



**TRANSPARENCY
INTERNATIONAL UK**
fighting corruption worldwide

ANNUAL IMPACT REPORT AND ACCOUNTS

2021-2022



Transparency International is a global movement sharing one vision: a world in which government politics, business and the daily lives of people are free of corruption.

Transparency International UK is the UK national chapter of this movement.

We work with the British government, parliamentarians, civil society and the private sector to tackle corruption at home, addressing the UK's global corruption footprint and helping multinational companies prevent corruption by operating with integrity.

We are also home to two major global programmes tackling corruption in the Defence and Security sector and Global Health on behalf of the wider Transparency International movement.

Our Vision

is a world in which government, business, civil society, and the daily lives of people are free from corruption.

Our Mission

is to stop corruption, promote integrity and, to that end, hold power to account for the common good.

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STOPPING CORRUPTION PROMOTING INTEGRITY

WE ADVANCE POLICY



Research, evidence and advocacy to drive the use and improvement of law, regulations, systems and policy to deter and pursue corruption.

WE IMPROVE PRACTICE



Drive the public and private sectors to change behaviours, attitudes and stop corruption.

WE PROMOTE CHANGE



Share knowledge, create pressure and reduce opposition, mobilise and support allies to tackle corruption.

HIGHLIGHTS OF 2021-2022

WE ADVANCED POLICY:



UK Government passes new law to reveal the real owners of foreign companies that own UK property. We have campaigned for seven years for this key step in the fight against dirty money in the UK.



In Kenya our advocacy contributes to the President mandating the publication of all COVID contracts signed by the Kenyan Medical Supplies Agency.



New health procurement policies with greater transparency provisions drafted in South Africa and Zambia with our advocacy and input. In Zambia the Public Procurement Bill has since become law.



Companies House reform announced in Queen's Speech 2022 following our long-term advocacy to stop abuse of shell companies by the corrupt.



In Parliament, the House of Commons Standards Committee proposes measures that would deliver our recommendations to tighten rules on MPs' second jobs and improve transparency over their financial interests.



UK government announces the end of tier 1 (Investor) visa programme or "golden visas". Our research showed more than 3,000 people from high-corruption risk countries entered the UK this way between 2008 and 2015 with few, if any, checks on the source of their wealth.

WE IMPROVED PRACTICE:



Make It Count provides a guide to how and why companies need to monitor the effectiveness of their anti-corruption processes.



Our online **Doing Business without Bribery** training accessed by almost 10,000 users in the last year.



Our **Global Anti-Bribery Guidance** portal provides guidance on corporate anti-corruption best practice and received over 17,500 visits from around the world.



Ministries of Defence in Latvia, Norway, Tunisia and Kuwait acknowledge the completed **Government Defence Integrity Index** as an important tool in addressing corruption risks in defence institutions.



The Defence Companies Index, published recently, is a robust tool already being used by companies to improve their compliance and corporate transparency.



WE PROMOTED CHANGE:



The UK Standards in Public Life watchdog warns that many of the rules designed to ensure politicians' honesty and integrity need "significant reform". It calls on the Prime Minister to make changes to "restore public confidence" following TI-UK's evidence and recommendations.



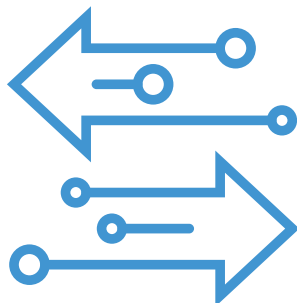
We support civil society in Zambia, Uganda, Kenya and Nepal to use procurement data to hold health officials to account. By July 2021, 100+ procurement deals/ construction works had been checked, and 60 per cent of problems found rectified.



42 per cent of participants in our Anti-Corruption Benchmark improved their overall score in the key risk areas of Joint Ventures and Consortia, Due Diligence, and HR Controls.



The Government Defence Integrity Index reveals that 62 per cent of countries face a high to critical risk of corruption in their defence and security sectors, leading to briefings and positive engagement with NATO, and governments around the world.



FROM THE CHAIR AND THE CHIEF EXECUTIVE

In a year that saw war break out in Europe, the continued devastation caused by COVID-19 and a constant drip of UK political integrity scandals, there has been one clear common denominator: corruption. The abuse of entrusted power for private gain, the traditional definition of corruption, is unmissable, evidenced by the billions of pounds of oligarchs' dirty money laundered and invested in UK property, the egregious lobbying carried out by some UK politicians, and mounting concerns about how large numbers of COVID response contracts were awarded.

The litany of headlines combined with the ever more concerning challenges they present to democracy and the rule of law have put corruption well and truly centre stage. They have provided an exceptional opportunity this year for us to leverage our evidence and step up our advocacy to press for real progress.

In the first year of our new ten-year strategy, Stopping Corruption, Promoting Integrity, our campaigns to end the UK's role as a global hub for dirty money, to increase integrity in politics and public life and to protect the public purse have made dramatic headway.

Action on Dirty Money

After seven years of determined campaigning in the UK, the Government, responding to the Russian invasion of Ukraine, finally passed a law to reveal the true owners of foreign companies buying UK property. Until now the corrupt, kleptocrats and those close to the Kremlin, have hidden behind anonymous shell companies, allowing them to launder their dirty money and embed themselves into the British establishment.

The Government passed these measures in March 2022, part of the Economic Crime Act, in just two weeks thanks to the "oven ready" bill we had been advocating for which had been waiting in the wings in legislative no man's land. Once up and running, this will be a key tool in the fight against dirty money, making it harder for oligarchs to hide it in the UK.

Our evidence and advocacy have also been key to advancing long-needed changes to rules for ministerial conduct to bring an end to abuses of high office for private



Daniel Bruce
Chief Executive



Fiona Thompson
Trustee Chair



WATCH » Daniel Bruce outlines Transparency International UK's achievements for 2021/22

gain. In Parliament, the House of Commons Standards Committee has proposed measures that would deliver our long-standing recommendations to tighten the rules on MPs' second jobs and improve transparency over their financial interests. These critical measures are intended to prevent conflicts of interest between politicians' public and private responsibilities.

We are also heartened that the UK's official COVID inquiry announced that its terms of reference will include the so-called "VIP lane" used to fast-track Personal Protective Equipment (PPE) and other COVID-19 response contracts. We've been advocating for its inclusion following our 2021 **Track and Trace** report which revealed apparently systemic bias towards businesses with political access.

Clamping down on Corruption in Business

Meanwhile, tackling bribery and corruption is a recognised and growing challenge for business in the UK. Nearly half of companies surveyed for a recent global economic crime survey reported experiencing fraud, corruption or other economic crimes in the last 24 months.

The private sector has to play a leading role in changing the direction of travel by promoting integrity but too many companies simply put processes in place to fulfil legal requirements without checking that they are working. Our report **Make it Count** focuses on monitoring anti-corruption systems to ensure they are working effectively and presents ways of doing this. It is already being used by companies to improve their approach.

Global Work

The role of corruption in defence and security and global health has been poorly recognised for too long.

The war in Ukraine, the international withdrawal from Afghanistan and the massive sums lost around the world to bogus or poor-quality protective health care equipment during the pandemic have begun to reset the dial. Our work in the last year has proved more than ever how anti-corruption has to be a core element of all systems and processes if they are to deliver the security and safety that people deserve.

Defence and Security

Our multi-year assessment of corruption risks in defence establishments, the Government Defence Integrity Index 2020 (GDI), was published in November 2021 with the accompanying deep dive analysis in January 2022.

It reveals how defence forces around the world are being undermined by corruption risks in military operations, arms transfers and security sector assistance, hampering their ability to protect citizens, secure national borders and bring about peace. It sets out a roadmap for better governance. NATO and governments around the world committed to improving transparency and accountability have begun using it as a valuable tool to shape their planning.

Global Health

While the pandemic has continued to take a massive toll on lives around the world, our Global Health team has focused on partnering with other Transparency International chapters to ensure healthcare procurement is transparent and free from corruption. We also investigated transparency in COVID-19 contracts between pharmaceutical companies and governments.

Working closely with Transparency International Kenya, our advocacy resulted in the Kenyan President mandating the publication of COVID contracts. We were also heavily engaged, partnering with other Transparency International chapters, in drafting new procurement policies with greater transparency provisions in South Africa and Zambia. We worked with civil society organisations in Kenya, Uganda, Zambia, Nepal and Bangladesh to launch community-based procurement monitoring, checking that goods are received and of good quality. We also trained more than 500 government officials, giving them the ability to upload data to procurement systems and confidence to share information with the community.

With the ongoing debate over equitable COVID-19 vaccine distribution, **For Whose Benefit?** highlighted the lack of transparency in vaccine contracts between countries and pharmaceutical companies. We have been campaigning

for greater transparency in the wake of the report's findings which revealed that few contracts are published, and those that are made available have significant redactions hiding key details of public interest, variable pricing and extensive indemnification clauses.

Advocacy and Media outreach

Our targeted advocacy and media outreach have been a key ingredient in our impact this year. We have engaged constructively with the UK Government and parties and politicians across the political spectrum (national and local), in addition to multilateral organisations like the World Health Organisation (WHO) and World Bank. We have worked with the private sector to push for business integrity and in collaboration with other civil society organisations in our anti-corruption mission.

This advocacy has been backed up with what can only be described as a breakthrough year for the organisation in high profile media coverage in UK and international print, broadcast and digital media. We achieved a 200 per cent growth in media coverage over the year. We've had high profile pieces based on our data on Russian property in the UK and regular quotes and mentions of our research in the Daily Mail, Financial Times, Guardian, Telegraph, Times and New York Times, with broadcast work across the BBC's networks, Sky News, ITV, Channel 4, LBC, Times Radio and many others. We are now firmly in people's contacts books as the experts on corruption in the UK.

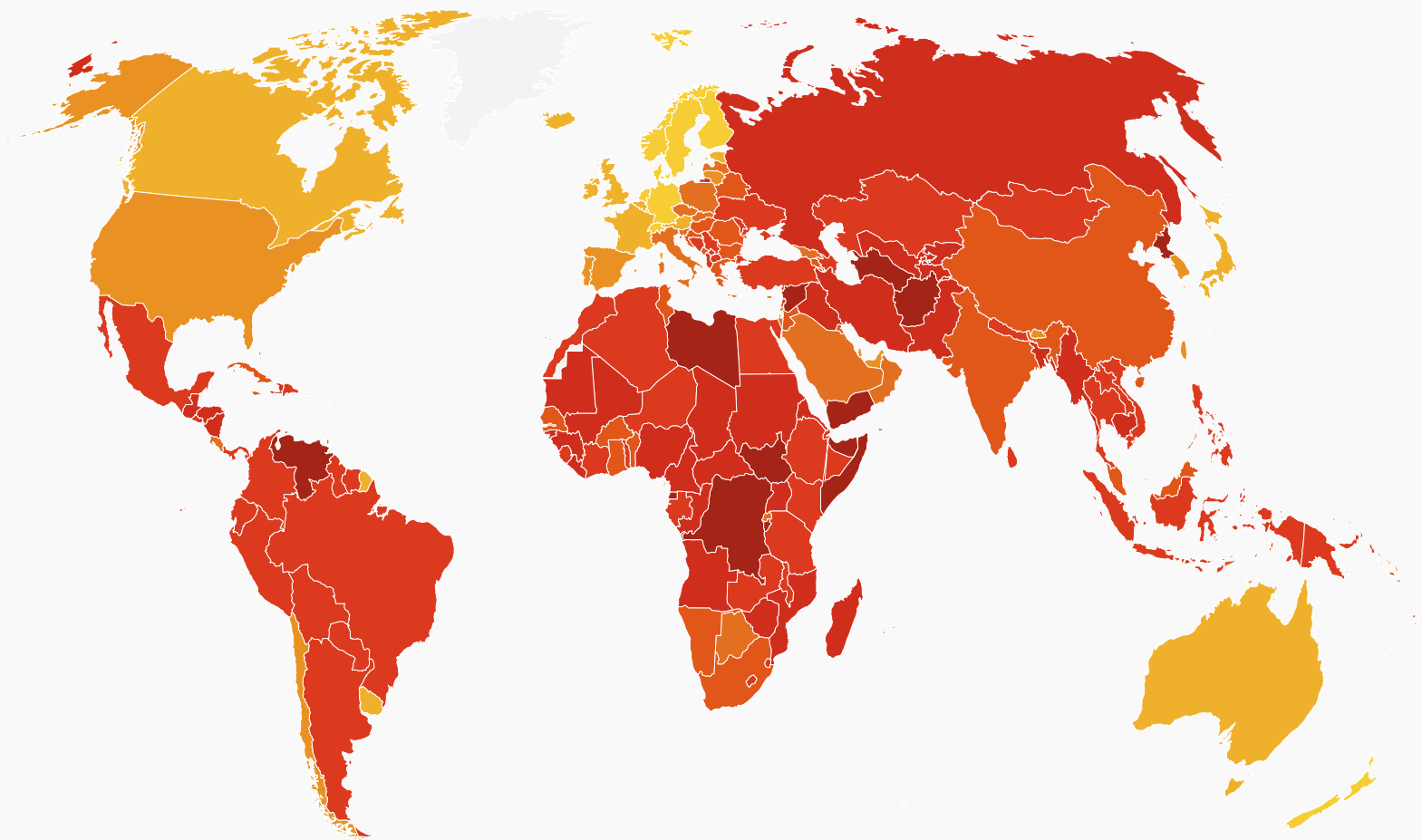
Our people continued to adapt to the challenges of collaborative working during the second year of the pandemic. In the months ahead, we will be returning to in-person collaboration and networking, incorporating the flexibility and benefits of blended working. Effective scenario planning ensured the organisation remained financially resilient and able to adapt to new opportunities.

There, of course, remains much to do. That work is already underway. We will be keeping up the pressure on the UK Government to fully close the loopholes on dirty money and to bolster the defences of integrity in public office. We will continue to work to influence the private sector with our groundbreaking research and change programmes. Globally we will be building on our work on equitable vaccine roll out and we will be looking at the role of mercenaries (private military security companies) in corruption in the defence sector.

**Thank you again for your support.
Without you, our work would not be possible.**

2021 CORRUPTION PERCEPTIONS INDEX

The **2021 Corruption Perceptions Index (CPI)** showed that corruption levels remain at a standstill worldwide. Eighty-six per cent of countries – including the UK – have made little to no progress in reducing public sector corruption according to experts and business leaders. The UK remains outside the top ten for the fourth consecutive year with a score of 78.



Highest and lowest ranking countries for 2021

88	█	Denmark	16	▲	Yemen
88	▲	Finland	14	▼	Venezuela
88	█	New Zealand	13	▲	Somalia
85	▲	Norway	13	▼	Syria
85	█	Singapore	11	▼	South Sudan

The CPI aggregates surveys from experts and business leaders to score and rank 180 countries and territories by their perceived levels of public sector corruption. It uses a scale of zero (highly corrupt) to 100 (very clean).

Bribery, the diversion of public funds or the use of public office for private gain are among the kinds of corruption levels the CPI assesses.

Denmark (88), Finland (88) and New Zealand (88) top the latest rankings, while Somalia (13), Syria (13) and South Sudan (11) remain at the bottom of the Index.

Twenty-three countries have significantly dropped in ranking in the last ten years. They include advanced economies such as Australia, Canada and the United States, the latter dropping out of the top 25 countries on the Index for the first time.

OUR OBJECTIVES

1

Stop the flow of Dirty Money

2

Protect the Public's Resources

3

Secure Integrity in Politics

4

Drive Integrity in Business

5

Incubate New Projects and Partnerships to Tackle Corruption



UK PROGRAMMES

STOPPING THE FLOW OF DIRTY MONEY

After our seven-year-long campaign, the UK government finally brought legislation before Parliament in March 2022 that introduces greater transparency over who owns offshore companies holding property in the UK. This new law is a significant achievement. We and our partners had to work hard to stop the Government dropping this Bill at the start of the year. The Economic Crime (Transparency and Enforcement) Act, which delivers this major reform, also introduces improvements to the use of the Unexplained Wealth Order, a tool that we originally championed. It allows officials to freeze assets suspected of having been purchased with the proceeds of corruption.



WATCH » Rachel Davies Teka highlights Transparency International UK's work on illicit finance

Our research has been central to our campaign's success. We have continued to uncover opaque companies based in secretive financial centres, like the British Virgin Islands, that are used regularly to buy property in the UK with corrupt wealth. Since 2016 Transparency International has been collating information on questionable funds from around the world being invested in UK property from sources including investigations by journalists, leaks of data and court cases. This figure now stands at £6.7 billion.

During the last 12 months, we have also supported over a dozen media collaborations exposing the role of the UK as an enabler of global corruption. This includes a major project with The Guardian and OCCRP (Organized Crime and Corruption Reporting Project) cataloguing the vast wealth held outside Russia by oligarchs and key figures close to Russian President Vladimir Putin. Our investigative work with global partners has also begun to bear fruit, with the National Crime Agency successfully pursuing £5.6 million of suspect wealth.

After years of our advocacy for reform to Companies House, the UK Government confirmed that it would table a Bill to deliver on this commitment in the 2022/23 parliamentary session. Its White Paper for reform includes many of our recommendations, such as giving Companies House the powers to check the accuracy of information it receives. Effective implementation of these changes will help end the use of UK companies in corruption and associated money laundering around the world.



RUSSIAN MONEY IN THE UK

In the wake of the invasion of Ukraine, we identified £1.5 billion worth of UK property bought by Russians accused of corruption or links to the Kremlin, many of whom are now subject to sanctions in the UK. We have identified almost 150 land titles ultimately owned by these individuals. More than £1 billion is held by companies based in secrecy havens.

The majority of these are in UK Overseas Territories and Crown Dependencies like the British Virgin Islands and the Isle of Man. The ownership of these firms has only been revealed due to court cases, document leaks and investigations by journalists. This figure includes:

- £200m worth of property owned by Roman Abramovich
- £25m worth of property belonging to Victor Fedotov, a Russian-born oil tycoon whose firm has made huge donations to the Conservatives
- A £11.44 million apartment owned by former First Deputy Prime Minister of Russia, Igor Shuvalov
- A £25 million mansion belonging to the daughter of the former Mayor of Moscow - allegedly dismissed from his post for “an outrageous level of corruption”

This data contributed to pressure on the UK Government to pass much needed reforms to reveal the owners of offshore companies holding British real estate.

PROTECTING THE PUBLIC'S RESOURCES

Working with partners from the UK Anti-Corruption Coalition, we secured government support and a commitment to implement our proposed reforms to the UK's procurement framework. These would increase transparency over the management of public money and reduce the risk of procurement corruption, which can result in substantial losses.

Alongside this, we have continued to push for greater accountability over pandemic related public spending. Both inside and outside Parliament, we have called for more information about the management of the 'VIP' lane triaging offers from PPE suppliers, and scrutiny

of procurement for the UK's COVID response. We are pleased to hear that the official COVID inquiry now has these issues within the scope of its terms of reference.



SECURING INTEGRITY IN POLITICS

After another febrile year of impropriety and scandal, we are gaining traction on reforms to deliver stronger safeguards against misconduct across Westminster. Using high-level advocacy combined with extensive media outreach and collaborations, we have focussed our efforts on securing changes that would make ministers' and parliamentarians' conduct more open and accountable. These briefings, submissions and interventions have started to bear fruit.



WATCH » Duncan Hames on progress towards restoring integrity in British politics

The long-awaited report from the UK standards watchdog, the Committee on Standards in Public Life, was published in November 2021. It agreed with our assessment that the system for overseeing integrity and standards largely based on convention was no longer fit for purpose and in need of urgent reform. The report warned that the government needs to take 'a more formal and professional approach to ethics rules' and supported our calls for improvements to departments' transparency disclosures. It contains 34 recommendations for reform in areas including lobbying, private sector jobs for former ministers and the public appointments process. Our Chief Executive Daniel Bruce gave extensive evidence to the review outlining our concerns and recommendations.

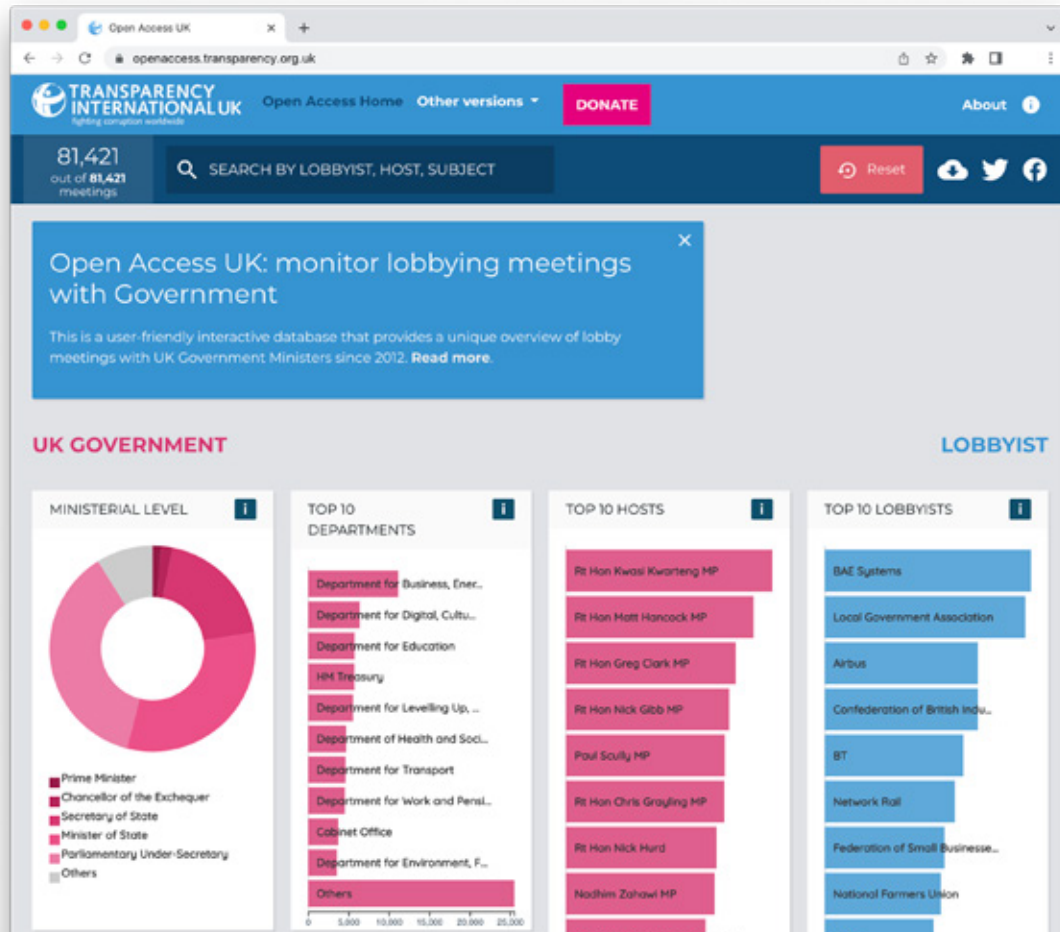
In Whitehall, the Prime Minister was under pressure from a range of quarters to make substantive improvements to the oversight of ministerial conduct, including our calls

to make his independent advisor truly independent.

The review he commissioned by Nigel Boardman into the Greensill saga also recommends many of the proposals we made to it that would deliver greater transparency over the lobbying of government. Recent events have thrown these issues into the spotlight, and created a once in a decade opportunity for significant reforms that can make politics more open and help end impunity for abuses of high office for private gain.

In Parliament, the House of Commons Standards Committee has just proposed measures that would deliver our long-standing recommendations to tighten the rules on MPs' second jobs and improve transparency over their financial interests. Since 2017, we have highlighted how many MPs hold outside roles that present serious conflicts of interest between their public and private responsibilities, and that this practice should end. Making Parliament's rules clear that MPs should not act as lobbyists – even in advisory roles – would be a major achievement.





OPEN ACCESS

The lack of transparency in the professional lobbying industry is a key challenge to improving political integrity. Lobbying is a key part of the democratic process but those seeking to influence policy, contracts and other big decisions should do so in the open.

Yet not all of the frequent meetings between professional lobbyists and ministers are transparent. Our free to use **Open Access** tool collates the information from UK Ministers' diaries published by Government departments. In the last six months we added 10,000 new meetings to the tool. It was pivotal in uncovering a scoop about a potential **breach of the ministerial code**.

DRIVING INTEGRITY IN BUSINESS

UK businesses are still dealing with the economic consequences of the pandemic, with many facing internal reorganisations where anti-corruption professionals must fight for a seat at the table.

At the same time, regulators continue to insist that businesses demonstrate that their approach to anti-corruption works in practice. Businesses' trade and operations are also still affected by the UK's exit from the European Union, with many encouraged to seek export arrangements with less familiar jurisdictions outside of Europe where anti-corruption standards are not as established, creating greater risk and need for guidance. In this context, over the last year we have concentrated on embedding the importance and value of effective anti-corruption processes and company culture from the top down.

Improving Business Practice: Online Training and Guidance for Businesses Online

During this period of extended remote working, our freely available online services were used extensively by the international business community. Our 30-minute online training for frontline staff, **Doing Business without Bribery**, served just under 10,000 users. Our regularly updated **Global Anti-Bribery Guidance** portal, which provides guidance on corporate anti-corruption best practice, received over 17,500 visits from around the globe.

Business Integrity Forum and Anti-Corruption Benchmark

Our **Business Integrity Forum** (BIF) brings together companies that wish to be at the forefront of the fight against corruption in the sector. The forum provides opportunities for knowledge-sharing and includes discussions on key anti-corruption trends. This year, we hosted six events with expert speakers, on topics including: Public Policy Briefing on Beneficial Ownership Transparency, Environment & Corruption, Country Risk Roundtable on the USA, Progress and Challenges in the Global Enforcement of Anti-Corruption Laws, and our annual Corruption Perceptions Index Briefing. We also welcomed new members, including Ropes & Gray LLP, RPC, and LexisNexis.

Our **Corporate Anti-Corruption Benchmark** provides a comprehensive assessment of a company's approach to anti-corruption. This year, 42 per cent of participants improved their overall score between 2020 and 2021, particularly in the key risk areas of Joint Ventures and Consortia, Due Diligence, and HR Controls.

Promoting Change: Advocacy

Continuing our campaign for companies to provide meaningful disclosures on their approaches to anti-corruption, we met with the corporate disclosure standard setting organisation, Global Reporting Initiative (GRI), where we presented our Open Business report recommendations, which will now be taken into consideration for the upcoming standards update.

We also shared our *Open Business* recommendations with B Corp, which certifies companies on their social and environmental performance. Our Corporate political Engagement and Country-by-Country reporting requirements were recognised for raising the bar on corporate disclosure.

Our team also submitted to the Business, Energy and Industrial Strategy (BEIS) consultation on audit reform and corporate governance, where we recommended that disclosures should be in line with *Open Business*.

In coordination with our UK Policy team, nine Business Integrity Forum members signed a letter on the importance of beneficial ownership transparency to the UK Secretary of State, and in doing so brought together civil society and business voices as a powerful force for change.





↓ DOWNLOAD REPORT

IMPROVING PRACTICE: BUSINESS INTEGRITY ADVOCACY

Make it Count, our keynote report this year, makes the case that companies that face significant corruption risks need to know whether their approach to anti-corruption works in practice and should be able to demonstrate that it does.

The report is informed by extensive research, including surveys and in-depth interviews with anti-corruption experts, both in-house practitioners and individuals from professional and legal services, and is guided by Transparency International UK's own anti-corruption expertise. It explores why and how a company ought to measure the effectiveness of its approach to anti-corruption. We analyse what is understood by "measuring effectiveness", highlight practical considerations, and provide examples of metrics that are proving useful for companies.

It is already influencing practice; TI-UK has held workshops with companies that changed their approach based on *Make it Count*, and that in some cases went beyond the report's recommendations.

Our advocacy on *Make it Count* also included direct meetings with influential stakeholders including UNPRI, Hermes Investment Management, Friends Provident, Aviva, the Basel institute and other multinationals.

We also ran a roundtable, co-hosted with Norges Bank, with 21 investors on what investors could be asking of their investee companies both on measuring the effectiveness of anti-corruption and disclosing the findings. In a follow-up survey, all who responded said they would review or change their expectations for companies regarding anti-corruption following the roundtable and all said the session was informative for them.



GLOBAL PROGRAMMES

TRANSPARENCY INTERNATIONAL DEFENCE AND SECURITY

The last year has provided more evidence that global levels of insecurity are rising. So too is the risk of corruption which can trigger and perpetuate conflict. The Russian invasion of Ukraine has transformed the European political, economic and security map and led to vast inflows of arms and security sector assistance to Ukraine and surrounding countries. It follows the collapse of the Afghan Government and military at the point of withdrawal of international forces in August 2021. Meanwhile, across Africa there has been an increase in military coups with corruption posited as a driving force behind them.

In this context, the last year saw the launch of our latest world-leading multi-year assessment of corruption risks in defence establishments, the Government Defence Integrity Index 2020 (GDI). Its peer-reviewed analysis of the risks in military operations, arms transfers and security sector assistance reveals how defence forces around the world are being undermined, hampering their ability to protect citizens, secure national borders and bring about peace.



WATCH » Ara Marcen Naval on the importance of the GDI

The GDI offers a clear roadmap for better governance of the defence sector with standards and safeguards that countries can follow to strengthen their systems. It has already led to national dialogue and commitment to change, with governments around the world and NATO welcoming it as an invaluable tool. The Norwegian Ministry of Defence wrote to us saying, *“The MOD considers the Index as a very useful tool in our internal strive to improve integrity in our sector. We look forward to continuing our fruitful cooperation also in the future.”*



[↓ DOWNLOAD REPORT](#)

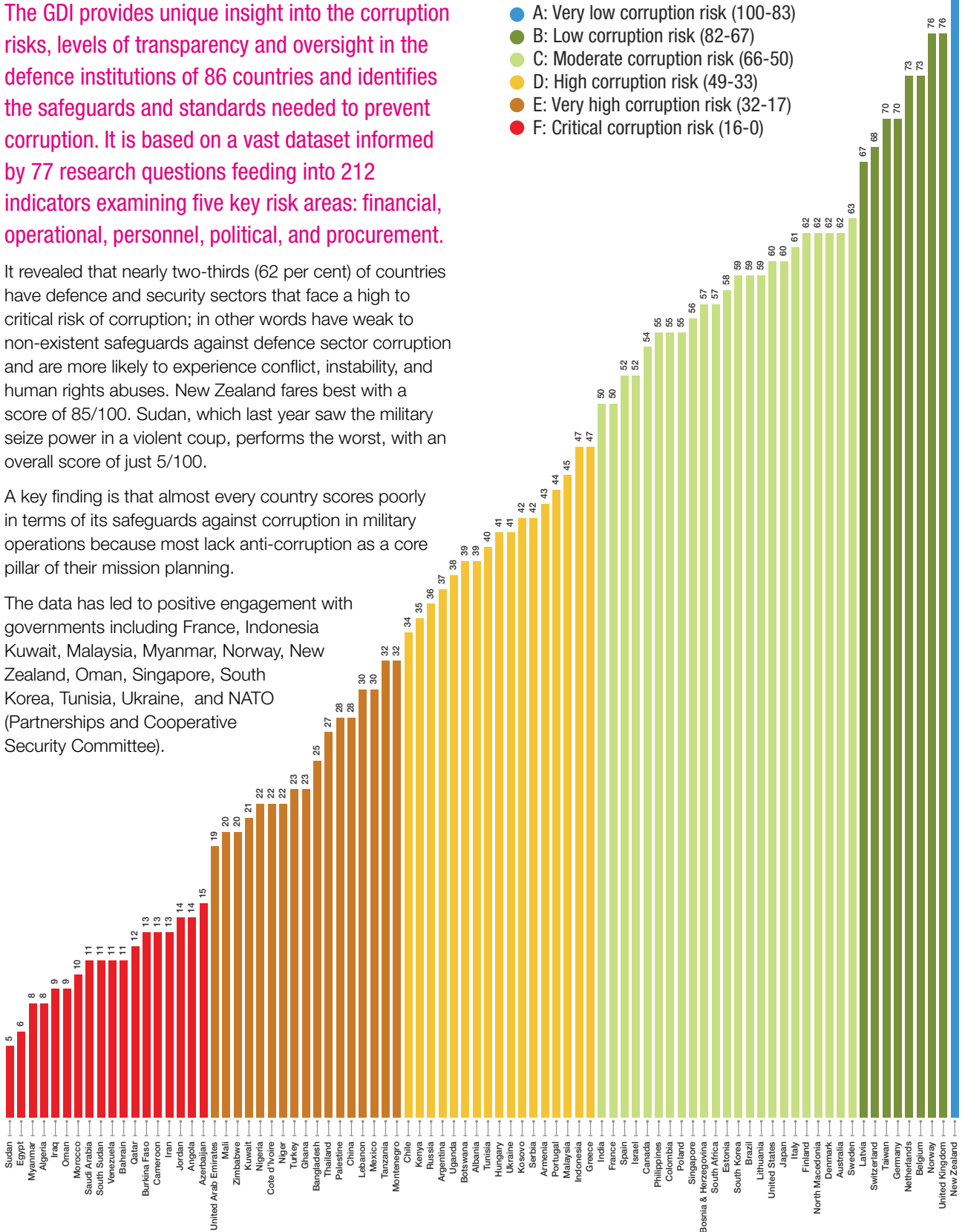
THE GDI

The GDI provides unique insight into the corruption risks, levels of transparency and oversight in the defence institutions of 86 countries and identifies the safeguards and standards needed to prevent corruption. It is based on a vast dataset informed by 77 research questions feeding into 212 indicators examining five key risk areas: financial, operational, personnel, political, and procurement.

It revealed that nearly two-thirds (62 per cent) of countries have defence and security sectors that face a high to critical risk of corruption; in other words have weak to non-existent safeguards against defence sector corruption and are more likely to experience conflict, instability, and human rights abuses. New Zealand fares best with a score of 85/100. Sudan, which last year saw the military seize power in a violent coup, performs the worst, with an overall score of just 5/100.

A key finding is that almost every country scores poorly in terms of its safeguards against corruption in military operations because most lack anti-corruption as a core pillar of their mission planning.

The data has led to positive engagement with governments including France, Indonesia, Kuwait, Malaysia, Myanmar, Norway, New Zealand, Oman, Singapore, South Korea, Tunisia, Ukraine, and NATO (Partnerships and Cooperative Security Committee).



Source: Transparency International, Defence & Security

INDONESIA AND THE GDI

Indonesia: Members of parliament, academics and representatives from civil society attended the online launch of the country's GDI result organised by Indonesia's Transparency International chapter.

The findings led to a hearing with directors from the Coordinating Ministry for Political, Legal and Security Affairs and the Ministry of Defence to discuss the implications in further detail. The signs are promising that the government will participate in future discussions on reforms needed to the country's defence sector.

OVERALL COUNTRY SCORE
HIGH RISK

D

47



MALAYSIA AND THE GDI

Government policy makers met with Malaysia's Transparency International chapter to fully understand the reasons for the country's GDI score.

The country's Ministry of Defence was also keen to get detailed information on the strengths and weaknesses that had been identified in the GDI. Our team briefed the chapter ahead of their meetings so that they could confidently and comprehensively present the Index methodology.

OVERALL COUNTRY SCORE
HIGH RISK

D

45



KUWAIT AND THE GDI

Kuwait's Transparency International chapter is planning a training course for Kuwait's Ministry of Defence based on its GDI assessment with the support of the Defence and Security team after meeting with Ministry of Defence officials.

OVERALL COUNTRY SCORE
VERY HIGH RISK

E

21



Defence Companies Index on Anti-corruption and Corporate Transparency: Key Findings

Any successful attempt to build transparency and anti-corruption into the defence sector must include the multi-million dollar global arms industry. This year we published our analysis of the findings of our latest **Defence Companies Index on Anti-Corruption and Corporate Transparency (DCI)**, the leading assessment of corporate transparency in the sector.

The Index analyses the public commitments of 134 of the world's largest defence companies in terms of transparency and anti-corruption standards and policies. It identifies 56 distinct indicators where stronger controls and greater transparency can reduce corruption risks. These are grouped into 10 categories including Leadership & Organisational Culture, Supply Chain Management, Internal Controls, Agents, Intermediaries & Joint Ventures, Support to Employees, Offsets, Conflict of interest and High-Risk Markets.

While many companies have publicly available ethics and anti-corruption programmes in place, the report concludes that the majority of major defence contractors are still not transparent about their policies and procedures when it comes to supply chains, agents and intermediaries, joint ventures and offsets. Where policies and procedures do exist, most defence companies (81 per cent) do not publish information to indicate that they take steps to assure they are effective or have been implemented.

We have presented the findings to a range of industry, legal, investor, civil society and media audiences, generating discussion and engagement with defence companies and industry associations worldwide – part of our long-term strategy to increase transparency in the defence industry. Some defence companies have already used the DCI to update their due diligence procedures. A submission to the Swiss Parliament in March 2021 called on the Federal Council to produce a report on the corruption risks in national defence procurement. The submission makes direct reference to the DCI and the relatively poor rankings of companies that supply the Swiss Armed Forces.



Undue Influence

The arms industry is increasingly being relied on by states for innovation and to gain a competitive advantage for their militaries.

We produced a policy framework and accompanying case studies to highlight the growing influence of business on government defence and security policy, **Defence Industry Influence on European Policy Agendas: Findings from Germany and Italy, May 2021**. The report demonstrates how the private sector exerts influence, including lobbying, funding and the “revolving door”, and identifies the weakness in government defence institutions which enable this to happen.



TRANSPARENCY INTERNATIONAL GLOBAL HEALTH

Our goal is to reduce corruption in global health and contribute to building resilient health systems around the world, a key step in the journey to achieving universal health care.

With between 10 and 25 per cent of public spending on health lost each year to corruption, we have worked during the second year of the pandemic to increase transparency and accountability in procurement systems, drug research and development and health service delivery, particularly in the global response to COVID-19.

We've worked closely with our Transparency International partners in Africa, Southern Asia and South America to increase global health security. We have engaged governments to put processes in place to raise awareness of corruption, how to report it, and vaccine rights so that health care is not stolen or squandered and reaches those for whom it is intended.



WATCH » Jonathan Cushing with a summary of the achievements of Transparency International Global Health

Increasing transparency in public health procurement

In partnership with Transparency International chapters in Nepal, Uganda and Zambia, our **Open Contracting for Health** project worked with government officials to improve the transparency of health sector procurement.

We successfully advocated for increased use of Open Contracting data standards. We introduced processes to routinely publish health procurement data. We also worked with local civil society organisations to understand procurement data, enabling them to hold officials to account. We were also heavily engaged in drafting new procurement policies with greater transparency provisions in South Africa and Zambia. In Zambia the Public Procurement Bill has since become law.

In Kenya our advocacy resulted in the President mandating the publication of all COVID-19 contracts signed by the Kenyan Medical Supplies Agency.



EMPOWERING CITIZENS TO STOP CORRUPTION IN HEALTH PROCUREMENT IN KENYA, ZAMBIA, UGANDA AND NEPAL

Global Health and Transparency International chapters support other civil society organisations (CSOs) to launch community-based health procurement monitoring groups.

They checked that goods are received, and of high quality. We equipped them with frameworks and training in procurement monitoring so they can work with district health offices and officials on planning processes. At the close of the project in July 2021, CSOs had monitored 100+ procurements and construction works across five

countries, rectifying over 60 per cent of problems found. Harriet Wachira, Programme Coordinator, TI Kenya said, “Through Transparency International Global Health, TI-Kenya has benefited from trainings on key concepts such as Open Contracting and Open Contracting Data Standards, which led to increasing the capacity of TI-Kenya to act and position itself as a thought leader in public procurement reforms in Kenya.”

We trained 500+ government officials to upload data to procurement systems, giving them confidence to share information with the community that should be in the public realm.

Service Delivery: Better transparency in national COVID-19 vaccine rollouts.

Over the last year we worked to increase transparency in national vaccine rollouts in Bangladesh, Uganda and Zambia.

We supported the setting up of distribution monitoring systems, as well as introducing corruption reporting mechanisms to reduce opportunities for corruption. We also developed an online artificial intelligence tool that captures media reporting of corruption in the vaccine rollout worldwide.

Increasing transparency in the development of COVID-19 vaccines and contracts

Our report **For Whose Benefit** examined transparency in two key stages of the COVID-19 vaccine development and distribution process: **clinical trials and government vaccine contracts.**

It focused on 20 vaccines that were in, or had completed, late-stage clinical trials as of January 2021. It uncovered poor transparency in the publication of clinical trial results and contracts to supply vaccines. In the contracts that were published, there were significant redactions and indemnification clauses.

Our findings and recommendations have implications not just for COVID-19 but for the wider governance of pharmaceutical development and public procurement. We have used the report to work with European and UK health regulatory authorities to increase transparency by strengthening legislation on clinical trial reporting.



Calendar

2021-2022

THE YEAR IN EVENTS

April



Daniel Bruce, Chief Executive, Transparency International UK



Dr Ngozi Iweala-Okonjo, Director General, World Trade Organisation

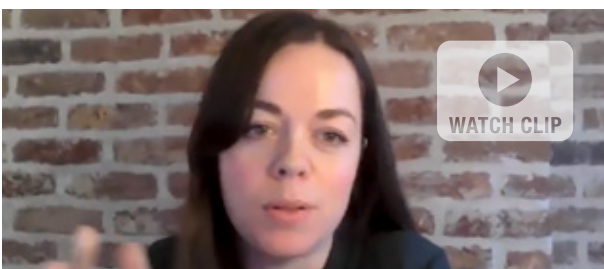
Our Annual Lecture took place virtually this year in light of the pandemic. But with the recently appointed Director General of the World Trade Organization, Dr Ngozi Iweala-Okonjo as keynote speaker, it was a compelling event, with an audience from 27 countries.

The lecture was part of our expanded and improved events programme. “Building Integrity in the Defence Sector: a Framework for Better Governance” attended by representatives from, Malaysia’s Ministry of Defence, United Nations Democracy Fund and the Dutch Ministry of Foreign Affairs was part of the official launch of the Government Defence Integrity Index. Executive Director of IWatch, Transparency International’s Tunisian chapter, Moheb Garoui said the index was the first time the Tunisian military had engaged with civil society openly. It laid the ground work for

IWatch to promote integrity in the defence sector and to partner with the Ministry of Defence on defence sector integrity.

Our side event at the United Nations General Assembly Special Session (UNGASS) on Corruption was attended by more than 100 people and heard from speakers including Anita Ramasastry of the United Nations Working Group on Business and Human Rights and Daniel Prims, Director, Security Sector Reform at United Nations.

Our more informal events included a conversation about the growing threat from Enablers with Transparency International Co-Founder and former Vice-Chair, Frank Vogl and Head of UK Advocacy, Rachel Davies Teka.



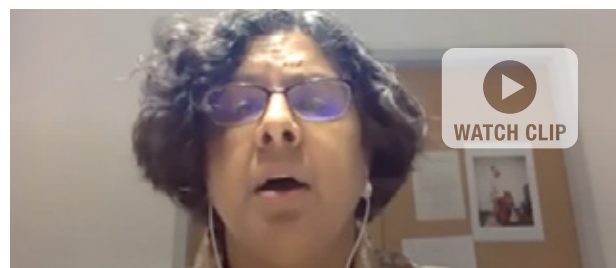
Rachel Davies Teka, Head of Advocacy, Transparency International UK



Daniel Prims, Director, Security Sector Reform at UN



Frank Vogl, Co Founder & Former Vice-Chair Transparency International

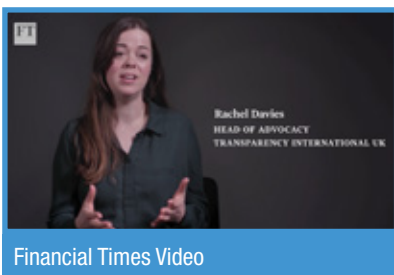


Anita Ramestry, UN Working Group on Business & Human Rights

MEDIA OUTREACH

The stream of corruption and political integrity scandals throughout the year, ending with the invasion of Ukraine, has meant that our evidence-based analyses and calls for changes have been and continue to be much in demand in the media. With nearly 4,400 pieces of media coverage including broadcast interviews, we achieved a more than 200 per cent increase in media coverage this year.

These include a front-page story in the Financial Times, high profile pieces in The Times, on BBC TV including Panorama, on BBC radio and its website. We also appeared in major stories in the Daily Mail, Sky News, the Telegraph, LBC and Guardian. Internationally, we were quoted in the New York Times, Washington Post and appeared on ABC, NBC, CBS and Bloomberg News among others.



How corrupt is Britain?

A steady stream of scandals raises questions for PM Boris Johnson.



Britain becomes 'global hub for money laundering' as property worth £1.5 billion is bought by Russians with Kremlin links or facing corruption allegations, new figures reveal

Pressure grows on UK to beef up measures to tackle economic crime

Call for independent review of MPs' jobs as firms working with Government revealed to be paying politicians

UKRAINE CRISIS
Ukraine crisis: Corruption alert over Russians with £1.5bn of British property

Passholder privilege: the MPs turned consultants

'Londongrad': UK's tough balancing act on Russian sanctions

Corruption doesn't stop with Paterson



NZ TOPS GLOBAL TRANSPARENCY RATINGS FOR DEFENCE AND SECURITY SECTOR

Canada's secret COVID-19 vaccine contracts hinder the fight to boost vaccine confidence, researchers say

Malaysia scores low for the defense sector's troubleshooting index

Corruption risk very high in Nigerian military police – Integrity report

Index shows Mexico at very high risk of corruption in defense and security

Despite significant risks, 'anti-corruption safeguards for operations are virtually non-existent'

US sounds alarm over Russian cash in London

Bangladesh scores 'E' on TI defence integrity index; 'Very high risk of corruption,' says TIB chief

06/04/21
COVID-19, lies and statistics: corruption and the pandemic

UK urged to suspend 'golden visas' after fast tracking of Russian millionaires

Portugal among countries with high risk of corruption in Defense

SOCIAL MEDIA

Website visitors

- Transparency International UK **178,777**
- TI-Defence and Security **23,764**
- TI-Global Health **30,676**

Twitter

21,924 followers, **14.4%** annual growth



LinkedIn

11,469 followers
40.81% growth

PUBLIC ENGAGEMENT HIGHLIGHTS

Despite the challenges posed by the pandemic, 2021-22 proved to be a busy year of engagement with key audiences for all UK and global programmes – inevitably most of this virtual. We hope to return to more in person meeting in the months ahead.

UK PROGRAMMES

- APR '21** ● Speech to the British Group of the Inter Parliamentary Union, alongside the then Prime Minister's Anti-Corruption Champion John Penrose MP, on UK corruption strategies
- APR '21** ● Representation of TI-UK at the 2-day 'C7' Summit ahead of the Cornwall G7
- MAY '21** ● Open Government Partnership event about Lobbying
- JUL '21** ● House of Commons Treasury Select Committee, providing oral evidence on UK's response to money laundering
- SEP '21** ● G7 Civil Society and Private Sector event
- SEP '21** ● Cambridge Economic Crime Symposium
- SEP '21** ● Royal United Services Institute round table with Home Office and law enforcement agencies
- SEP '21** ● Representation of TI-UK in a Ministerial Roundtable on the UK's International Development Strategy
- OCT '21** ● Centre for New American Security, Trans-Atlantic Forum on Russia
- NOV '21** ● Representation of TI-UK in the Commonwealth Secretary General's annual dialogue with accredited organisations
- DEC '21** ● Anti-Money Laundering Practitioners (AMLPr) Forum
- JAN '22** ● Spoke at City of London sponsored webinar on transparency and company registers
- FEB '22** ● Keynote speech to Institute of Business Ethics event on Public Attitudes to Business and Ethics
- FEB '22** ● Keele World Affairs Series lecture: 'Global corruption, for better or worse'
- FEB '22** ● Representation of TI-UK at a Buckingham Palace reception for international organisations
- MAR '22** ● Foreign, Commonwealth & Development Office organised Anti-Corruption Evidence Programme (ACE) research conference at The British Academy

DEFENCE AND SECURITY

- JUNE '21 ● United Nations General Assembly Special Session (UNGASS) on Corruption
- JULY '21 ● TI Mozambique webinar on defence governance
- NOV '21 ● TI-DS discussed transparency in defence and the findings from the GDI related to Access to Information in particular, as part of a panel on Freedom of Information in their National Anti-Corruption Conference in Montenegro
- NOV '21 ● TI Germany press conference on the launch of the GDI
- NOV '21 ● UN Forum for Business and Human Rights
- DEC '21 ● Webinar on anti-corruption and Canadian foreign policy, just before the US Summit for Democracy (organised by TI Canada)
- JAN '22 ● GDI Launch event

GLOBAL HEALTH

- MAR '21 ● 2021 OECD Integrity Forum, International Anti-Corruption Conference
- MAR '21 ● United Nations Office on Drugs and Crime expert reference groups
- MAR '21 ● World Health Organization Global Preparedness Monitoring Board
- SEP '21 ● World Health Organization State of Universal Health Coverage board
- NOV '21 ● World Bank Law, Justice and Development Week



LESSONS LEARNT THIS YEAR

Long-term relationship building is the foundation for effective, agile advocacy.

Changing the law to reveal who really owns the foreign companies holding property in the UK is a landmark transparency reform that was years in the making. When a government minister resigned in January, we discovered that promised legislation for this reform had been ditched from the Government's programme.

With civil society colleagues, we were able to mobilise a vocal opposition to this in Parliament at great speed, because we had steadily built relationships across the political divide over a number of years. Then, when Ministers were persuaded they needed this measure to strengthen the effectiveness of their Russia sanctions, the legislation for the reforms – for which we had campaigned – was introduced at unprecedented pace.

Fighting for transparency and an end to corruption is dangerous work for many of our partners.

In the UK we take for granted being able to fight for transparency and accountability without our team facing personal risk.

This year, we have been reminded that for many of our partner chapters around the world this is a dangerous and even deadly mission that challenges the power and lifestyles of kleptocrats and other powerful individuals. Ensuring we do not put our colleagues even more at risk with hastily issued words is something we've become acutely aware of in the past year.

Our work in Global Health and Defence and Security has underscored how pervasive the risk of corruption is across these sectors. Procurement of medical supplies and vaccines, pharmaceutical research, and healthcare service delivery suffer from a lack of transparency. Military operations by some of the world's biggest military powers and multi-billion-dollar arms deals are vulnerable to corruption. It's clearer than ever that the only way to tackle corruption and its terrible consequences for communities around the world is to incorporate anti-corruption into every aspect of planning and process. We will be campaigning for exactly this in the months and years going forward.

GOING FORWARD



WATCH » Daniel Bruce on Transparency International UK's continued work in the fight against corruption

In the months ahead we will work to keep up the momentum to close the remaining gaps in the UK's defences against dirty money. We will maintain pressure on the UK Government to live up to its commitment to passing reforms to Companies House. We will press for more effective oversight of the UK's professional services to better protect against their involvement in enabling corruption and the laundering of dirty money, and for reforms to corporate criminal liability so that large companies involved in these crimes do not remain above the law. We will also continue to advocate for Britain's Overseas Territories and Crown Dependencies, such as the British Virgin Islands and Isle of Man, to introduce public beneficial ownership registers by the end of 2022.

To help secure greater integrity in politics and protect the public's resource, we will continue our efforts to advance stronger safeguards against impropriety in high office, including reform of the ministerial code and greater transparency over the lobbying of government. We will seek changes that would deliver improved transparency over parliamentarians' financial interests, and tighter controls on MPs' second jobs. We will engage local authorities on how better to protect against impropriety in major planning decisions. We will advocate for improvements to the UK Government's Procurement Bill as it advances through Parliament and pursue accountability over the use of public funds during the pandemic.

Globally our Defence and Security programme will use the findings of the Government Defence Integrity Index (GDI) to engage with specific governments and international organisations as an international standard for curbing corruption risks in defence institutions. New research will examine how weak defence governance contributes to conflict and instability in fragile conflict-affected states. The programme will also undertake work to establish the importance of anti-corruption being mainstreamed into Security Sector Reform and Governance processes – and will develop guidance, policy and tools on how to do this. Additionally, a report will be published on US Private Military and Security Companies (PMSCs) followed by engagement with the US government on the key recommendations for enhanced regulation and oversight of PMSCs.

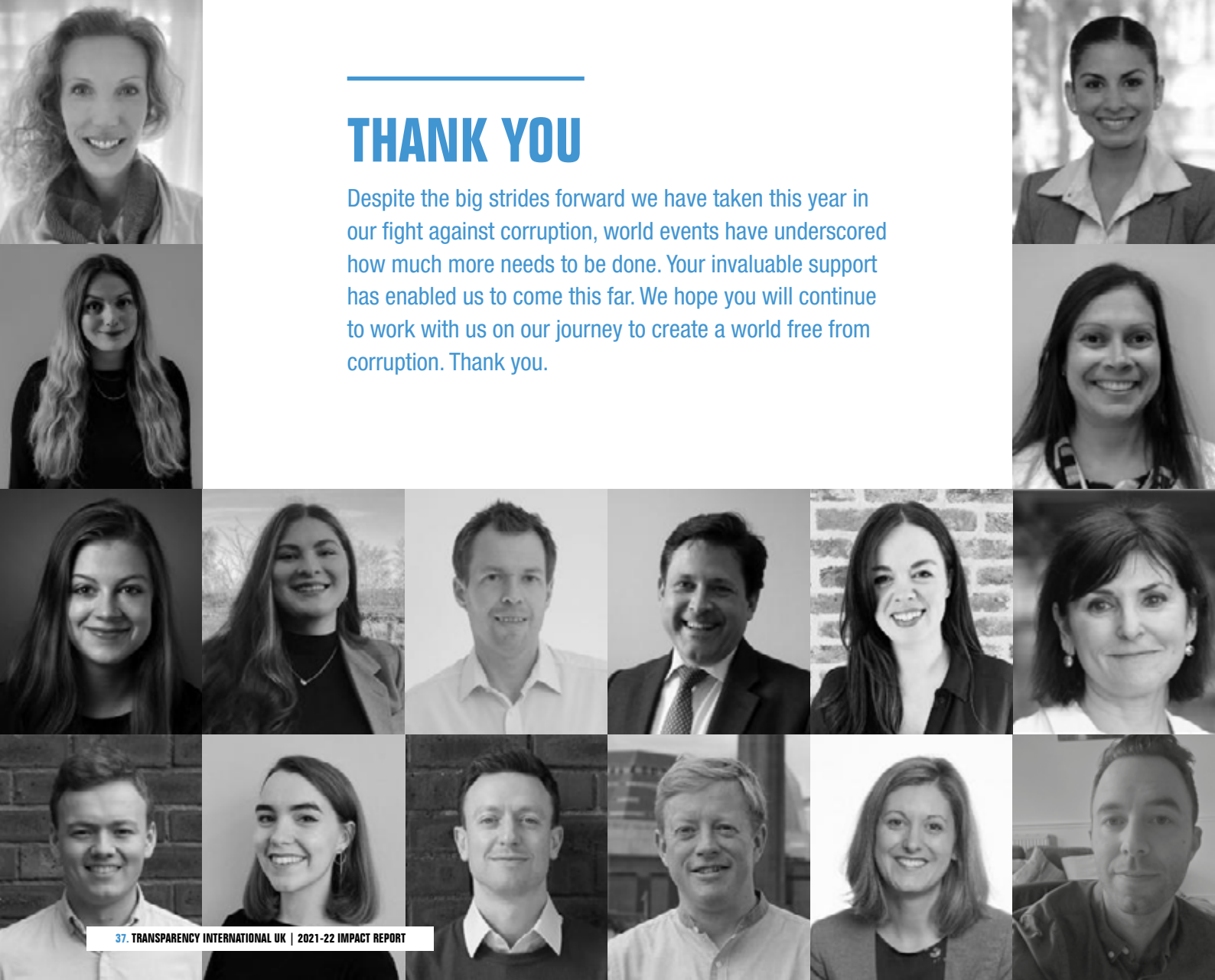
Our Global Health programme will continue to focus on curbing corruption to create stronger health systems that reach more people. We will work closely with other Transparency International chapters around the world to put in place best practice standards on health delivery, particularly public procurement. We will also use machine learning to give insight into how and where corruption is affecting equitable access to health services.

We will investigate how to build greater transparency into pharmaceutical development and distribution processes, to ensure there is no undue influence in purchasing, or decision making.



THANK YOU

Despite the big strides forward we have taken this year in our fight against corruption, world events have underscored how much more needs to be done. Your invaluable support has enabled us to come this far. We hope you will continue to work with us on our journey to create a world free from corruption. Thank you.



ANNUAL ACCOUNTS

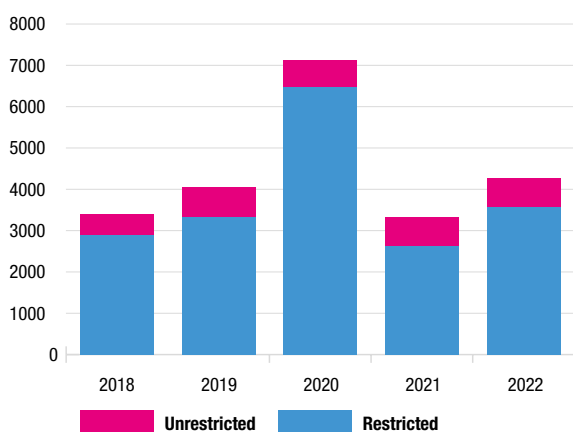
2021-2022

The Trustees report (which includes the Directors report required by Company Law), comprises the contents of the Impact Report and the section of the Annual Review and Accounts between pages 39 and 64.

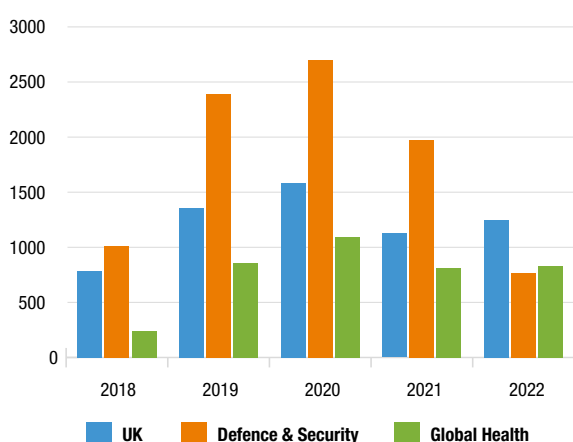
Financial Review

Income from all sources was £4,253,000 in the year to 31 March 2022 (2020/21: £3,321,000). The five-year graphs show significant changes to the restricted income received (where the funds can only be used for specific donor purposes) and the associated expenditure, particularly where sums are received late in the financial year but the activities and their expenditure occur in the subsequent year. The multi-year activities associated with publishing of the Government Defence Integrity Index and the Defence Companies Index are reflected in the higher revenues and expenditure between 2019-2021. Of the income received to March 2022, £3,623,000 (2020/21 £2,631,000) was restricted for specific programmes and projects, largely made up of grant income. The remaining income of £630,000 (2020/21 £690,000) was unrestricted (where the funds can be spent at the discretion of the charity), comprising grants, donations and TI-UK membership income as well as revenue generated by the Business Integrity Programme through membership of the Business Integrity Forum (BIF) or Thought Leadership donations. Unrestricted income remains invaluable to the financial sustainability of the charity.

Total Revenue (£'000)



Programme Expenditure (£'000)



Expenditure for the year reduced by 23 percent to £3,079,000 (2020/21 £4,015,000) primarily due to a reduction in funding for the Defence & Security programme. The majority, 97 percent, went towards charitable activities and three percent to raising funds. The programme expenditure reductions between 2021 and 2022 reflect delays in receiving funding from a major donor. In order to ensure the financial resilience of the organisation a series of cost reductions were implemented during 2020 with a reduction in headcount both in the international programmes and shared service teams, as well as office costs. The charity made a total surplus for the year of £1,174,000 (2020/21 £694,000 deficit). This comprised a surplus on restricted funds of £1,277,000 (2020/21 £1,080,000 deficit) as a significant amount of funds were received for work undertaken in the first half of the following year, and a deficit on unrestricted funds of £103,000 (2020/21 £386,000 surplus) as a result of a short term funding gap on the defence & security programme that was resolved in October 2021.

The COVID-19 global pandemic continued to place restrictions on travel and has required office colleagues to work for the most part remotely since March 2020. Fundraising events continued but were limited to on-line opportunities. Revenue budgets and cash flow forecasts have been regularly stress tested given the uncertainty of the disruption from the pandemic.

Reserves policy and going concern

The Trustees consider that the charity needs to hold unrestricted reserves for the following principal reasons:

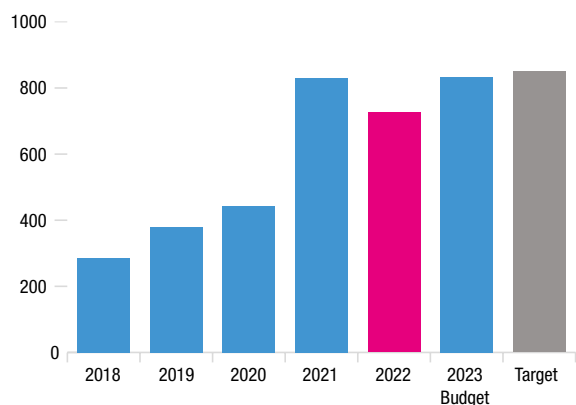
- to maintain sufficient working capital cash flow to cover delayed debtor receipts (40 percent);
- to maintain programme delivery activities if delays in grant instalment payments from funders occur and to maintain the organisational structure including staffing in the short term where delays or gaps on the expiry of major grants occur, given dependence on a relatively small number of funders (46 percent);
- to cover risks related to failing to meet donor obligations resulting in claw back of funding for activities undertaken (5 per cent); and
- other income risks (9 percent).

Total reserves at 31 March 2022 amounted to £2,834,000 (2020/21: £1,660,000) of which unrestricted reserves amounted to £726,000 (2020/21 £829,000) and restricted reserves amounted to £2,108,000 (2020/21 £831,000).

The charity also has a small amount of reserves tied up in fixed assets, amounting to £2,000 at 31 March 2022 (2020/21 £7,000), leaving free reserves at 31 March 2022 of £724,000 (2020/21 £822,000).

Based on a risk assessment including weighting of the risks referred to above, the Trustees are of the opinion that the Charity needs to target an unrestricted reserve within a range of £800,000 to £850,000. The target is reviewed on a six-monthly basis, and future changes to the target will be dependent on shifts in the risk profile of the charity, an ongoing assessment of the likelihood of major grant renewals and our ability to grow revenue in light of the wider economic situation, most recently because of the global pandemic as well as increased competition for funding.

Unrestricted Reserve (£'000)



The level of unrestricted reserves at present is marginally below the targeted range going into the next financial year but has been budgeted to meet the target over the next 12-18 months. The key risk that could arise in the year ahead relates to a need to maintain programme delivery (principally for international activities) where delays in grant instalment payments from funders occur. Plans are in place to monitor this and take action to reduce expenditure commitments should this risk materialise. Budget risks include inflationary pressures and higher levels of expenditure on office costs to facilitate in-person working as well as international travel.

The Trustees consider that there are no material uncertainties about the charity's ability to continue as a going concern (see also Accounting Policies (Note 1)). The Trustees have reviewed the financial position, budgets and cash flows for the period to September 2023 and consider that the charity is in a position to meet its financial obligations as they fall due.

Grant making policy

TI-UK awards grants to other organisations as part of delivering our charitable and strategic objectives; this can include Chapters within the TI network or to other organisations working on anti-corruption and bribery agendas or engaged in research or advocacy in these fields. Formal evaluation and due diligence of a partner is undertaken in advance of agreeing funding. All grants outlining key activities and deliverables are approved by the relevant Director prior to funds being disbursed. Monitoring and evaluation of progress is undertaken to ensure that the grant is being managed according to the agreement, and where progress or implementation is deemed unsatisfactory, the grant will either be delayed or discontinued. Total grants to partner organisations were £550,000 (2020/21: £501,000) and for a full list, see note 6 to the accounts.

Future plans

The Trustees approved the 2022/2023 Annual Plan that is aligned to the **Stopping Corruption Promoting Integrity 2021-2030** strategy.

The priorities are:

In the UK:

- Reform of UK company registries, better supervision of anti-money laundering defences, and transparency of UK property ownership by overseas companies.
- Seeking stronger public procurement rules and securing accountability for COVID-19 contracting, for example through its inclusion within the scope of the forthcoming public inquiry.
- Strengthening the institutional defences against corruption risks in public life, including greater transparency over lobbying and more meaningful oversight of ethical standards.
- Enhancing practice in corporate anti-corruption programmes through new insights into impact investing and the interplay of corruption, human rights risks and environmental (ESG) risks.
- Building on network and gap analysis in Scotland to explore how we might best increase TI-UK's presence in other devolved administrations or metro regions.

Internationally:

In Global Health

- Building upon the lessons learned from COVID-19 to ensure that transparency and accountability are given due consideration by global health actors in both pandemic recovery and in preparations for future pandemics.
- Deepening the knowledge base on the systemic drivers of corruption at the point of service delivery. Develop

approaches to tackle those drivers of corruption at the point of service delivery.

- Deepening our approaches to transparency within health resource allocation processes, and work with partners to scale up approaches to improving transparency in planning, budgeting and procurement.
- Advancing the knowledge base on the risk of regulatory capture by the pharmaceutical industry.

In Defence & Security:

- Delivering a programme of work on corruption, conflict and human security including further developing our work on anti-corruption in military operations.
- Developing robust nationally led bodies of work with four national chapters in North and West Africa including two countries in the Sahel.
- Building on the launch of the GDI 2020 to engage key stakeholders on the risk corruption poses to security and the key role of the defence sector within this to promote findings and research uptake.
- Advancing the knowledge base for an increase in transparency in arms exports from the USA to the Middle East. Scoping out opportunities to develop a body of partnership work in one other region.
- Defining the next generation of Defence & Security work as it relates to the private sector.

Public Benefit

Charity trustees have a duty to develop strategic plans to ensure that they provide public benefit and achieve the objectives as set out in the governing document. The Trustees have had due regard to the Charity Commission guidance in relation to public benefit.

TI-UK's primary objective is the relief of poverty, suffering and distress caused directly or indirectly by corruption and the promotion for the public benefit of ethical standards and compliance with the law by the public and private sectors. The Trustees are satisfied that the Charity's activities continue to further these aims and meet the public benefit (as defined by the Charity Commission).

The Trustees consider that those who benefit from the activities of TI-UK include:

- those at risk of harm caused directly or indirectly by corruption in the UK and overseas
- all those in societies who benefit from strong and transparent institutional structures that help deter and defend against corruption; and
- those in economies whose development is enhanced through reducing corruption.

Organisationally:

- Continuing to work with colleagues in the TI-Secretariat in Berlin whilst also strengthening the movement-wide value and leadership of TI-UK's international programmes.
- Sustaining the step-change made in media exposure and relationships over 2021/22, with a focus on building strategically important engagement. Driven by audience-focused objectives this will cover media, social media and events.
- Embedding a consistent cross-organisational approach to Monitoring, Evaluation and Learning, supporting our people to identify what works in delivering impact, and building knowledge management.
- Continuing to diversify and strengthen our income pipeline. Additionally, we will establish the potential for a new major gifts/individual donor income stream.
- Promoting a high trust culture where blended working delivers a collaborative, engaging and learning culture, colleagues are confident and have access to the tools to Speak Up, and our approach to diversity and inclusion challenges our programmatic and organisational assumptions particularly on gender and ethnicity.

TI-UK considers that there are clear public benefits arising from:

- promoting the enforcement of the UK Bribery Act and other anti-corruption legislation
- highlighting the threat of corruption in specific sectors of the UK
- building integrity and preventing corruption in the defence and security and health sectors
- ensuring the UK effectively enforces international anti-corruption conventions
- helping companies and NGOs to raise their anti-corruption standards; and
- Increasing public awareness of corruption issues.

The Board monitor the activities of TI-UK to ensure they continue to meet the public benefit (as defined by the Charity Commission).

Risk Management

The Trustees and Senior Leadership Team review regularly the principal risks faced by the Charity. These include risks related to our strategy, people, security, finance and funding, legal and donor compliance and external relationships.

Board of Trustees	<ul style="list-style-type: none"> • Responsible for management & control of the Charity • Sets overall risk management and appetite • Approves risk register annually with bi-annual review
Finance, Risk and Audit Committee/All Committees	<ul style="list-style-type: none"> • Advises on financial control & risk management • Reviews and monitors risk register including deep dives into risk areas • Considers whether risks identified through other committees have organisational impact
Senior Leadership Team	<ul style="list-style-type: none"> • Monitors & maintains internal control environment ensuring day-to-day operations have adequate systems and procedures in place. • Reviews & monitors the risk register on quarterly basis to ensure new or emerging risks are profiled as well as to ensure timely follow up of mitigating actions to reduce risks to manageable levels.

How we are managing our principal risks

Key Organisational Risks

How we are mitigating the risk

Strategic

Strategic: the failure to deliver on the ambition outlined in the new strategic goals.

- TI-UK and global programmes strategies aligned to the TI Movement strategy
- Annual Plan & Budget aligned to new strategy with board cycle to review strategic opportunities and challenges across all programme areas
- Organisational structure aligned to assist delivery with SLT focused on new partnerships and incubation of ideas
- Focus on measuring outcomes and impact
- Board skills and expertise review and future recruitment and use of advisors to meet identified gaps

People

High levels of **employee turnover**. As a result of institutional funding uncertainty this could threaten our ability to complete existing contractual obligations as well as continuity of sector and TI knowledge and expertise. The failure of the organisation to evolve and meet changing employee expectations including blended working. Potential for career progression can be limited.

- Quarterly reporting on Annual Plan delivery
- Engagement forums including monthly 'One Team' meetings, Chief Executive drop-in sessions and regular Listen into Action surveys
- Personal objectives reflecting priorities, values and matrix working across TI-UK with appraisal cycle to discuss career plans and learning and development needs
- Ensuring our salary & benefits package remains comparable with the sector
- Investing in a digital recruitment platform that is attractive to applicants and reduces the time involved in recruitment
- Managing the move to blended working, aligning to sector developments with focus events to create a stronger sense of community post pandemic

Safeguarding (*duty to protect from harm*): there is a risk that our culture does not recognise that all our people are responsible for safeguarding and that norms, values, attitudes and behaviours are as important as policies and procedures. The risks of ensuring this takes place across funding partners that vary in size and context and have limited resources makes us vulnerable to financial, donor and reputational risk.

- Safeguarding & Whistleblowing Policies & Codes of Conduct
- Mandatory training
- Partner guidance/ toolkits
- Annual Safeguarding Report
- TI Chapter and Secretariat safeguarding and security framework
- Participation in sector Speaking Up initiative to reduce the barriers for reporting concerns

Key Organisational Risks

How we are mitigating the risk

Security

Increased levels of political uncertainty in many countries, pandemics and erratic weather conditions means that **international travel** places many of our travellers at higher levels of risk and disruption including being affected by protests, strikes, terrorism, flooding and cyclones. The safety of Chapters/ researchers is a key risk in some countries/ areas of work and must be prioritised.

- Safety & Security Risk Framework, policies and procedures with updated materials for Chapter/ research risks
- Safety and Security Focal Points in each team with refresher training as international travel recommences following the pandemic
- Crisis management plans
- Insurance cover & overseas assistance scheme

Finance

Failure to achieve adequate **cost recovery** on restricted grants prevents an effective level of shared services to be funded. Where programmes are not fully funded there can be an unequal share of recoveries across the organisation.

- Budgetary templates and internal reporting
- Formal approval process for funding bids
- Regular review of overhead charges across programmes

Funding

Opportunities to increase **unrestricted income** requires targeted interventions specific to the programme area if we are to meet revenue contribution/ fundraising targets. These are dependent upon sufficient time to build credible pipelines as well as addressing skill gaps through training / recruitment/ backfilling. Ensuring the Business Integrity offer remains engaging to members as they move from a controls based approach to one integrating culture/ ethics interventions.

- Fundraising team with dedicated support for institutional funding and individual donor giving
- Regular monitoring of revenue pipelines across programmes
- Developing fundraising-related messaging and marketing via digital media, events etc.
- Review of Business Integrity products including membership, thought leadership and benchmark

Increased competition, matched funding, reduced/stretched ODA funding and gaps in the international programme finances place short term pressure on maintaining strategic priorities.

- On-going dialogue with existing donors to ensure strategic alignment between TI-UK and their funding priorities
- Investment in institutional fundraising capacity to increase and diversify revenue growth particularly for the international work
- Engagement with TI-Secretariat and national chapters to overcome barriers to funding channels and enhance collaboration
- Diversifying funding opportunities across programmes with aim of broader range of multi-year funding partnerships including as sub-contractors

Legal

Aggressive litigation ("SLAPP suits") compromise TI-UK's ability to operate or result in major legal costs.

- Documented content creation process to ensure legal risk is considered prior to publication with training to all colleagues working on research and communications
- Access to range of legal advice to defend possible litigation
- Review of insurance coverage/ products

Grant management procedures insufficient to meet increasing donor requirements, particularly monitoring large sub-grants to chapters leading to long term loss of restricted income.

- Shared services function provides programme support across teams covering grant management, compliance, partner due diligence, procurement and administration & logistics.
- Knowledge management processes improved as part of Office 365 enhancements

External

The ability to **effectively engage donors and the wider public** will be at risk if we are not designing projects to deliver impactful results and / or we are unable to provide robust programme evidence of that impact.

- Investment in Evidence and Impact capacity
- Impact and Evaluation framework for all programmes that feeds into proposal design, log frame developments and organisational strategy
- Development of a learning culture across the organisation

Governance

The Charity is a company limited by guarantee and was set up by a Memorandum of Association on 1 March 1994 (last amended 12 January 2006). It was registered in England and Wales as charity on 27 January 2006. The Articles of Association were last amended on 8 December 2016.

Transparency International (UK) is a national chapter of the global movement, Transparency International (TI), incorporated in Berlin. National chapters lead the work of TI in their country and participate in TI's regional and international work. The membership base of each TI national chapter differs in type and size from country to country. TI-UK's members are an important part of the chapter's governance in that they are able to vote at the AGM and approve appointments to the Board. The number of members at 31 March 2022 was 88 (2021: 111) and the decrease reflects a review of membership records for accuracy. Plans are in place to review membership procedures in the year ahead in order to maintain numbers.

The Transparency International secretariat based in Berlin leads global advocacy and international initiatives, supports national chapters and coordinates regional work. The relationship of mutual support reflects the sharing of insight and research undertaken by the chapter to complement global research tools with the secretariat supporting efforts to obtain the necessary resources to tackle corruption. TI-UK operates under a national chapter accreditation agreement which was renewed for a further three years in June 2021.

Whilst operating as integral parts of the structure of the host chapter, Global Thematic Networks (GTNs) are globally focused programmes shaped by their innovative approaches and ambition to deliver global impact in their defined thematic areas. TI-UK is accredited to operate two of these on behalf of the movement in Defence & Security and Global Health.

Trustee & Board members

TI-UK is governed by a Board of Trustees, elected by the members of TI-UK or co-opted subject to election. The Board meets regularly during each financial year (normally four half days along with a Strategy Away Day) to provide strategic guidance, discuss and agree policy issues, review expenditure, approve budgets and review progress in implementing programmes. The Board's decisions are implemented by the employees of the Charity, led by the Chief Executive. Board committees meet depending on needs but generally three or four times a year.

The Board concluded a process of reviewing the committee structure to ensure that governance is arranged to best support the delivery of the strategy. This review also reflected on the changes to the Charity Governance Code (December 2020) as they could apply to TI-UK. A revised Governance Framework was approved at the June 2021 Board meeting and has been implemented.

The procedures for appointing Trustees and their terms of office are set out in TI-UK's Articles of Association and a document approved by the Board, which facilitates the process of recruiting Trustees. The process seeks to ensure that relevant skills are reviewed, and includes public advertising and a panel interview. The Trustees are appointed to the Board until the next Annual General Meeting at which time they stand for appointment by the membership. New Trustees participate in a half-day induction and are given a comprehensive induction pack. Additional training for Trustees is arranged as and when it is considered necessary.

The Trustees undertook a formal evaluation of the effectiveness of the Board in June 2021 and the Senior Leadership Team contributed their feedback. The Chair has annual objectives agreed with the Board and these are reviewed with the opportunity for the SLT to contribute.

The following Trustees held office in 2021/22:

Trustee	Date of Appointment/ Resignation	Committees	Board Attendance 2021/2022
Graham Baxter	29 January 2014 -	G, N, P (Chair)	6 of 6
Michael Bowes QC	16 May 2015 -	G (Chair), N	2 of 6
Sarah-Jayne Clifton	14 May 2019-22 February 2022	F, G, R	5 of 6
Steve Cockburn	26 February 2019 -22 February 2022	G, R	5 of 6
Sam Eastwood	22 November 2012-16 November 2021	G, R	5 of 5
James Ford	4 January 2022-	F, R	1 of 1
Prof Paul Heywood	12 October 2015 -	G, R (Chair)	6 of 6
Natasha Houseman	16 May 2015 -	F (Chair), N, R	6 of 6
Dominic Martin	26 February 2019 -	F, R, P	5 of 6
Val Monk	4 January 2022-	G, P	1 of 1
Eddie Rich	14 May 2019 -	G, P	6 of 6
Fiona Thompson (Chair)	16 May 2015 -	N (Chair)	6 of 6

G: Global Thematic Networks F: Finance, Risk & Audit N: Nominations & Governance P: Private Sector Engagement R: Research

One trustee retired during the year, Sam Eastwood who after nine years as a Board member completed his maximum eligible term. Sarah-Jayne Clifton and Steve Cockburn resigned in February 2022 after three years on the Board following changes to their respective personal circumstances. The Board recognizes all three for their considerable contribution to TI-UK.

Following an open recruitment process with a particular emphasis on shortlisting a diverse range of possible candidates, two new Trustees, James Ford and Val Monk were appointed.

The Charity has an Advisory Council that allows the Board to draw on its members' varied expertise and experience. An Ethics Advisory Panel is in place for the purpose of providing advice to the Board on ethical questions including conflicts of interest.

TI-UK's reputation is of paramount importance. The Charity has internal policies and procedures to ensure that the Board of Trustees and employees preserve their independence, safeguard their integrity and express opinions based on an impartial assessment of facts. All Trustees and Senior Employees complete conflict of interest forms (annually updated) and these are published on the Charity website. Every meeting notes any potential conflicts of interest. Professional Indemnity, Trustees Indemnity and Employment Practices insurance cover are in place.

People

The skilled, committed, independent and often courageous colleagues who deliver TI-UK's strategy remain our most important resource. With 65 percent female, 35 percent male and a wide range of ages and backgrounds, a key area of focus this year has been defining what it means to live by TI-UK's shared values: Acting with integrity; valuing and respecting differences; working collaboratively; and having the courage to demand better of ourselves and others.

The views of colleagues are captured through quarterly Listen into Action surveys and these are shared with the SLT and as part of the Annual People report to the Board. With prolonged home working these not only provided helpful monitoring over the last year but also helped guide future plans on returning to use office space and how to successfully adapt to blended working.

A Salary and Benefits system is in place to ensure fairness and transparency. Management provide an annual report to the Finance Risk and Audit Committee on implementation of the policy.

The wellbeing of employees remains critical. The Employee Assistance Programme is promoted and available to support with advice, counselling and guidance on both workplace matters and others. In October 2021 a series of learning events on Mental Wellbeing took place with high levels of satisfaction reported by those who took part. Policies on leave were extended to include miscarriage and the support that managers/teams can provide to both women and men experiencing this situation.

Remuneration policy

TI-UK's policy is to provide remuneration sufficient to attract, retain and motivate the kind of capable and dedicated people we need to help us fulfil our mission. Salaries are benchmarked periodically against comparable organisations, and in determining individual salary level and progression internal comparisons and the financial circumstances of the organization are taken into account. The most recent benchmarking exercise was completed in the first quarter of 2019 and there are plans to review this again in the year ahead. For details of key management remuneration, see note 10 to the accounts.

The Nominations & Governance Committee is responsible for setting the remuneration of the Chief Executive. The Chief Executive sets the remuneration of members of the senior leadership team in consultation with the Finance, Risk and Audit Committee who also consider changes to the overall reward policy.

Diversity & Inclusion

In 2021, 25 percent of TI-UK employees define themselves as people of colour. Having become a member of the Business in the Community Race at Work Charter in 2020, an action plan was developed in conjunction with a newly formed anti-racism forum open for all employees to participate in. The multi-year plan aims to help ensure that that we play our part in tackling barriers that national minority people face in recruitment and progression and that TI-UK, including the senior leadership and Board, is representative of British society today. In July 2021 a review of the salary progression of current employees based on their time with TI-UK and their ethnicity and gender was undertaken and this identified no disparity overall or within teams. Data monitoring for recruitment was introduced in October 2022 with agreement to move to a recruitment platform designed to help remove bias (Be Applied) to be introduced in summer 2022. There is more that can be done on this important topic and plans for the year ahead include further commitments and continuing to learn through sector best practice.

Safeguarding

TI-UK publishes its Safeguarding Report annually (latest February 2022). This report provides transparency on the safeguarding (duty to protect from harm) framework in place, summarises matters that were reported and investigated, and details how evolving sector best practice is being considered. In the year to December 2021 there were no safeguarding matters reported. The report outlines the TI-UK Code of Conduct that everyone working with us must agree to uphold. There are details of the values and behaviors expected in the workplace, pre-employment checks that are undertaken, relevant policies together with the learning and training resources

and how incidents can be reported. During 2021/22 the whistleblowing and complaints policies were updated and publicised to help encourage a culture where people are confident to Speak Up. The Trustees also reviewed the latest Charity Commission guidance in relation to safeguarding and working overseas. Future plans include:

- Continuing engagement with colleagues to ensure our culture of integrity and trust is promoted and understood. This will include Listen into Action survey results and induction/refresher training on safeguarding, whistleblowing and anti-bullying and harassment.
- The external review (spring 2022) by Defence & Security related to gender and programme design and delivery to help inform discussions on future planning across different TI-UK programmes.
- Continued engagement with the sector on developments including BOND (international development) and the Charity Speak Up Network.

Environmental

The two key environmental impacts by TI-UK are in relation to business travel and office use. Due to travel restrictions there was very limited air travel in the last year. Geography, infrastructure and safety are key considerations in determining international air travel and participation is limited to those who will gain most and contribute from being present in person. Domestic travel using trains rather than air is encouraged. Office provision has been transitional in the last year with the lease surrendered from June 2021. The approach to future office use, taken up from spring 2022, is based on ensuring that co-working space can be used in order to reduce the impact of vacant desk space. The main co-working location has taken into account best use of walking, bus, tube and train links and car parking is not provided. Other co-working space is also available to help reduce travel times. We continue to monitor how we can measure and report our environmental impact.

How we ensure we fundraise responsibly

The small central fundraising team, housed within our Development, Communications and Impact (DCI) team, with additional involvement from the Chief Executive, concentrates on raising unrestricted funds, coordinating a cross-organisational approach to donors and supporting restricted fundraising for each programme. Responsibility for raising programme funding is shared between Programme Directors and the Director of DCI. The majority of funding comes in the form of restricted funds from a small number of large government donors, together with trusts and foundations (UK and USA based). This carries two risks: that the programmes become over-reliant on a small number of donors, and that the programmes may seem to be too close to the governments that we are aiming to hold to account.

In order to mitigate the perception that our mission may be compromised by our donors, Transparency International globally has clear guidelines that we adhere to on the circumstances in which funds can be accepted, relationships with donors, and transparency around funders. We ensure our fundraising strategy that is revised annually reflects these risks. The majority of unrestricted funding is generated by the Business Integrity Programme.

The fundraising strategy, over and above generating the revenues necessary to support TI-UK's mission, aims to diversify the base of our donors, both in type and number, and to seek more unrestricted funding. This is principally so as to enable programme colleagues to plan for the longer term and to be responsive to advocacy opportunities - both of which underpin our ability to deliver change. We also aim to ensure we have funding to allocate to areas of our work that are important or emerging but may be less immediately attractive to conventional funders. This enables us to maintain our independence by being willing to turn away money when we feel the circumstances require. In order to deliver the fundraising strategy, we have increased the commitment to investing in raising funds from institutions, trusts and foundations and individual donors. The intention is to maintain our approach of directing as much possible financial support towards the programmes while ensuring our core support team is adequately resourced. A senior leadership role also focuses on partnerships which deliver wider strategic objectives as well as financial commitments.

We aim to operate to the highest standards in fundraising, including the codes and norms for the sector as well as GDPR compliance. We undertake little or no 'retail' fundraising from the wider public and do not use third parties, external fundraisers (either volunteer or professional) or contract out our fundraising, so our exposure in areas particularly highlighted by the codes is not high. We are registered with the Fundraising Regulator and have committed to follow the regulator's Code of Fundraising Practice and the Fundraising Promise. We have not received any complaints about our fundraising practices during the year.

Trustee responsibilities regarding the financial statements

The Trustees (who are also directors of Transparency International (UK) for the purposes of company law) are responsible for preparing the Trustees' Report and the financial statements, in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

The law applicable to charities in England and Wales requires the Trustees to prepare financial statements for each financial year which give a true and fair view of

the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period. In preparing these financial statements, the Trustees are required to:

- select suitable accounting policies and then apply them consistently;
- observe the methods and principles in the Charities SORP and FRS102;
- make judgements and estimates that are reasonable and prudent;
- state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue in business.

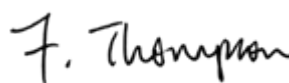
The Trustees are responsible for keeping proper accounting records that disclose with reasonable accuracy at any time the financial position of the charitable company, and enable them to ensure that the financial statements comply with the Charities Act 2011, the Charity (Accounts and Reports) Regulations 2008 and Companies Act 2006. They are also responsible for safeguarding the assets of the charitable company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The Trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of the financial statements may differ from legislation in other jurisdictions.

The Trustees have taken all the necessary steps to make themselves aware of any information needed by the Charity auditors for the purpose of their audit and establish that the auditors are aware of that information. The Trustees are not aware of any relevant audit information of which the auditor is unaware.

In preparing this report, the Trustees have taken advantage of the small companies exemptions provided by Part 15 of the Companies Act 2006.

Approved by the Board of Trustees and signed on their behalf by:



Fiona Thompson
Chair

29 July 2022

Independent Auditor's Report to the Trustees of Transparency International – UK

Opinion

We have audited the financial statements of Transparency International (UK) for the year ended 31 March 2022 which comprise the Statement of Financial Activities, the Balance Sheet, Cash Flow Statement and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and

United Kingdom Accounting Standards, including Financial Reporting Standard 102 the Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the charitable company's affairs as at 31 March 2022 and of the charitable company's net movement in funds, including the income and expenditure, for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the charity in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the trustees' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the charitable company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the trustees with respect to going concern are described in the relevant sections of this report.

Other information

The trustees are responsible for the other information. The other information comprises the information included in the Trustees' Annual Report. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Trustees' Annual Report (which includes the strategic report and the directors' report prepared for the purposes of company law) for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the strategic report and the directors' report included within the Trustees' Annual Report have been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the charitable company and its environment obtained in the course of the audit, we have not identified material misstatements in the Trustees' Annual Report (which incorporates the strategic report and the directors' report).

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept by the charitable company; or
- the charitable company financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of trustees' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit

Responsibilities of trustees for the financial statements

As explained more fully in the trustees' responsibilities statement set out on page 47, the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the trustees are responsible for assessing the charitable company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the trustees either intend to liquidate the charitable company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

Based on our understanding of the charitable company and the environment in which it operates, we identified that the principal risks of non-compliance with laws and regulations related to charity and company law applicable in England and Wales and we considered the extent to which non-compliance might have a material effect on the financial statements. We also considered those laws and regulations that have a direct impact on the preparation of the financial statements such as the Companies Act 2006 and the Charities Act 2011, and consider other factors such as income tax, payroll tax and sales tax.

We evaluated management's incentives and opportunities for fraudulent manipulation of the financial statements (including the risk of override of controls), and determined that the principal risks were related to the improper recognition of revenue and management bias in accounting estimates. Audit procedures performed by the engagement team included:

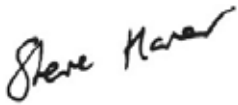
- Discussions with management including consideration of known or suspected instances of non-compliance with laws and regulation and fraud;
- Evaluating management's controls designed to prevent and detect irregularities;
- Identifying and testing journals; and
- Challenging assumptions and judgements made by management in their critical accounting estimates.

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of this report

This report is made solely to the charitable company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the charitable company's members those matters we are required to state to them in an Auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charitable company and the charitable company's members as a body, for our audit work, for this report, or for the opinions we have formed.



Steven Harper (Senior Statutory Auditor)

For and on behalf of Haysmacintyre LLP, Statutory Auditors

10 Queen Street Place, London, EC4R 1AG

Date: 3 August 2022

Transparency International UK

STATEMENT OF FINANCIAL ACTIVITIES

(incorporating income and expenditure account) for the year ended 31 March 2022

	Notes	Restricted Funds 2021/22 £000	Unrestricted Funds 2021/22 £000	Total Funds 2021/22 £000	Restricted Funds 2020/21 £000	Unrestricted Funds 2020/21 £000	Total Funds 2020/21 £000
Income from:							
Donations	2	-	58	58	-	62	62
Charitable activities	3	3,573	622	4,195	2,631	628	3,259
Total income		3,573	680	4,253	2,631	690	3,321
Expenditure on:							
Raising funds		-	94	94	-	44	44
Charitable activities							
Programmes:							
UK		830	420	1,250	971	154	1,125
International:							
Defence & Security		704	63	767	1,939	33	1,972
Global Health		812	21	833	801	14	815
Other activities:							
Communication		-	135	135	-	59	59
Total charitable activities	5	2,346	639	2,985	3,711	260	3,971
Total Expenditure		2,346	733	3,079	3,711	304	4,015
Net Income / (Expenditure)		1,227	(53)	1,174	(1,080)	386	(694)
Transfers between funds	14/15	50	(50)	-	-	-	-
Net movement in funds		1,277	(103)	1,174	(1,080)	386	(694)
Reconciliation of funds							
Funds brought forward 1 April		831	829	1,660	1,911	443	2,354
Funds carried forward 31 March	15	2,108	726	2,834	831	829	1,660

The Statement of Financial Activities includes all gains and losses recognised in the year and are from continuing activities. The notes on pages 54 to 64 form part of these financial statements.

Transparency International UK

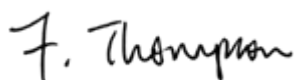
BALANCE SHEET

as at 31 March 2022

Company Registration 02903386

	Note	2021/22		2020/21	
		£000	£000	£000	£000
Fixed Assets					
Tangible fixed assets	11		2		7
Current Assets					
Debtors	12	390		512	
Cash at bank		3,154		1,505	
			3,544		2,017
Creditors: amounts falling due within one year	13		(712)		(364)
Net Current Assets			2,832		1,653
Net Assets	15		2,834		1,660
The Funds of the charity					
Restricted income funds	15		2,108		831
Unrestricted funds	14		726		829
Total charity Funds			2,834		1,660

The financial statements were approved and authorised for issue by the Board of Trustees on 29 July 2022 and were signed below on its behalf by:



Fiona Thompson

Chair

The notes on pages 54 to 64 form part of the financial statements

Transparency International UK

CASHFLOW STATEMENT

for the year ended 31 March 2022

	2021/22	2020/21
	£000	£000
Cash flows from operating activities:		
Net cash provided by operating activities	1,651	37
Cash flows from investing activities Purchase of fixed assets	(2)	(2)
Change in cash and cash equivalent in the reporting period	1,649	35
Cash and cash equivalents at the beginning of the reporting period	1,505	1,470
Cash and cash equivalents at the end of the reporting period	3,154	1,505
All amounts relate to continuing activities.		
Reconciliation of net movement in funds to net cash flow from operating activities		
Net movement in funds for the period (as per the Statement of Financial Activities)	1,174	(694)
Adjustments for:-		
Depreciation charges	7	12
Decrease in debtors	122	778
Increase/(Decrease) in creditors	348	(59)
Net cash provided by operating activities	1,651	37
Analysis of cash and cash equivalents		
Cash in bank & at hand	3,154	1,505
Total cash and cash equivalents	3,154	1,505

A net debt reconciliation note has not been presented as the charity has no debt. The notes on pages 54 to 64 form part of these financial statements.

Notes to the Financial Statements

1. Accounting Policies

The principal accounting policies adopted, judgements and key sources of estimation uncertainty in the preparation of the financial statements are as follows:

Accounting basis

Transparency International (UK) is a registered charity in England and Wales (charity number 1112842) and a company limited by guarantee (number 02903386).

The financial statements have been prepared in accordance with the Charities Statement of Recommended Practice (SORP) FRS 102 – ‘Accounting and Reporting by Charities (2019)’ Second Edition, effective 1 January 2019, the Charities Act 2011 and applicable accounting standards.

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s).

Going concern

The COVID-19 global pandemic continued to place restrictions on travel and required office colleagues for the most part to work remotely since March 2020. Fundraising events were limited to on-line opportunities. We utilised the government support packages including delayed VAT payment and where possible use of the Coronavirus Job Retention Scheme due to business interruption. Revenue budgets and cash flow forecasts have been stress tested given the uncertainty as to any remaining disruption that the pandemic could have.

The Trustees consider that there are no material uncertainties about the charity’s ability to continue as a going concern. The Trustees have reviewed the financial position, budgets and cash flows for the period to September 2023 and consider that the charity is in a position to meet its financial obligations as they fall due. The level of unrestricted free reserves (excluding fixed assets) of £724,000 is below the targeted range of £800-£850,000 with budgets in place to meet the target in the next 12-18 months. The key risk that could arise in the year ahead relates to a need to maintain programme delivery (principally for international activities) where delays in grant instalment payments from funders occur or matched funding has not been demonstrated. Plans are in place to monitor this and take action to reduce expenditure commitments should these risks materialise. As such, the financial statements have been prepared on a going concern basis.

Company status

The charity is a company limited by guarantee (registered number 02903386) which is incorporated and domiciled in the UK. The address of the registered office is 10 Queen Street Place, London EC4R 1AG. The charity meets the definition of a public benefit entity under FRS 102. More detail on how the Trustees have satisfied themselves that TI-UK has met the public benefit requirements is given

in the Trustees’ Report. The members of the company are subscribers to the Memorandum of Association and the persons listed in the Register of Full Members of the company. In the event of the company being wound up, the liability in respect of the guarantee is limited to £1 per member of the company.

Critical accounting estimates and judgements

In accordance with FRS 102, the Trustees are required to make certain estimates and judgements that have an impact on the policies and amounts reported in the financial statements. These estimates and judgements are based on historical experience and other factors including expectations of future events that are believed to be reasonable at the time such estimates and judgements are made.

The estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects the current and future periods.

The significant estimates and judgements are:

- Accrued income (see Income policy below)
- Accruals: costs not yet invoiced (see Expenditure policy below)
- Allocation of support costs (see Expenditure policy below)

In the view of the Trustees no assumptions concerning the future or estimation uncertainty affecting assets and liabilities at the balance sheet date are likely to result in a material adjustment to their carrying amounts in the next financial year.

Income

All income is included in the Statement of Financial Activities (SOFA) when the charity is legally entitled to the income, receipt is probable and the amount can be quantified with reasonable accuracy, and the amount can be measured reliably. Where contracts for advisory

services cover a period of time spanning the financial year end the proportion of revenue recognised in the year reflects an assessment of the fair value of services provided to the reporting date. Gifts in kind and donated services are recorded at the value to the charity at the date of receipt. No amount has been included in the financial statements for services donated by volunteers. Income from BIP membership is recognised when invoiced.

Gift Aid receivable is included in income when the donation is made and where there is a valid Gift Aid declaration from the donor.

Expenditure

All expenditure is accounted for on an accruals basis and has been included under expense categories that aggregate all costs for allocation to activities. Where costs cannot be directly attributed to particular activities they have been allocated on a basis consistent with the use of the resources. Overheads have been allocated on the basis of employee costs (head count).

At the year-end, employee emoluments include paid annual leave where this has not been taken at the rate of pay applicable at that date. Termination benefits are accounted for on an accruals basis.

Fundraising costs are those incurred in seeking voluntary contributions and do not include the costs of disseminating information in support of the charitable activities. Support costs are those costs incurred directly in support of expenditure on the objects of the company and include general management, payroll, administration, budgeting, and accounting, technology, and human resources.

Foreign currency

Foreign currency transactions are translated at the rate applicable on the transaction date. Foreign currency balances are translated at the exchange rate prevailing at the balance sheet date. Gains and losses on translation are included in the SOFA.

Tangible fixed assets

Tangible fixed assets are stated at cost net of depreciation. All fixed assets costing more than £1,000 are capitalised. Depreciation is provided on equipment and fixtures over three years straight line.

Pension costs

The charity provides a defined contribution scheme, which is available to all employees. The funds are independently held from those of the charity. The pension costs comprise the costs of the charity's contribution to its employees' pension schemes.

Taxation

The charity falls with the meaning of Part 1, Schedule 6 of the Finance Act 2010. Accordingly, the charity is potentially exempt from taxation in respect of income or capital gains within categories covered by Chapter 3 of Part 11 of the Corporation Tax Act 2010 or Section 256 of the Taxation of Chargeable Gains Act 1992, to the extent that such income or gains are applied exclusively to charitable purposes. No tax charges arose in the period.

Irrecoverable VAT is not separately analysed and is charged to the SOFA when the expenditure to which it relates is incurred, and is allocated as part of the expenditure to which it relates.

Financial instruments

The charity has financial assets and liabilities of a kind that qualify as basic financial instruments. Financial assets comprise cash at bank and in hand, trade and other debtors. Financial liabilities include trade and other creditors. Basic financial instruments are recognised at transaction value. Details of these financial assets and liabilities and their carrying value are given in the notes to the accounts.

Funds

Restricted funds are funds that are to be used in accordance with specific restrictions imposed by donors. The cost of raising and administering such funds are charged against the specific fund. The aim and use of each restricted fund is set out in the notes to the financial statements.

General reserves are unrestricted funds which are available for use at the discretion of the Trustees in furtherance of the general objectives of the charity and which have not been designated for other purposes.

2. Donation Income

	Restricted Funds 2021/22	Unrestricted Funds 2021/22	Total Funds 2021/22	Restricted Funds 2020/21	Unrestricted Funds 2020/21	Total Funds 2020/21
	£'000	£'000	£'000	£'000	£'000	£'000
Grants	-	13	13	-	13	13
Donations	-	45	45	-	49	49
Total	-	58	58	-	62	62

Unrestricted grants include funding from the following trusts and foundations:-

Ajahma Charitable Trust	£Nil	(2020/21: £9,600)
Luminate Foundation	£5,559	(2020/21 Nil)
PF Charitable Trust	£3,500	(2020/21: £2,500)
Tinsley Charitable Trust	£2,500	(2020/21: £1,000)
Marsh Trust	£500	

3. Income from Charitable Activities

	Restricted Funds 2021/22	Unrestricted Funds 2021/22	Total Funds 2021/22	Restricted Funds 2020/21	Unrestricted Funds 2020/21	Total Funds 2020/21
	£'000	£'000	£'000	£'000	£'000	£'000
Grants receivable (Note 4)	3,573	50	3,623	2,631	-	2,631
Business Integrity:						
- Bronze Membership	-	162	162	-	144	144
- Gold Membership	-	240	240	-	260	260
- Standalone Benchmark	-	37	37	-	13	13
- Thought Leadership & other income	-	133	133	-	211	211
Total	3,573	622	4,195	2,631	628	3,259

A list of Business Integrity Forum members is found on page 65.

The unrestricted Thought Leadership income includes donations from GlaxoSmithKline £40,000 (2020/21: £40,000) and Commonwealth Development Corporation (British International Investment), £80,000 (2020/21: Nil).

4. Grants Receivable

	Notes	Total Funds 2021/22 £'000	Total Funds 2020/21 £'000
UK			
Fairness Foundation		5	-
Foreign, Commonwealth & Development Office – I-ACT tracking Summit Commitments		-	208
Joffe Charitable Trust		-	30
Luminate: The Omidyar Group		149	280

	Notes	Total Funds 2021/22 £'000	Total Funds 2020/21 £'000
Open Society Foundations		463	-
David and Elaine Potter Foundation (unrestricted- designated for UK programme)		50	-
Julia & Hans Rausing Trust		200	243
Sigrid Rausing Trust		150	-
Joseph Rowntree Charitable Trust		30	50
University of Sussex		2	-
TI Secretariat (International Anti-Corruption Conference Commitments)		-	5
Trust for London		40	12
	14	1,089	828
International: Defence & Security			
The Beale Trust		2	-
Carnegie Corporation		-	115
Foreign, Commonwealth & Development Office – I-ACT		-	813
Netherlands Ministry of Foreign Affairs		1,465	67
NATO		6	-
United Nations Office for Project Services (UNOPS)		6	-
	14	1,479	995
International: Global Health			
Foreign, Commonwealth & Development Office – FAST – Open Contracting for Health		70	652
GlaxoSmithKline		90	90
Open Society Foundations COVID-19 procurement		14	66
Open Society Foundations Equitable Access		313	-
Swedish Ministry of Foreign Affairs		568	-
	14	1,055	808
Total	14	3,623	2,631

5. Charitable Activities Expenditure

	Total Funds 2021/22	Total Funds 2020/21
	£000	£000
Direct charitable costs	463	904
Employee costs (see note 10)	1,791	2,484
Grants payable (see note 6)	550	501
Support costs (see note 7)	181	82
Total	2,985	3,971

6. Charitable Expenditure: Grants Payable

	Total Grants 2021/22	Total Grants 2020/21
	£000	£000
Association CRI 2002 Mali (TI Chapter)	12	17
CISLAC Nigeria (TI Chapter)	12	29
Corruption Watch South Africa (TI Chapter)	-	64
Ghana Integrity Initiative (TI Chapter)	-	10
Institute for Democracy and Mediation	-	6
Intelligent Sanctuary	141	-
I-Watch Tunisia (TI Chapter)	11	26
Kings College London	5	-
Lebanese Transparency Association (TI Chapter)	-	37
NAKO Ukraine	-	53
Open Contracting Partnership	59	5
Open Democracy	10	-
Publish What You Pay	-	6
RISE Moldova	-	5
Spotlight on Corruption	25	-
Transparency International Bangladesh	40	-
Transparency International Chile	-	34
Transparency International Jordan	-	11
Transparency International Kenya	-	35
Transparency International Nepal	6	24
Transparency International Niger	11	-
Transparency International Sri Lanka	-	2
Transparency International Uganda	-	63
Transparency International Sweden	109	-
Transparency International Uganda	68	-

	Total Grants 2021/22	Total Grants 2020/21
	£000	£000
Transparency International Ukraine	-	15
Transparency International Zambia	41	59
Total	550	501

7. Charitable Activities Expenditure: Support Costs

	Charitable Activities 2021/22	Fundraising 2021/22	Total 2021/22	Charitable Activities 2020/21	Fundraising 2020/21	Total 2020/21
	£'000	£'000	£'000	£'000	£'000	£'000
Governance	15	-	15	7	-	7
Employee & consultancy	127	-	127	56	-	56
Other	39	-	39	19	-	19
Total	181	-	181	82	-	82

Support costs have been allocated as above based on the proportion of employee time spent on each activity. Due to the way in which the teams work, it is not possible to split support costs between grants payable and direct charitable costs. The increase in support costs in 2021/22 is due to the temporary gap in funding for the Defence & Security programme that limited our ability to charge costs directly to restricted grants.

8. Net Income / (Expenditure)

This is stated after charging:

	2021/22	2020/21
	£000	£000
Depreciation	7	12
Auditor's remuneration – audit services	12	9
Auditor's remuneration – audit services	2	-
Pension costs	73	90

9. Board of Trustee Remuneration, Expenses & Donations

No Trustees received remuneration or benefits in kind during 2021/22 (2020/21: Nil). No travel or other expenses were paid/reimbursed (2020/21 Nil).

The cost incurred by the charity for Trustee indemnity insurance was £2,128 (2020/21: £2,177).

During the year four Trustees (2020/21: two Trustees) donated, in aggregate, £1,900 (2020/21: £1,370) to the charity.

10. Employee Numbers and Emoluments

The average number of employees during the year was:

	2021/22	2020/21
	£000	£000
Charitable activities	26	37
Fundraising	2	3
Support	9	10
Total	37	50

Employee emoluments were as follows:

	2021/22	2020/21
	£000	£000
Wages and salaries	1,544	2,161
Social security costs	174	233
Pension costs	73	90
Total	1,791	2,484

The total amount of benefits received by key management personnel includes gross salaries and employer pension contributions, was:

	2021/22	2020/21
	£000	£000
Chief Executive	117	113
Chief Operating Officer	93	94
Director of Policy & Programmes (part-time during 2021/22)	77	79
Director of Strategic Partnerships (maternity leave during 2021/22)	64	81
Director of Development, Communications & Impact	72	70
Total including gross salaries, employer pension contributions	423	437
Total including gross salaries, employer pension contributions and employer National Insurance contributions.	472	490

Number of employees who earned from:	2021/22	2020/21
£60,001 – £70,000	2	2
£70,001 – £80,000	2	2
£80,001 – £90,000	1	2
£100,001 – £110,000	1	1
	6	7

The remuneration above includes gross salaries only. Total pension contributions in 2021/22 for these employees amounted to £19,541 (2020/21: £25,307).

No employees received employee benefits (excluding employer pension costs) of more than £60,000. No termination payments were made (2020/21: one payment of £11,919).

The lowest paid employee, with the exception of interns who are paid the London Living Wage, was paid an annual equivalent gross salary of £26,574 per annum (2020/21: £26,442 per annum). The highest paid employee received 4.24 times (2020/21: 4.14 times) the salary of the lowest paid employee.

11. Tangible Fixed Assets

	Equipment & Fitting £000
Cost	
At 1 April 2021	63
Additions	2
Disposals	-
At 31 March 2022	65
Depreciation	
At 1 April 2021	56
Charge for year	7
Depreciation on disposals	-
At 31 March 2022	63
Net book value	
At 31 March 2022	2
At 31 March 2021	7

12. Debtors

	2021/22 £000	2020/21 £000
Trade debtors	259	127
Prepayments	5	46
Accrued income	126	296
Rent deposit	-	43
Total	390	512

13. Creditors

	2021/22	2020/21
	£000	£000
Trade creditors	101	81
Accruals	521	156
Social security and other taxes	89	114
Other creditors	1	13
Total	712	364

14. Total Funds

2021/2022	Brought forward	Income	Expenditure	Carried forward
	£000	£000	£000	£000
Restricted & Designated income funds				
UK	693	1,089	(830)	952
International: Defence & Security	129	1,479	(704)	904
International: Global Health	9	1,055	(812)	252
	831	3,623	(2,346)	2,108
Unrestricted funds	829	630	(733)	726
Total funds	1,660	4,253	(3,079)	2,834

2020/2021	Brought forward	Income	Expenditure	Carried forward
	£000	£000	£000	£000
Restricted income funds				
UK	836	828	(971)	693
International: Defence & Security	1,073	995	(1,939)	129
International: Global Health	2	808	(801)	9
	1,911	2,631	(3,711)	831
Unrestricted funds	443	690	(304)	829
Total funds	2,354	3,321	(4,017)	1,660

Restricted funds are held for the following purposes:

The UK Programme funds aim to challenge Britain's role in facilitating global corruption, the need to safeguard public services, politics and the private sector in the UK against corruption.

The funds are for projects that include:

- Stopping the flow of Dirty Money: a programme of research and advocacy seeking to address where corrupt wealth is laundered into the UK economy and financial system. Ensuring that illicit assets are recovered by law enforcement agencies both in the UK and territories where it has influence.
- Securing Integrity in Politics: putting integrity and accountability into the heart of UK politics with evidence-based policy solutions to remove the corrupting influence of big money, campaign financing, lobbying or the use of the 'revolving door'.
- Protecting the public's resources: ensuring best practice in access to information, managing conflicts of interest and open public contracting.

Unrestricted designated funding is utilised to match funding on expenditure within the programme (2021/22 £50,000 (2020/21: Nil)).

The Defence & Security International Programme aims to reduce corruption risks in the global defence and security sector by conducting research and by influencing policy recognizing that it is a factor contributing to conflict, insecurity and crises. It seeks to improve the integrity of private sector defence and security actors. Funding allowed the production of global indices (Government Defence Integrity Index and Defence Companies Index on Anti-Corruption and Corporate Transparency).

The Global Health International Programme aims to ensure effective, accountable and transparent health systems which leave no room for corruption and which deliver Universal Health Coverage. The programme focuses on research and development, procurement and service delivery. Restricted funding relates to ensuring transparency in national COVID-19 vaccine rollouts in selected countries and Open Contracting for Health to improve transparency in health sector procurement.

Restricted & Designated funds detail

2021/2022	Brought forward	Income	Expenditure	Carried forward
	£000	£000	£000	£000
Ajahma Charitable Trust	230	-	-	230
Fairness Foundation	-	5	(5)	-
Joffe Charitable Trust	30	-	(26)	4
Luminate: The Omidyar Group	245	149	(206)	188
Open Society Foundations	-	463	(251)	212
David and Elaine Potter Foundation (unrestricted- designated for UK programme)	-	50	(50)	-
Julia & Hans Rausing Trust	182	200	(232)	150
Sigrud Rausing Trust	-	150	(10)	140
Joseph Rowntree Charitable Trust	6	30	(23)	13
University of Sussex	-	2	-	2
Trust for London	-	40	(27)	13
UK Programme	693	1,089	(830)	952

The Beale Trust	-	2	(2)	-
Carnegie Corporation	129	-	(129)	-
Netherlands Ministry of Foreign Affairs (2017-21 Grant)	-	121	(121)	-
Netherlands Ministry of Foreign Affairs (2022-26 Grant)	-	1,344	(440)	904
NATO	-	6	(6)	-
United Nations Office for Project Services (UNOPS)	-	6	(6)	-
International: Defence & Security Programme	129	1,479	(704)	904
Foreign, Commonwealth & Development Office - FAST – Open Contracting for Health	-	70	(70)	-
GlaxoSmithKline	-	91	(45)	46
Open Society Foundations COVID-19 procurement	8	14	(22)	-
Open Society Foundations Equitable Access	-	312	(106)	206
Swedish Ministry of Foreign Affairs (2021 Grant)	-	468	(468)	-
Swedish Ministry of Foreign Affairs (2022 Grant)	-	100	(100)	-
Other	1	-	(1)	-
International: Global Health Programme	9	1,055	(812)	252
Total	831	3,623	(2,346)	2,108

15. Analysis of Net Assets Between Funds

	Restricted Funds 2021/22	Unrestricted Funds 2021/22	Total Funds 2021/22	Restricted Funds 2020/21	Unrestricted Funds 2020/21	Total Funds 2020/21
	£'000	£'000	£'000	£'000	£'000	£'000
Fixed assets	-	2	2	-	7	7
Current assets	2,108	1,436	3,544	831	1,186	2,017
Creditors due within one year	-	(712)	(712)	-	(364)	(364)
Total	2,108	726	2,834	831	829	1,660

16. Related Party Transactions

In 2021/22 there were no related party transactions (2020/21: £Nil).

There was no debtor balance at the year-end (2020/21: £Nil).

We would like to thank:

Our **donors and funders** including: the UK Foreign, Commonwealth and Development Office, the Netherlands Ministry of Foreign Affairs, the Swedish Ministry of Foreign Affairs, UNOPS, Carnegie Corporation of New York, GlaxoSmithKline, Fairness Foundation, Julia and Hans Rausing Trust, Joffe Charitable Trust, Joseph Rowntree Charitable Trust, Luminare, Open Society Foundations, Marsh Charitable Trust, PF Charitable Trust, David and Elaine Potter Foundation, Sigrid Rausing Trust, Tinsley Charitable Trust, Trust for London, Jane Thurnell-Read, University of Sussex and individual supporters and those who request anonymity.

Our **Business Integrity Forum members** at 31 March 2022: ABRDN, Anglo American, Barclays, BHP Group, Brunel, CDC (British International Investment), Clifford Chance, Control Risk Group, Crown Agents, DLA Piper, FTI Consulting, Genel Energy, GlaxoSmithKline, Grant Thornton UK, HSBC, IHG, LexisNexis, Lloyds Bank, Meggitt, National Grid, Natwest, New Age (African Global Energy), Norton Rose Fulbright, Orange UK, Oxford University Press, PwC, RB Group, RBS, RPC, Santander, Shell International, Siemens, Subsea 7, Tullow Oil, Unilever and Vodafone Group.

We thank: CDC (British International Investment) and GlaxoSmithKline for their contribution to the Thought Leadership programme, and Huawei, Johnson & Johnson and Stora Enso for their participation in the Standalone Benchmark programme.

Our **Advisory Council members:** David Nussbaum, President, Edward Bickham, Laurence Cockcroft, Jane Ellison, Phil Mason, Baroness Sugg and Lord Wills. Peter Berry CMG stepped down as President during the year and we express our appreciation for his significant contribution to TI-UK since its founding in 1993. We also recognise with appreciation Lord Chidgey who sadly passed away. Karina Litvak stepped down after ten years and we thank her for all the contributions she made.

Statutory Information

Transparency International – UK (a company limited by guarantee)

Registered Address:

10 Queen Street Place, London EC4R 1AG

Registered Charity Number: 1112842

Registered Company Number: 02903386

External advisors

Auditors:

Haysmacintyre LLP

10 Queen Street Place, London, EC4R 1AG

Bankers:

HSBC Plc

PO Box 41, High Street, Uxbridge, Middlesex, UX8 1BY

Solicitors:

Bates Wells

10 Queen Street, London, EC4R 1BE

Clifford Chance

10 Upper Bank Street, London, E14 5JJ

Senior Leadership Team (July 2022)

Daniel Bruce: *Chief Executive*

Colin Munro: *Chief Operating Officer / Company Secretary*

Sara Bandali: *Director of International Engagement*

Duncan Hames: *Director of Policy & Programmes*

Naomi Neiland: *Director of Development, Communications & Impact*

Sophie Ogilvy: *Director of Strategic Partnerships*



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