

Implementation Status of G20 Commitments in its Anti-Corruption Action Plan

Item	Action Plan Items	Commitments	Implementing Body	Action Taken	Unfinished Work
1.	Ratify, accede, fully implement UNCAC; invite non-G20 states to do so; strengthen reviews*/****	Ensure that individual reviews are done effectively and thoroughly; increase transparency and inclusivity*	Individual Countries*	~ 17 G20 countries have ratified and implemented the UNCAC; six have undergone UNCAC review and the rest are to take place by 2014; some G20 countries have assisted with UNCAC seminars or events** ~ 17 G20 countries have ratified and are implementing UNCAC***	~ G20 members Germany, Japan and Saudi-Arabia to ratify UNCAC. All G20 countries to actively apply and enforce UNCAC. In compliance with their commitment to lead by example in increasing transparency and inclusivity, civil society and other stakeholders should be involved in national reviews and country visits by review teams. Furthermore, all G20 countries should publish their full review reports.
2.	~ Adopt & enforce laws against international bribery*/**** ~ Establish the liability of legal persons****	~ Engage more with OECD Working Group; promote Article 16 of UNCAC* ~ In 2013 share information and work with the private sector to identify effective enforcement measures****	Individual Countries*	~ 15 G20 countries are party to and implemented the OECD Anti-Bribery Convention; one is a full member and three regularly participate in the OECD working group; 15 G20 countries have undergone phase 1 & 2 reviews, 10 have undergone phase 3; some G20 countries have assisted with OECD seminars or events** ~ Russia has acceded the OECD Convention. ¹ ~ China has introduced legislation criminalising foreign bribery.***	~ G20 countries China, India, Indonesia and Saudi-Arabia should ratify the OECD Anti-Bribery Convention and participate in ist peer review process. All G20 countries should criminalise and actively enforce foreign bribery legislation.
3.	Prevent access to global financial system & combat money laundering by corrupt officials*	~ Encourage FATF to keep engaging countries with AML/CFT deficiencies, update and implement standards calling for transparency of cross-border wires, beneficial ownership, and due diligence* ~ Share best practices in anti-money laundering efforts and undertake horizontal thematic reviews of the treatment of high risk customers and business relationships****	FATF* and its member countries	~ Revised FATF standards (adopted in February 2012) supported by G20 ² ~ New AML legislation in some G20 countries, e.g. criminalising insider trading or regulations on preventing the transfer of criminal proceeds specific to financial institutions.***	~ Implementation of FATF standards (next FATF peer review to be completed in 2013 will focus on effectiveness of implementation) FATF paper on best practices of how to use the FATF standards in the fight against corruption ~ Implement horizontal thematic reviews of the treatment of high risk customers and business relationships and publish and act on results.
4.	Prevent corrupt officials from traveling abroad*	~ Framework for denying entry & safe haven for corrupt officials*/**** ~ Establish an experts' network****	Individual Countries*	~ Endorsed principles for denial of entry*** ~ Initiated an informal expert network to identify obstacles and opportunities for cooperation and individual action	~ Implementation of the framework in national law and practice
5.	Strengthen cooperation in addressing corruption and bribery*	~ Promote use of UNCAC, particularly related to extradition, mutual legal assistance, & asset recovery; offer technical assistance; encourage bi- and multi-lateral treaties to these ends* ~ Produce "a G20 step-by-step guide to mutual legal assistance to support improved international cooperation against corruption."***	"the G20"	~ Published a step-by-step guide to assist authorities seeking mutual legal assistance.***/*	~ Implement swifter information exchange procedures and respond quickly to requests. ~ All G20 countries should sign the Convention on Mutual Administrative Assistance in Tax Matters ³ , encourage other countries to join and support the provision for automatic exchange of tax information.
6.	Support the recovery of the proceeds of corruption; each country will make progress to prevent and detect transfers of the proceeds of crime, to support the direct recovery of property, to support the recovery of property through international cooperation in asset tracing, freezing, and confiscation, to cooperate in voluntary disclosure, and to return and dispose of assets per Chapter V of UNCAC*	~ Countries will - by the 2011 summit - create clear, effective channels of mutual legal assistance and other types of international cooperation on corruption and asset recovery, including designating an authority responsible for mutual legal assistance pertaining to corruption and asset recovery; establish points of contact for law enforcement; develop specialized expertise in an appropriate agency* ~ In 2013 develop national guides on international cooperation in asset recovery**** ~ Review experiences in G20 countries with regard to promoting transparency of legal entities to identify "good practices"****	Individual Countries*	~ Agreed on principles on asset recovery (which haven't been published). ~ Most G20 countries have published information on contact points and required procedures for stolen asset recovery requests in their countries.*** ~ Published guide "Requesting Mutual Legal Assistance in Criminal Matters from G20 Countries: A Step-by-step Guide 2012" which provides states seeking mutual legal assistance from G20 countries with a step-by-step overview of the requisite procedures of G20 countries to ensure requests are received and processed as efficiently as possible.***/*	~ Finalise work on effective asset recovery framework. G20 countries should adopt and implement the recommendations from the Stolen Asset Recovery's 'Barriers to Asset Recovery' report. ⁴ ~ Furthermore, the G20 should put in place legal frameworks that would enable victims of corruption and civil society to take asset recovery cases to court, both in the countries from where the assets have been stolen and in the countries where the assets are deposited.

7.	Protect whistleblowers*	<p>~ Countries will enact and implement whistleblower protections by the end of 2012; building on work by the OECD, the World Bank, and others, experts will study and summarize existing whistleblower protections and mechanisms and will propose best practices*</p> <p>~ Protect reporters from threats or legal action****</p> <p>~ Countries will implement UNCAC Articles 6 and 36 as soon as possible*</p> <p>~ Examine anti-corruption authorities and promote/protect independence of the judiciary****</p>	Individual Countries* & "G20 experts"*	<p>~ 13 G20 countries have whistleblower protection for private sector, 14 for the public sector.**</p> <p>~ OECD principles for whistleblower protection.⁵</p>	~ Remaining countries to enact and implement whistleblower protection legislation for public and private sectors based on the OECD principles.
8.	Strengthen anti-corruption bodies and enforcement authorities; allow these bodies to function free from undue influence*	<p>~ "[Promote] the integrity, honesty and accountability of all public officials; [adopt] fair and transparent government procurement systems; and [commit] to fiscal and budgetary transparency."**/****</p> <p>~ Internet reporting of (1) public procurement policies, (2) selection & evaluation criteria, and (3) additional information about awards of contracts, modifications, exceptions***</p> <p>~ Implement fiscal and budget transparency measures with reference to UNCAC Article 9, IMF Code of Good Practices in Fiscal Transparency, and OECD Best Practices on Budget Transparency****</p> <p>~ Consider G20 countries' current systems for financial and asset disclosure by public officials****</p> <p>~ Explore the effect of public officials' immunities on anti-corruption efforts****</p> <p>~ Develop minimum criteria to combat corruption in IO/IFI funded projects****</p>	Individual Countries*	~ Commitment to ensure independence of anti-corruption agencies.***	<p>G20 countries should ensure:</p> <p>~ appropriate levels of financial resources towards the enforcement function of anti-corruption agencies and ethics commissions to prosecute corruption, fraud, mismanagement and violations of conflict of interest laws by government employees and officials.</p> <p>~ that anti-corruption agencies have the necessary supportive legal framework to operate effectively granting the appropriate powers and authority to carry out investigations, if they have an investigative function.</p> <p>~ that anti-corruption agencies are independent from the Executive and have the ability to investigate a country's government and leadership.</p>
9.	Promote public sector integrity, transparency, accountability, and corruption prevention, including use of public finances*/****	<p>~ "[Promote] the integrity, honesty and accountability of all public officials; [adopt] fair and transparent government procurement systems; and [commit] to fiscal and budgetary transparency."**/****</p> <p>~ Internet reporting of (1) public procurement policies, (2) selection & evaluation criteria, and (3) additional information about awards of contracts, modifications, exceptions***</p> <p>~ Implement fiscal and budget transparency measures with reference to UNCAC Article 9, IMF Code of Good Practices in Fiscal Transparency, and OECD Best Practices on Budget Transparency****</p> <p>~ Consider G20 countries' current systems for financial and asset disclosure by public officials****</p> <p>~ Explore the effect of public officials' immunities on anti-corruption efforts****</p> <p>~ Develop minimum criteria to combat corruption in IO/IFI funded projects****</p>	G20****	~ Endorsed principles for financial and asset disclosures by public officials.***/*****	<p>~ Enact the standards for procurement and public financial management consistent with Article 9 of the UNCAC and the OECD Principles on Enhancing Integrity in Public Procurement.</p> <p>~ Furthermore, all G20 governments should ensure that export credit agencies enforce rules forbidding bribery, fraud or collusion.</p> <p>Implementation of financial and asset disclosure principles in national law and practice</p>
10.	~ "[E]xplore the potential and effectiveness of integrity pacts between business and governments and other mechanisms for sharing anticorruption expertise among businesses and governments"**** ~ Support "public-private partnerships to combat corruption in specific sectors" & support specific initiatives like EITI and CoST****	<p>~ Work with B20 to explore business-government integrity pacts****</p> <p>~ "[S]hare experiences and best practices from existing sectoral initiatives"****</p> <p>~ "[C]arry out a risk-mapping analysis of" highest risk sectors, including those identified by the B20 as priority areas, including "cross-cutting issues such as the awarding of rights, licenses or other similar benefits"****</p>	G20****		~ Following the Dodd-Frank Act in the US and the forthcoming Accounting and Transparency Directives in the European Union all G20 countries should pass legislation obliging oil, gas and mining companies to publish the payments they make to governments of all the countries where they operate on a project-by-project basis.

* From G20 Seoul Summit 2010, "G20 Agenda for Action on Combating Corruption, Promoting Market Integrity, and Supporting a Clean Business Environment"

** From G20 Cannes Summit 2011, "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"

*** From G20 Los Cabos Summit 2012, "G20 Anti-Corruption Working Group 2012 Monitoring Report"

**** From "G20 Anti-Corruption Action Plan 2013 - 2014"

***** From G20 Los Cabos Summit 2012, "Requesting Mutual Legal Assistance in Criminal Matters from G20 Countries"

***** From G20 Los Cabos Summit 2012, "High-Level Principles on Asset Disclosure by Public Officials"

1. From "OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions: Ratification Status as of April 2012"

2. From FATF, February 2012, "International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation - the FATF Recommendations"

3. From the OECD, last updated December 2012, "Convention on Mutual Administrative Assistance in Tax Matters"

4. Stolen Asset Recovery Initiative, "Barriers to Asset Recovery"

5. From OECD CleanGovBiz, "Whistleblower Protection: Encouraging Reporting"