National Chapters, Coalition Partners or other parties, net of the recognisable income for which evidence of expenditure has been received, are recorded as Changes in accrued disbursements (see note 20 and 21).*

This meant that advance payments not yet reported for were recognized as expenses in the budget report but not in the Income Statement.

We are pleased to report that in keeping with our Financial Statements, “Net changes in advances to National Chapters and Other Parties” are now part of Income reflected. Our financial numbers for the year 2009 and 2010 in this report were therefore reinstated.

In follow-up to the adoption of the TI-wide 2015 Strategy at the end of 2010, TI-S re-aligned in early 2011 its own internal structural arrangements so as to be better fit for purpose. Following such re-organisation, Expenses in all our reports follow a break-down by the new functions. In order to enable comparability with previous years, figures for 2010 and 2009 were re-instated following the new organisational structure.

**3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report. [GRI NGOSS: p. 27]**

None

**GRI Content Index**

**3.12 Table identifying the location of the Standard Disclosures in the report. [GRI NGOSS: p. 27]**

N/A: This report follows the GRI Level C Reporting Template

**4. Governance, Commitments, and Engagement Governance**

**4.1 Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight. [GRI NGOSS: p. 27]**

The governance structures at Transparency International aim to reflect the spirit of our mission and the ownership by our Members operating on the front lines of the fight against corruption and to embody our commitment to transparency, accountability and integrity. We will continue to evaluate and assess our governance procedures and to pursue best practice in this arena.

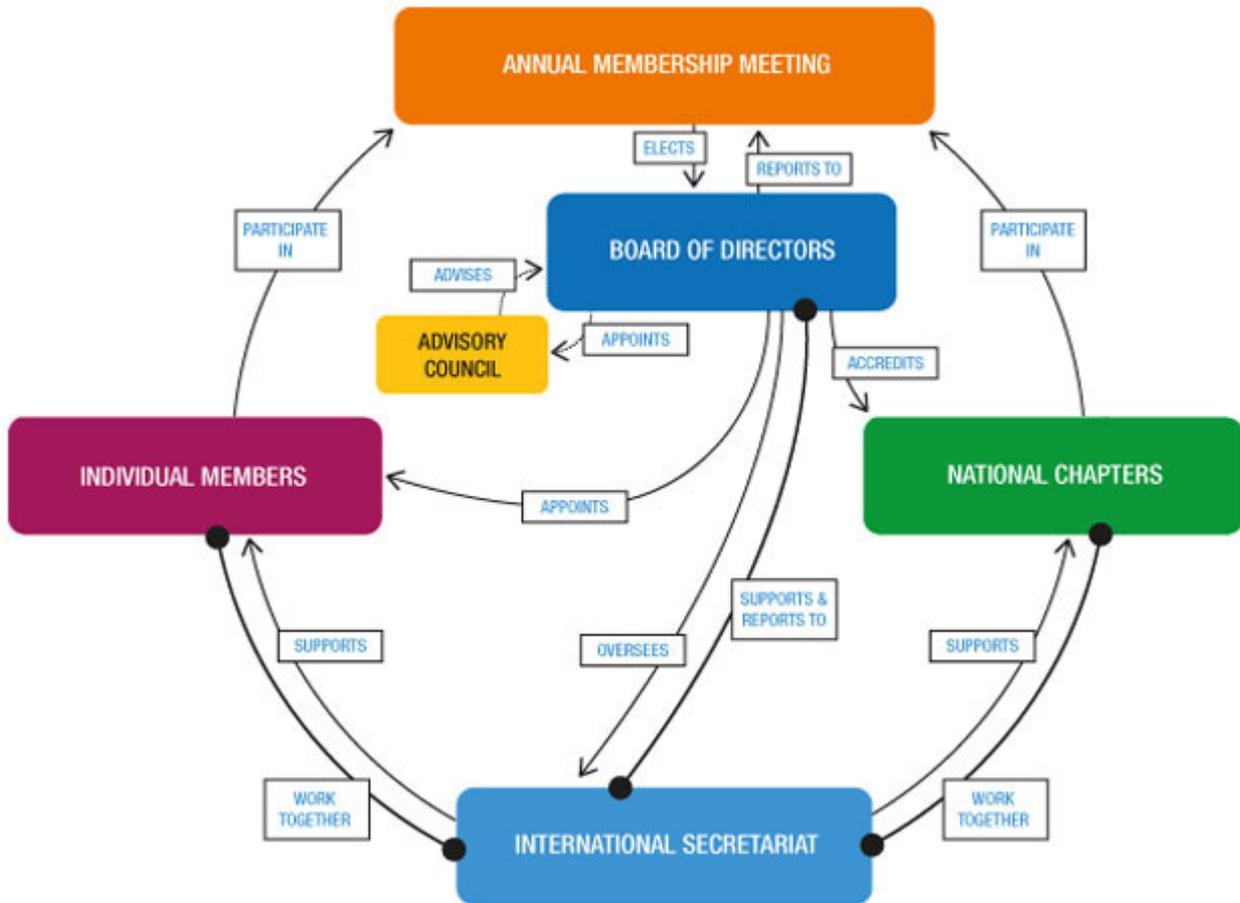
The pillars of our governance principles are deeply rooted into our Charter [http://www.transparency.org/whoweare/accountability/our\\_charter/0/](http://www.transparency.org/whoweare/accountability/our_charter/0/) which is itself approved by our Annual Membership Meeting. It is underpinned by the TI Statement of Mission, Values and Guiding Principles: [http://www.transparency.org/whoweare/accountability/a\\_statement\\_of\\_vision\\_values\\_and\\_guiding\\_principles\\_for\\_ti/2/](http://www.transparency.org/whoweare/accountability/a_statement_of_vision_values_and_guiding_principles_for_ti/2/)

The Annual Membership Meeting is the highest decision-taking body. Main policies and the financial statements are subject to its approval, it elects the Board of Directors from among the Chapter Representatives and the Individual Members.

The TI Board of Directors reports to the Membership Meeting, is in charge of supervising the organisation through the year, appoints the TI-S Managing Director, approves the budget, and



is, by virtue of our Charter, in charge of Strategy. However, while it watched over the development process of our current strategy (2015 Strategy), it submitted the approval of the final draft to the critical feedback and final approval of the Annual Membership Meeting. The functioning and governance of TI-S can be illustrated as follows:



The highest governance body in TI is the Annual Membership Meeting. As per the Charter, its duties are to

- a) consider the Annual Report and financial statements of the Society presented by the Board of Directors and give formal approval to the actions of the Executive and the Board of Directors;
- b) determine the fees if any to be paid by Members;
- c) elect and remove the Chairperson, the Vice Chairperson and members of the Board of Directors;
- d) decide and revising a policy for the accreditation of National and Regional Chapters and for the appointment of Individual Members.
- e) approve amendments to the Charter of the Society, or its dissolution.

It delegates to the international Board of Directors the duty to implement its decisions.

**The Board of Directors**

1. approves the annual budget;
2. refers to the Membership Meeting any matters to be decided upon by that meeting;
3. implements decisions of the Membership Meeting;
4. proposes the Annual Report and financial statements of the Society for the last fiscal year for approval by the Membership Meeting;
5. approves any expenditure of EUR 250,000 (two-hundred and fifty thousand Euros) or more which has not gained prior approval as part of the annual budget;
6. accredits, suspends and dis-accredits National Chapters;



7. appoints, suspends, removes and expels Individual Members;
8. appoints, suspends and removes Supporters and Honorary Members;
9. approves the appointment of the Managing Director(s);
10. makes decisions on any other matters of particular importance not reserved to the Membership Meeting;
11. determines from time to time the size of the Board of Directors, within the parameters set by Article 13.1;
12. approves the minutes and disseminates to the membership decisions taken at Board Meetings; and
13. appoints and removes members of the Advisory Council and its Chairperson.

The Chair of the Board of Directors also chairs the Annual Membership Meeting and does not exercise any executive functions in TI-S.

The Managing Director is appointed to represent TI-S in all usual matters of up to a value of Euro 250,000 (two-hundred and fifty thousand Euros). He can enter into, terminate, and nullify contracts of employment.

**4.3** For organizations that have a unitary board structure, state the number of members of the and/or non-executive members highest governance body that are independent and/or non-executive members. [GRI NGOSS: p. 27]

The TI Board of Directors counts 12 members, all of which are independent of TI-Secretariat and do not perform any executive functions at TI-S.

**4.4** Mechanisms for internal stakeholders (e.g., members), shareholders and employees to provide recommendations or direction to the highest governance body. [GRI NGOSS: p. 27]

With TI being a membership-based organisation, the most critical stakeholder to the highest governance body is the Membership itself.

As per §16.2 of our Charter, *Members may for consideration by the Executive submit matters for inclusion on the agenda [of the **Membership Meeting**] by sending notice in writing to the Chairperson at least two weeks before the date of the Membership Meeting. The person chairing the Membership Meeting shall announce these additional matters at the start of the Meeting. The Membership Meeting itself shall decide whether to accept such additional matters for inclusion on the agenda.*

Members are invited to provide feedback to the draft minutes of Membership Meeting over e-mail and approve the final minutes at the following Membership Meeting.

Also Members are informed of the dates of **Board Directors meeting** meetings at the beginning of the year and receive the agenda of such meetings ahead of time. They also receive Board meeting minutes and are informed by way of posting on our intranet of any decisions taken by the Board of Directors in-between meetings, i.e. over e-mail.

The Managing Director conducts, in preparation of each Board of Directors meeting, a comprehensive exercise of gathering input for accountability and recommendation purposes to the Board where all TI-S Departments are involved.

Since July 2010, TI-S staff members have represented by a Works Council. The general duties of Works Councils are set out in Article 80 of the Works Constitution Act. Relevant duties include

- 1- to ensure implementation of the laws, regulations, safety regulations, collective bargaining agreements and works agreements concluded for the benefits of the employees;



- 2- to request that the employer implement measures that serve the interest of the establishment and the staff;
  - a. to promote the genuine equality of women and men, especially with respect to hiring, employment, training, continuing and further education and promotion;
  - b. to promote the compatibility of family with employment.
- 4- to promote the integration of the severely disabled and other persons requiring special protection;
- 7- to promote the integration of foreign employees in the establishment...[ ]...as well as to petition measures to combat racism and xenophobia in the establishment;
- 8- to promote and secure employment in the establishment;
- 9- to promote industrial safety and operational environmental measures

(2) The employer shall promptly and completely inform the Works Council so that it may execute its duties pursuant to this act...[ ]...upon request the works council shall have necessary documents made available to it so it may execute its duties...[ ].

(3) The works council may call for experts to assist it in its execution of its duties, with an additional agreement from the employer, to the extent this is necessary for the orderly execution of its duties.

**4.14 List of stakeholder groups engaged by the organization. [GRI NGOSS: p. 29]**

TI takes a holistic approach to the fight against corruption and seeks to involve all stakeholders from **business, civil society and governments** in a coalition against corruption. This is most clearly expressed by our first Guiding Principle:

*As coalition-builders, we will work cooperatively with all individuals and groups, with for-profit and not-for-profit corporations and organisations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.*

In view of this coalition-building approach, engagement with stakeholders is at the very root of our work and structures, first and foremost so in our National Chapters.

As stated earlier, for the purpose of this report, TI-Secretariat engages primarily with our local affiliates in 109 countries (in the form of our National Chapters and National Contacts) as well as Intergovernmental organisations, businesses operating internationally, our donors, and peer international Civil Society organisations.

**4.15 Basis for identification and selection of stakeholders with whom to engage. [GRI NGOSS: p. 29]**

As described in our National Chapter Accreditation Policy ([http://www.transparency.org/whoweare/accountability/national\\_chapter\\_accreditation\\_and\\_individual\\_member\\_appointment\\_policy/0/](http://www.transparency.org/whoweare/accountability/national_chapter_accreditation_and_individual_member_appointment_policy/0/)), our local counter-parts (i.e. our National Chapters) are identified through a three-step accreditation process going over some six years, where we test their integrity, commitment, ability to set up and maintain a structure and to have an impact at local level. Once accredited National Chapters are subject to a triennial accreditation review, but may also be the object of a special review if the safety or reputation of TI is at stake. Fundamental features required include:

- anti-corruption and good governance focus
- a coalition-building approach
- Non political-partisanship
- Working on systems rather than raising allegations on individual cases of corruption.

In this process, the Membership Accreditation Committee, consisting of two Board members and three members elected by the Annual Membership Meeting, formulates recommendations on accreditation to the Board of Directors for its decision.

Besides our local affiliates, the criteria for identifying stakeholders to engage with is based on:



- 1- Urgency or **strategic interest** in seeking change in a particular sector.
- 2- **relevance** of the given stakeholder to induce that change
- 3- **political will** of the given stakeholder to eradicate corruption

Other sources of information informing our engagement include:

- our own research (e.g. Global Corruption Barometer: <http://gcb.transparency.org/gcb201011/>,
- our Global Corruption Report: <http://www.transparency.org/research/gcr>) or
- our news monitoring through our Daily Corruption News (<http://www.transparency.org/news/dcn>)

## Data on Performance

**Indicator 1: NGO1 - Processes for involvement of affected stakeholder groups in the design implementation, monitoring and evaluation of policies and programs. [GRI NGOSS PE: p. 2]**

High-level TI-S policy and strategy decisions are informed by our main stakeholders, TI National Chapters, through a variety of mechanisms.

Wherever our prime stakeholders are affected, a decision by the Annual Membership Meeting (AMM) is required. The AMM serves as the highest decision-making body of the TI Movement, and provides a platform for our stakeholders to influence the agenda of TI-S, to sanction the work of our Board of Directors and decide on important policies and strategy (please refer to 4.1 and 4.4 above for details).

The TI 2015 Strategy (for the whole TI movement) developed over the course of 2010, involved a year long collaborative process (as appended in the Annex), and was endorsed at our Annual Membership Meeting in late 2010. The 2015 Strategy informed the strategic direction and content of the TI-S Implementation Plan, which outlines the focus and goals of TI-S' work in the coming years. Although the Implementation Plan is centred around TI-S' contribution to the realisation of the 2015 Strategy, consultation with internal (within the TI Movement) and external stakeholders (anti-corruption experts, academics, other INGOs etc) was intrinsic to its development. This process of stakeholder consultation included the production and discussion of briefing notes covering each of the 16 Key Areas of Focus laid out in Strategy 2015, as well as several consultations on draft versions of the Plan with active input from Secretariat staff, Senior Advisors, Chapters and Individual Members. The Implementation Plan was approved by the International Board on 2 July 2011. The process of consultation with stakeholders around the design of the Implementation Plan greatly informed the final document, and consequently will have significant bearing on TI-S' policies and programmes in the years to come.

All TI-S led programmes involve wide-ranging consultation with stakeholders. Where programmes are implemented exclusively by Chapters, TI-S works closely with these during the design and implementation phases, including workshops and meetings to plan activities. Chapters themselves are responsible for consultation with stakeholders within their countries. TI's overall approach to fighting corruption is one of engagement with stakeholders. Therefore, without exception, all programmes are designed to involve a range of stakeholders in identifying, diagnosing and acting together to promote transparency, accountability and integrity. That is, this is **an** underpinning principle of our approach to fighting corruption and therefore is central to all our programmes.

TI is developing a Monitoring, Evaluation and Learning (MEL) Framework. The MEL Matrix (See NGO3) will ensure that National Chapters as our key stakeholders are involved more systematically and explicitly in the design, implementation, monitoring and evaluation of all TI-S policies and programmes.



**Indicator 2:** *Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies. [GRI NGOSS PE: p. 3]*

As per the ToRs of the Board Ethics Committee, staff members from TI Chapters or at TI-S, who feel aggrieved by a decision of the Managing Director of TI- issues may bring a case to the attention of the Board Ethics Committee. Advice in such cases is given to the manager who made the contested decision, with copy to the person who submitted the request and the Chairperson of TI's Board of Directors. (ToRs are posted at: [http://www.transparency.org/whoweare/organisation/board\\_committees\\_and\\_task\\_forces/1/#Ethics](http://www.transparency.org/whoweare/organisation/board_committees_and_task_forces/1/#Ethics)). On the same website page, contact details are outlined to bring such cases to the attention of the Board Ethics Committee.

On the basis of the TI-S Code of Conduct, ([http://www.transparency.org/files/content/ouraccountability/TIS\\_CodeOfConduct\\_3\\_8\\_2011.pdf](http://www.transparency.org/files/content/ouraccountability/TIS_CodeOfConduct_3_8_2011.pdf)) the TI-S Ethics Advisor can assess complaints and give confidential advice on ethical questions to staff members and other stakeholders who request it. The contact details of the TI-S Ethics Advisor are posted at <http://www.transparency.org/whoweare/accountability/ethics/2/>.

TI-S adopted in June 2011 a Grievance Policy which outlines scope and processes for complaints by staff, including an appeal mechanism.

Looking to the future of enhanced MEL practices at TI-S, a complaints system has been defined as key to the MEL process, and a mechanism for affected stakeholders to lodge complaints and feedback is envisaged to form part of the MEL Framework which is currently under development, and expected to be operational in 2012.

**Indicator 3:** *NGO3 - System for program monitoring, evaluation and learning, (including measuring program effectiveness and impact) resulting changes to programs, and how they are communicated. [GRI NGOSS PE: p. 4]*

In 2011 TI-S fulfilled its reporting commitments to monitoring and evaluation for Secretariat led multi-country programmes; where work on the ground is carried out by National Chapters, and the Secretariat provides a supporting role, particularly in assisting Chapters to fulfil their reporting duties.

As a receiver of DFID funding, TI-S also produces a Secretariat-wide annual self-assessment, based around a high level framework upon which the Secretariat measures its performance on a broad array of strategic indicators. This can be found at [http://www.transparency.org/files/content/ouraccountability/TI\\_PPASelfAssessment\\_2010-2011.pdf](http://www.transparency.org/files/content/ouraccountability/TI_PPASelfAssessment_2010-2011.pdf)

TI has also been working with the International Aid Transparency Initiative (IATI) to develop a common donor reporting standard to track how much aid goes where and for what purpose. During 2011, a TI-S multi-disciplinary team (involving fundraising, policy and research, governance, communications and finance) worked to put in place the necessary systems and processes to map our own management information to the IATI standards for publishing of our data in compliance with the standard in 2012.

Since the second half of 2011, TI-S has embarked on a significant organisational change and development in the fields of Monitoring, Evaluation and Learning.

The current MEL system works mainly within the framework of our specific grants and projects (with National Chapters) and for TI-S activities. However, over the next year TI-S will be taking its MEL commitments further by developing a more comprehensive MEL system which, over time, will seek to include greater parts of the Movement. We have been working with consultants since 2009 to scope the MEL needs at TI-S, and, in 2011, an MEL coordinator was hired to lead on the development of an MEL system for the organisation. The



system will cover externally focused work aiming to contribute to deep and sustainable change in policies and key institutions around the world, and to improve public understanding of, and mobilisation against, corruption. It will also cover Secretariat support to the capacity of the Movement. Key elements will be an Annual Network Performance Survey, clear guidelines, data collection and reporting tools and indicators, central coordination of external evaluations and training of Secretariat staff.

Ultimately, the MEL system aims to provide a deeper and richer analysis of the real change occurring in the lives of people resulting from anti-corruption work, with an emphasis on learning from Chapters. The internal MEL system will allow the Secretariat to both improve accountability through demonstration of results, as well as to deepen and consolidate learning and reflections on our work.

**Indicator 4: NGO4 - Measures to integrate gender and diversity into program design and implementation, and the monitoring evaluation, and learning cycle. [GRI NGOSS PE: p. 5]**

Our Guiding Principle #10 (approved by the Annual Membership Meeting) stipulates:

*We will strive for balanced and diverse representation on our governing bodies.*

Details about diversity amongst our Board can be found under Indicator 15 of this report.

In view of the international nature of our work, advertisements of positions systematically seek knowledge of relevant languages and experience in the region where applicable. We developed over the course of 2011 (finalised in 2012) a Recruitment Policy further ensuring, amongst others, appropriate attention to diversity amongst our staff.

Over the past two years, there have been four main approaches to mainstreaming gender at TI:

- 1) *Information and knowledge*: Publications on Gender and Corruption as a field of knowledge and action. For example, there was a session on gender at the Annual Membership Meeting (October 2009) and a 2010 Anti- Corruption Research Network (ACRN) newsletter was dedicated to the state of gender research. We also disaggregate gender data in our Global Corruption Barometer.
- 2) *Analysis*: A TI-S Gender Audit was commissioned and a report completed mid- 2010. Gender audits were undertaken for four NCs.
- 3) *Institutionalisation*: A Gender Task Force at TI-S was established as a central body for coordination and internal information and
- 4) First steps for concrete *implementation*: A Gender Strategy Workshop, resulting in a Gender Strategy Planning Matrix, is a recent effort to achieve a coherent strategy for Gender Mainstreaming. In 2012 Gender mainstreaming at TI-S will be clearly affected within the purview of the newly established Monitoring, Evaluation and Learning function.
- 5) many of our projects and programmes collect gender disaggregated data.

**Indicator 5: - Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns. [GRI NGOSS PE: p. 6]**

TI has developed a series of advocacy tools to carry its messages.

Clear processes dictate the consultation and approval for **policy positions** and **working papers** (see [www.transparency.org/content/download/36280/570188](http://www.transparency.org/content/download/36280/570188) and [www.transparency.org/content/download/36279/570184/file/Appendix A Working Paper Guidelines\\_21-2-07.pdf](http://www.transparency.org/content/download/36279/570184/file/Appendix_A_Working_Paper_Guidelines_21-2-07.pdf))

Production of the **Global Corruption Report** (GCR) draws on a wide network of stakeholders. A select group of individuals who are experts on the report's thematic focus are invited to serve on an Expert Advisory Panel and help to shape the structure and content of the report. Collaboration with these individuals, as well as GCR contributing authors and article peer reviews further build TI's expert network which is useful for later outreach and



advocacy on report's focus issue. A webportal developed through TI's Chapter Zone (intranet) also provides a network platform for all stakeholders through discussion forums, and information and resource exchange. The GCR also relies significantly on its experts within the TI movement. Individual members are invited to comment on the report outline at its initial stages and, where expertise allows, may contribute more substantially to the publication, for example, through participation on the Expert Advisory Panel. The TI Board of Directors contribute to topic selection for the report and are given the final report for review prior to publication. All TI National Chapters and contact groups are welcome to contribute case studies to the GCR and are often closely involved with advocacy activities associated with the launch and roll-out.

Advocacy messages are also developed by **resolutions at Annual Membership Meetings**. As per §16.2 of our Charter, such resolutions can be tabled by any Member at least two weeks ahead of the Meeting and must be approved for discussion by the Annual Membership Meeting to be considered. Once on the agenda, the proposed resolution is debated and voted upon by the full Annual Membership Meeting.

Looking forward, as part of the 2015 Implementation Plan, a *Rapid Response Unit* was developed to scale up the organisation's responsiveness to emerging issues related to the field of anti-corruption, and to formulate and communicate TI-S advocacy positions and campaigns with enhanced effectiveness and rapidity. The Rapid Response Unit became operational in 2012.

**Indicator 6: NGO6 - Processes to take into account and coordinate with the activities of other actors. [GRI NGOSS PE: p. 7]**

TI engages in numerous coalitions through de facto arrangements, Memoranda of understanding, memberships, etc, to optimise and coordinate its actions with other relevant stakeholders. These relationships are kept track of in an internal database, part of which is planned to be published on our new website, upon its launch toward the end of this year. Our country affiliates, and our earlier-mentioned news monitoring through our Daily Corruption News ([www.transparency.org/news\\_room/corruption\\_news](http://www.transparency.org/news_room/corruption_news)) also helps inform us about the actions of other actors.

**Indicator 7: NGO7 - Resource allocation. [GRI NGOSS EC: p. 4]**

Expenditure	2011	2010	2009
<b>Organisational Development Unit and 2015 Implementation</b>	<b>232</b>	<b>236</b>	<b>0</b>
<b>Governance &amp; Special Initiatives</b>	<b>2,676</b>	<b>1,836</b>	<b>1,712</b>
<b>Advocacy, Ext Relations &amp; Fundrsg</b>	<b>2,706</b>	<b>2,187</b>	<b>1,860</b>
<b>Research and Knowledge</b>	<b>2,565</b>	<b>2,035</b>	<b>1,979</b>
Africa and Middle East	4,627	3,092	2,696
Americas	966	1,008	829
Asia & Pacific	2,286	1,220	826
Europe and Central Asia	1,471	2,071	1,210
Programmes	2,656	1,381	768
<b>Chapters and Programmes</b>	<b>12,006</b>	<b>8,772</b>	<b>6,329</b>
<b>Other (incl. FX Gains &amp; Losses)</b>	<b>62</b>	<b>18</b>	<b>170</b>
<b>Total expenditure</b>	<b>20,247</b>	<b>15,084</b>	<b>12,050</b>

Amounts in thousand (€)



See Annex 2 IFRS Statements:

[www.transparency.ca/Reports/AGM/Files/2010-2011/201108-2010-FS.pdf](http://www.transparency.ca/Reports/AGM/Files/2010-2011/201108-2010-FS.pdf)

Note:

Last year we had reported:

The difference between the Statement of Comprehensive Income in the Financial Statements and the above budget report which is caused by a deferred income and comprises the "Changes in accrued disbursements" is explained in the financial statements on page 12, note 3 (b) paragraph 5-6:

*Payments to project partners are initially recorded as receivables under Advances to National Chapters or Coalition Partners, or, if third parties are involved, as Advances to other parties as project outlays. Related Donor contributions are not recognised as income until TI-S receives evidence of expenditure in the form of project audit reports, original receipts, or any other proof as required by the relevant contract; instead, they are reported as Liabilities to Donors in the Statement of Financial Position.*

*Advances to National Chapters, Coalition Partners or other parties, net of the recognisable income for which evidence of expenditure has been received, are recorded as Changes in accrued disbursements (see note 20 and 21).*

meaning advance payments not yet reported for are recognized as expenses in the budget report but not in the Income Statement. The reconciliation can be found on the cover sheet of Annex 2 of the financial statements.

For an easier comparison between the Statement of Comprehensive Income and the Annual report, the disclosures for 2011 in the latter report have been changed. *Net changes in Advances to National Chapters and Others* are not part of the expenditure across all categories as in 2010 anymore, but now included as part of Income as a separate line item in accordance with the Statement of Comprehensive Income. They are now recognized as a deferred income (see notes 20 and 21 of the Financial Statements). In addition the amounts of EUR 2,706,000 for 2010 and EUR 1.895,000 for 2009 added in summary last year have been allocated to each Donor group and now illustrate better the contributions from each of the groups.

As an International Secretariat, TI-S conducts most of its activities through its staff while in Berlin or on travel. TI-S financial resources are administered following internal policies, in particular on Procurement, Travel, Personnel costs.

Our Clearance Procedures for the Submission of External Funding Proposals routinely verifies at top management level the consistency of the project with TI's strategic direction, costing practice, available resources as well as compliance with TI-S principles including our Donations Policy

([http://www.transparency.org/files/content/ouraccountability/Transparency International Donations Policy.pdf](http://www.transparency.org/files/content/ouraccountability/Transparency_International_Donations_Policy.pdf))

Our salary ranges are published on our website, the current ones can be found at [http://www.transparency.org/files/content/work/TIS\\_SalaryStructure\\_Apr2012.pdf](http://www.transparency.org/files/content/work/TIS_SalaryStructure_Apr2012.pdf)

The TI-S financial team was in 2011 composed of 12,4 FTEs, (14 people full and part-time) and exercises controlling. Since 2008, TI-S's financial accounts are audited following International Financial Reporting Standards, (IFRS) thereby providing explicit and detailed information on the use of our resources. Individual projects are subject to project audits, as per the requirements of the relevant donors. External evaluations of our programmes are posted at <http://www.transparency.org/whoware/accountability/evaluations>



**Indicator 8: - NGO8 - Sources of funding by category and five largest donors and monetary value of their contribution. [GRI NGOSS EC: p. 5]**

See p39, IFRS Statements:

[http://www.transparency.org/files/content/ouraccountability/TIS\\_2011AuditedFinancials.pdf](http://www.transparency.org/files/content/ouraccountability/TIS_2011AuditedFinancials.pdf)

<b>Income</b>	<b>2011</b>	<b>2010</b>	<b>2009</b>
Government	17,110	13,649	10,260
International organisations	1,936	366	622
Foundations	805	2,749	2,214
Private sector	396	690	654
Individuals	21	82	45
<b>Donor contributions</b>	<b>20,268</b>	<b>17,536</b>	<b>13,794</b>
<b>Other income</b>	<b>282</b>	<b>491</b>	<b>442</b>
Net changes in advances to National Chapters and Other Parties *)	-244	-2,706	-1,895
<b>Total income</b>	<b>20,306</b>	<b>15,321</b>	<b>12,342</b>

Amounts in thousand (€)

\*) Disclosure changed for better comparison between Annual Report and Financial Statements:

Net changes in advances to National Chapters and Other Parties were reported as part of expenditure in previous years. For a detailed explanation see Financial statements (Note 3(b) on page 12 "Accounting for Grants")

#### **Our 5 Largest Donors were in 2011:**

Department for International Development, United Kingdom (DFID): EUR 5,615,105

European Commission: EUR 2,014,326

Bill & Melinda Gates Foundation: EUR 1,705,014

Ministry of Foreign Affairs, The Netherlands: EUR 1,397,424

Swedish International Development Cooperation Agency (Sida): EUR 928,561

**Indicator 9: - Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation. [GRI NGOSS EC: p. 14]**

TI National Chapters are independent and locally rooted. The choice of leadership made at National Chapter level is therefore fully outside of our control. On the ground all of our 109 Chapters are staffed and led by nationals of their respective countries, with maybe one or two exceptions.

At TI-S, as an international Secretariat that seeks to be representative of a global movement, it is imperative for us to have a highly international and diverse staff. As such, ensuring diversity (rather than local hiring) remains an important consideration in our hiring procedures (LA1).

This is in line with TI Guiding Principle #10:

*10. In our operations and recruitment policies, we will strive to create equal opportunities for all, and achieve balanced and diverse representation with respect to gender and region, as the diversity of the movement we serve requires.*



**Indicator 10: EN16 - Total direct and indirect greenhouse gas emissions by weight. [GRI NGOSS EN: p. 22]**

	2011		2010		2009	
	CO2 in metric tons		CO2 in metric tons		CO2 in metric tons	
Number of flights for TI-S staff, Board, consultants and volunteers	590		599		596	
Flight (km)	5.295.679	1.695	5.994.074	1.918	5.012.103	1.604,0
Train (km)	43.882	2,5	33.430	1,9	56.170	3,1
Taxi (km)	32.382	5,5	40.130	6,8	35.930	6,1
<b>Total direct emissions:</b>	<b>1.703</b>		<b>-- 1.927</b>		<b>-- 1.613</b>	
Office Electricity (kWh)	127,510	54,45	112,437	48.01	101,181	43
Office heating (kWh-e)		* yet unknown on 12 October 2012	107,175	45.76	93,737	40
<b>Total indirect emissions</b>			<b>93.77</b>		<b>83</b>	
<b><u>Total approx sum of emissions</u></b>	<b>1,757 (w/o office heating)</b>		<b>2,020</b>		<b>1,696</b>	

For calculation:

Flight: 320g/km (source: <http://www.prima-klima-weltweit.de/co2/kompens-berechnen.php>)

Train: 56g/k m (source: <http://www.prima-klima-weltweit.de/co2/kompens-berechnen.php> weighting long (3/4) and short-distance (1/4).

Taxi: 169g/km (source: [www.auto-motor-und-sport.de/mercedes-e-220-cdi-17267.html](http://www.auto-motor-und-sport.de/mercedes-e-220-cdi-17267.html))

Electricity : 427g/kWh (source: US Department of Justice)

Note: TI-S electricity is generated from 100% renewable energy (<http://www.vattenfall.de/de/gewerbestrom-berlin-oekopur.htm>.)

\* To our regret, it was not possible for us to obtain from our property management company, data for Office heating for 2011 in time for submission to the independent review panel. The missing data will be added to the report once available to us.

**Indicator 11: EN18 - Initiatives to reduce greenhouse gas emissions and reductions achieved. [GRI NGOSS EN: p. 25]**

TI-S pays particular attention to environmental responsibility in its work. As almost all the TI-S staff is based in Berlin, the large amount of air travel presents an environmental challenge to our work. While acknowledging the importance of personal contact and face-to-face dialogue, we try to minimise the number of trips and seek to find the most environmentally friendly flight routes in planning travel, incorporating as many visits and meetings in any single trip.

Telecommunications, including video- and teleconferencing, is also used to the greatest extent possible to reduce the amount of travel required.



The holding of our Annual Membership Meeting in Berlin In 2011 permitted to considerably reduce our flight-induced emissions by more than 10% in comparison with the year before when the meeting was held in Bangkok. This is due to the fact that such meetings require the presence of many of our staff.

Environmental considerations are also integrated into the everyday running of the TI-S office, with measures including an office-wide recycling programme and conversion to 100% green energy. A Green Task Force promotes environmental awareness amongst our employees, interns and volunteers and encourages them to work in an environmentally responsible manner. Waste is reduced through re-use and recycling and by purchasing recycled, recyclable or re-furnished products and materials where these alternatives are available, economical and suitable.

**Indicator 12: LA1 - Total workforce, including volunteers, by employment type, employment contract, and region. [GRI NGOSS LA: p. 4]**

Staff	132	FTE	124	unlimited	64
Interns	14	PTE	8	limited	68
total	146				

**Indicator 13: LA10 - Average hours of training per year per employee by employee category. [GRI NGOSS LA: p. 16]**

The basic number of training hours per full time TI-S employee as recorded by the Human Resources Department was **16.6 hours in 2011**. This is a substantial increase from the 2.29 hours reported for 2010. Reason for that is to a large extent better central tracking of training which does not all fall under the purview of the HR Department. Such increase however is also the result of actual more substantial training investments done in the training period including a 3-day line-management seminar for 31 staff. The wider range of training opportunities offered for TI-S employees, continues to include beyond professional training seminars, in-house trainings and inductions, thematic jour fixes, presentations by external experts (researchers, anti-corruption practitioners, NCs and Senior Advisors, other NGOs), language courses, participation in international conferences, seminars and workshops, working groups which are not monitored but provided to ensure staff receive what requires them to meet their job requirements.

**Indicator 14: 14. LA12 - Percentage of employees receiving regular performance and career development reviews. [GRI NGOSS LA: p. 18]**

All employees (100%) receive regular performance and development reviews at least twice a year.

It is a mechanism put in place, in order to capture, monitor and evaluate needs for professional and personal development and a framework that supports respected leadership.

The performance review cycle consists of three stages:

1. End of year review (November/December)

A main purpose of the meeting is enhancing the communication between staff and line managers/directors and improving the teamwork. When discussing past performance this should be done with a view to how this can be improved in the future. Management and HR are prepared to support people with their work flow (load & priorities) and their learning and development.



**2. Setting Objectives (January)**

The objectives are a living tool to guide and improve everyday performance and job satisfaction. They are negotiated between employee and manager in a shared process. This process establishes mutually agreed objectives that reflect organisational purpose alongside individual needs and aspirations. Objectives bring clarity and greater effectiveness to everyday roles/responsibilities of the employee. The objectives consist of (1) output objectives and (2) personal development / behavioural objectives

**3. Mid-year Review (May/June)**

The mid-year review is based on the Participatory Feedback and is followed by a formal 1:1 Review and Planning Meeting between staff and line managers/directors.

The 360° Feedback process was not pursued in 2011 as it was not deemed helpful by many in the way it was conducted. We have been seeking to update that particular process of broader input gathering on behaviour and performance to a more reliable framework, but have not yet satisfactorily tackled that need.

**Bilateral (1:1) Review & Planning Meeting (1.5 hours)**

During this 1:1 meeting, staff and line managers discuss:

1. Participatory Feedback Report
2. Feedback to the line manager
3. Objectives for the following year

**Indicator 15:** *LA13 - Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity. [GRI NGOSS LA: p. 19]*

As per the TI-S Code of Conduct

[http://www.transparency.org/files/content/ouraccountability/TIS\\_CodeOfConduct\\_3\\_8\\_2011.pdf](http://www.transparency.org/files/content/ouraccountability/TIS_CodeOfConduct_3_8_2011.pdf) *Appointments to all positions are made on merit, regardless of gender; region; religion; disability; family status; sexual orientation, etc.*

**TI-S Staff - Gender Breakdown**

Level	female	male	total
APC	19	6	25
PC	30	11	41
SPC	14	18	32
PM	8	9	17
SPM	2	3	5
DD	3	5	8
GD	1	3	4

**TI-S Staff -Age Breakdown**

Age gp	18-24	30-44	45-64	65 +
APC	20	5	0	0
PC	11	24	6	0
SPC	5	19	8	0
PM	0	10	7	0
SPM	0	4	1	0
DD	0	3	5	0
GD	0	1	3	0



**TI-S Staff- Region of Origin**

<b>Regional Background</b>	<b>Asia Pacific</b>	<b>North America</b>	<b>Eastern Europe+FSU</b>	<b>Western Europe</b>	<b>Africa &amp; ME</b>	<b>Latin America &amp; Caribbean</b>
APC	2	2	1	19	0	1
PC	2	2	3	31	3	0
SPC	2	5	5	17	1	2
PM	2	5	0	10	0	0
SPM	0	0	0	4	0	1
DD	0	1	0	5	1	1
GD	0	2	1	1	0	0

**Abbreviations:**

*APC: Assistant Programme Coordinator*  
*PC: Programme Coordinator*  
*SPC: Senior Programme Coordinator*  
*PM: Programme Manager*

*SPM: Senior Programme Manager*  
*DD: Department Director*  
*GD: Group Director*

**TI Board of Directors representation:**

	<b>Africa + Middle East</b>	<b>Americas</b>	<b>Asia Pacific</b>	<b>Europe + Central Asia</b>
<b>Female</b>	0	3	0	1
<b>Male</b>	2	1	1	4

	<b>25-44 y.o.</b>	<b>45-64 y.o.</b>	<b>65+ y.o.</b>
<b>Female</b>	0	3	1
<b>Male</b>	3	3	2

We do not systematically collect data on the age of our Board members. The above data happened to have been available to us due to a specific need.

It is important to note that, as per our Nomination Policy, the statutory call by the Chair of the Board to the Membership for nominations of Board candidates requests that due consideration be given by nominators to the representation of all the world regions in which TI works as well as the representation of women. The TI Board has been chaired by a woman, Huguette Labelle, since 2005.



**Indicator 16:** . SO1 - Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting. [GRI NGOSS SO: p. 3]

A number of TI-S projects and programmes work with communities in the areas of providing assistance to victims and witnesses of corruption, engaging communities to effectively demand transparency and community-based diagnostics of corruption in relation to basic service delivery. However, all of these activities are undertaken by National Chapters, not by TI-S.

**Indicator 17:** SO3 - Percentage of employees trained in organization's anti-corruption policies and procedures. [GRI NGOSS SO: p. 5]

The TI-S Ethics Advisor conducted two trainings in 2011 with Staff on the TI-S Code of Conduct, including one dedicated to discussing real-life ethical dilemma issues. By the nature of our work, the majority of our recruited staff is knowledgeable on the corruption, and all of them are particularly sensitive to it. All TI-S employees receive a full day of formal induction which covers all our internal procedures on anti-corruption. Our National Chapter in the UK (TI-UK), have developed together with BOND comprehensive anti-corruption guidelines for NGOs. We are working to further our own anti-Corruption capability in light of these, to be operational in 2013.

**Indicator 18:** PR6 - Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship. [GRI NGOSS PR: p. ]

TI-S does not actively fundraise from the wider public but primarily from institutions. The fundraising team for our global operations consists of 4 people who know and comply with our Donations Policy and the relevant provisions of the INGO Charter.

As explained under Indicator 7, our Clearance Procedures for the Submission of External Funding Proposals helps ensure compliance with internal and external laws and standards.

As part of its ongoing efforts to widen its donor base, TI-S is increasingly seeking to raise funds from the public and from the corporate donors. While doing so we follow stringent due diligence processes ensuring the funding we receive is accepted in line with our donations policy, which is publicly available on the TI website. Due diligence on potential new donors takes place each time when financial support for our work is sought from such donors.

We for example enters into partnerships with private-sector actors who have committed to anti-corruption throughout their operations, and who demonstrate such commitment through their internal policies and external engagements. TI-S does not offer any certification or approval of the policies or actions of its private-sector partners, and does not perform any confidential work for their sole benefit. TI-S's corporate partnerships seek to raise awareness throughout the private sector of the devastating impact of corruption.

Marketing is not part of TI-S fundraising. Discussions regularly arise with our stakeholders about approaching particular donors, but no formal complaint was received in that context over the reporting period.

**I hereby declare that to the best of my understanding this report fulfils the requirements for a GRI G3 Application Level C.**

**Name:** Stan Cutzach  
**Position:** Governance Manager  
**Date:** 12 October 2012

# TI Strategy 2015 development

*"empowering our diversity and finding our common focus"*

