L'intelligenza artificiale applicata al sistema dei Controlli:

Breaking BIAS, Gold standards and Business perspective

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AODV 231 Associazione dei Componenti degli Organismi di Vigilanza ex D.Lgs. 231/2001

STRAIGHT TO THE POINT

Today I would like to convey the **sense of urgency** and the **responsibility** we have in fighting this **global cross cutting issue** in light of the tremendous opportunities coming from the use of **digital technology**

AGENDA

1. **BREAKING BIAS EXERCISE** → No trade off Performance vs Compliance, Zero as a value, together for a new SDG

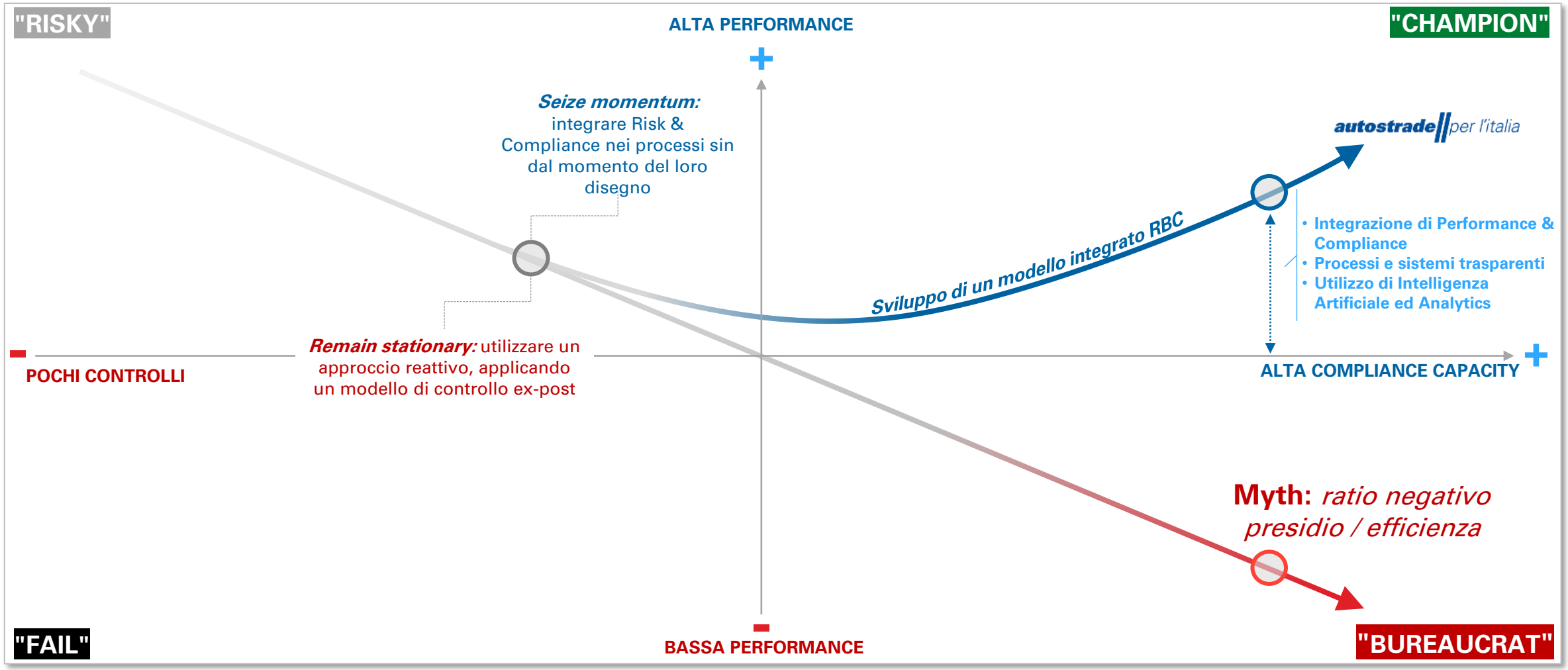
2. **GOLD STANDARDS** → illustration of the Business at OECD **"Zero Corruption" Manifesto and** Paper **"Digital technologies for the promotion of the fight against corruption – a business perspective"**

3. **BUSINESS PERSPECTIVE** → illustration of a **Smart Continuous Monitoring Model** of a large infrastructure company, Autostrade per l'Italia

BREAKING BIAS

Presupposto per una Compliance integrata è **sfatare il falso mito** per cui aumentando il presidio diminuisce la performance dei processi…

- È possibile avere Processi efficienti e presidiati -



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AUTOSTRADE PER L'ITALIA

The Autostrade per l'Italia Group ("ASPI" or the "Group") is Italy's leading toll road infrastructure operator, with a network under concession of 2,968 km, equal to ca.49% of the entire Italian toll road network, and one of Europe's largest toll road franchises.
The network under concession crosses 15 regions and 60 provinces, with 215 service areas, 2,062 bridges and viaducts[1], 1,836 overpasses and 642 tunnels.

ASPI Group

ASPI is an integrated mobility provider along the entire value chain putting highest sustainability standards at the center of its long-term strategy.
ASPI through its subsidiaries operates in the field of engineering and construction services as well as in the development of innovative and sustainable mobility systems. That range of activities positions the Group along the whole value chain as an integrated mobility operator. The activities span from designing, building, and managing the network to researching and developing new mobility services, with the aim of improving customer experience and minimizing the environmental impact of the business.

Operations	Leader in the design, construction and operation of a safe, sustainable and resilient motorway network
Engineering	Design-to-sustainability approach for durable and innovative infrastructures, extended to supply chain
Construction & services	Use of low-impact and recycled materials and machineries in the construction, with specific care to the protection of natural resources
Technology & R&D	Development and integration of hardware and software solutions in the field of Intelligent Transport Systems
Energy	Green energy production and distribution with PV plants on the road network
Travelers Services	Enhanced customer experience, sustainable inter-modal transport, electric vehicle recharge stations network

ASPI Network

- 2,968 km motorway network
- 2.5 million vehicles per day
- 4.6 million clients per day
- 215 service areas
- 257 toll-booths
- 642 tunnels for a total of c.436 km
- 2,062 bridges and viaducts (>10 meters length)
- 100 charging electric stations

1. Number of bridges and viaducts >10 meters length

Source: DNF 2023; Sustainability-linked financing framework

LINEE GUIDA STRATEGICHE DI PIANO

autostrade per l'italia

Indirizzi Strategici di Piano Industriale

Consiglio di Amministrazione
5 Ottobre 2023

- **Aggiornamento del PEF per il quinquennio regolatorio 2025-2029** recependo la revisione dei parametri regolatori (WACC, inflazione, parametro di efficienza), i nuovi fabbisogni di investimento e la base costi operativi aggiornata per effetto del mutato contesto normativo e macroeconomico
- **Assicurare i fabbisogni di cassa per i piani di capex ed opex**, in funzione dell'obiettivo di mantenere un rating IG e la solidità delle metriche finanziarie e patrimoniali
- **Prosecuzione del programma Next To lean** per il miglioramento continuo dei processi, l'evoluzione degli **strumenti digitali** e l'**efficientamento** degli altri costi operativi e del personale, di **ASPI** e del **Gruppo** (in particolare YouVerse)
- **Consolidamento delle società di ingegneria, costruzione e tecnologia del Gruppo** con focalizzazione sul piano industriale di ASPI, nel rispetto dei limiti imposti dal nuovo Codice Appalti in merito alle quote in-house
- Mantenimento di un elevato livello di **Stakeholder Engagement e Comunicazione**, funzionali a consolidare e rilanciare costantemente il ruolo del Gruppo come operatore di mobilità strategico per il Paese
- **Integrazione strategia ESG** definita nella carta degli impegni, coerente con il commitment SBTi e i target di **finanza sostenibile**, per raggiungimento obiettivi al 2030
- **Valorizzazione dei business ancillari e non core**, con particolare riferimento a FIX, Elgea, TEM e Polska, generando cassa da utilizzare per migliorare la liquidità disponibile per capex e dividendi

$$\sum 4S = P = f(I, R, Q)$$

SICUREZZA

SERVIZIO

SMART SOLUTION

SOSTENIBILITÀ

PERFORMANCE

BUSINESS
INTEGRITY
Condotta responsabile

BUSINESS
RESILIENCE
Capacità di far accadere le cose

QUALITY
IMPROVEMENT &
Passione per l'eccellenza

BUSINESS INTEGRITY

RESPONSABILITA' + CONSAPEVOLEZZA

RESPONSIBLE BUSINESS CONDUCT

ANTICORRUZIONE

ANTIFRODE

MONITORAGGIO TERZE PARTI

L'integrità è una volta a costruire la **cultura della responsabilità,** stimolando una **Condotta** di **business responsabile** che richiede un'aderenza **convinta** e non solo formale alla normativa e la consapevolezza di comportarsi in modo che non in quanto "conveniente", ma perché «**giusto**»

BUSINESS RESILIENCE

CAPACITA' DI ADATTARSI + RAFFACCADERE LE CRISI

BUSINESS CONTINUITY

ENTERPRISE RISK MANAGEMENT

STABILIZZAZIONE FORNITORI CRITICI

IT SECURITY

Diventare un **benchmark di resilienza** nel conseguimento degli obiettivi del piano strategico, attraverso il **presidio dei rischi tecnologici e operativi,** il rafforzamento delle **performance** e il rafforzamento della **reputazione e** della **fiducia dei nostri stakeholder**

QUALITY IMPROVEMENT & LEAN

STANDARD + VELOCITA'

SISTEMA DI GESTIONE INTEGRATO (ISO)

QUALITY STANDARDS

LEAN MANAGEMENT

Garantire i più elevati standard di qualità attraverso il sistema di gestione integrato e controlli di secondo livello efficienti ed efficaci

Migliorare i processi aziendali con il fine di **ridurre i costi, ottimizzare i tempi** ma allo stesso tempo **garantire il livello di controllo e qualità**

CONTINUOUS MONITORING

TRANSACTIONS | GAPS/ACTIONS | RISKS

GROUP INTERNAL CONTROL SYSTEM

IL FRAMEWORK DRBQ

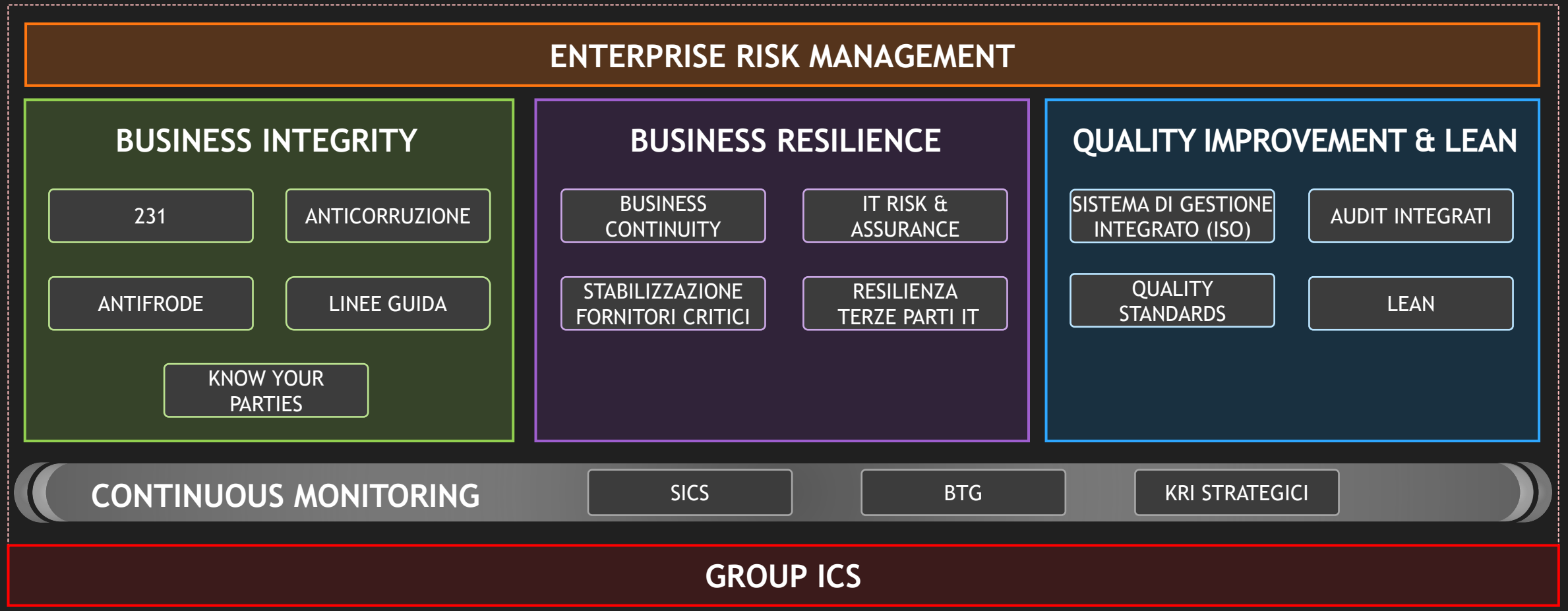


TABLEAU DI DIREZIONE GEN-MAG 2024

autostrade per l'italia

esemplificativo

ENTERPRISE RISK MANAGEMENT

RISK APPETITE INDEX 2024

FOLLOW UP ERM

xx AP

yy Chiusi
15 Ripianificati
31 On track

FOLLOW-UP TEMI WL

= n Tematiche stabili
m Tematiche evoluzione positiva
2 Tematiche evoluzione negativa
6 Nuove tematiche da attenzionare

BUSINESS INTEGRITY

231 / ANTICORRUZIONE / ANTIFRODE

RBC Index

xx/50 Interviste (compresi Workshop) — di cui 30 Integrate

5/20 Incontri di sensibilizzazione

40% Efficientamento attività

KNOW YOUR PARTIES — LG

+xx NEW Terze Parti

Analisi Nuove Terze Parti Anagrafica 2024

xx TP ok

xx TP non critiche inserite nel piano di monitoraggio periodico

+2 Linee Guida emesse

xx Linee Guida a piano 2024

BUSINESS RESILIENCE

OPERATIONAL RESILIENCE

BUSINESS CONTINUITY

ISO 22301	MONITORAGGIO	PREVENZIONE	GESTIONE
5/8 L0 32/40 L1 Processi certificati	xx Eventi Registrati (>= Level 2)	xx Deep Dive	xx Toolkit operativi

147 Business Interruption (Event List)

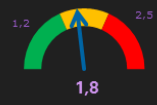
STABILIZZAZIONE FORNITORI CRITICI

4/8 L0 Processi con BIA Fornitori

xx Fornitori/ categorie classificati "critici"

DIGITAL RESILIENCE

IT Risk Profile Index



- Data Governance
- AI Governance
- Cyber Security
- Logical Access
- IOT/OT Governance

Verifiche II livello

Sistemi IT: 12/20 — Chiusura Q4

Fornitori IT: 0/30 — Avvio Q2

QUALITY IMPROVEMENT & LEAN

SISTEMA INTEGRATO

Certificazioni: 9 Standard ISO Integrati (+1 vs '23)

Esiti certificazione: 0 NC (Non conformità)

Previsto a Luglio rating integrazione

AUDIT INTEGRATI

16/95 Avanzamento* al 14/05 (17%)

7 NC (Non conformità)

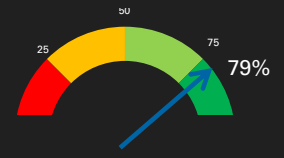
53% Efficientamento

+ 1000 Controlli

*9 rapporti da emettere

QUALITY STANDARD

Coverage / Corpo normativo



Ottimale in lieve aumento (+3% rispetto Dic 23)

LEAN

-xx GG LT pagamento AMPLIA (da '22 a '24)

xxx k Ricavi recuperati (Concessioni Aree)

7 Cantieri con contabilità digitale

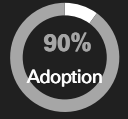
xxx k Iter recupero avviato (Pagamenti Lavori)

3 Comunicazione/ Formazione Lean

xx Kaizen Group

CONTINUOUS MONITORING

SMART ICS



	KRI / KFI ICS	KPI PAG. AMPLIA
Indicatori	55	xx
Transazioni analizzate	+1,8mln	+ 800k
Utenti abilitati	34	25 expected

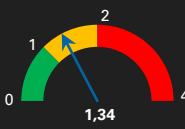
BRIDGE THE GAP
KPI adoption = 100%

1500 Gap — 50 Macro Gap Primari Aperti

1700 Azioni — 40 Azioni Prioritarie (- 19 chiuse da dic 23 +27 aperte da dic 23)

GROUP ICS

12 OPCO — Risk Coverage: 100% Approvati in CDA



Avg. Enterprise Risk Index

12 OPCO — 231/Anticorruption Coverage: 100%

5 OPCO — 5 Modelli Antifrode implementati; 3 Da avviare; 4 Out of scope

9 BCM model centralizzato

11 OPCO — BCM model avviato (Big); Movyon da avviare

10 OPCO — 10 SGI in corso; 2 Out of scope

RBC INTEGRATA NELLA STRATEGIA AZIENDALE

Occorre individuare nel piano industriale delle **direttrici specifiche in ambito risk & compliance** che abilitano il raggiungimento degli obiettivi aziendali. Tali direttrici saranno responsabili di definire ed implementare soluzioni in grado di trasformare il commitment in azione

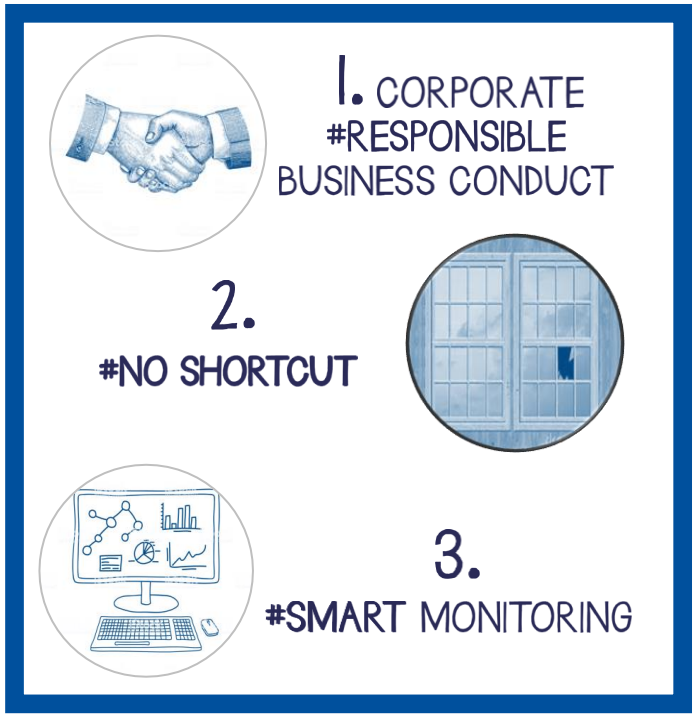
- La Compliance Footprint -

Compliance Footprint

Direttrici di Piano

- next to Digital — Transformation network in "smart" infrastructure
- next to People — Induction program and employees on-boarding
- next to Active safety — Safety Academy
- next to Legality — **Strengthening of the Internal Control System**
- next to Knowledge — Partnership with university excellence
- next to Transformation — Communication and information transformation
- next to Excellence — Ensure operational excellence

Focus on Next to Legality



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SMART MONITORING

Smart Monitoring Solutions are enablers for the improvement of processes, systems and controls, through data optimization/sharing and a new way of working.

NEW WAY OF FIGHTING CORRUPTION

CONTINUOS MONITORING

REAL TIME RESULTS

100% DATA ANALYSIS

SMART CONTROLS

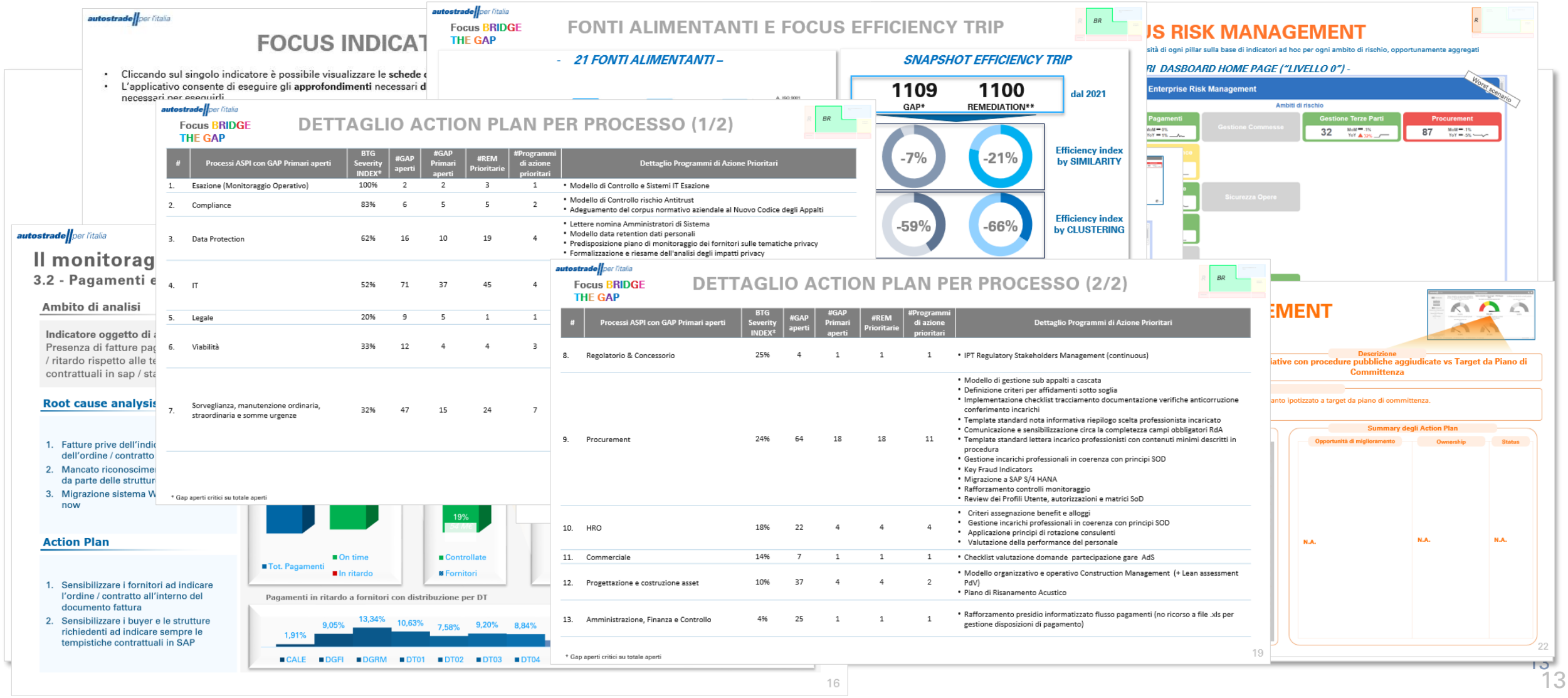
INTEGRATING PERFORMANCE AND COMPLIANCE

INSIGHTS FOR STRATEGIC DECISIONS

12

SMART MONITORING: HOW IT WORKS

By **implementing transparent processes and systems**, integrating **performance & compliance** and by using **AI and Analytics**, Autostrade per l'Italia has **developed a process-based continuous monitoring model on** company **transactions, gaps, actions and risks.**



$$E \equiv Q \times A$$

KEY SUCCESS FACTORS FOR **COMPLIANCE EFFECTIVENESS**

EFFECTIVENESS OF ANTICORRUPTION SOLUTIONS

E = Q x A

Quality	x	Acceptance
1. **Multidisciplinary team** with Data Analytics Expertise, Process Expert, Risk Expert 2. Allocation of financial resources from **Budget** 3. **Availability and reliability of data** in conjunction with evolved systems 4. **Mature internal control system level** 5. **Reporting with tailored approach**, appropriate to target audience		I. **Value to business processes** by making them more simple, effective and adherent to the specific context II. Internal and external **communication** III. **Top management perspective** IV. **Reduction** of number **of controls**
Commitment		
Trust		
Culture // Breaking Bias		

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UNCONVENTIONAL COMMUNICATION

Autostrade per l'Italia has designed and adopted an **innovative, unconventional** and effective **way** of **communicating** with managers, using simple and direct messages ("**Brain-Gut Communication**"). Below are some examples:

EXAMPLES OF UNCONVENTIONAL COMMUNICATION

Legality Days

Compliance pills: Integrity Pack

Examples of unconventional communication

THE USE OF DIGITAL TECHNOLOGY IN THE FIGHT AGAINST CORRUPTION

THE BUSINESS PERSPECTIVE

NICOLA ALLOCCA

CHAIR OF THE BUSINESS AT OECD ANTICORRUPTION COMMITTEE &

RISK, BUSINESS INTEGRITY, RESILIENCE AND QUALITY DIRECTOR AT AUTOSTRADE PER L'ITALIA

B20 BRAZIL INTEGRITY & COMPLIANCE TASK FORCE CO-CHAIR

BUSINESSatOECD

MINIMIZE

THE IMPACT OF THE DISEASE

VS

ERADICATE

THE DISEASE

#VISIONSWITCH

MANAGE

CORRUPTION RISK

VS

zero

/zè·ro/

Ø

ELIMINATE

CORRUPTION RISK

- La nostra visione si fonda sul concetto di zero come valore -

zero Ø

/ʒè·ro/

sostantivo maschile

1. Numero cardinale che indica assenza di qualsiasi valore, unità o quantità, e in particolare la mancanza, per una determinata classe, di elementi

SENSE OF MATERIALITY

"By eliminating the economic impact of corruption in Europe, it would be possible to..."

1° ELIMINATE WORLD HUNGER

2° PROVIDE DRINKING WATER GLOBALLY

3° PROVIDE FREE HEALTHCARE IN THE POOREST COUNTRIES

IMPATTO SOCIALE DELLA CORRUZIONE

IMPATTO SOCIALE

- Impatto della Corruzione in Europa -

CORRUZIONE

904 MILIARDI € / ANNO

COSA POTREMMO FARE?

1	2 FAME ZERO	ELIMINARE LA FAME NEL MONDO	229 MILIARDI € / ANNO
2	6 ACQUA PULITA E IGIENE	OFFRIRE ACQUA POTABILE GLOBALMENTE	129 MILIARDI € / ANNO
3	3 SALUTE E BENESSERE	SANITÀ GRATIS NEI PAESI PIÙ POVERI	259[1] (dato 2018: 115) MILIARDI € / ANNO
+		RISORSE RESIDUE (NB: >PNRR)	287 MILIARDI € / ANNO

FONTE> THE COSTS OF CORRUPTION ACROSS THE EUROPE: https://www.greens-efa.eu/files/doc/docs/e46449daadbfebc325a0b408bbf5ab1d.pdf

[1]FONTE> OXFAM: https://www.oxfamitalia.org/wp-content/uploads/2020/05/BRIEFING_PAPER-Tutto-laiuto-necessario_final.pdf

IMPATTO SOCIALE DELLA CORRUZIONE

IMPATTO SOCIALE

- Impatto della Corruzione in Italia -

CORRUZIONE	237 MILIARDI € / ANNO	

A COSA CORRISPONDONO?

1	BUDGET NAZIONALE SERVIZIO SANITARIO	1.7x
2	BUDGET NAZIONALE ISTRUZIONE	>4x
3	BUDGET NAZIONALE FORZE POLIZIA	9x
4	BUDGET NAZIONALE DISOCCUPAZIONE	6x
+	REDDITO ADDIZIONALE PER OGNI CITTADINO	€ 3.900

CIRCA 11% DEL REDDITO PRO CAPITE

FONTE> THE COSTS OF CORRUPTION ACROSS THE EU: https://www.greens-efa.eu/files/doc/docs/e46449daadbfebc325a0b408bbf5ab1d.pdf

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OUR CO-PILOTS IN THE RACE TO ZERØ

OECD

CONVENTION ON COMBATING BRIBERY OF FOREIGN PUBLIC OFFICIALS IN INTERNATIONAL BUSINESS TRANSACTIONS

and Related Documents

BUSINESSatOECD

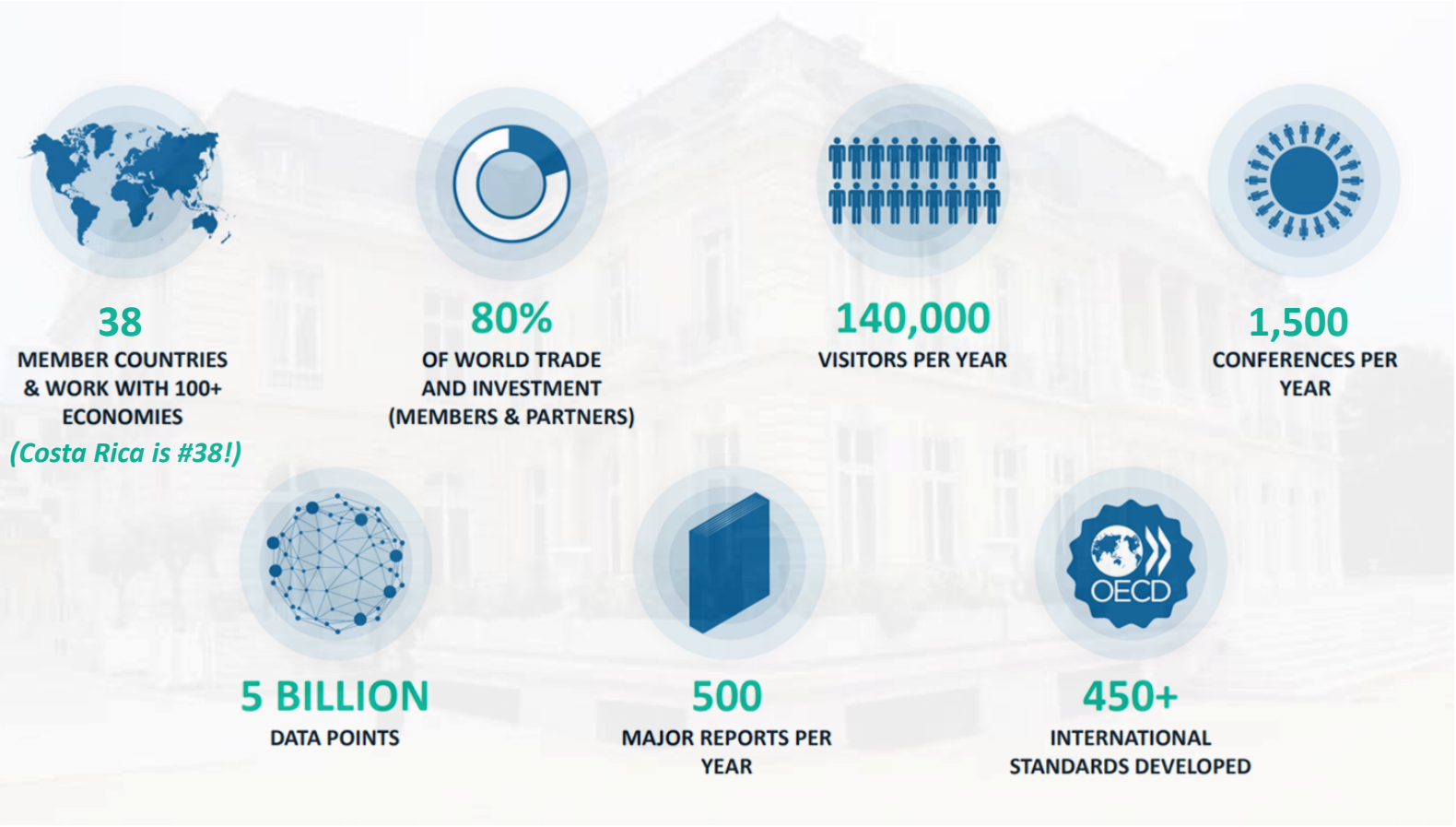
Business at OECD (BIAC)

Anti-Corruption Committee

THE OECD

A LEADING INSTITUTION IN THE FIGHT AGAINST CORRUPTION

The **Organisation for Economic Co-operation and Development (OECD)**, established in 1961, is an international organisation in which governments work together to find solutions to common challenges, develop global standards, share experiences and identify best practices to promote better policies for better lives.



OECD anticorruption instruments:

- → OECD Anti-Bribery Convention and following Recommendations,
- → OECD Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises, MNEs, etc.
- → Plus research and analysis, including on the demand side of bribery and corruption in state-owned enterprises (SOEs)

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ANTIBRIBERY CONVENTION AT A GLANCE

The **OECD Anti-Bribery Convention** is one of the most important tools to combat international bribery.
It establishes **legally binding** standards to criminalise bribery of foreign public officials in international business transactions.

IMPLEMENTATION ROADMAP

1997 / 99

Signature of the OECD Antibribery Convention, which entered into force in 1999

Objective: help governments to:

- pass new laws,
- strengthen their existing regulations
- foster effective enforcement.

It focuses exclusively on the Supply Side of bribery.

> **Before the OECD Anti-Bribery Convention was signed in 1997, there was no effective multinational framework for the prevention and prosecution of bribery.**

2009

Revision of the recommendation: "Further combating bribery in International Business Transactions"

Objective: enhance the ability of Parties to prevent, detect, and investigate foreign bribery.
In particular, new topics regard:

- provisions for combating small facilitation payments;
- protecting whistle-blowers;
- communication between public officials vs law enforcement authorities
- Good Practice Guidance on Internal Controls, Ethics and Compliance (Annex II)

2021

Revision of the recommendation

Objective: enhance the ability of parties to address challenges, good practices and cross-cutting issues that have emerged in the global anti-corruption landscape since 2009.
In particular, new topics regard:

- Addressing the Demand Side of Foreign Bribery Cases;
- Sanctions and Confiscation;
- Non-Trial Resolutions;
- International Co-operation;
- Protection of Reporting Persons;
- Incentives for Compliance;
- Data Protection.

Accelerator for the use of digital technology in compliance

BUSINESS @ OECD

THE BUSINESS VOICE IN THE FIGHT AGAINST CORRUPTION

Established in 1962, *Business at OECD* (BIAC) is the **institutional stakeholder for business to the OECD** providing expertise to ensure competitive economies and a pro-business policy environment

BUSINESS AT OECD (BIAC)

9M+

Businesses in OECD countries and beyond

2800+

Business representatives that include small businesses and entrepreneurs, national industry and employer organizations, and multinational corporations.

60M+

Business **employees** represented

45+

National Business Organizations from all OECD Member Countries

10+

National Business Organizations from non-OECD economies

29

Policy groups/ committees that shape public policy through engagement in OECD at leadership and policy group levels

+280

Policy submissions per year to the OECD to highlight key business messages

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BUSINESS @ OECD ANTICORRUPTION COMMITTEE

THE SUBJECT MATTER EXPERT IN THE FIGHT AGAINST CORRUPTION

BUSINESS AT OECD (BIAC) ANTICORRUPTION COMMITTEE

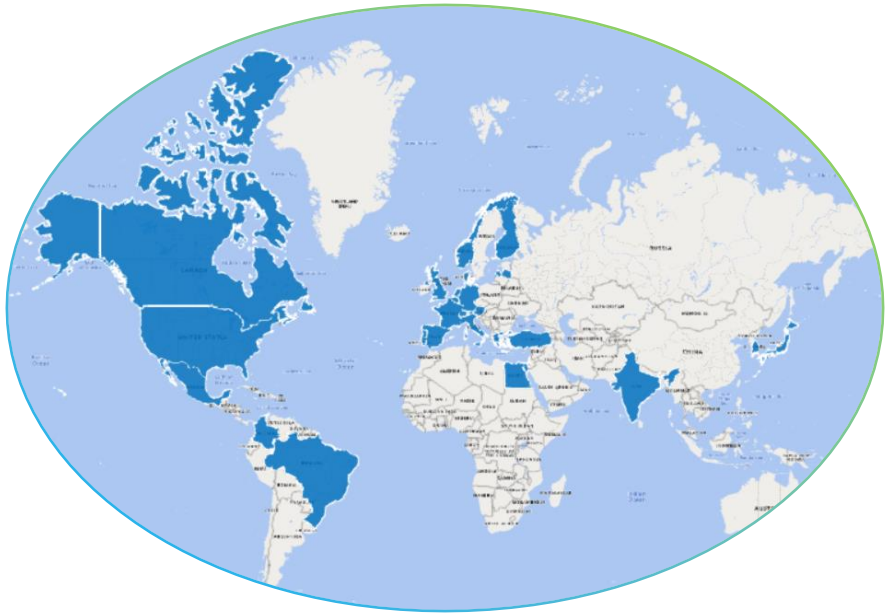
Brings together **business integrity and anti-corruption experts** (e.g. lawyers, auditors etc.) from a range of different sectors in order to:

Relevant OECD Fora

- **support OECD efforts** to fight bribery and corruption, to foster integrity and to ensure a global level playing field.
- contribute the **business voice to the OECD Working Group on Bribery,** the **OECD Anti-Corruption and Integrity Forum** and other relevant OECD meetings which deal with the issues of bribery and corruption.

B20 «Integrity & Compliance» TF

Furthermore, it contributes actively to the B20 Integrity & Compliance task force



30+
Countries

130+
Members

BUSINESS @ OECD ANTICORRUPTION COMMITTEE

THE SUBJECT MATTER EXPERT IN THE FIGHT AGAINST CORRUPTION

BUSINESS AT OECD (BIAC) ANTICORRUPTION COMMITTEE

- **Chairman:** Nicola Allocca, Autostrade per l'Italia (Italy)
- **Vice-Chairs:** Snam (Italy), Amber Beverage Group (Latvia), Novartis (Switzerland), Deloitte (United States), Schneider Electric (France), Nilfisk (Denmark), Rolls-Royce-Civil Aerospace (Germany)
- **Policy Manager:** Benedikt Wiedenhofer (France)
- **Virtuous Corporations are more the welcome to apply!**

LATEST DELIVERABLES OF THE ANTICORRUPTION COMMITTEE

We are contributing to the development of the convention and its recommendations, trying to anticipate and focus on EMERGING TRENDS, such as:

DIGITAL TECHNOLOGIES

STEPPING UP THE GAME: DIGITAL TECHNOLOGIES TO PROMOTE THE FIGHT AGAINST CORRUPTION

EDUCATION

SHAPING THE VALUES FOR A SUSTAINABLE FUTURE – EDUCATION FOR THE FIGHT AGAINST CORRUPTION"

ZERO AS A TARGET

"ZERO CORRUPTION" MANIFESTO FOR A NEW SDG

TODAY FOCUS

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

WHY WE ISSUED THE MANIFESTO

The benefits from **zero corruption** have a positive impact on the achievement of other SDGs

I. **Call to action**: we need an urgent action plan.
Businesses need to develop a long-term vision which considers both **planet challenges and opportunities**.
In this regard **corruption is a global cross-cutting issue** that we must face together to guarantee a sustainable future and progress on long-term challenges.

II. **Vision switch**: we must have the courage to admit that **it is possible to eliminate corruption** and we must have the intellectual honesty to give this target a proper dignity in the **UN SDG Agenda**.

III. **Right Momentum**: experiences of the pandemic, geopolitical crisis, VUCA world accelerate **our race to zero**

DEDICATED CAMPAIGN LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

WHAT THE MAIN FEATURES ARE

I. **Sources**: it is based on OECD standards and best practices:
   - **OECD Anti-Bribery Convention**, 2009 and 2021 Recommendation.
   - **OECD Guidelines** on Anti-Corruption and Integrity in State-Owned Enterprises, MSMEs, MNEs, etc.

II. **Multistakeholder**: It can be supported by **public** and **private** organizations, **corporations** and **business** representatives.

III. **Bias breaking**: It has the ambition of breaking **cultural barriers** and it will be one of the main instruments to **sponsor the 18th SDG**.

DEDICATED CAMPAIGN LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

HOW THE MANIFESTO IS STRUCTURED

#10 ACTIONS clustered in 3 groups

1. **CHANGING THE WAY WE THINK ABOUT CORRUPTION**
2. **CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES**
3. **ACTING TOGETHER GLOBALLY**

DEDICATED CAMPAIGN LAUCHED IN MARCH 2024 IN THE OCCASION OF THE 25° ANNIVERSARY OF THE OECD ANTIBRIBERY CONVENTION

MANIFESTO

How can we "TRANSLATE COMMITMENT INTO ACTION TO IMPACT"?

DEDICATED CAMPAIGN LAUCHED IN MARCH

RACING TO ZERØ

1 Strive to eliminate biases that corruption cannot be eliminated

CHANGING THE WAY

HUM

2 Recogn WE THINK ABOUT nines human rights and con tful environment

CORRUPTION

CROSS CUT

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4 D… …ics within any co… …any jurisdiction

INCENT…

5 Sup… …rage to speak up a… …e environment

PROMOTE FREEDOM OF PRESS

6 A fre… …and prot… …iding transpare…

TECH FOR…

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CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES

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4 STIMULATE RESPONSIBLE CONDUCT
Develop a culture of integrity, transparency, and ethics within any context, any entity, any government, and any jurisdiction

5 INCENTIVATE & PROTECT BRAVE VOICES
Support and defend individuals that have the courage to speak up and take action ensuring a psychologically safe environment

6 PROMOTE FREEDOM OF PRESS
A free press is crucial for the fight against corruption and protects our society by uncovering the truth and providing transparency (vigilant media)

7 TECH FOR TRUST AND TRANSPARENCY
Harness technology as a gamechanger in the fight against corruption, seizing the opportunities of digital compliance solutions and using a building-block approach

8 THINK GLOBAL AND ACT LOCAL ("GLOCAL")
Local actions we take to fight corruption need to be both inspired by a global vision and adjusted to the specificities of local contexts

9 ZERØ T
Strive f orruption within all jurisdictions

ACTING TOGETHER GLOBALLY

10 COLLECTIVE ACTION FOR A MULTISTAKEHOLDER APPROACH
Build alliances between corporations, public institutions and civil society organizations to fight corruption and level the playing field

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9 ZERØ TOLERANCE
Strive for zero tolerance against any form of corruption within all jurisdictions

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What if every company implemented the Manifesto?

OUR AMBITION

Supply-Side of Bribery addressed!

THE ESSENTIAL TRUTH ABOUT #ZEROCORRUPTION

1. The race to zero corruption is a great responsibility.
2. We must give "zero corruption" proper dignity in the UN SDG Agenda.
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5. The manifesto forges an alliance between us and those who will come after us

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LATEST DELIVERABLES OF THE ANTICORRUPTION COMMITTEE

We are contributing to the development of the convention and its recommendations, trying to anticipate and focus on EMERGING TRENDS, such as:

DIGITAL TECHNOLOGIES

STEPPING UP THE GAME: DIGITAL TECHNOLOGIES TO PROMOTE THE FIGHT AGAINST CORRUPTION

EDUCATION

SHAPING THE VALUES FOR A SUSTAINABLE FUTURE – EDUCATION FOR THE FIGHT AGAINST CORRUPTION"

ZERO AS A TARGET

"ZERO CORRUPTION" MANIFESTO FOR A NEW SDG

TODAY FOCUS

Stepping up the game: digital technologies to promote the fight against corruption

Context of reference

WHY WE ISSUED THE PAPER

I. **Best Practice Requirements**: 2021 OECD Anti-Bribery Recommendation recognizes 'the potential role of innovative technologies in advancing public and private sector efforts to combat foreign bribery'

II. **Global hot topic**: Growing focus in the **international policy debate** (e.g. think tanks, B20/G20)

III. **Momentum**: experiences of the pandemic accelerate digital transition

Stepping up the game: digital technologies to promote the fight against corruption

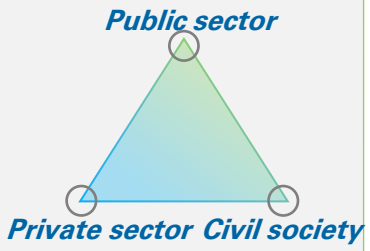
Overview of the Paper

PART 1: THE FIGHT AGAINST CORRUPTION IN THE DIGITAL

Assess the role of technologies and their **application in anti-corruption efforts** (public and private sectors and civil society)

How is digital tech being deployed to advance the fight against corruption?

Overview of some of the most important digital tools and technologies in the fight against corruption and their concrete applications:



What are the challenges and limitations related to digital tech solutions?

Overview of practical factors which may hamper uptake, as well as potential risks that may be associated with novel digital technologies that are poorly governed

PART 2: PROMOTING DIGITAL SOLUTIONS

Provide key learning from specific business case studies

#13 Business case studies

snam, Walmart, ALTANA, Integrity Distributed, autostrade per l'italia, amazon, SANOFI, brf, Telefónica, Unilever, NOVARTIS, MERCK, Rolls-Royce

Key policy recommendations for the OECD

Key recommendation that Member countries should develop, and apply strategies for continually improving the environmental performance of their governments

PART 1: THE FIGHT AGAINST CORRUPTION IN THE DIGITAL:
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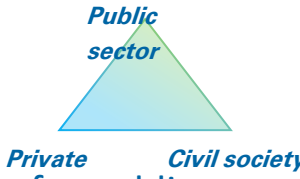


The section provides an overview of some of the most important digital tools and technologies and their concrete applications for public, private sectors and civil society efforts against corruption.

DIGITAL TOOLS AND TECHNOLOGIES APPLIED

Private Sector

1. **DATA GENERATION AND ANALYSIS:** converting of information and documents into a digital format – also known as digitization
2. **DATA-DRIVEN RISK ASSESSMENTS:** improving risk analysis through data analytics, AI, big data, and machine learning,
3. **E-TRAINING AND DIGITAL COMMUNICATIONS CHANNELS:** enhancing awareness through advanced training and unconventional communication
4. **DIGITAL REPORTING CHANNELS:** promoting whistleblower channels within companies increasing transparency, assuring shared accountability, and strengthening the internal control system
5. **TECHNOLOGY-SUPPORTED SUPPLY CHAIN MONITORING:** implementing third party continuous monitoring models (KY3P)

Public Sector

1. **E-GOVERNMENT:** transforming analog, paper-based legacy systems into digital, open, and simple systems to build e-government solutions
2. **OPEN DATA:** developing platforms that make information about government operations available to the public, thus allowing for more transparency, while also facilitating the tracking of potentially corrupt activities
3. **WHISTLEBLOWING PLATFORMS/HIGH-LEVEL REPORTING MECHANISMS:** stimulating high-level reporting mechanisms as a way for citizens to track corruption and wrongdoings on the part of public officials
4. **DIGITAL IDENTITIES:** enabling the digitized credentials of a person or entity that enable users to authenticate themselves and others

- **BLOCKCHAIN:** offering immutability and traceability of data given that changing the information on one part of a blockchain requires changes to the other 'blocks' in the chain
- **ARTIFICIAL INTELLIGENCE (AI):** fostering self-learning algorithms that infer patterns and relationships from large amounts of data to accomplish a specific, pre-determined goal

ENABLER: COOPERATION BETWEEN PUBLIC, PRIVATE SECTORS AND CIVIL SOCIETY

THE NEW FRONTIER OF TECHNOLOGICAL SOLUTIONS

GENERATIVE ARTIFICIAL INTELLIGENCE

It is not the same as Artificial Intelligence

"Generates **original content** without the need for structured and complete data."

It is advancing rapidly

The solutions we have implemented until today are already **obsolete**

It requires new competences

+ Reskilling
+ Upskilling
+ Change management

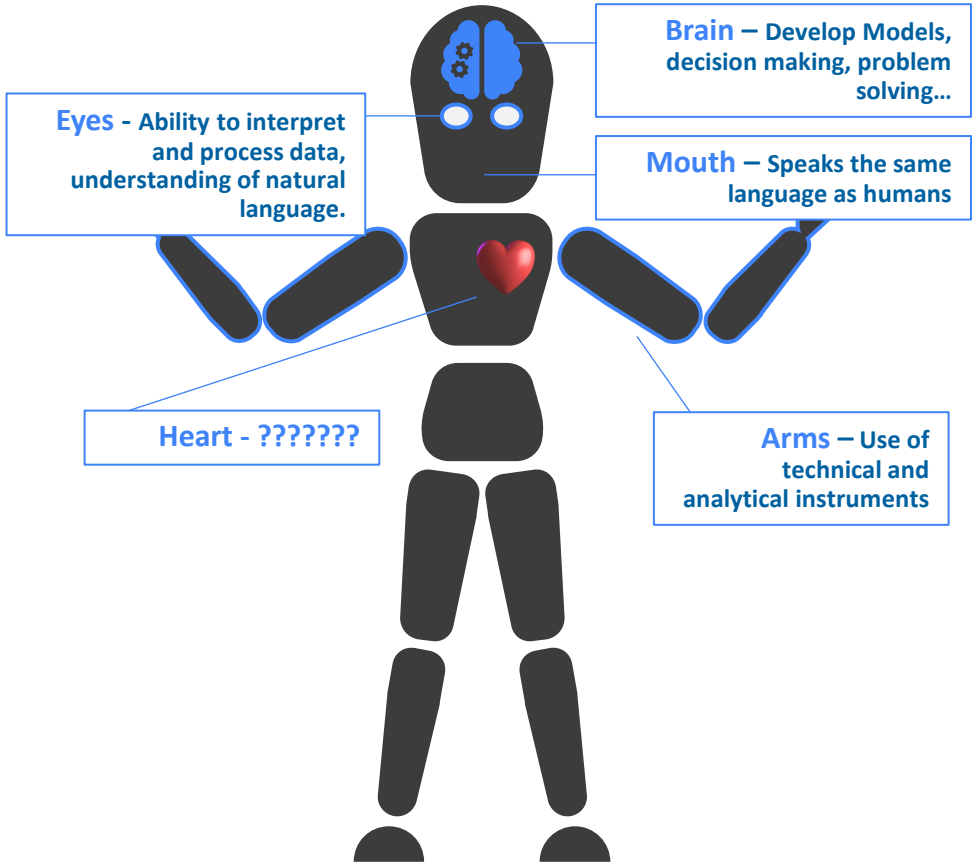
It changes the vision on internal control

+ Quality
+ Speed
+ Integration

Focus: GENERATIVE AI

"It is not a tool that increases compliance capacity..."

...but he is a new colleague with brains, mouth, eyes and arms



PART 1: THE FIGHT AGAINST CORRUPTION IN THE DIGITAL

WHAT ARE THE LIMITATIONS?

Below are the main limitations to the application of the Digital Tech in Compliance:

CHALLENGES, RISKS AND LIMITATIONS

There are a number of **challenges** and **risks**:

ICT	People & Culture	Costs	Regulatory
Availability and quality of **data**	**Understanding** of underlying technology	Substantial upfront **investments**	Entailing **security** and **privacy** risks
Availability of appropriate digital **infrastructure**	Digital **skills** required	**Speed** of adoption and **interoperability**	Sound governance **frameworks**

While technology can play an important role in the fight against corruption, it can also open **new loopholes** for illegal and corruption activities

Stepping up the game: digital technologies to promote the fight against corruption

Focus on Part 2

PART 1: THE FIGHT AGAINST CORRUPTION IN THE DIGITAL

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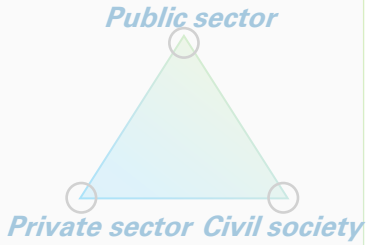

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snam, Walmart, Telefonica, Integrity Distributed, ALTANA, autostrade per l'italia, Unilever, amazon, SANOFI, brf, NOVARTIS, MERCK, Rolls-Royce

Key policy recommendations for the OECD

Key recommendation that Member countries should develop, and apply strategies for continually improving the environmental performance of their governments

PART 2: FOSTERING THE UPTAKE OF DIGITAL TECHNOLOGIES IN THE PRIVATE SECTOR

To gain a comprehensive understanding of how companies are currently leveraging digital technologies in the battle against corruption, the paper features use cases submitted by members of the Business at OECD (BIAC). These cases highlight their digital solutions and provide insights into their practical experiences in implementing these technologies.

THE BUSINESS PERSPECTIVE: #13 USE CASES

ALTANA	**Commerce platform** to process public and non-public shipment records and supply chain data points
amazon	**PPPs** for improving the transparency of local compliance requirements for MNEs and combating illicit commodity trafficking in global supply chains
autostrade per l'italia	**Continuous monitoring system**
brf	**Compliance-Chatbots**
Integrity Distributed	**Improvement of algorithms through machine learning, ledger technology and AI** to detect supply side corruption in accounts payable and third-party management systems used by multi-nationals
MERCK	**Third party risk management**; **stakeholder engagement and reporting tools**
Rolls-Royce	**Centralized, standardized and technology-based due diligence**, Third-party risk management

snam	**Supplier's Compliance Monitoring**
Telefónica	**Third party screening; advanced gifts and hospitality reporting tool**
Unilever	**Centralized, smart risk management center**
Walmart	**Multi-stakeholder cooperation** for the digitalization of licensing & permitting processes
NOVARTIS	**Pocket-sized, mobile, and application** enabled spectrometric drug sensor to detect falsified medicine
SANOFI	**Real-time**, proactive ethics and compliance with **artificial intelligence**

Every use case focuses on:

1. internal adoption process
2. ensuring management and staff buy- in
3. the complementary role of governments
4. approaches to fostering acceptance and trust

PART 2: FOSTERING THE UPTAKE OF DIGITAL TECHNOLOGIES IN THE PRIVATE SECTOR

RECOMMENDATIONS TO THE OECD

1. **Capacity Building:** Help demystify and educate about different types of technologies and their applications

2. **Awareness raising on the demand side:** Promote the use of digital technology to support transparency and efficiency in public sector processes

3. **Incentives and support from the governments:** Support Countries in establishing and ensuring enabling environments for private sector efforts leveraging digital tech

4. **Cross-border cooperation:** Foster harmonization and cross-border cooperation on digital aspects

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MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

Context of reference

WHY WE ISSUED THE MANIFESTO

The benefits from **zero corruption** have a positive impact on the achievement of other SDGs

I. **Call to action**: we need an urgent action plan.
Businesses need to develop a long-term vision which considers both **planet challenges and opportunities**.
In this regard **corruption is a global cross-cutting issue** that we must face together to guarantee a sustainable future and progress on long-term challenges.

II. **Vision switch**: we must have the courage to admit that **it is possible to eliminate corruption** and we must have the intellectual honesty to give this target a proper dignity in the **UN SDG Agenda**.

III. **Right Momentum**: experiences of the pandemic, geopolitical crisis, VUCA world accelerate **our race to zero**

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MANIFESTO "ZERO CORRUPTION" FOR A NEW SDG

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WHAT THE MAIN FEATURES ARE

I. **Sources**: it is based on OECD standards and best practices:
   - **OECD Anti-Bribery Convention**, 2009 and 2021 Recommendation.
   - **OECD Guidelines** on Anti-Corruption and Integrity in State-Owned Enterprises, MSMEs, MNEs, etc.

II. **Multistakeholder**: It can be supported by **public** and **private** organizations, **corporations** and **business** representatives.

III. **Bias breaking**: It has the ambition of breaking **cultural barriers** and it will be one of the main instruments to **sponsor the 18th SDG**.

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HOW THE MANIFESTO IS STRUCTURED

#10 ACTIONS clustered in 3 groups

1. **CHANGING THE WAY WE THINK ABOUT CORRUPTION**
2. **CREATING MEANINGFUL TOOLS AND TAKING IMPACTFUL MEASURES**
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