



IN WHOSE INTEREST?



**Analysing how corrupt and repressive regimes
seek influence and legitimacy through
engagement with UK Parliamentarians**

Transparency International is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, Transparency International has extensive global expertise and understanding of corruption.

Transparency International UK (TI-UK) is the UK chapter of Transparency International. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK.

Acknowledgements: We would like to thank the Global Anti-Corruption Consortium for their generous financial support that made the research possible.

© 2018 Transparency International UK. All rights reserved.

Reproduction in whole or in parts is permitted, providing that full credit is given to Transparency International UK (TI-UK) and provided that any such reproduction, in whole or in parts, is not sold or incorporated in works that are sold. Written permission must be sought from Transparency International UK if any such reproduction would adapt or modify the original content.

Published July 2018.

Photo Credit: Cover - Istock, p7 - EPA, p12 - PA p18 - Ammar Abdulrasool

Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of July 2018. Nevertheless, Transparency International UK cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

Transparency International UK's registered charity number is 1112842.

IN WHOSE INTEREST?

Analysing how corrupt and repressive regimes seek influence and legitimacy through engagement with UK Parliamentarians

INTRODUCTION

The role of the UK Parliament is broad, but can be summarised into four key functions:¹

- Making and changing laws.
- Checking and challenging the work of the UK Government.
- Checking and approving UK Government spending.
- Debating important issues of the day.

In order to fulfil these duties parliamentarians must draw on the expertise and experience of a wide range of stakeholders. This spans the lives of their constituents, hard statistical evidence from specialists in science and industry, visits to other jurisdictions and dialogue at international fora. The insight provided by these engagements can help generate a rich tapestry of knowledge to feed into deliberation at Westminster.

When done well this exchange of ideas and understanding strengthens our democracy and improves the decisions made in parliament and government. However, without due caution and appropriate safeguards this openness is exploited to the benefit of corrupt and repressive regimes.

Overview

Through [three country case studies](#), Transparency International UK has looked at how some parliamentarians are engaging in activity that appears to be supporting or legitimating the actions of corrupt and repressive regimes in [Azerbaijan](#), [Russia](#) and [Bahrain](#). Although these case studies reflect a range of engagement – from potentially unknowing legitimisation through to seemingly active endorsement – the effect of these activities is to provide a veneer of respectability to foreign regimes that stymie freedom of expression, ride roughshod over the rule of law and abuse their positions of power for personal enrichment.

Issues

Our case studies have found that some parliamentarians are – either consciously or unwittingly – helping to [launder the reputations of corrupt and repressive regimes](#) through:

- An apparent lack of due diligence being undertaken on who they engage.
- Participating in overseas visits that either pose no obvious potential benefit to policy deliberations, or appear highly inappropriate considering their host's corruption and human rights record.
- Providing access and services to groups and individuals connected with high-level corruption or human rights abuses abroad.

This activity is [not challenged](#) because of:

- The scope and interpretation of the UK Parliament's Codes of Conduct.
- The opacity of parliamentarians' financial interests.
- A culture of impunity within the UK Parliament.

The [impact](#) of this activity on our democracy is threefold:

1. It undermines the credibility of those who engage in these activities, and the validity of their contributions in Parliament.
2. It undermines the efforts of other parliamentarians and UK Government, which seek to help democratisation and the adoption of international legal norms through initiatives like the Westminster Foundation for Democracy (WFD) and the Inter-Parliamentary Union (IPU).
3. It is to the detriment of the UK's standing as a beacon of democracy and a defender of the rule of law, and UK Government foreign policy.²

¹ <https://www.parliament.uk/about/how/role/> [Accessed 02/07/2018]

² Promoting human rights, good governance and the rule of law is a key part of the UK Government's current foreign policy priorities <https://www.gov.uk/government/publications/foreign-and-commonwealth-office-single-departmental-plan/foreign-and-commonwealth-office-single-departmental-plan> [Accessed 11 April 2018]

Recommendations

We have identified **five solutions** that, if implemented effectively, should help reduce the risk of UK parliamentarians bringing British democracy into disrepute.

1. Review the conduct of parliamentarians

We are concerned that some foreign lobby groups representing corrupt and repressive regimes are operating openly in Westminster without challenge. In particular, the activities of the Azerbaijan lobby in Parliament have become so infamous that it is seemingly tolerated as almost an eccentricity. The fact that it can be so widely acknowledged as problematic yet unchallenged shows there is a culture of impunity that is undermining the integrity of our democracy.

It is unclear whether this culture stems from the wording of the current rules, their enforcement in practice or some other factor. Those responsible for monitoring and enforcing standards in the UK Parliament should review this issue as a matter of priority.

We recommend that both of Parliament's Commissioners for Standards undertake a joint inquiry into the conduct of MPs and Peers and their role – either unwittingly or complicitly – in legitimating corrupt and repressive regimes. This should include both a review of Parliament's Codes of Conduct and the arrangements through which they are enforced.

2. Protect parliamentarians' independence on overseas visits

It is imperative that when parliamentarians undertake engagements overseas their independence is beyond question. At present, there is a clear risk that overseas trips sponsored either directly or indirectly by corrupt and repressive regimes may present the perception or reality that parliamentarians' judgements and actions are influenced by the malign intent of their hosts, which could also constitute a bribery offence.

There are controls on the sources of donations and loans to political parties and politicians to prevent such foreign interference in our democracy. A similar approach should be applied to those funding overseas visits.

We recommend parliamentarians be prohibited from accepting paid foreign travel costing over £500 other than from prescribed organisations that are either:

- acting in the UK national interest;
- which the UK or UK Parliament is a full member, for example, the Inter-Parliamentary Union; or
- would otherwise be sufficiently regulated to provide this safeguard, for example, UK political parties.

3. Prohibit parliamentarians from providing advisory services to foreign governments and state institutions

Our previous research has highlighted how the current rules for MPs allow them to undertake private advisory work for paying clients that directly conflicts with their duty to represent the public interest.³ The evidence we have outlined in this paper shows how some parliamentarians are also providing advice and other services to the benefit of corrupt and repressive regimes. This kind of activity ultimately undermines the reputation of Westminster as a beacon of democracy and the rule of law, and risks bringing into question the integrity of parliamentarians.

We recommend that parliamentarians are prohibited from providing any paid or voluntary services to foreign governments and state institutions.

4. Better due diligence by parliamentarians

Given the nature of their role, it is not uncommon for parliamentarians to engage a wide range of stakeholders. This can help inform their deliberations in Westminster, deepen their understanding of a particular subject or context, or assist in the furtherance of the UK's foreign policy goals, including the promotion of security, human rights and good governance. However, the nature of the interactions we have observed raises serious questions about the quality of due diligence being done by some parliamentarians, especially when engaging those connected with corrupt and repressive regimes. As illustrated by recent allegations of corruption at the Council of Europe, this can result in parliamentarians being labelled as 'apologists' for these regimes. We do not consider this to be consistent with the principles of leadership and integrity that parliamentarians must maintain whilst in public office.

We recommend that the Commissioners for Standards in both the Commons and the Lords provide advice and guidance to parliamentarians on how to approach due diligence on external engagements.

³ Transparency International UK, *Accountable Influence: Bringing Lobbying Out of the Shadows* (September 2015) <http://www.transparency.org.uk/publications/accountable-influence-bringing-lobbying-out-of-the-shadows/> [Accessed 9 July 2018]

4 In Whose Interest?

5. Improvement of financial interest disclosure

The time it would take a member of the public to uncover the details of parliamentarians' visits and outside employment, as we have done in this report, is unnecessarily long due to the outdated way in which both Houses of Parliament publish the details of members' interests. As is currently the case with data on political donations published by the Electoral Commission, the public should be empowered with the ability to instantly query details about parliamentarians' financial interests and download it to examine them in more detail.

Parliament Digital Service have mapped-out the technical details of how this can be done in practice. What is needed now is the political will to see this implemented across both Houses, which would radically improve the transparency over parliamentarians' interests and any corruption-risks these may represent.

We recommend that the Registers of Members' Financial Interests in the Houses of Commons and Lords are published as structured open data by the end of 2020.



AZERBAIJAN

Key Facts

Corruption Perception Index (2017): 122 / 180 countries
Freedom House rating (2018): 12/100

(0=Least Free, 100=Most Free)

World Press Freedom Index (2017): 163 / 180 countries

Scale and nature of engagement with UK parliamentarians

The European Azerbaijan Society (TEAS) is the 2nd biggest spending foreign lobby group in the House of Commons⁴

111 known visits by 71 different parliamentarians and their staff to Azerbaijan (2007 to 2017)

£333,000+ spent on flights and accommodation for UK Parliamentarians⁵ (2007 to 2017)

Overwhelming majority (84 per cent) of visits paid for by the Government of Azerbaijan or other institutions and organisations connected to the regime

Over a quarter (26 per cent) of visits (29) by parliamentarians were for unspecified purposes or as a 'guest' of Azeri state institutions

Two parliamentarians participated in an election observation mission boycotted by the international community and paid for by Azeri state bodies – a direct conflict of interest

A parliamentarian's private firm produced promotional material for the regime during a period when it was cracking down on civil society and journalists

UK-Azerbaijan relations

Azerbaijan is a petrostate and former Soviet Republic in the South Caucasus that has been ruled by the same family dynasty since 1993.

According to the UK Government's guide to doing business in Azerbaijan, the UK exported almost £730 million to the country in 2014.⁶ The biggest UK connection to the country is BP's exploration, production, and storage of the country's oil and gas reserves, which dates back to 1992.

BP is also a key shareholder of three major energy pipelines that provide oil and gas to Western Europe from Azerbaijan.⁷ This includes the Southern Gas Corridor, parts of which have recently received major funding commitments from the European Investment Bank (EIB)⁸ and European Bank for Reconstruction and Development (EBRD).⁹

Political context

Azerbaijan's current President (Ilham Aliyev) and Vice-President (Mehriban Aliyeva) are husband and wife. According to leaked US diplomatic cables, their families are two of the most powerful in the country: the Aliyevs and Pasheyevs.¹⁰ Ilham's father, Heydar, was a former member of the Soviet Politburo and then President of the independent Republic of Azerbaijan from 1993 to 2003.

None of the country's presidential elections since the Aliyev's came to power – held in 1998,¹¹ 2003,¹² 2008¹³ and 2013¹⁴ – have been deemed free or fair by the Organisation for Security and Cooperation in Europe

4 We calculated this based on the visits reported by MPs, which are published on the Electoral Commission's website (as of 7 July 2018). We categorised the visits by the jurisdiction of the trip's sponsor and the type of organisation they were. We defined lobbying organisations narrowly as non-state actors that could reasonably be thought to be trying to influence politicians and decision-makers in the UK. Note this does not include state institutions, which may be carrying out similar activities. We could not do similar analysis for the House of Lords because their interests are not published as structured open data and they do not include the financial value of the trip in their register of interests.

5 Based on the average value of trips where the value is included in public records. Unlike MPs, members of the House of Lords are not required to record the value of overseas visits paid for by others in their Register of Members' Interests.

6 <https://www.gov.uk/government/publications/exporting-to-azerbaijan/exporting-to-azerbaijan> [Accessed 24 July 2018]

7 https://www.bp.com/en_az/caspian/operations/projects/pipelines.html [Accessed 21 February 2018]

8 <https://uk.reuters.com/article/uk-eu-energy/eib-approves-1-5-billion-euro-loan-for-tap-gas-pipeline-idUKKBN1FQ2DA> [Accessed 21 February 2018]

9 <http://www.ebrd.com/news/2017/ebrd-board-approves-financing-for-transanatolian-natural-gas-pipeline.html> [Accessed 21 February 2018]

10 https://wikileaks.org/plusd/cables/10BAKU54_a.html [Accessed 25 January 2018]

11 <http://www.osce.org/odihr/elections/azerbaijan/14329?download=true> [Accessed 25 January 2018]

12 <http://www.osce.org/odihr/elections/azerbaijan/13467?download=true> [Accessed 25 January 2018]

13 <http://www.osce.org/odihr/elections/azerbaijan/35625?download=true> [Accessed 24 January 2018]

14 <http://www.osce.org/institutions/110015?download=true> [Accessed 24 January 2018]

6 In Whose Interest?

(OSCE). Elections to Azerbaijan's legislature have also been criticised by the international community, with the 2015 parliamentary polls boycotted by the OSCE observation mission due to restrictions imposed on its activities by the Azerbaijan authorities.¹⁵

In September 2016, the country voted in a controversial referendum, called by Ilham Aliyev, on amendments to the constitution that have:

- extended the Presidential term from five to seven years;
- created the office of Vice-President; and
- eliminated age limits for the President.

The most recent presidential election was due to take place in October 2018 however under new powers brought-in by the September 2016 referendum, Ilham Aliyev unilaterally brought forward the poll to 11 April 2018.¹⁶

Corruption

The Foreign and Commonwealth Office (FCO) states that "Corruption is an everyday aspect of life in Azerbaijan".¹⁷ This ranges from low-level bribes solicited by public officials up to the abuse of power for private gain at the highest levels of government. Evidence of this is visible in three main areas: the wealth of the first family, the country's banking sector and its extractives industry. Cumulatively, corruption in Azerbaijan appears to be undermining the long-term stability of the country's economy.

The Aliyevs and Pasheyevs are reported to control a wide range of business interests both domestically and internationally, including secret holdings in an Azerbaijan gold mine,¹⁸ stakes in three domestic banks accounting for 19 per cent of the country's banking assets,¹⁹ and one

of Azerbaijan's largest businesses.²⁰ Alongside domestic holdings they are reported to own a large property portfolio abroad, including prime London real estate.²¹

Until recent exposés like the Panama Papers, the Aliyevs' ownership of these businesses and properties remained hidden behind opaque companies based in offshore secrecy havens like Panama and the British Virgin Islands (BVI). The use of opaque structures by individuals in positions of power – 'Politically Exposed Persons' – are recognised by financial crime experts as a common way to hide the proceeds of corruption.²² When questioned about their ownership of these assets by reporters the Aliyevs have not responded to requests for comment.

The Carnegie Endowment for Democracy has put Azerbaijan's ruling elite at the centre of a large network benefitting from bribery, embezzlement and rigged procurement in the country.²³ The first family and their associates are also alleged to have made a series of sizeable transactions shortly before the local currency's substantial devaluation in 2015, which is estimated to have earned them at least \$64 million.²⁴

In 2014, the Council of Europe (COE) identified that the "weak implementation of the rule of law and democratic principles" might have left Azerbaijan's major state-owned bank – the International Bank of Azerbaijan (IBA) – "vulnerable to misuse for [money laundering and terrorist financing]".²⁵ This has since been proved to be true. In 2017, investigative journalists at the Organised Crime and Corruption Reporting Project (OCCRP) obtained documents identifying how £2.2 billion was laundered out of the country between 2012 and 2014 through a scheme labelled "the Azerbaijan Laundromat".²⁶ At the core of this money laundering scheme were shell companies registered in the UK.²⁷ Almost half of the money came from accounts held at the IBA by shell companies connected to the Aliyevs.²⁸ Since these revelations, the IBA has filed for restructuring proceedings in the US and UK due to insolvency.²⁹ In its application to the courts the IBA cited low oil prices for its liquidity issues and gave no mention of losses due to widespread money laundering out of its

15 <http://www.osce.org/odihr/elections/azerbaijan/181611> [Accessed 24 January 2018]

16 <http://president.az/articles/26943> [Accessed 6 February 2018]

17 <https://www.gov.uk/foreign-travel-advice/azerbaijan/safety-and-security> [Accessed 24 January 2018]

18 <https://www.occrp.org/en/panamapapers/aliyev-mining-empire/> [Accessed 23 April 2018]

19 <https://www.occrp.org/en/corruptistan/azerbaijan/2015/06/11/azerbaijani-first-family-big-on-banking.html> [Accessed 23 April 2018]

20 <https://www.theguardian.com/world/2018/apr/23/azerbaijan-ruling-families-linked-to-secret-investments-via-maltese-bank> [Accessed 23 April 2018]

21 <https://www.occrp.org/en/panamapapers/azerbaijan-first-familys-london-private-enclave/> [Accessed 25 January 2018]

22 Financial Action Task Force, *The Use of the FATF Recommendations to Combat Corruption* (October 2013) pp.8-11 <http://www.fatf-gafi.org/media/fatf/documents/recommendations/BPP-Use-of-FATF-Recs-Corruption.pdf>

23 Sarah Chayes, *The Structure Of Corruption: A Systemic Analysis Using Eurasian Cases* (June 2016) p.31 http://carnegieendowment.org/files/CP274_Chayes_EurasianCorruptionStructure_final1.pdf

24 <https://www.occrp.org/en/corruptistan/azerbaijan/2016/06/06/azerbaijani-insiders-benefited-from-currency-collapse.html> [Accessed 25 January 2018]

25 Council of Europe, *Report on Fourth Assessment Visit: Anti-Money Laundering and Combating the Financing of Terrorism*, Azerbaijan (December 2014) p.24 <https://rm.coe.int/report-on-fourth-assessment-visit-anti-money-laundering-and-combating-1680715b1d>

26 <https://www.occrp.org/en/azerbaijanlaundromat/> [Accessed 10 July 2018]

27 For more information on the use of UK shell companies in money laundering see Transparency International UK, *Offshore in the UK: Analysing the Use of Scottish Limited Partnerships in Corruption and Money Laundering* (June 2017) <http://www.transparency.org.uk/publications/offshore-in-the-uk>

28 <https://www.occrp.org/en/azerbaijanlaundromat/> [Accessed 17 July 2018]

29 [https://uk.practicallaw.thomsonreuters.com/w-009-7552?transitionType=Default&contextData=\(sc.Default\)](https://uk.practicallaw.thomsonreuters.com/w-009-7552?transitionType=Default&contextData=(sc.Default)) [Accessed 25 January 2018]

accounts.³⁰

A key driver of Azerbaijan's economy and state income is its energy resources. On average, Azerbaijan's oil revenues accounted for 64 per cent of its tax revenue between 2005 and 2015, with a substantial proportion coming from the state sovereign wealth fund, The State Oil Fund of the Republic of Azerbaijan (SOFAZ).³¹ It has also received large investments from multilateral institutions to help develop its oil and gas export capabilities, including a £358.5 million loan from the EBRD to extend the Southern Gas Pipeline, which will connect the country's vast gas reserves to the Western European Market. There are significant concerns about the governance of these resources.

On 9 March 2017, the country was suspended by the Extractives Industry Transparency Initiative (EITI) – the global standard for natural resource good governance – because of its failure to allow civil society oversight of its energy industry.³² The next day it withdrew from the initiative altogether.³³ Prior to Azerbaijan's withdrawal from the EITI the anti-corruption organisation Global Witness raised significant concerns about the opacity of Azerbaijan's state-owned oil company, SOCAR, and major deficiencies in its tendering processes.³⁴ According to Global Witness' analysis, this has left the country's natural resources exposed to embezzlement and rigged procurement.³⁵

Human rights abuse

Azerbaijan has been consistently criticised by civil society organisations (CSOs) and international institutions for its use of arbitrary detention and restricting the freedom of movement, expression and association of its citizens. As of December 2016, CSOs in Azerbaijan had identified there were a total of 158 political prisoners either arrested or imprisoned on grounds that were either improper, unjust or in violation of their rights.³⁶ This includes the leading opposition figure, Ilgar Mammadov, on charges challenged by the European Court of Human Rights.³⁷ Previous detainees have included Khadija Ismayilova, an

investigative journalist who won the Magnitsky Human Rights Award in 2017 for her work exposing corruption in Azerbaijan.³⁸

Current detainees include investigative journalist Afgan Mukhtarli, who had reported on alleged corruption at the country's Ministry of Defence. In May 2017, he was beaten, abducted from the Republic of Georgia and left with Azerbaijan border guards with \$10,000 planted on him by unknown assailants.³⁹ In January 2018, he was sentenced to six years in prison for alleged illegal border crossing and smuggling money. The US State Department⁴⁰ and European Union⁴¹ have both called for Mukhtarli's release and a review of the case. The UK Government has called Mukhtarli's trial 'politically motivated' and has called for his case to be reviewed; however, it is yet to call for his release.⁴²

Scale and nature of engagement with UK parliamentarians

In recent years, there has been a concerted attempt by the regime to portray itself as a modern and respectable part of the international community. This has included playing host to a series of international cultural events such as the European Games, the Baku Formula 1 Grand Prix and the Eurovision Song Contest. Human rights groups note that waves of arbitrary arrest and detention often accompany these events.⁴³

The regime has sought to win support in national and international institutions as part of a concerted influencing strategy. This has included courting allies in the UK Parliament, the COE and the US Congress.⁴⁴ Recently, the Azerbaijan lobby became infamous because of its alleged role in bribing politicians at the Parliamentary Assembly of the Council of Europe (PACE). The payments are alleged to have been made to secure enough support from PACE delegates to vote down a report critical of the country's human rights record.⁴⁵ An independent investigation into these allegations published its findings in April 2018, which concluded that a number of former PACE members had

30 <https://www.esquireglobalcrossings.com/files/2017/06/OJSC-1.pdf> [Accessed 24 April 2018]

31 <https://www.resourcedata.org/dataset/az-budget/resource/23b4fa19-c073-46c5-8579-e4a4355613ce> [Accessed 23 April 2018]

32 <https://eiti.org/BD/2017-15> [Accessed 23 April 2018]

33 <https://eiti.org/azerbaijan> [Accessed 23 April 2018]

34 <https://www.globalwitness.org/en/archive/azerbaijan-anonymous/> [Accessed 18 July 2018]

35 Global Witness, Anonymous Azerbaijan (December 2013) p.4 https://www.globalwitness.org/sites/default/files/library/azerbaijan_anonymous_lr.pdf

36 The Working Group on "A Unified List of Political Prisoners in Azerbaijan" (August 2017) http://smdtaz.org/wp-content/uploads/2017/08/Political-Prisoners-Report_Azerbaijan-August_2017.pdf

37 https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680749f3c [Accessed 25 January 2018]

38 <https://www.occrp.org/en/daily/7271-khadija-ismailova-wins-magnitsky-award?src=ilaw> [Accessed 25 January 2018]

39 <https://cpj.org/data/people/afgan-mukhtarli/index.php> [Accessed 10 July 2018]

40 <https://www.state.gov/r/prs/ps/2018/01/277441.htm> [Accessed 25 January 2018]

41 https://eeas.europa.eu/headquarters/headquarters-homepage/38212/statement-spokesperson-sentencing-journalist-afgan-mukhtarli-azerbaijan_en [Accessed 25 January 2018]

42 <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-01-19/123787/> [Accessed 10 July 2018]

43 <https://www.indexonensorship.org/2017/10/joint-submission-to-the-universal-periodic-review-of-azerbaijan/> [Accessed 25 January 2018]

44 <http://foreignpolicy.com/2015/06/11/how-azerbaijan-and-its-lobbyists-spin-congress/> [Accessed 25 January 2018]

45 European Stability Initiative, *The European Swamp: Caviar Diplomacy Part 2* (December 2016) pp.6-16 <http://www.esiweb.org/pdf/ESI%20-%20The%20Swamp%20-%20Caviar%20Diplomacy%20Part%20two%20-%202017%20December%202016.pdf>

8 In Whose Interest?

breached its code of conduct and that it had a 'strong suspicion' that current and former PACE members had undertaken 'corruptive activities' for Azerbaijan in the assembly.⁴⁶

The PACE independent investigation found that one of the UK's delegates, Robert Walter MP,⁴⁷ breached four parts of the COE's code of conduct. He had failed to declare or resolve conflicts of interest that could have prejudiced his opinions whilst being a rapporteur for the country and head of a PACE mission to observe the country's 2013 presidential election.⁴⁸ Another UK delegate, Mike Hancock MP,⁴⁹ has been singled-out as an 'apologist' for the regime by the European Stability Initiative (ESI) – an organization describing itself as a think tank for South East Europe.⁵⁰ He allegedly defended the integrity of Azerbaijan's 2008 and 2010 elections in the face of criticism from the OSCE international observation missions,⁵¹ and opposed a key report⁵² critical of the country's record on human rights.⁵³

The PACE independent investigation noted that Mike Hancock refused to give evidence as part of its inquiry into alleged bribery by Azerbaijan delegates, citing ill health.⁵⁴

In 2010, both Mike Hancock's local constituency party and party headquarters⁵⁵ received a total of £11,500 in cash donations from The European Azerbaijan Society (TEAS) – Azerbaijan's lobbying organisation for Europe, including the UK.⁵⁶ With support from a number of UK public relations firms,⁵⁷ TEAS' activities have included organising parliamentary visits to Azerbaijan, supporting the All Party Parliamentary Group (APPG) on Azerbaijan⁵⁸ in Westminster, and producing promotional material for the country featuring UK parliamentarians.⁵⁹

The founder and Chairman of TEAS is Tale Heydarov, the son of the country's Minister of Emergency Affairs, Kamaladdin Heydarov.⁶⁰ According to a statement from TEAS in 2011, it is funded by individual and corporate membership fees.⁶¹ We have not been able to independently verify the provenance of its funds.⁶² We have, however, some information about the level of its expenditure.

According to TEAS' annual accounts, it employs around 19 members of staff, including a consultant lobbyist costing £150,000 annually, and has an office lease worth almost £200,000 per annum.⁶³ Companies House records show TEAS' registered address as 15 Queen Anne's Gate in Westminster, just a short stroll from the Ministry of Justice.

Until recently, the freehold for this property was held by a company registered in the BVI called 15 Queen Annes Gate Ltd, who purchased it in January 2013.⁶⁴ Companies House records show TEAS moved in later in November 2013.⁶⁵ We have not been able to verify whether TEAS and 15 Queen Annes Gate Ltd have the same beneficiaries due to the secrecy around who owns companies based in the BVI. However, Land Registry documents show the freehold was bought from 15 Queen Annes Gate Ltd on 15 May 2018 by a property investment firm.⁶⁶ Although TEAS confirmed at the end of May 2018 it was their registered address,⁶⁷ the property is now advertised as a vacant property for sale.⁶⁸

Our analysis of official records and open source material has found that a total of 71 parliamentarians and their staff have been on 111 known visits to the country between 2007 and 2017.⁶⁹ Based on available information, we

46 Council of Europe, *Report of the Independent Investigation Body on the allegations of corruption within the Parliamentary Assembly* (April 2018) <http://assembly.coe.int/Communication/IBAC/IBAC-GIAC-Report-EN.pdf>

47 MP for Mid Dorset from May 1997 until March 2015 <https://www.parliament.uk/biographies/commons/Mr-Robert-Walter/244> [Accessed 19 July 2018]

48 Council of Europe, *Report of the Independent Investigation Body* pp.124-129

49 MP for Portsmouth South from June 1984 until March 2015 <https://www.parliament.uk/biographies/commons/mr-mike-hancock/59> [Accessed 19 July 2018]

50 Council of Europe, *Report of the Independent Investigation Body* p.6

51 European Stability Initiative, *The European Swamp: Caviar Diplomacy Part 2* pp.9-10

52 Committee on Legal Affairs and Human Rights, *The follow-up to the issue of political prisoners in Azerbaijan, Doc. 13079* (December 2012)

53 <http://assembly.coe.int/nw/xml/Votes/DB-VotesResults-EN.asp?VoteID=34435&DocID=14409&MemberID> [Accessed 24 April 2018]

54 Council of Europe, *Report of the Independent Investigation Body* p.159

55 £1,500 was received by the Portsmouth accounting unit of the Liberal Democrats, which according to its accounts covered Mr Hancock's constituency <http://search.electoralcommission.org.uk/Api/Accounts/Documents/2598> [Accessed 19 July 2018]. There are certain circumstances when MPs have to report this information for publication on the Register of Members' Financial Interests (see Paragraph 16 of the rules <https://publications.parliament.uk/pa/cm201516/cmcode/1076/1076.pdf>). However, there is no identifiable mention of this payment on the Register of Members' Financial Interests.

56 <http://search.electoralcommission.org.uk/English/Donations/C002707>; <http://search.electoralcommission.org.uk/English/Donations/C0027125>

57 See p.3 <https://www.appc.org.uk/wp-content/uploads/AUG-14-REGISTER-28.11.14.pdf>; see p.15 <https://www.appc.org.uk/wp-content/uploads/APPC-Register-November-2016.pdf>; [Accessed 25 January 2018]

58 <https://publications.parliament.uk/pa/cm/cmallparty/150730/azerbaijan.htm> [Accessed 4 July 2018]

59 This video and others like it no longer appear to be online <https://vimeo.com/36402323> [Accessed 25 January 2018]

60 <http://teas.eu/our-team> [Accessed 25 January 2018]

61 <https://www.thebureauinvestigates.com/stories/2011-08-29/questions-over-mps-all-expense-paid-trip-to-azerbaijan> [Accessed 25 July 2018]

62 TEAS only submits abbreviated accounts to Companies House and at the time of writing its website was unavailable for viewing <https://teas.eu/> [Accessed 4 July 2018]

63 <https://beta.companieshouse.gov.uk/company/06635743/filing-history/MzE4NTk4NDk5OWFkaXF6a2N4/document?format=pdf&download=0> [Accessed 5 July 2018]

64 Based on Land Registry data on overseas companies owning UK property published in January 2018 available from the Land Registry website <https://www.gov.uk/guidance/hm-land-registry-overseas-companies-ownership-data> [Accessed 19 July 2018]

65 <https://beta.companieshouse.gov.uk/company/06635743/filing-history/MzA4OTAxMDAyN2FkaXF6a2N4/document?format=pdf&download=0> [Accessed 10 July 2018]

66 See Land Title Number LN25301 available from the Land Registry

67 <https://beta.companieshouse.gov.uk/company/06635743/filing-history/MzlwODMwMzgzMWFkaXF6a2N4/document?format=pdf&download=0> [Accessed 4 July 2018]

68 <http://www.tuckerman.co.uk/properties/archive/15-queen-annes-gate/> [Accessed 12 July 2018]

69 The Electoral Commission's register of political donations, the Commons' and Lords' Registers of Members Financial Interests and material published in news outlets.

estimate that these visits – paid for by TEAS and state institutions in Azerbaijan – cost a minimum of £333,000.⁷⁰

Although the nature of many of these visits are described in parliamentarians' registers of interest, over a quarter (29) were for unspecified purposes or as a 'guest' of Azerbaijan state institutions. It is unclear from the disclosures how these visits relate to their parliamentary duties. There are also questions as to how much due diligence parliamentarians undertook on those paying for these trips, with one admitting they "had not really researched" who TEAS were.⁷¹

Two parliamentarians also participated in an observation mission for the controversial 2016 constitutional referendum, paid for by the Government of Azerbaijan,⁷² despite the OSCE not being invited to observe the polls.⁷³ The US delegation to OSCE expressed concerns about alleged voting irregularities during the plebiscite⁷⁴ and the Venice Commission was highly critical of the substance of the reforms and the electoral process.⁷⁵ Despite this, news outlets in the country used the presence and comments from the UK parliamentarians observing the polls to help promote the integrity of the referendum.⁷⁶

Alongside TEAS is the Anglo-Azerbaijani Society (AAS), which provides a range of benefits to members, including privileged access to closed tenders for contractors and "Access to VIP guests from corporate and governmental positions".⁷⁷ One of its members, Jovdat Guliyev, received £479,212 as part of the Azerbaijan Laundromat from two UK shell companies called Hilux Services LP and Polux Management LP.⁷⁸ He is no longer a member of the society and has claimed the money was for his personal use. When contacted for comment the AAS' Co-Chair, Lord German, said Guliyev quit nine minutes after these revelations were made public and added that none of the

payments went to the society.

In addition to paid-for overseas visits and political party contributions, Azeri lobby groups and organisations close to the regime have also:

- Paid two parliamentarians £15,000 each for "advice and discussions on matters relating to parliamentary relations and business, academic and educational links between the UK and Azerbaijan and discussions of two international conferences".⁷⁹ Both were cited by local press praising Azerbaijan, and their comments were re-published on one of the MP's personal websites.⁸⁰ Neither are still Members of Parliament.
- Co-authored two publications with a UK parliamentarian promoting the country in advance of the Baku Grand Prix and European Games – a period in which there were widespread arrests and a crackdown on civil society.⁸¹ The parliamentarian's publishing company produced both sets of promotional literature.⁸²
- Paid parliamentarians to attend prestigious events, such as the Royal Windsor Horse Show.⁸³
- Paid a UK parliamentarian to provide PR advisory services.⁸⁴
- Paid for the translation of a book written by a UK parliamentarian into Turkish.⁸⁵

70 Based on the average value of trips where the value is included in public records. Unlike MPs, members of the House of Lords are not required to record the value of overseas visits paid for by others in their Register of Members' Interests.

71 Council of Europe, *Report of the Independent Investigation Body* footnote 143 p.37

72 See p.92 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register181116.pdf> ; <http://search.electoralcommission.org.uk/English/Donations/V0260303> [Accessed 4 July 2018]

73 Email response to TI-UK enquiry to OSCE on 9 February 2018.

74 <http://www.osce.org/pc/273631?download=true> [Accessed 8 February 2018]

75 Venice Commission, *Azerbaijan: Preliminary Opinion on Draft Modifications to the Constitution* (September 2016) [http://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDD-Pl\(2016\)010-e](http://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDD-Pl(2016)010-e) [Accessed 8 February 2018]

76 <https://www.azernews.az/nation/102820.html> <https://news.milli.az/politics/473349.html> [Accessed 8 February 2018]

77 <http://www.anglo-azerbaijani-society.com/membership/benefits-of-membership/> [Accessed 25 January 2018]

78 <https://www.theguardian.com/world/2017/sep/05/theresa-may-challenged-over-azerbaijani-money-laundering-scheme> ; <https://www.occrp.org/en/azerbaijanilaundromat/profiles/jovdat-guliyev> [Accessed 25 January 2018]

79 See p.12 and p.217 <https://publications.parliament.uk/pa/cm/cmregmem/141027/141027.pdf> [Accessed 8 February 2018] Note: The true ownership of Trend News Agency is difficult to determine because Azerbaijan's register of companies does not publish this information.

80 <http://www.tonybaldry.co.uk/2014/09/18/trend-azerbaijan-has-very-important-story-to-tell-the-world-british-mp-says/> [Accessed 5 June 2018]

81 Co-author of the publications was Rafiga Huseynzade, who is SOCAR's Vice President for Ecology and a member of the ruling New Azerbaijan Party <http://socar.az/socar/en/news-and-media/news-archives/news-archives/id/9509> ; <https://report.az/en/energy/event-in-cambridge-university-marks-25th-anniversary-of-socar-bp-partnership/> ; <http://www.socar.az/socar/en/company/management/vice-president-for-ecology> [Accessed 12 February 2018]

82 See <http://www.senatepublishing.co.uk/publications/partner-publications/> and p.103 <http://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register160118.pdf> [Accessed 12 February 2018]

83 See p.30 and p.372 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register140318.pdf> ; see p. 78 and p.167 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register220217.pdf> [Accessed 10 July 2018]

84 See p.112 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/lordsreg1806.pdf> [Accessed 10 July 2018]

85 See p.108 <https://publications.parliament.uk/pa/cm/cmregmem/140616/140616.pdf> [Accessed 8 February 2018]

10 In Whose Interest?

- Recruited a UK parliamentarian to their Board.⁸⁶
- Held at least seven banqueting and reception events in the Houses of Parliament between 2012 and 2017.⁸⁷
- Paid for fringe events at political party conferences.⁸⁸

86 <http://www.bfsac.org.uk/people/lord-malcolm-bruce-of-bennachie> [Accessed 5 July 2018]

87 <https://www.parliament.uk/site-information/foi/transparency-publications/hoc-transparency-publications/catering-services/transparency-of-events-functions-data/> [Accessed 12 February 2018]

88 At the time of publication this website is not available <http://www.teas.eu/press-release-teas-jazz-reception-attracts-appreciative-libdem-audience> , <http://teas.eu/past-event-labour-party-conference-2012-european-azerbaijan-society-reception> , and <http://www.teas.eu/press-release-conservative-minister-sajid-javid-speaks-joint-conhometeas-reception> [Accessed 25 January 2018]



RUSSIA

Key facts

Corruption Perception Index (2017): 135 / 180 countries
Freedom House rating (2018): 20/100
(0=Least Free, 100=Most Free)
World Press Freedom Index (2018): 148 / 180 countries

Scale and nature of UK parliamentarians' engagement

12 MPs paid at least £93,700 in total to appear on state TV channel, RT, since 2014

Total likely to be much higher, with at least 161 UK politicians and public servants appearing on RT 381 times between 2010 and 2017

Two former MPs have hosted talk shows on RT

MPs targeted by Russian spies, according to MI5

Russian parliamentary lobby group abandoned by senior MPs after concerns it was a Kremlin front

Former MP turned PR agent allegedly used his connections to provide high-level UK political access to Russian and Ukrainian businesspersons

UK-Russian relations

There has long been a suspicion that Russia, and previously the Soviet Union, have sought to exert malign influence over UK political affairs. Since the Bolshevik revolution of 1918 and subsequent civil war – which saw British troops fight against the Red Army – there was concern within the UK Government and security services that Moscow was investing substantial money and human resources into fermenting political discontent in Britain and the rest of Western Europe. Until 1943, this was the explicit aim of Soviet foreign policy, which was supported by the third Communist International ('Comintern'). Allegedly, funds were channeled to British trade unions from the Soviet Union, including during the UK general strike of 1926, and to the Communist Party of Great Britain.

After the collapse of the USSR there was a thaw in Western-Russian relations, with the UK seeking to 'develop a strong and productive partnership' as part of wider attempts in the West to help integrate the newly-independent state into the international system and global economy.⁸⁹ However, despite some early success, relations became increasingly strained during the 2000s, with tension over the US-led invasion of Iraq and revolutions in Ukraine and Georgia that overthrew regimes more sympathetic to Moscow.

Since then, there has been a succession of events leading to a significant worsening in diplomatic ties, including:

- the murder of Alexander Litvinenko by Russian agents in London;
- Russia's annexation of Crimea and de facto annexation of Eastern Ukraine;
- the attempted assassination of the former spy, Sergei Skripal, in Salisbury in March 2018, allegedly by Russian agents; and
- the subsequent death of Dawn Sturgess, which is suspected to have been caused by the same nerve agent used on the Skripals.

89 Written evidence from Foreign and Commonwealth Office (RUS0011) <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/foreign-affairs-committee/the-uks-relations-with-russia/written/27869.html> [Accessed 21 March 2018]

Political context

Since the dramatic resignation of Boris Yeltsin on New Year's Eve in 1999, Vladimir Putin has dominated Russian politics. Despite constitutional provisions intended to prevent the dominance of one individual over the political system, he has served as Prime Minister twice and on 18 March 2018 was re-elected for his fourth presidential term in office.

An amendment to the 1993 Constitution of the Russian Federation extended presidential term limits from four to six years. There is still a prohibition of the president serving two consecutive terms in office.

Despite being a member of the COE since 1996, the OSCE has noted serious irregularities and issues with presidential and prime ministerial elections in Russia since 2004, including:

- The use of public resources to campaign in favour of the incumbent.
- The coercion of state employees to vote for the incumbent.
- Heavy media bias that provides a significant advantage to the incumbent.
- Undue restrictions and prohibitions on alternative candidates standing for election.
- The detention of those criticising the legitimacy of the elections.

Recent examples of this include an OCCRP investigation identifying a number of Russian foundations that appeared to be using funds received from the state to support Putin's re-election,⁹⁰ and the prohibition of Transparency International Russia from publishing the details of candidates' views on corruption by the Central Election Commission because they were deemed a 'foreign agent'.⁹¹

In its final report on the 2018 Presidential elections, the OSCE noted that there was a distinct lack of competition with the primary focus of authorities being to increase the level of turnout.⁹²

Corruption

In its advice to potential investors, the FCO describes corruption in Russia as 'endemic'.⁹³ The solicitation of bribes by public officials is widespread, whilst high-level abuse of power is pervasive across political, state and judicial institutions, including embezzlement, the misuse of state property and rigged public procurement.

High-end corruption has provided an environment in which a relatively small number of individuals have accumulated large amounts of the country's wealth. According to Forbes' Rich List, Russia has one of the highest densities of billionaires in the world,⁹⁴ with World Bank estimates suggesting that almost 30 per cent of the country's income is enjoyed by only 10 per cent of the population.⁹⁵ An investigation by OCCRP/Novaya Gazeta in 2017 found that Putin's inner circle had a personal combined wealth of \$24 billion, with the most successful individuals running companies with a strong relationship with the state.⁹⁶

The overall scale of corruption across Russia is difficult to quantify however there are some broad estimates on the amount of money that has been moved illegally out of the country. According to on bank documents leaked to OCCRP, over \$20.8 billion was laundered out of Russia between 2011 and 2014.⁹⁷ UK companies and banks were key to moving these illicit funds through the global economy.

In 2015, Deutsche Bank estimated that around £100 billion in hidden financial flows had made its way into the UK economy since 2006. In 2017, Deutsche Bank itself was fined £163 million by the Financial Conduct Authority (FCA) for failures in their money laundering controls, which allowed \$10 billion in suspicious wealth from Russia to flow through its UK offices.

A popular destination for the proceeds of Russian corruption is the property market both domestically and abroad. An investigation by Transparency International Russia found that Deputy Prime Minister Dmitry Rogozin and his family own a luxury apartment in Moscow worth an estimated £6.2 million. In order to be able to afford this property with the family's combined official income, it would take the Rogozins 50 years.⁹⁸

Our research has found that suspicious wealth from Russia has bought at least £940 million worth of property in the UK. This is only based on open source information

90 <https://www.occrp.org/en/investigations/7773-anonymous-generosity-the-foundations-sponsoring-putin-s-re-election> [Accessed 21 March 2018]

91 <https://transparency.org.ru/projects/korotkie/tsik-ne-razreshil-transperensi-sprashivat-kandidatov-v-prezidenty-o-korrupsii.html> [Accessed 31 March 2018]

92 <https://www.osce.org/odihr/elections/383577?download=true> [Accessed 10 July 2018]

93 <https://www.gov.uk/government/publications/overseas-business-risk-russia/overseas-business-risk-russia#bribery-and-corruption> [Accessed 21 March 2018]

94 <https://www.forbes.com/billionaires/list/> [Accessed 17 May 2018]

95 See <https://data.worldbank.org/indicator/SI.DST.10TH.10?locations=GB-RU&view=chart> Note that the UK's distribution is 26 per cent of income held by the top 10 per cent as of 2014 [Accessed 29 March 2018]

96 <https://www.occrp.org/en/putinandtheproxies/> [Accessed 29 March 2018]

97 <https://www.occrp.org/en/laundromat/the-russian-laundromat-exposed/> [Accessed 24 April 2018]

98 <https://transparency.org.ru/special/rogozin/eng/> [Accessed 21 March 2018]

and is likely to be the tip of the iceberg. The properties include an £11.44 million apartment bought without a mortgage that, according to an investigation by Alexei Navalny's Fund for the Fight Against Corruption, is owned by Igor Shuvalov, who at the time of purchase was a Russian Deputy Prime Minister. Estimates suggest that it would have taken Shuvalov at least 76 years to pay for these flats based on his official salary.⁹⁹

As well as buying UK property, there is evidence to suggest a large number of affluent Russian emigres have settled in the UK using wealth of questionable origin, exploiting loopholes in the UK's Tier 1 (Investor) visa system that were only closed in 2015.¹⁰⁰ Based on the minimum amount applicants had to invest as part of this cash-for-residency scheme, we estimate that Russian applicants moved a minimum of £707 million through this visa system whilst there were weak due diligence checks on the provenance of these funds.¹⁰¹ The actual amount is likely to be much higher.

Human rights abuse

In its 2017/18 report on the state of global human rights, Amnesty International highlighted serious infringements of liberty spanning everything from freedom of expression to freedom of assembly, religious freedoms and discrimination against the Lesbian, gay, bisexual, transgender and intersex (LGBTI) community.¹⁰² Some egregious forms of abuse are key to securing the stability of Russia's current political and economic elite.

Restricting and intimidating the press has inhibited the widespread scrutiny of Russia's political and economic elite. This has ranged from removing state funding from critical news outlets through to the assassination of journalists, which are often thought to be ordered by the authorities. Data collected by the Committee to Protect Journalists shows that since Putin assumed office in 2000, 25 journalists have been murdered in Russia. Of these, 21 were covering corruption, political or human rights issues when they were killed.¹⁰³

The most widely known of these in the West is the murder of Anna Politkovskaya, who had reported extensively on the repressive activities on both sides of the various conflicts in Chechnya. She was shot four times at point blank range in October 2006. The two most recent reported killings were of Nikolai Andrushchenko¹⁰⁴ and Dmitry Popkov.¹⁰⁵ They were both murdered in 2017 and both are suspected to have been killed for their work in exposing corruption.

As well as being harassed and physically intimidated, independent media outlets are also subjected to administrative measures intended to make their operations more difficult.¹⁰⁶ In November 2017, new legislation was introduced requiring media outlets with funding from overseas, or based overseas, to register as a 'foreign agent'.¹⁰⁷ Those subject to these new requirements have to state in their broadcasts and on their website that they are funded by sources from overseas. These new measures extend others that were already in place for CSOs receiving funds from overseas.¹⁰⁸

On top of having to comply with the requirements for 'foreign agents', Transparency International Russia has faced numerous legal challenges from the Russian authorities and its associates for their role in exposing high-level corruption amongst the country's elite. The most recent case is a defamation suit for its investigation into the alleged misappropriation of funds at a prestigious education institute by its director, Vladimir Litvinenko.¹⁰⁹ Other staff at Transparency International Russia have been detained and held on dubious charges because of their work, and TI's international website has been blocked within Russia.¹¹⁰

99 <https://www.occrp.org/en/daily/4207-russia-deputy-pm-owns-us-18-million-flat-in-london-navalny-says> [Accessed 21 March 2018]

100 <http://www.transparency.org.uk/whatever-happened-to-the-great-british-gold-rush/> [Accessed 21 March 2018]

101 Transparency International UK, *Gold Rush: Investment Visas and Corrupt Capital Flows into the UK* (October 2015) p.16 <http://www.transparency.org.uk/publications/gold-rush-investment-visas-and-corrupt-capital-flows-into-the-uk/>

102 Amnesty International's *Report 2017/18: The State of the World's Human Rights* (February 2018) pp.310-314 <https://www.amnesty.org/en/documents/pol10/6700/2018/en/>

103 https://cpj.org/data/killed/europe/russia/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Murder&cc_fips%5B%5D=RS&start_year=2000&end_year=2018&group_by=year [Accessed 29 March 2018]

104 <https://cpj.org/data/people/nikolai-andrushchenko/index.php> [Accessed 29 March 2018]

105 <https://cpj.org/data/people/dmitry-popkov/index.php> [Accessed 29 March 2018]

106 For an overview see Freedom House's *Freedom of the Press 2017: Russia* <https://freedomhouse.org/report/freedom-press/2017/russia> [Accessed 11 April 2018]

107 Federal Law of 25.11.2017 No. 327-FZ <http://www.pravo.gov.ru/proxy/ips/?searchres=&x=0&y=0&bpas=cd00000&a3=&a3type=1&a3value=&a6=&a6type=1&a6value=&a15=&a15type=1&a15value=&a7type=1&a7from=&a7to=&a7date=&a8=327-%D4%C7&a8type=1&a1=&a0=&a16=&a16type=1&a16value=&a17=&a17type=1&a17value=&a4=&a4type=1&a4value=&a23=&a23type=1&a23value=&textpres=&sort=7> [Accessed 11 April 2018]

108 Federal Law No. 121-FZ of July 20, 2012 <http://www.pravo.gov.ru/proxy/ips/?searchres=&x=0&y=0&bpas=cd00000&a3=&a3type=1&a3value=&a6=&a6type=1&a6value=&a15=&a15type=1&a15value=&a7type=1&a7from=&a7to=&a7date=&a8=121-%D4%C7&a8type=1&a1=&a0=&a16=&a16type=1&a16value=&a17=&a17type=1&a17value=&a4=&a4type=1&a4value=&a23=&a23type=1&a23value=&textpres=&sort=7> [Accessed 11 April 2018]

109 <http://www.dw.com/en/david-and-goliath-corruption-in-russia/av-42909372> [Accessed 11 April 2018]

110 <https://transparency.org.ru/en/projects/news/korotkie/rossiya-zablokirovala-sayt-transparency-org.html> [Accessed 25 July 2018]

Scale and nature of engagement with UK parliamentarians

Recent events both here and in the US have led many to focus on alleged attempts by the Russian state to manipulate the views and actions of electors in the West. The nature and scale of these activities are still being uncovered. However, it was not long ago that Russia was engaging key UK decision-makers, and others across the EU,¹¹¹ as part of a wider influencing strategy to win over the West and portray the country as a respectable member of the international community.

The most identifiable areas of engagement have been:

- Inviting UK politicians to appear on Russian state media outlets.
- Courting MPs and political figures by suspected Russian spies.
- Securing access to senior politicians with the help of lobbyists.

There has been increased scrutiny in recent years about the content and editorial stance of the state-backed Russian news and current affairs channel, RT (formerly Russia Today). Despite having a relatively small TV audience, it is reportedly more popular online with Britons with an estimated two million UK viewers.¹¹² Its critics label it as a propaganda arm of the Russian state that provides highly partial representations of topical issues in order to further the Kremlin's agenda. In 2015, RT was found by the UK's broadcasting regulator, Ofcom, to have failed to maintain due impartiality of their coverage of the conflicts in Ukraine and Syria.¹¹³ Ofcom is now examining a number of incidences in which the outlet may have breached broadcasting rules on impartiality during its coverage of the Salisbury chemical weapon attack.¹¹⁴

Despite questions about its strong editorial stance, a number of UK politicians have accepted invitations to participate in, and even host, RT programmes. This can give rise to the perception that UK MPs are helping

legitimate a media outlet that is the propaganda arm of a corrupt and repressive regime. According to our analysis of the House of Commons' register of members' financial interests, a total of 12 MPs from across the political spectrum have been paid at least £93,700 to appear on RT since 2014. This does not include two former MPs who have hosted their own shows. Research by European Values indicates the total number of UK parliamentarians appearing on RT is likely to be significantly larger, with at least 161 UK politicians and public servants appearing on RT 381 times between 2010 and 2017.¹¹⁵

In response to growing criticism of RT, a number of MPs who have participated in its shows have since distanced themselves from the channel and have stated they will not respond to any further requests to participate. After the Salisbury incident, the Shadow Chancellor of the Exchequer, John McDonnell, stated that Labour MPs should no longer appear on RT.¹¹⁶

Beyond media appearances, the enlisting of UK MPs and figures from across the political spectrum has included courting by Russian spies.¹¹⁷ Although the two MPs involved reportedly rejected these approaches, a prominent political British campaigner appears to have become involved in Conservative Friends of Russia, which disbanded in 2012 following an attempt to smear Chris Bryant MP, who had claimed it was acting as a pro-Putin front.¹¹⁸

One of those alleged to have courted these figures is Sergey Nalobin, a former staffer at the Russian Embassy who had his right to stay in the UK revoked suddenly in August 2015 – a week after the inquiry into the assassination of Alexander Litvinenko concluded that his murder was probably ordered by the Russian state.¹¹⁹ He is also alleged to have been given “explicit instructions from Moscow to deepen co-operation between the Tory party and Putin's United Russia party in the Council of Europe parliamentary assembly”, and offered to help solicit political donations for the Conservative Party from Russian companies,¹²⁰ even though this would have been illegal under UK electoral law.¹²¹

111 Transparency International Russia, *Russian Corporate Lobbyism in the Countries of the European Union* (2017) <https://transparency.org.ru/special/lobbying/docs/report-en.pdf>

112 According to figures produced by the Broadcasters' Audience Research Board (BARB), on average RT tends to be viewed slightly less than BBC Parliament, but significantly less than BBC 1, ITV, BBC 2, Channel 4 and Channel 5 <http://www.barb.co.uk/> [Accessed 17 April 2018]

113 Ofcom, *Ofcom Broadcast Bulletin: Issue number 288* (September 2015) pp.5-60 https://www.ofcom.org.uk/_data/assets/pdf_file/0017/50507/issue_288.pdf

114 https://www.ofcom.org.uk/_data/assets/pdf_file/0012/113043/rt-investigations.pdf [Accessed 12 July 2018]

115 Monika L Richter, *The Kremlin's Platform for 'Useful Idiots' in the West: An Overview of RT's Editorial Strategy and Evidence of Impact* (September 2017) <http://www.europeanvalues.net/wp-content/uploads/2017/09/Overview-of-RTs-Editorial-Strategy-and-Evidence-of-Impact-1.pdf> Note that the sample does not cover all appearances for RT outlets during this period, so the actual numbers are likely to be much higher. For more detailed notes on these figures check the source data in the following location www.europeanvalues.net/wp-content/uploads/2017/09/RT-Guest-List.xlsx

116 <https://www.theguardian.com/politics/2018/mar/11/labour-mps-should-not-appear-on-russia-today-says-john-mcdonnell> [Accessed 18 April 2018]

117 <https://www.theguardian.com/politics/2012/nov/30/activities-of-conservative-friends-of-russia>; <http://www.dailymail.co.uk/news/article-5431187/Kremlin-offered-Labour-MP-help-set-pub.html> [Accessed 18 April 2018]

118 https://www.theguardian.com/politics/2017/nov/04/brexit-ministers-spy-russia-uk-brexit?utm_source=dlvr.it&utm_medium=twitter [Accessed 18 April 2018]

119 The Litvinenko Inquiry, *Report into the death of Alexander Litvinenko* (January 2016) p.240 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/493860/The-Litvinenko-Inquiry-H-C-695-web.pdf

120 <https://www.theguardian.com/politics/2017/nov/04/brexit-ministers-spy-russia-uk-brexit> [Accessed 18 April 2018]

121 The list of 'permissible' donors and lenders is defined in the Political Parties, Elections and Referendums Act 2000 (PPERA). Anyone who isn't a permissible donor cannot donate or lend over £500 to political parties, politicians or non-party campaigners. This limit is £50 for donations to candidates at elections.

Sergey Nalobin is not the only Russian official to seek to develop connections with senior British politicians. In 2013, a number of prominent Russians with Kremlin connections attended a Conservative Party fundraising event, sitting at a table hosted by a PR consultancy who has donated over £140,000 to the party since 2009.¹²²

This access helped one of the attendees – senior Russian MP and Putin friend, Vasily Shestakov – secure a conversation with the then Prime Minister.¹²³ Just before this fundraising event, a key member from this PR firm incorporated an organization – Positive Russia Foundation (PRF) – to help promote the country’s image abroad.¹²⁴ Russian media reported Vasily Shestakov as the project leader of the PRF.¹²⁵

The PR firms’ wider activities have included:

- Paying UK Government ministers to be its guest at political party fundraising events.¹²⁶
- Representing the charitable foundation of Dimitry Firtash, the Ukrainian billionaire currently facing extradition to the US on corruption charges¹²⁷ and alleged by the US Department of Justice to be part of the “upper-echelons” of Russian organized crime.¹²⁸
- Providing reputation management services to a Russian billionaire seeking a pathway to citizenship through the UK’s Tier 1 Investor visa scheme, including introductions to influential individuals in politics.¹²⁹

122 <http://search.electoralcommission.org.uk/?currentPage=1&rows=10&query=new%20century%20media&sort=AcceptedDate&order=desc&tab=1&et=ppm&et=tp&et=perpar&et=rd&isIrishSourceYes=true&isIrishSourceNo=true&prePoll=false&postPoll=true®ister=gb®ister=ni®ister=none&optCols=Register&optCols=CampaigningName&optCols=AccountingUnitsAsCentralParty&optCols=IsSponsorship&optCols=IsIrishSource&optCols=RegulatedDoneeType&optCols=CompanyRegistrationNumber&optCols=Postcode&optCols=NatureOfDonation&optCols=PurposeOfVisit&optCols=DonationAction&optCols=ReportedDate&optCols=IsReportedPrePoll&optCols=ReportingPeriodName&optCols=IsBequest&optCols=IsAggregation> [Accessed 12/07/2017]

123 <http://www.sambo-fias.org/en/news/prezident-fias-na-torzhestvennom-vechere-pravyashchey-partii-velikobritanii/> [Accessed 10 July 2018]

124 <https://beta.companieshouse.gov.uk/company/08532530/filing-history/MzA3ODExNDk1NWFKaXF6a2N4/document?format=pdf&download=0> [Accessed 11 July 2018]

125 <https://www.fontanka.ru/2013/11/28/129/> [Accessed 11 July 2018]

126 See p.270 <https://publications.parliament.uk/pa/cm/cmregmem/1782/1782.pdf>; see p.82 <https://publications.parliament.uk/pa/cm/cmregmem/100927/100927.pdf> [Accessed 11 July 2018]

127 <https://web.archive.org/web/20140906081450/http://www.newcenturymedia.co.uk:80/expertise/> [Accessed 11 July 2018]

128 <https://www.scribd.com/document/354809991/U-S-v-Dmitro-Firtash-and-Andras-Knopp> [Accessed 11 July 2018]

129 <http://www.baillii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/QB/2013/3556.html> [Accessed 11 July 2018]



BAHRAIN

Key facts

Corruption Perception Index (2017): 103 / 180 countries

Freedom House rating (2018): 12/100

(0=Least Free, 100=Most Free)

World Press Freedom Index (2018): 166 / 180 countries

Scale and nature of engagement with UK parliamentarians

76 known visits by 56 different parliamentarians (2007 to 2017)

£235,505+ spent on flights and accommodation for UK parliamentarians to visit Bahrain (2007 to 2017)¹³⁰

Overwhelming majority (90 per cent) of visits paid for by the Government of Bahrain or other institutions closely connected to the regime

Just under £100,000 spent directly or indirectly by the Government of Bahrain on UK parliamentarians attending the Manama Dialogue between 2007 and 2017¹³¹

Two parliamentarians have provided advisory services directly to the King of Bahrain, including during the Arab Spring uprising

UK-Bahrain relations

The UK's close relationship with Bahrain dates back to the nineteenth century, with the countries signing a Treaty of Friendship in 1816 and Britain assuming responsibility for the jurisdiction's defence and foreign relations in 1861. A large UK naval presence remained in Bahrain until the country's independence in 1971. This was re-established in 2016 with the opening of HMS Juffair.

According to the UK Government's guide to doing business in Bahrain, the UK exported £295.5 million in goods and services to the country in 2014 and it presents the largest export market for British businesses in the Gulf.¹³²

Political context

Despite having a partly-elected National Assembly, Bahrain is ruled by a de facto absolute monarchy currently headed by Sheikh Hamad bin Isa Al Khalifa.¹³³ In 2011, large-scale protests erupted in Bahrain as part of the Arab Spring. The demands of protestors included calls for political, socio-economic and human rights reforms. In response, the Bahraini authorities violently suppressed the demonstrations with the support of military personnel from neighboring Saudi Arabia and the United Arab Emirates. The International Crisis Group states that at least 30 individuals were killed during the crackdown, with hundreds more arbitrarily detained and independent newspapers silenced.¹³⁴

¹³⁰ Based on the average value of trips where the value is included in public records. Unlike MPs, members of the House of Lords are not required to record the value of overseas visits paid for by others in their Register of Members' Interests. There are four visits by Peers that have not been entered into their register of interests, which could be because they were self-funded. We have not included these visits in the estimated total amount spent on parliamentarians visiting Bahrain; however, we have included them in the total number of visits by parliamentarians.

¹³¹ 86 per cent (£84,844) of the cost of visits was paid for directly by the Government of Bahrain. We have treated costs covered by the IISS (£13,325) as indirect costs from the regime based on the evidence that the funding for these events were provided for by the Bahraini Government.

¹³² <https://www.gov.uk/government/publications/exporting-to-bahrain/exporting-to-bahrain> ; <https://www.gov.uk/government/publications/exporting-to-bahrain/exporting-to-bahrain#uk-and-bahrain-trade> [Accessed 21 February 2018]

¹³³ Article 33 of the constitution provides the King with broad executive powers to rule by decree http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---ilo_aids/documents/legaldocument/wcms_125858.pdf [Accessed 27 February 2018]

¹³⁴ International Crisis Group, *Popular Protest in North Africa and the Middle East (VIII): Bahrain's Rocky Road To Reform* (July 2011) <https://d2071andvip0wj.cloudfront.net/111-popular-protest-in-north-africa-and-the-middle-east-viii-bahrain-s-rocky-road-to-reform.pdf> [Accessed 21 February 2018]

Corruption

The 2017 Corruption Perceptions Index (CPI) saw Bahrain's scores continue to drop in the wake of the country's crackdown on protestors in 2011. In particular, the underlying surveys that form the CPI reflected the view that there are worsening checks on executive power and corruption in the Kingdom, including oversight of the use of public funds. Over the last decade, growing criticism has been levelled at the expropriation of public assets by the Royal Family and members of the Government, which has been made possible by the Kingdom's highly opaque public finances.

Historically, the quality and accessibility of budgets for Bahrain has been poor.¹³⁵ Where data is available, it is estimated that between 1925 and 1970 a quarter of the country's revenue – predominantly from oil and gas sales – was diverted to the Royal Family (known as the 'Privy Purse'). Accounting for actual revenue from Bahrain's energy reserves is, however, very difficult.

The country is not a member of the EITI and has lacked independent legislators since opposition parties were dissolved in 2016 and 2017.¹³⁶ The country's National Audit Office does not have the jurisdiction to examine the Royal finances and is also overseen by two members of the Al Khalifa family. Given the lack of oversight over this revenue stream – which is estimated to account for around 80 per cent of the country's income – the official allocations to the Privy Purse are likely to represent conservative estimates.

When funds are received by the Government, a substantial proportion is then spent on defence and security expenditure, which is subject to extremely low levels of scrutiny and oversight. According to a comprehensive audit in 2015 by Transparency International, poor oversight of defence and security spending put Bahrain in the highest risk category for corruption.¹³⁷ These sectors are estimated to account for 30 per cent of the Kingdom's public spending.

Land ownership in Bahrain is also particularly controversial and formed a key part of demands during the Arab Spring demonstrations. Investigations by opposition parties and activists have unearthed serious allegations of land expropriation by the Royal Family and Prime Minister.

In 2011, Bahraini MPs alleged that the Prime Minister and members of the Al Khalifa family had acquired the Bahrain Financial Harbour – a piece of real estate worth an estimated £28 billion¹³⁸ – for one Bahraini Dinar (equivalent to around £2).¹³⁹ One Bahraini Dinar notes were waved by demonstrators during the 2011 unrest in protest against this alleged appropriation. This is claimed by opposition MPs to be just one of a series of secretive land acquisitions by private entities that have cost the Bahraini budget an estimated \$40 billion.¹⁴⁰ Funds from this expropriated land are reported to have been invested into £900 million of prime UK real estate by the Royal Family.

Human rights abuse

In the wake of the Arab Spring protests, King Hamad bin Isa Al Khalifa appointed an independent panel of human rights experts to examine allegations of abuse during the regime's crackdown on protestors. In December 2011 the Bahrain Independent Commission of Inquiry (BICI) produced a set of 26 recommendations that the regime should adopt covering issues ranging from greater accountability for those in power to greater due process and the humane treatment of those in custody. According to Human Rights Watch, the only two substantive recommendations that had been implemented by the regime have recently been reversed.¹⁴¹

Both Amnesty International and Human Rights Watch have catalogued continuing and widespread human rights violations in recent years, covering freedom of expression, assembly and association.¹⁴² This includes the imprisonment of human rights activists on trumped-up charges, closing down the country's only independent newspaper and banning members of the dissolved opposition parties from voting at future elections.¹⁴³

¹³⁵ Omar AlShehabi, *Show Us the Money: Oil Revenues, Undisclosed Allocations and Accountability in Budgets of the GCC States* (September 2017) p.14-16 http://eprints.lse.ac.uk/84521/1/show-us-the-money_V1.pdf [Accessed 22 February 2018]

¹³⁶ <http://www.bbc.co.uk/news/world-middle-east-36818610> <http://www.bbc.co.uk/news/world-middle-east-40104731> [Accessed 27 February 2018]

¹³⁷ <http://government.defenceindex.org/countries/bahrain/> [Accessed 27 February 2018]

¹³⁸ Based on exchange rates of USD to GBP as of 27 February 2018. The original estimated price of this real estate was USD 40 billion.

¹³⁹ Based on exchange rates as of 27 February 2018.

¹⁴⁰ <https://www.ft.com/content/51943274-73fb-11e4-b444-00144feabdc0> [Accessed 27 February 2018]

¹⁴¹ <https://www.hrw.org/world-report/2018/country-chapters/bahrain> [Accessed 21 February 2018]

¹⁴² For the latest update see Amnesty International's *Report 2017/18: The State of the World's Human Rights pp.84-87* and Human Rights Watch's *World Report 2018* <https://www.hrw.org/world-report/2018/country-chapters/bahrain> [Accessed 27 February 2018]

¹⁴³ <http://bahrainmirror.com/en/news/44839.html> [Accessed 27 February 2018]

Scale and nature of engagement with UK parliamentarians

The most public engagement of UK parliamentarians by the regime in Bahrain is through the Manama Dialogue – an annual conference held in the country's capital that aims to provide “a platform for participating states to exchange views on regional challenges”.¹⁴⁴ Although the event is organised by the International Institute for Strategic Studies (IISS), files uncovered by Bahrain Watch – a watchdog for corruption and human rights abuses in the country – found that the Government of Bahrain was paying for the event, and that a third of IISS' income derived from the regime.¹⁴⁵ A memorandum of understanding between the IISS and the Bahraini regime explicitly states that this funding arrangement be kept secret.¹⁴⁶

Based on data published by the UK Electoral Commission and Parliament's registers of members' interests, we have identified 19 different parliamentarians who have had all-expenses paid trips to the Manama Dialogue since 2007. The total cost of these trips is estimated to be just over £100,000, 94 per cent of which was paid for either directly or indirectly by the Government of Bahrain.

Alongside paid-for visits to Bahrain, a number of parliamentarians have provided direct forms of support to the regime. Through analysis of the registers of members' financial interests in the Commons and Lords, we have found two parliamentarians who have been providing advisory services directly to the King of Bahrain. One of them had advised the King of Bahrain for at least 14 years,¹⁴⁷ including the period in which the regime repressed peaceful pro-democracy demonstrations during the Arab Spring.¹⁴⁸ The other listed the Kingdom as a client for a geo-strategic advisory firm of which he is a director;¹⁴⁹ he also holds a position with the IISS.¹⁵⁰

We have also identified three parliamentarians who have visited the King of Bahrain over three different occasions between 2012 and 2018, yet these trips do not appear on their register of interests.¹⁵¹ It is not clear from publicly available information whether these visits were reportable under the House of Lords' rules.

144 <https://www.iiss.org/en/events/manama-dialogue/about-s-manama-s-dialogue> [Accessed 22 February 2018]

145 <https://bahrainwatch.org/blog/2016/12/06/iiss-files-british-thinktank-bahrain/> [Accessed 22 February 2018]

146 <https://www.theguardian.com/world/2016/dec/06/british-thinktank-iiss-received-25m-from-bahraini-royals-documents-reveal> [Accessed 24 July 2018]

147 The first recorded entry in the Lords register of interests we were able to find for this roles is in 2004 see p.124 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/147.pdf> [Accessed 21 May 2018]

148 See p.117 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register140311.pdf> [Accessed 22 February 2018]

149 See pp.228-229 <https://www.parliament.uk/documents/publications-records/House-of-Lords-Publications/Records-activities-and-membership/Register-of-Lords-Interests/Register140318.pdf> [Accessed 12 July 2018]

150 <https://www.iiss.org/governance/the-council/lord-robertson-of-port-ellen> ; <https://www.parliament.uk/biographies/lords/lord-richards-of-herstmonceux/4317> [Accessed 12 July 2018]

151 <http://www.bna.bh/portal/en/news/826869>; <https://www.bna.bh/portal/en/news/800381>; <https://www.bna.bh/portal/en/news/781924> [Accessed 25 July 2018]

CONCLUSIONS

At a time when there are growing concerns about foreign interference in our elections, we must also be conscious and alert to those seeking to recruit our representatives to their defence. From the three country case studies in this paper, it is evident that certain regimes are keen to engage our parliamentarians in a way that would help improve their image abroad. And it is obvious to see why.

Through violence, intimidation and the erosion of meaningful opposition their national elites have obtained free reign, which they have abused for their personal enrichment. Whilst these actions alone are abhorrent enough, it is all the more worrying how obliging some of our parliamentarians can be in legitimating and defending them.

Although some can explain this away through ignorance, it is clear many of those involved would have at least been aware that they were nearing the edge of acceptable behaviour. As illustrated by the case of Ian Paisley Jr MP and his undeclared visits to Sri Lanka, not dissimilar conduct can lead to members being judged as bringing Parliament into disrepute.¹⁵² This is reflective of a culture of impunity that needs to be addressed as a matter of urgency.

In this paper we have outlined five measures that Parliament should adopt, which if implemented effectively will help:

- Reform its behaviour
- Preserve its independence
- Protect its integrity
- Inform its judgements
- Increase its accountability

We take pride in our democratic history and have gone to great lengths on helping others develop theirs abroad, yet these efforts are ultimately undermined if those who are selected to represent us work in the interests of regimes who seek to undermine it.

¹⁵² House of Commons Standards Committee, *Ian Paisley* (July 2018) HC 1397 <https://publications.parliament.uk/pa/cm201719/cmselect/cmstandards/1397/1397.pdf>

KEY DATA USED IN THIS REPORT

Corruption Perceptions Index (CPI) *Transparency International*

The CPI is produced by Transparency International. It scores and ranks countries/territories based on how corrupt a country's public sector is perceived to be by experts and business executives. It is a composite index, a combination of 13 surveys and assessments of corruption, collected by a variety of reputable institutions. The CPI is the most widely used indicator of public sector corruption worldwide.

<https://www.transparency.org/research/cpi/overview>

Freedom in the World *Freedom House*

Freedom House is an independent watchdog organisation dedicated to the expansion of freedom and democracy around the world.

Freedom in the World is Freedom House's flagship annual report, assessing the condition of political rights and civil liberties around the world. It is composed of numerical ratings and supporting descriptive texts for 195 countries and 14 territories. Freedom in the World has been published since 1973, allowing Freedom House to track global trends in freedom over more than 40 years. It has become the most widely read and cited report of its kind, used on a regular basis by policymakers, journalists, academics, activists, and many others.

<https://freedomhouse.org/report/methodology-freedom-world-2018>

Journalist Fatalities since 1992 *Committee to Protect Journalists*

The CPJ reports on violations in repressive countries, conflict zones, and established democracies alike. A board of prominent journalists from around the world helps guide CPJ's activities.

CPJ has detailed records on journalist fatalities since 1992. Staff members independently investigate and verify the circumstances behind each death. CPJ considers a case "confirmed" as work-related only when reasonably certain that a journalist was murdered in direct reprisal for his or her work; in combat or crossfire; or while

carrying out a dangerous assignment. Cases involving unclear motives, but with a potential link to journalism, are classified as "unconfirmed" and CPJ continues to investigate. The CPJ does not include journalists who are killed in accidents such as car or plane crashes.

<https://cpj.org/data/killed/>

World Press Freedom Index *Reporters Without Borders*

Based in Paris, Reporters Without Borders (RSF) is an independent CSO with consultative status with the United Nations, UNESCO, the Council of Europe and the International Organization of the Francophonie (OIF). Its foreign sections, its bureaux in ten cities, including Brussels, Washington, Berlin, Tunis, Rio de Janeiro, and Stockholm, and its network of correspondents in 130 countries give RSF the ability to mobilize support, challenge governments and wield influence both on the ground and in the ministries and precincts where media and Internet standards and legislation are drafted.

The degree of freedom available to journalists in 180 countries is determined by pooling the responses of experts to a questionnaire devised by RSF. This qualitative analysis is combined with quantitative data on abuses and acts of violence against journalists during the period evaluated. The criteria evaluated in the questionnaire are pluralism, media independence, media environment and self-censorship, legislative framework, transparency, and the quality of the infrastructure that supports the production of news and information.

<https://rsf.org/en/ranking>

Transparency International UK

7 - 14 Great Dover Street,
London,
SE1 4YR