

### **GUARANTEE THAT WHISTLEBLOWERS CAN REPORT CORRUPTION ANONYMOUSLY**

#### **Anonymity**

Article 33 and 32 of UNCAC, which requires that states consider laws to protect those who report corruption and prevent them from potential retaliation or intimidation. The only way to implement adequate whistleblower protection is to ensure that the person or entity being investigated never knows who the whistleblower is.

### **PROVIDE WHISTLEBLOWERS WHOSE CLAIMS RESULT IN A SUCCESSFUL SANCTION WITH MONETARY REWARDS CONSISTING OF 10-30% OF THE SANCTION LEVIED.**

#### **Compensation**

Article 37 of UNCAC requires States Parties to encourage persons who have participated in the commission of an offense to supply information. Financially incentivizing those who participate/ witness corruption to blow the whistle is the best way to do this. It is also the proven most effective way to increase whistleblowing across the board, as it eliminates the financial risk of whistleblowing.

### **QUICKLY AND EFFECTIVELY PUNISH/SANCTION GUILTY PERSONS/ ENTITIES BASED ON WHISTLEBLOWER CLAIMS, COLLABORATING BETWEEN AGENCIES AND INTERNATIONALLY.**

#### **Enforcement**

Effective enforcement requires inter-agency collaboration domestically and inter-state cooperation internationally. When tips result in successful enforcement, the anti-corruption and deterrent potential of the program are maximized.

### **Money Laundering**

Article 14 of UNCAC is strictly dedicated to “Measures to Prevent Money-Laundering.” Given UNCAC’s dedication to fighting money-laundering, it is pertinent that States Parties recognize the crucial role of best-practice whistleblower programs devoted to Anti Money-Launder (AML) and advocate for expanded use of AML Whistleblower programs with transnational application.

### **Climate Crimes**

Best practice whistleblower programs help to stop climate crimes, from bribery in extractive industries, to ESG fraud, to wildlife trafficking.

As Civil Society urges further recognition and response towards the intersection of corruption and environmental crime, it is important to understand how whistleblowers can and do defend against this.

### **WHISTLEBLOWER REWARDS CONSTITUTE BEST PRACTICE**

#### **OECD PHASE 4 AUDIT ON IMPLEMENTATION OF THE ANTI-BRIBERY CONVENTION**

“The Dodd-Frank Act’s multi-faceted protections . . . Constitute[s] a good practice given that they provide powerful incentives for qualified whistleblowers to report foreign bribery allegations against issuers.”

#### **US STRATEGY ON COUNTERING CORRUPTION, OBJECTIVE 3.1**

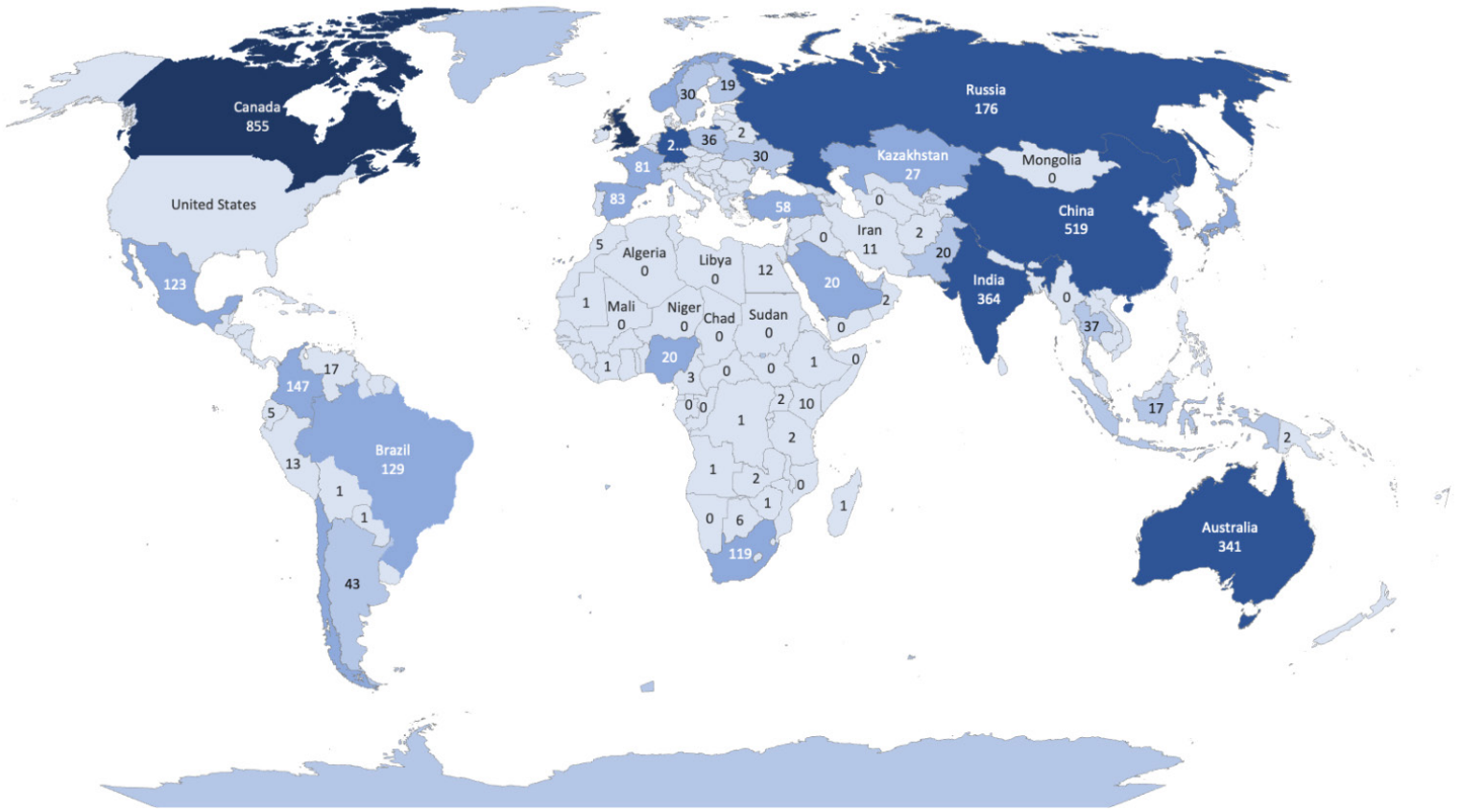
“The United States will implement newly established tools for investigating and prosecuting money laundering offenses [including] . . . financial rewards to incentivize reporting on Bank Secrecy Act.”

#### **FURTHER RESOURCES:**

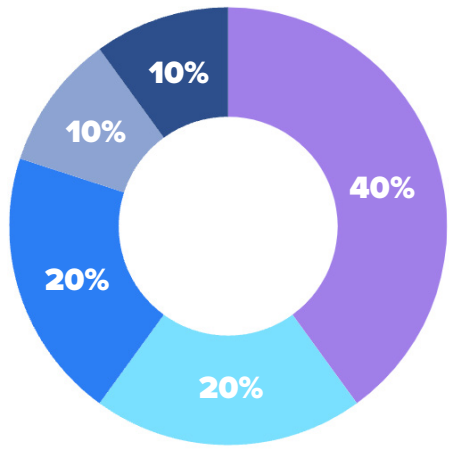
“The Importance of Rewards,” NWC, [whistleblowers.org/the-importance-of-rewards/](https://whistleblowers.org/the-importance-of-rewards/)

Why Rewards Work,” The Whistleblower Law Library, [kcc.com/law-library/conclusion/](https://kcc.com/law-library/conclusion/)

### SEC DODD FRANK WHISTLEBLOWER REWARD CLAIMS 2012-2021 (NON-US)



**TOP 5 COUNTRIES:** Canada – 855 | UK – 774 | China – 519 | India – 364 | Australia – 341



### GUARANTEE THAT WHISTLEBLOWERS CAN REPORT CORRUPTION ANONYMOUSLY

- Direct Whistleblowers
- Media/Reports
- NGOs/International Law Enforcement
- Other U.S. Federal Agencies
- Corporate Self Report

MAP DATA SOURCE: SEC Annual Reports to Congress on Dodd-Frank Whistleblower Program – [sec.gov/files/2023\\_ow\\_ar.pdf](https://sec.gov/files/2023_ow_ar.pdf)