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**STRENGTHENING EFFORTS TO ELIMINATE CORRUPTION IN  
AFRICA**

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Sub-Saharan Africa faces enormous development challenges. As observed by Transparency International: *"It is the only region of the world where poverty has increased in the past 25 years and half of the continent's population of 840 million people lives on less than 1 USD per day. Thirty-two of the world's 38 highly indebted poor countries (HIPC) are in Africa"*.<sup>1</sup> Challenges facing the continent include corruption, protracted armed conflict, the HIV/AIDS pandemic and declining terms of trade for non-mineral primary products continue to exacerbate the many challenges facing the region.

Corruption is definitely not unique to Africa alone. It prevails globally in one form or another in practically all countries and regions. However, it has become endemic in Africa. Despite recent progress in democracy and human rights in a number of African countries, corruption remains one of the biggest challenges throughout the continent, and continues to exacerbate other problems including poverty, protracted armed conflict and the HIV/AIDS pandemic etc.

The devastating effects of corruption include capital flight, misuse of grants and aid resources earmarked for development purposes and lack of service delivery etc, thereby severely contributing to the development crisis faced by Africa today. According the Global Programme Against Corruption: *"corruption undermines democratic institutions, retards economic development and contributes to government instability. Corruption attacks the foundation of democratic institutions by distorting electoral processes, perverting the rule of law, and creating bureaucratic quagmires whose only reason for existence is the soliciting of bribes. Economic development is stunted because outside direct investment is discouraged and small businesses within the country often find it impossible to overcome the "start-up costs" required because of corruption"*<sup>2</sup>.

This view is supported by Kofi Annan, the UN Secretary-General who stated during the adoption by the General Assembly of the United Nations Convention against Corruption as follows: *"Corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice, and discouraging foreign investment and aid"*.

The extent of corruption is massive. For instance, Nuhu Ribadu (Head of the Nigerian Economic and Financial Crimes Commission (EFCC) indicates that that corruption and mismanagement swallow about 40 percent of Nigeria's \$20 billion annual oil income. Despite its oil riches, 70 percent of the West African country's population live below the poverty line because of corruption and economic mismanagement.<sup>3</sup>

There are constellations of factors that make Africa such a fertile ground for corruption, including historical, socio-economic and political dynamics that

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<sup>1</sup> See [http://www.transparency.org/regional\\_pages/africa\\_middle\\_east/about/africa](http://www.transparency.org/regional_pages/africa_middle_east/about/africa) (accessed on 4/09/2006)

<sup>2</sup> Global Programme Against Corruption. See <http://www.unodc.org/unodc/en/corruption.html> (accessed on 04/09/2006)

<sup>3</sup> Reuters, December 14, 2004. See World News. Boston.Com. [http://www.boston.com/news/world/africa/articles/2004/12/17/corruption\\_costs\\_nigeria\\_40\\_percent\\_of\\_oil\\_wealth\\_official\\_says/](http://www.boston.com/news/world/africa/articles/2004/12/17/corruption_costs_nigeria_40_percent_of_oil_wealth_official_says/). Accessed on 04/09/2006)

contribute to this. These range from the issue of political will, the reliance on the extractive sector and the resource scourge, linked to the quest for power, wealth and prestige. Issues in this regard include complex relationships, alliances, pacts and networks such as aspirations of various groups e.g. the international community (stability, equity and stabilisation), the elites (access), the middle class (self actualisation) and the average citizen (service delivery).

The economies of some countries are still primarily dependent on natural resources and in many cases dominated by the extractive sector. This proffers a number of opportunities for economic growth as in the case of resource rich countries. The reliance on natural resources however creates a number of vulnerabilities in terms of fuelling corrupt and dubious business practices as well as internal strife and conflict arising out of the quest for control and allocation of resources. Properly managing the revenues arising from natural resources to contribute to the long-term sustainability requires that the forces of public and economic governance be converged within a culture of the cardinal principles of accountability, transparency, responsibility and fairness.

Other drivers of corruption in Africa include the link between economic and political governance and the exploitation of public office for private benefit. Also, noteworthy are the abuse of cultural practices that facilitate corruption (e.g. the cultural practice of “shaking hands” or giving of token gifts as a courtesy – originally in the form of kola nuts – during meetings presents an opportunity for misuse).

The culture of disclosure regarding African corporations, generally, is yet to come up to par with international standards. According to the Summary of Progress Report on Corporate Governance in Africa 2005: *“the challenge is to convince corporations that disclosure is an asset, rather than a burden, but this impediment will remain for so long as corporations continue to suspect that disclosure of information may be used in a manner perceived as discretionary by the authorities”*.

The continent’s dark history of autocratic and unaccountable government, as well as conflict and crisis in many parts of the continent have posed particular challenges to governance and the fight against corruption in Africa. Unfortunately, most of the region is particularly characterised by a proliferation of weak governance zones, where governments are unwilling or unable to assume their responsibilities in relation to public administration and protecting human rights. Also, progress is slow even in those countries where the political will to reform exists. There is also the issue of resistance to reform by groups and individuals benefiting from the status quo. In addition, the capacity of civil society organisations to increasingly become active and outspoken in respect of governance and corruption issues requires additional impetus.

Further challenges facing reform in Africa include the quality of the regulatory and institutional framework to promote transparency and accountability. Notable in this regard is the capacity for reform and enforcement considering that public services are unevenly provided and of poor quality, and civil servants are often so badly paid that they resort to petty corruption in order to survive. Also, the institutions that are intended to provide checks and balances within the system (including prosecuting systems) are generally under-resourced and lack requisite skills, infrastructure and independence. Further, the appropriateness of global standards to local markets and economic structures is also a point in issue. With regards to the regulatory environment, there are lacunas or gaps in the procedural and evidence laws of some countries, some of which are out of date and do not accommodate technological advancements (particularly the evidential status and admissibility of computer and other electronically generated documents) that are part of the present day. This links with jurisdiction problems, owing to the digital revolution that has dissolved physical boundaries of countries around the world, thus, making those with inadequate cyber crimes or internet related offences laws to be vulnerable for the commission of such crimes.

Further, the proliferation of small, medium and micro enterprises (SMMEs), State-owned enterprises (SOEs), co-operatives and other forms of economic enterprises within the informal sector in many parts of the continent require significant innovation to mainstream corporate governance. This may be easier said than done considering the lack of incentives for the informal sector to improve their corporate governance standards as well as their capacity to implement reform programmes. A further challenge is the lack of shareholder activism/effective ownership in promoting acceptable levels of corporate governance standards within investee companies throughout the various stages<sup>4</sup> of investment processes.

At this point, it is important to sketch the institutional framework promoting transparency in Africa. At an international level, *The United Nations Convention Against Corruption (UNCAC)* creates the opportunity to develop a global language about corruption and a coherent implementation strategy. A multitude of international anti-corruption agreements exist, however their implementation has been uneven and only moderately successful. The UNCAC gives the global community the opportunity to address both of these weaknesses and begin establishing an effective set of benchmarks for effective anti-corruption strategies. The Global Programme against Corruption (GPAC) is a catalyst and a resource to help countries effectively implement the provision of the UN Convention against Corruption. The main areas of work of the programme include technical co-operation, international co-ordination, policy development and research as well as advocacy and outreach.

*The Extractive Industries Transparency Initiative (EITI)* was launched at the World Summit on Sustainable Development in Johannesburg, South Africa in September 2002. The EITI aims to increase transparency in transactions between

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<sup>4</sup> Due diligence, negotiation, investment, monitoring and exit stages

governments and companies operating in the extractive industries as a way of ensuring that revenues from the extractive industries contribute to sustainable development and poverty deduction. The multi-stakeholder nature of the EITI implementation however presents two clear challenges. The first is the natural adherence by each stakeholder group to its own distinct agenda and perspective when engaging on issues surrounding the EITI. The second is the sensitive nature of the issues, around which stakeholders are being invited to engage. The full publication and verification of company payments and government revenues in many cases demands that stakeholders confront issues of systemic corruption, poor governance, poverty and conflict. The implementation of the EITI is therefore not without risks and challenges. As a result, meaningful multi-stakeholder engagement around these risks and challenges is an important element to aid the process of implementation. Over twenty countries have committed to the EITI principles and criteria, in respect of which the majority are African countries.<sup>5</sup>

The *Publish What You Pay* coalition of over 250 NGOs worldwide calls for the mandatory disclosure of the payments made to all governments for the extraction of natural resources, so as to help citizens of resource-rich developing countries hold their governments accountable for the management of revenues from the oil, gas and mining industries.

*The Financial Action Task Force (FATF)* is an inter-governmental body (created in 1989) whose purpose is the development and promotion of national and international policies to combat money laundering and terrorist financing. The FATF is a "policy-making body" that works to generate the necessary political will to bring about legislative and regulatory reforms in these areas. The FATF has published 40 + 9 Recommendations in order to meet this objective. There are however concerns that irrespective of the FATF guidelines in respect of politically exposed persons (PEP), that funds siphoned from Africa as a result of grand corruption are still being laundered through financial centres abroad.

Closely linked to the FATF is the *Organisation for Economic Co-operation and Development (OECD)*, which plays a prominent role in fostering good governance in the public service and in corporate activity. The OECD's Principles of Corporate Governance were comprehensively updated in 2004 and continue to form the basis for a number of international declarations on corporate governance. Adopted in 1976, the OECD Guidelines for Multi-national Enterprises are recommendations from governments (30 membership countries + 9 non-membership countries) to companies. The Guidelines are voluntary and are referred to by many companies from OECD and provide voluntary principles and standards for responsible business conduct in a variety of areas including employment and industrial relations, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, competition, and taxation. Recently, the

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<sup>5</sup> Fourteen African countries have committed to the EITI: Angola, Cameroon, Chad, DRC, Republic of Congo, Equatorial Guinea, Gabon, Ghana, Guinea, Mauritania, Niger, Nigeria, Sao Tome and Principe and Sierra Leone

OECD has offered guidance for multinationals operating in weak governance zones through a new Risk Awareness Tool.

*Transparency International (TI)* is the global civil society organisation that is prolific in the fight against corruption and brings people together in a powerful worldwide coalition to end the devastating impact of corruption around the world. Now in its second decade TI's global network of chapters and contacts also use advocacy campaigns to lobby governments to implement anti-corruption reforms. Since 1995, TI has published an annual Index of perception of corruption ordering the countries of the world according to the degree to which corruption is perceived to exist among public officials and politicians.

The efforts of the *Basel Committee on Banking Supervision* to revise the standards governing the capital adequacy of internationally active banks culminated in the publication of *Basel II*. This framework describes a more comprehensive measure and minimum standard for capital adequacy that national supervisory authorities are now working to implement through domestic rule-making and adoption procedures. It seeks to improve on the existing rules by aligning regulatory capital requirements more closely to the underlying risks that banks face. In addition, Basel II is intended to promote a more forward-looking approach to capital supervision, one that encourages banks to identify the risks they may face, today and in the future, and to develop or improve their ability to manage those risks. As a result, it is intended to be more flexible and better able to evolve with advances in markets and risk management practices.

At a pan-African level, *The New Partnership for Africa's Development (NEPAD)* is a framework that provides an opportunity for the emancipation of the continent. Adherence to the principles and objectives of NEPAD is being monitored by the *African Peer Review Mechanism (APRM)* in relation to those countries in Africa acceding to NEPAD. This will require participating countries to accelerate their progress towards adopting and implementing specific objectives, standards, criteria and indicators demonstrating appropriate levels of democracy, political, economic, social and corporate governance. This is being undertaken through mutual co-operation and mutual learning and the allocation of resources and assistance to strengthen institutions of democracy and human rights; improving budgeting and financial management; fighting corruption; increasing access to social services such as education, health, water and energy; and working towards increased co-operation in mobilising the necessary institutional infrastructure and processes to attract both domestic and foreign investment. The NEPAD framework deals with corruption as a cross cutting issue in the four thematic areas (democracy and good political governance; socio-economic development; economic and corporate governance) of the APRM.

The APRM, which has to date attracted 23 countries is a self-monitoring mechanism voluntarily acceded to by member states of the African Union (AU) with the aim of fostering the adoption of policies, standards and practices that will lead to political

stability, high economic growth, sustainable development and accelerated regional and economic integration. This is achieved through sharing of experiences and reinforcement of successful best practices, including identifying deficiencies and assessing the needs for capacity building of participating countries.

The establishment of the *Pan African Consultative Forum on Corporate Governance (PACFCG)* was in response to the growing interest in, and commitment to, economic reform across the continent. It provides a platform for an inclusive and open dialogue between leaders and representatives from the public and private sectors, multinational corporations, international agencies and institutions, global and local investors, civil society and others committed to the development of Africa as an integral constituent in the international policy framework in launching practical corporate governance initiatives at the Pan-African, regional and national levels. The PACFCG has to date held three forums in South Africa (2001), Kenya (2003) and Senegal (2005).

*The Business Action Against Corruption (BAAC)* is a campaign against corruption launched in Africa, and backed by the G8 Business Action for Africa (BAA) campaign, which was set up at the July 2005 G8 Summit. It is implemented by a working group made up of the African Institute for Corporate Citizenship (AICC) – Africa Corporate Sustainability Forum (ACSF), the Commonwealth Business Council (CBC), the Convention on Business Integrity, Nigeria (CBI), the Human Rights Trust of Southern Africa (SAHRIT) and the Southern African Forum Against Corruption (SAFAC). The aim of BAAC is to find practical ways of creating effective and sustainable partnerships between business, governments and civil society organisations in tackling corruption.

Noteworthy is that there are numerous organisations and initiatives combating corruption at the national level, including civil society organisations and anti-corruption agencies that are too numerous to mention although some of them will be indicated in the course of this paper.

The prospects for systematic reforms, which could counter corruption, vary considerably among African countries. A summary of recent measures undertaken in Kenya, Malawi, Nigeria, Sierra Leone and Nigeria follows hereunder.

Developments in Kenya having some bearing on the fight against corruption include:

- (a) The establishment of several tribunals and commissions to hear allegations into past economic crimes by the ministry of justice and constitutional affairs.
- (b) The Public Officer Ethics Act, passed in May 2003, lays down a code of conduct for public officers, with its main target being wealth declaration, although concerns have been raised in relation to the effectiveness of the legislation in practice.

- (c) The Centre for Corporate Governance (CCG) has been instrumental in the issue of a number of corporate governance documents for Kenya including *The Principles for Corporate Governance in Kenya* and a *Sample Code of Best Practice for Corporate Governance; Good Corporate Governance in State-owned Corporations; and Reporting and Disclosure in Corporate Governance for Kenya* etc.
- (d) Several bodies established under the Anti-Corruption and Economic Crimes Act passed by Parliament in May 2003 became operational in 2003/2004. These include the:
- Kenya Anti-Corruption Commission, which is the main investigating body for economic crimes in Kenya;
  - Public Complaints Office, established under the same legislation, functions as an Ombudsman's office; and
  - Public Service Integrity Programme, which aims to establish an anti-corruption prevention plan within every public institution.
- (e) In May 2004, the government launched a multi-sectoral National Anti-Corruption Steering Committee to run a countrywide anti-corruption awareness-raising campaign.
- (f) The APRM process is underway in Kenya with the CCG appointed as the local technical agency for the corporate governance thematic area. In the course of this work, it has developed questionnaires for the Expert Panel, National Sample Survey and Focus Group Discussion exercises, all of which are expected to comprehensively inform corporate governance and policy responses in Kenya.

In Malawi, *The Malawi Leaders' Forum on Building Alliances to Eliminate Corruption*, is a multi-stakeholder initiative with support from the presidency that involves a series of roundtable discussions facilitated by BAAC Malawi and AICC/ACSF to map out the way forward and develop clear set of outcomes that includes the following measures:

- The establishment of a business action against corruption taskforce that includes government, private sector and civil society representatives;
  - The development of a code of conduct for Malawi private sector and state enterprise that is to be endorsed and agreed upon by all management;
  - The set up of an independent ratings system/agency that will assess systemic action of companies, state enterprise and government procurement (potentially using CBI as model); and
  - The move towards a national framework on corruption that integrates government, business and civil society initiatives under one common umbrella.
- In the case of Nigeria, the country is struggling to stave off the perception of corruption that has had severe negative consequences on the country e.g. discouraging numerous would-be investors that has led to a decreased foreign direct investment; economic instability resulting in business failures and unemployment; and loss of much-needed revenue.

Past governments have made attempts to curb corruption e.g. through establishing laws such as the National Drug Law Enforcement Agency Act (NDLEA); the Money Laundering Act of 1995; Advance Fee Fraud (otherwise known as “419”) and Fraud Related Offences Act of 1995; Failed Banks Act of 1996; Banks and Other Financial Institutions Act of 1991; and the Foreign Exchange Act of 1995.

There has been a high level of focus in the implementation of sound corporate governance especially in the banking and related sectors. The Central Bank (CBN) and Nigerian Deposit Insurance Corporation (NDIC) have been quite effective in regulating this sector and ensured satisfactory compliance by bank directors with good corporate governance. The country has achieved significant success in public sector initiatives e.g. a new due process in public procurement as well as a revamped multi-year budgeting process.

The EFCC that was established in 2002, has been active in bringing a number of criminal elements (including several high profile functionaries) to book, towards addressing financial and economic crimes, although there are concerns that the efforts of the agency have been selective and at times politically motivated. The Nigerian Financial Intelligence Unit (NFIU) domiciled within the EFCC (as an autonomous unit), serves as the country's central agency for the collection, analysis and dissemination of information regarding money laundering and the financing of terrorism. Nigeria has recently been taken off the list of non co-operative countries by the FATF.

The present Nigerian government in demonstrating its political will towards eradicating corruption in Nigeria has strengthened institutions such as the CBN; the NDIC; the NDLEA; the National Agency for Food and Drug Administration (NAFDAC); Securities and Exchange Commission (SEC); the National Insurance Commission (NAICOM); the Independent Corrupt Practices Commission (ICPC); the Nigerian Police; the Customs and Excise; and the Corporate Affairs Commission (CAC). Notably, the Nigerian chapter of the BAAC initiative was launched earlier in 2006 with support from the country's major anti-corruption agencies.

The level of corruption, governance and transparency in Sierra Leone is widely acknowledged as a principal factor for the socio-economic decay, poverty and instability in the country, as well as a major factor that led to and fuelled the decade-long civil war. Corruption has proven to be a major stumbling block in the establishment of an effective and modern state in Sierra Leone. This has undermined the State's ability to utilise resources, collect taxes and contributes to the continued violence in the country.

Sierra Leone, which has long been synonymous with conflict diamonds, has improved transparency in its diamond industry, but still has a long way to go before

earnings from the precious stones benefit the country's impoverished citizens.<sup>6</sup> The country's Gold and Diamond Department (GDD) which values diamonds for export and levies diamond export taxes has been lauded for functioning with a level of transparency and professionalism unmatched by other institutions in Sierra Leone.

The Campaign for Good Governance (CGG) was established in Sierra Leone to promote good governance and to facilitate and encourage the full and genuine participation of all Sierra Leoneans in the political, social, and economics processes of development in Sierra Leone. Also, the Governance and Anti-corruption (GAC) Assessment in Sierra Leone promotes learning through long-term partnership between the government and civil society, The Assessment serves as an input for the design of a National Governance strategy aimed at improving governance and transparency and improving the quality of public services. The GAC Assessment has been completed and the draft GAC Strategy identifies key areas for reform and proposes specific policy measures.

Some of the recommendations offered by the National Anti-Corruption Strategy 2005 (NACS) towards curbing corruption and improving the business environment in Sierra Leone include:

- establishing a public complaint mechanism at the customs office to hamper civil servants from soliciting bribes. All reported cases are sought to be recorded and investigated;
- oversight of bidding process for public contracts by an independent entity (i.e. one outside of the soliciting Ministry) to prevent any non-merit-based granting of contracts; and
- thoroughly investigating all accusations of businesspersons unduly influencing public officials.

Corporate governance reform in South Africa has been long established with the formation of the King Committee on Corporate Governance in 1992 under the auspices of the Institute of Directors (IoD). Initially this was a private sector-led initiative that culminated in the release of the first King Report on Corporate Governance in 1994. This has formed the benchmark for many similar initiatives in corporate governance in Africa, certainly within the Commonwealth countries.

The King Committee was re-constituted in August 2001 to undertake a comprehensive review of corporate governance in South Africa which resulted in the second King Report released in 2002 (King II) and provides a significant compilation of corporate governance standards and principles that are not only applicable to South African companies in both the private and public sectors, but has gained

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<sup>6</sup> According to the Diamond Industry Annual Review Report for Sierra Leone 2005, produced by the Ottawa-based Partnership Africa Canada (which has undertaken regular research on diamond mining in Sierra Leone) and the Freetown based Network Movement for Justice and Development

recognition globally for its extensive examination of corporate governance standards and practices.

Since the advent of King II in 2002, and its enforcement through various regulatory measures, numerous steps of a mandatory nature have been taken by regulators in South Africa notwithstanding that King II is largely based on a voluntary system of conformance (based on the concept of “comply or explain”).

Much of the work and developments in the South African economy in the regulatory sphere over the past two years has been focused on reviewing laws and regulations necessary to ensure that the South African regulatory environment is operating in accordance with international best practices and conventions with the pivotal influence of King II in the following developments:

- The Johannesburg Stock Exchange’s (JSE) listing rules have been comprehensively updated to incorporate certain elements of King II as mandatory requirements for companies quoted on the JSE (with no exception made for local or foreign incorporated companies).
- The banking regulator has introduced rigorous provisions around director accountability in amendments to the South African Banks Act, which reflect a number of the principles enshrined in King II.
- Other areas of the financial markets in South Africa have also been subject to new laws and/or regulations introducing strong governance measures, particularly in the sectors dealing with short and long term insurance and collective investment schemes.
- The Insider Trading Act and other important financial markets legislation, such as that regulating the JSE, has been consolidated as the Securities Services Act (SSA) and enhanced with stronger provisions of enforcement and sanction.
- Accompanying all of these developments has been the introduction of other essential legislation governing whistleblowing, anti-corruption measures (which has extraterritorial implications), money laundering and anti-terrorism measures, and priority amendments to the existing Companies Act calling for mandatory audit committees in “public interest” companies and giving legal force to accounting standards and reporting. Embracing this is the country’s commitment to ensuring full adherence to Basel II and International Financial Reporting Standards (IFRS) ahead of many countries in Western Europe.
- A major response to these developments has been the surge in director development and corporate governance training, led by the IoD in South Africa primarily and has evolved into a major industry of itself through the activities of private consultants, large auditing and accounting firms, higher education institutions and business schools, etc.

South Africa has recently embarked on the NEPAD APRM review, using an extensive consultative process that officially covered as many as 5 million people. The country has produced a detailed Technical Report and Country Self Assessment Reports in the four thematic area of the APRM with positive programme of action deliverables towards improving the level of integrity in the country.

In conclusion, corruption is a key issue that needs to be addressed in Africa as the region's long-term growth and competitiveness requires an environment underpinned by the cardinal pillars of accountability, fairness, responsibility and transparency that have been lacking in many parts of the region. Leverage points for reform in sub-Saharan Africa include:

- The opportunity created by the NEPAD process and peer reviews in engaging issues of public policy and economic management.
- There is the need for policy review and effective enforcement of the legal and regulatory framework.
- As banks play such a pivotal role in the economy, banks should adopt and implement practices of good corporate governance to enable them to play a leadership role in promoting good corporate governance. In order to prepare for Basel II banking guidelines, it would be necessary to undertake studies to identify gaps and develop a time profile for implementation (understanding the prior need for full application of the Basel I requirements).
- There is the need to encourage countries in Africa to put in place mechanisms that will ensure that directors appointed are qualified, competent and independent and that they are properly inducted into their roles and regularly trained.
- The role of the State as trustee shareholder and regulator must be acknowledged, and SOEs need to adopt guidelines for good corporate governance compatible with international standards. However, these guidelines should take into consideration local circumstances without compromising on the fundamental principles of accountability, transparency, efficiency and effectiveness, and probity.
- Enlightenment of existing and prospective shareholders of their rights, duties and obligations is imperative to encourage participation in the formal private sector and to further advance the monitoring of companies and good corporate governance practices. This can involve training, workshops, school and university initiatives, and more active exercise of responsibilities by investment managers and pension funds. Develop more effective linkages for communication of corporate governance practices, standards and developments,

including sharing of experiences, to ensure that corporate governance remains at the forefront of policy priorities.

- The promotion of shareholder activism is imperative and could be through public policy interventions and regulatory mechanisms to enable the ability of shareholders to more effectively exercise and enforce their rights.
- What is interesting is that the solutions required to eradicate corruption are too complex and the resources too thinly spread across the various sectors for any particular sector to do it alone. What is required is multi-stakeholder action and building the capacity of civil society organisations to engage with and hold both government and business accountable.
- International donors and developmental agencies should strengthen their efforts to engage in the fight to eliminate corruption within their programmes and spheres of influence and to the extent possible promote the role of responsible multi-national corporations.