BASEL INSTITUTE ON GOVERNANCE

Mainstreaming Collective Action
Tracking its emergence as a norm in the ASEAN region and South Africa

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About this report

This report tracks the emergence of anti-corruption Collective Action as a norm, with a specific focus on the ASEAN region and South Africa. Building on the Basel Institute's 2020 study "Mainstreaming Collective Action: Establishing a baseline", it reviews national anti-corruption strategies (NACS) or equivalent frameworks, including relevant government statements. The report finds a clear shift towards greater recognition and government engagement, with seven countries (58 percent) referring to Collective Action or multi-stakeholder cooperation in national strategies or government frameworks, and nine (75 percent) having at least one documented public-sector Collective Action initiative. The findings identify common focus areas across the countries reviewed, including business integrity and corporate compliance, whole-of-society engagement, digitalisation and emerging corruption risks, and shared integrity standards and supply chains. These provide a basis for identifying Collective Action opportunities.

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Executive summary

This report continues the work of the Basel Institute on Governance to track the mainstreaming of anti-corruption Collective Action towards becoming a recognised national, regional and international norm. It builds on the Basel Institute's 2020 study, "Mainstreaming Collective Action: Establishing a Baseline", which found that only 17 of 78 national anti-corruption strategies (NACS) reviewed globally endorsed Collective Action at the time. Moving from a global baseline to a regional and country-level analysis, this report examines the ASEAN region and South Africa, selected for their growing economic importance, strong links to international trade and investment, and diverse but increasingly interconnected business environments.

The analysis examines the extent to which Collective Action has progressed from awareness and recognition towards endorsement and practice across the 12 priority countries, and what this reveals about its emergence as an anti-corruption norm. It draws on the most recent publicly available NACS, policy documents, equivalent frameworks and government statements adopted since 2020, as well as documented Collective Action initiatives.

The findings point to a clear shift towards greater policy recognition and government engagement. Seven of the 12 countries now have a current NACS or equivalent framework, up from three in the 2020 baseline, while three more are currently developing one. The number of countries referring to Collective Action or multi-stakeholder cooperation in a NACS, framework or government document has also increased from three to seven (58 percent). Four of these (Indonesia, Malaysia, Thailand and South Africa) specifically mention Collective Action in their strategies.

Across these documents, collaboration with non-state actors is increasingly framed as a shared responsibility of government, business, civil society and the wider public. However, these references primarily express policy intentions, rather than demonstrating implementation. This is where Collective Action can play an important role in bridging the gap between policy endorsement and practical action.

Government engagement is also increasingly visible in practice. Nine of the 12 countries (75 percent) have at least one documented Collective Action initiative involving the public sector as a partner, as captured on the B20 Collective Action Hub. This points to growing government interest in Collective Action and an emerging role for public sector actors in supporting and participating in such initiatives across the countries reviewed.

The analysis identifies four common themes where national commitments and Collective Action initiatives meet: business integrity and corporate compliance; whole-of-society engagement, trust and protection; digitalisation and emerging corruption risks; and shared integrity standards and supply chains of small and medium-sized enterprises (SMEs).

Case studies illustrate how Collective Action can translate national policy commitments into implementation across these themes and highlights the following opportunities to apply and advance Collective Action:

1. **Turn commitments into practice**: Use the implementation of national anti-corruption strategies as an entry point for Collective Action, linking initiatives such as certification, business pledges and Integrity Pacts to procurement eligibility and other incentives.
2. **Build shared infrastructure**: Develop collaborative platforms, common integrity standards for SMEs, and shared data and digital tools that enable stakeholders to work towards common objectives.
3. **Build and leverage trust**: Strengthen confidence between government, business and civil society, including through whistleblower protection, and create opportunities for business to contribute to national and regional policy platforms.
4. **Contextualise design and measure progress**: Tailor initiatives to local contexts and develop indicators that capture uptake and impact at country, regional and global levels.

These opportunities can be pursued individually or in combination, building on existing national strategy action plans, procurement frameworks and regional work plans.

The most immediate opportunity lies with governments explicitly identifying Collective Action as a means of delivering specific national strategy commitments, which gives business a clear entry point for engagement. Business can respond by demonstrating how shared standards, platforms and incentives translate these commitments into action, strengthen accountability and contribute to a healthier business ecosystem.

In this way, Collective Action can move beyond isolated initiatives towards becoming an established and sustainable means of preventing corruption.

Acronyms and abbreviations

AML	Anti-money laundering
ACB	Anti-Corruption Bureau (Brunei Darussalam)
ACCC	Anti-Corruption Cooperation Committee (Thailand)
ACU	Anti-Corruption Unit (Cambodia)
ASEAN	Association of Southeast Asian Nations
ASEAN-PAC	ASEAN Parties Against Corruption
B20	Business 20
BPKP	Finance and Development Supervisory Agency (Indonesia)
CIPE	Center for International Private Enterprise
CISM	Corporate Integrity System Malaysia
CPIB	Corrupt Practices Investigation Bureau (Singapore)
EC4B	Ethics Coalition for Business (South Africa)
G20	Group of Twenty
IICD	Indonesian Institute for Corporate Directorship
IIM	Malaysian Institute of Integrity
ISO	International Organization for Standardization
JAGA	*Jaringan Pencegahan Korupsi* (corruption prevention application in Indonesia)
KAKI	*Koalisi Anti-Korupsi Indonesia* (Indonesia Collective Action Coalition Against Corruption)
KPI	Key Performance Indicator
KPK	*Komisi Pemberantasan Korupsi* (Corruption Eradication Commission, Indonesia)
MACC	Malaysian Anti-Corruption Commission
MACN	Maritime Anti-Corruption Network

MCP	Monitoring Center for Prevention (Indonesia)
NACAC	National Anti-Corruption Advisory Council (South Africa)
NACC	National Anti-Corruption Commission (Thailand)
NACS	National anti-corruption strategy
OECD	Organisation for Economic Co-operation and Development
SADC	Southern African Development Community
SC	Securities Commission Malaysia
SME	Small and medium-sized enterprise
SSM	Companies Commission of Malaysia
THAI CAC	Thai Private Sector Collective Action Against Corruption
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
VBII	Vietnam Business Integrity Index
VCCI	Vietnam Chamber of Commerce and Industry

1 Tracking Collective Action uptake

1.1 Mainstreaming Collective Action: from the 2020 global baseline to the current status

In 2008, the World Bank Institute defined Collective Action as "a collaborative and sustained process of cooperation between stakeholders".[1] Collective Action has since continued to evolve into diverse forms across industry sectors and regions, involving different combinations of stakeholders to address shared challenges and generate impact at sectoral, country and regional levels. This evolution has not been linear, reflecting the diverse contexts in which Collective Action is applied, but it has increasingly established Collective Action as a recognised mechanism in anti-corruption efforts.

Capturing the extent to which Collective Action has become an established approach within diverse business ecosystems requires looking beyond the number of Collective Action initiatives and examine how these initiatives and the approach itself are integrated into anti-corruption policies and the public sector.

The Basel Institute's 2020 study "Mainstreaming Collective Action: Establishing a baseline" (Aiolfi et al. 2020) provides a starting point for assessing how Collective Action and private-sector engagement are reflected in national anti-corruption strategies or equivalent frameworks. Subsequent policy developments, including the 2021 Anti-Bribery Recommendation of the OECD's Working Group on Bribery in International Business Transactions (OECD 2021) and the OECD report *Advancing Business Integrity through Collective Action: A Blueprint for Government Support* (OECD 2025) provide further reference points and strengthen the role of governments in facilitating collaboration between public and private sector actors.

Building on the 2020 baseline study, this report examines developments in Southeast Asia, specifically Association of Southeast Asian Nations (ASEAN) member states (Brunei Darussalam, Cambodia, Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand, Timor-Leste and Vietnam) and South Africa. Across these 12 priority countries, it assesses the uptake of Collective Action through four interconnected stages: awareness, recognition, endorsement and practice.

[1] World Bank Institute definition (2008:4): "Collective action is a collaborative and sustained process of cooperation between stakeholders. It increases the impact and credibility of individual action, brings vulnerable individual players into an alliance of like-minded organizations and levels the playing field between competitors. Collective action can complement or temporarily substitute for and strengthen weak local laws and anti-corruption practices."

As Figure 1 below shows, the uptake of Collective Action as a norm is a progressive process. It starts with raising awareness and recognising the relevance of anti-corruption Collective Action, and moves on to endorsing it in policy and integrating it into practice.



Figure 1: The pathway towards Collective Action as a norm.
Source: Adapted from the study "Mainstreaming Collective Action: Establishing a baseline" (Aiolfi et al. 2020).

The report considers whether Collective Action has progressed across these four stages since the 2020 baseline study. It focuses on how governments endorse Collective Action through policies, strategies and institutional initiatives, which distinguishes general awareness from policy commitments and evidence of implementation. This helps to identify progress, gaps and opportunities to strengthen the mainstreaming of Collective Action.

1.2 From a global to a regional and country-level analysis: ASEAN and South Africa

The global 2020 analysis provides an important baseline for understanding the broader evolution of mainstreaming Collective Action. This report takes a more granular regional and country-focused approach, allowing for a closer examination of the context, drivers and forms of Collective Action uptake.

ASEAN and South Africa have been selected based on programmatic alignment of the Basel Institute, in addition to their growing economic importance, their strong links to international trade and investment, and diverse but increasingly interconnected business environments.

ASEAN is a dynamic centre of production, innovation and growing economic opportunity, (Singh and Adam/World Economic Forum 2026), a trend which is also reflected in the Asian Development Bank's forecast of 5.0 percent growth for the region in 2026 (ADB 2026).

The strength of investment interests in the region is specifically driven by its evolving manufacturing infrastructure as well as its digital and electronic market innovation, which expose companies to shared integrity risks across borders.

In addition to the ASEAN countries, the report also looks at South Africa. Although the country accounts for only a small share of global economic output, it has one of the most diversified economies on the African continent, with Africa's largest stock exchange and trade and

logistics networks that link regional and international markets, making it a key economic player in the region.

In 2025, South Africa held the G20 Presidency, highlighting its growing role in shaping global responses to shared challenges, including corruption. Under its presidency, the Anti-Corruption Working Group emphasised the inclusive participation of the public sector, private sector, civil society and academia in preventing and combating corruption. This builds on Indonesia's G20 Presidency in 2022, which also placed anti-corruption high on the agenda. As countries that have both held the G20 Presidency, South Africa and Indonesia offer a useful link between the global and regional dimensions of Collective Action examined in this report.

ASEAN offers a regional perspective across diverse but closely connected economies, while South Africa provides a complementary country-level perspective in a substantially different regional, political and economic context. Looking across both makes it possible to identify common patterns, differences and opportunities for strengthening Collective Action uptake.

An initial comparative review of the priority countries, drawing on existing data from the Basel-led B20 Collective Action Hub, confirmed these 12 countries as particularly relevant for further assessing the mainstreaming of Collective Action.

Since 2024, the Basel Institute has tracked government engagement in Collective Action through the B20 Collective Action Key Performance Indicator (KPI) [2], which covers 93 countries, including G20 members, all European Union member countries and members of the African Union. The KPI results provide a useful benchmark against which we have assessed the countries selected for this report, using the same methodology.

The B20 Collective Action KPI recorded government engagement – i.e. involvement of government in at least one ongoing Collective Action initiative – in 56 percent of the covered countries in its latest reported figures for 2026. The figure for the 12 priority countries in this report is 19 percentage points higher: a total of nine countries[3] (or 75 percent) have at least one documented Collective Action initiative involving the public sector as a partner. This suggests a comparatively high level of documented public-sector engagement in the selected countries.

1.3 Approach to assessing Collective Action uptake

To assess the status of anti-corruption Collective Action within the identified priority countries, the study applies a qualitative, evidence-based review of Collective Action integration across ASEAN and South Africa, building on the existing 2020 baseline. A desktop review of the latest

[2] "B20 Collective Action Key Performance Indicator: From recommendation to measurable impact": The KPI measures whether at least one Collective Action initiative with government involvement is present (i.e. documented on the B20 Collective Action Hub) in the assessed countries. See: https://b20-dev.baselgovernance.org/explore/b20-g20.

[3] Namely Brunei Darussalam, Indonesia, Malaysia, Myanmar, the Philippines, Singapore, Thailand, Vietnam and South Africa.

accessible NACS, legislative and policy updates, relevant government statements and international publications, including the OECD Anti-Bribery Recommendation (2021) and the OECD Report on *Advancing Business Integrity through Collective Action* (2025), website content of the Global Civil Society Coalition for the UNCAC and source data including from the Basel Institute's B20 Collective Action Hub supported the content development for this report.

The B20 Collective Action Hub records over 350 initiatives worldwide and was the main platform used to assess whether commitments identified in policy documents were reflected in active initiatives as per the case studies presented.

The review examined references to Collective Action in publicly available national anti-corruption strategies (NACS), legislation, policy updates and government statements. The authors coded relevant passages and developed themes inductively, with AI-assisted sorting applied (ChatGPT powered by GPT-6) to organise statements under these themes and flag potentially overlooked passages. All classifications were checked against the original sources, and unsupported classifications were removed. Only publicly available documents were entered into the tool.

2 Collective Action trends in ASEAN and South Africa

2.1 An evolving Collective Action ecosystem

Following the 2020 baseline assessment (Aiolfi et al. 2020), this section examines how Collective Action has evolved across the 12 priority countries in ASEAN and South Africa. To allow for comparison with the baseline, the analysis applies the same two questions to assess the extent to which Collective Action is embedded in national anti-corruption frameworks:

- Question 1: Does the country have a current national anti-corruption strategy (NACS) or equivalent framework?
- Question 2: Does that strategy or framework explicitly recognise or endorse Collective Action as an approach to preventing and combating corruption?

Question 1: Does the country have a current national anti-corruption strategy (NACS) or equivalent framework?

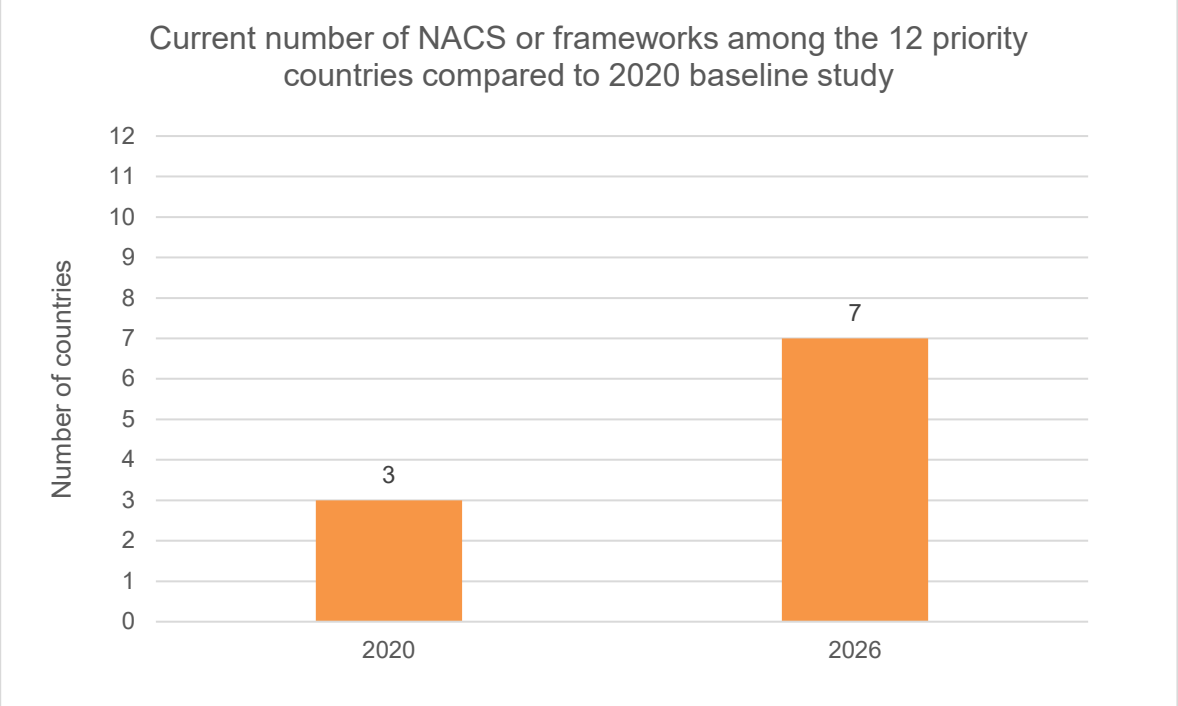


Figure 2: National anti-corruption strategies or equivalent frameworks: 2020 and 2026.
Source: Aiolfi et al. (2020) and authors' analysis (Annex 2).

As seen in Figure 2 above, the comparison between the 2020 baseline and the 2026 assessment indicates an increase in the number of selected countries with a current national anti-corruption strategy (NACS) or equivalent framework, from three to seven out of 12. These countries are Cambodia, Indonesia, Malaysia, Myanmar, Thailand, Vietnam and South Africa.

Brunei Darussalam and Singapore do not have a national strategy but rely on legislative anti-corruption frameworks. For Myanmar, the assessment draws on government statements, as strategy texts were not reviewed. Lao PDR, the Philippines and Timor-Leste are developing their respective strategies.

This expansion suggests a growing institutional focus on addressing corruption in the priority countries and provides a broader entry point for mainstreaming Collective Action in future strategy development and updates.

Question 2: Does that strategy, or equivalent national framework or legislation, endorse Collective Action?

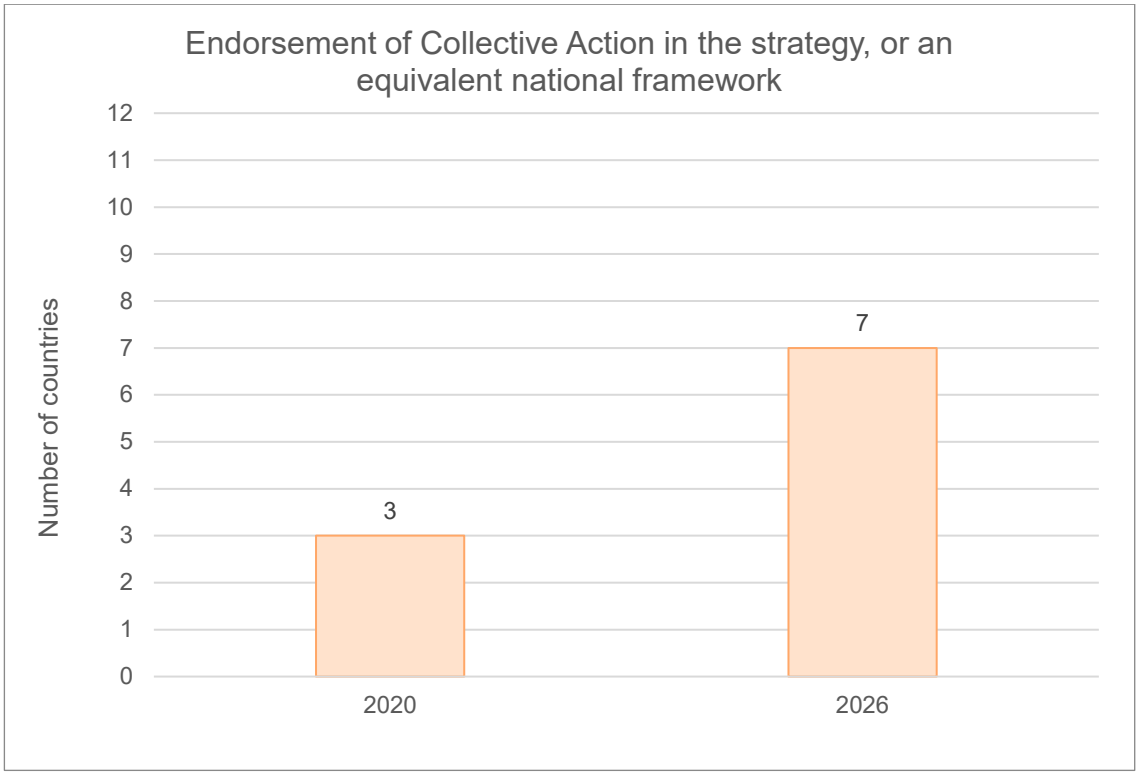


Figure 3: Collective Action endorsement in strategy, or equivalent national framework: 2020 and 2026.
Source: Aiolfi et al. (2020) and authors' analysis (Annex 2).

As shown in Figure 3 above, Collective Action is increasingly recognised within the assessed frameworks. The number of countries taking a Collective Action approach as part of a NACS, framework or government document equally increased from three to seven (58 percent). Four of the seven countries – Indonesia, Malaysia, Thailand and South Africa – specifically mention Collective Action within their national anti-corruption strategies.

Malaysia's National Anti-Corruption Strategy 2024–2028 calls for "whole-of-society mobilisation" and requires implementation to be "coordinated collectively across governmental bodies, law enforcement agencies, non-governmental organisations, civil society groups, and various stakeholders" (Government of Malaysia, Prime Minister's Department 2024:i/6).

South Africa's strategy is the most explicit, naming collaboration with the business sector as a principle of the strategy:

> "*Collaboration: In a spirit of partnership, multi-sectoral collaboration is required across all spheres of government, communities, CSOs and the business sector in the collective fight against corruption and in working together to achieve the objectives of this Strategy*." – Source: Republic of South Africa (2020:25): National Anti-Corruption Strategy 2020–2030.

Figure 4 below shows how South Africa's National Anti-Corruption Strategy 2020–2030, puts the collaboration principle into practice. The strategy rests on six pillars, three focused on people and culture (citizen participation, professional conduct and ethical governance) and three on systems and institutions (clean procurement, strong agencies and vulnerable sectors). Oversight is carried out by the multi-sector National Anti-Corruption Advisory Council (NACAC).

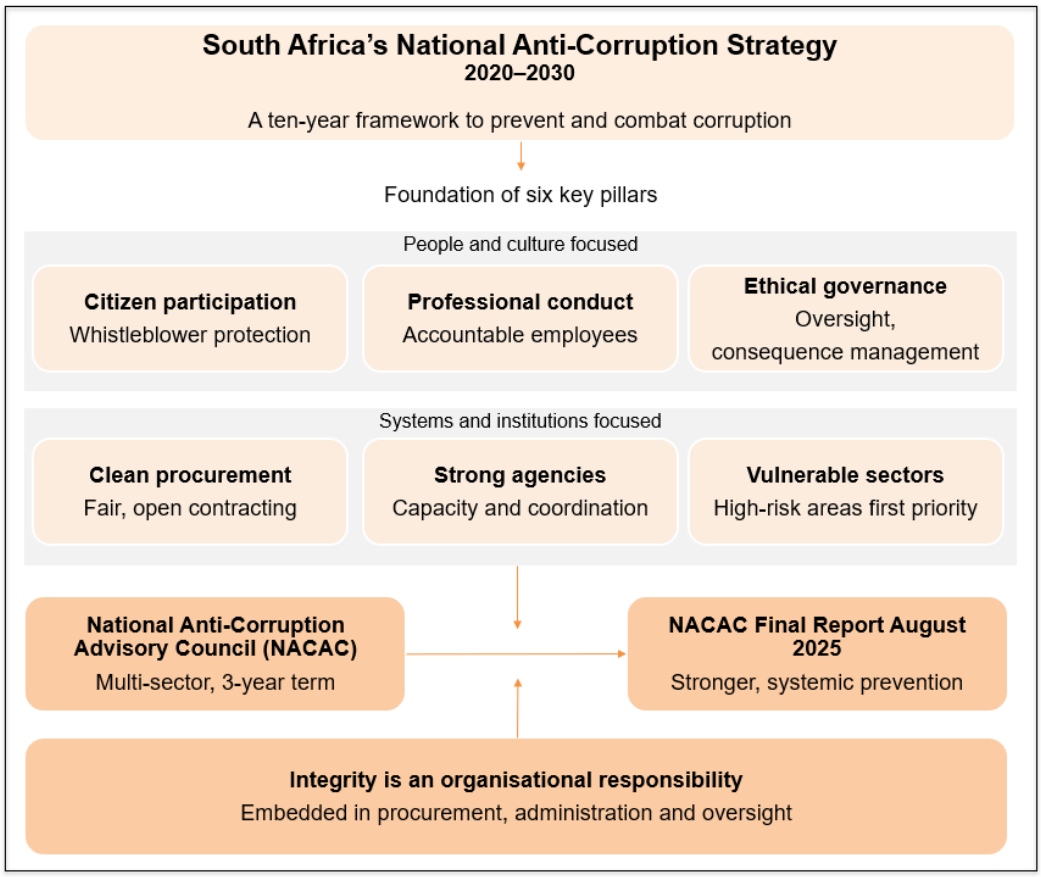


Figure 4: South Africa's National Anti-Corruption Strategy 2020–2030: pillars and oversight.
Source: Authors' compilation based on South Africa's National Anti-Corruption Strategy (2020–2030) and the National Anti-Corruption Advisory Council Final Report (2025).

Beyond South Africa and Malaysia, **Indonesia and Thailand** have endorsed Collective Action through implementation mechanisms. Both use a cross-government implementation model: Indonesia through its National Strategy for Corruption Prevention (Stranas PK), and Thailand

through the Anti-Corruption Master Plan under its National Strategy 2018–2037. In both, engagement with business is shaped through agency-level initiatives.

Cambodia has also endorsed Collective Action, with a narrative focused on preventive measures, private sector collaboration and good governance (Cambodia Anti-Corruption Unit 2025). **Vietnam's** 2023–2030 anti-corruption strategy frames the fight against corruption as "an important task of the entire political system and society" and calls on state bodies, businesses, the press and "all people" to participate in its implementation (Government of Vietnam 2023: sections II.1(a) and IV.2).

The remaining countries refer to Collective Action in other forms, such as consultation with the private sector, Integrity Pacts or regional government-to-government collaboration like the ASEAN Parties Against Corruption (ASEAN-PAC).

In conclusion, the analysis shows that both the number of countries with a national anti-corruption strategy or equivalent framework and the number taking on Collective Action approaches have grown since the 2020 baseline. Several countries now explicitly mention Collective Action in their strategies, with South Africa and Malaysia setting out the clearest commitments. The wider spread of strategies, and those still in development, offers an opening to embed Collective Action more firmly in future strategy updates.

2.2 Capturing patterns of collaboration

To better understand how the 12 countries describe working with non-state actors, the country NACS, statements in equivalent frameworks, and relevant government documents, media and official agency communications were reviewed (see Annex 1).

The statements were coded inductively and grouped into six patterns. The patterns show how collaboration is framed: who takes part, how actors relate to each other and how commitments are to be carried out. They reflect the current 2026 status and do not measure change since 2020, as this was not included in the baseline study.

Figure 5 below depicts the six patterns that can be identified and their central messages. Overall, the statements present Collective Action as a shared responsibility, articulated through societal mobilisation, partnership building, embedding integrity and driving prevention, coordination of action and implementation, cross-border connections, and alignment of a shared direction.

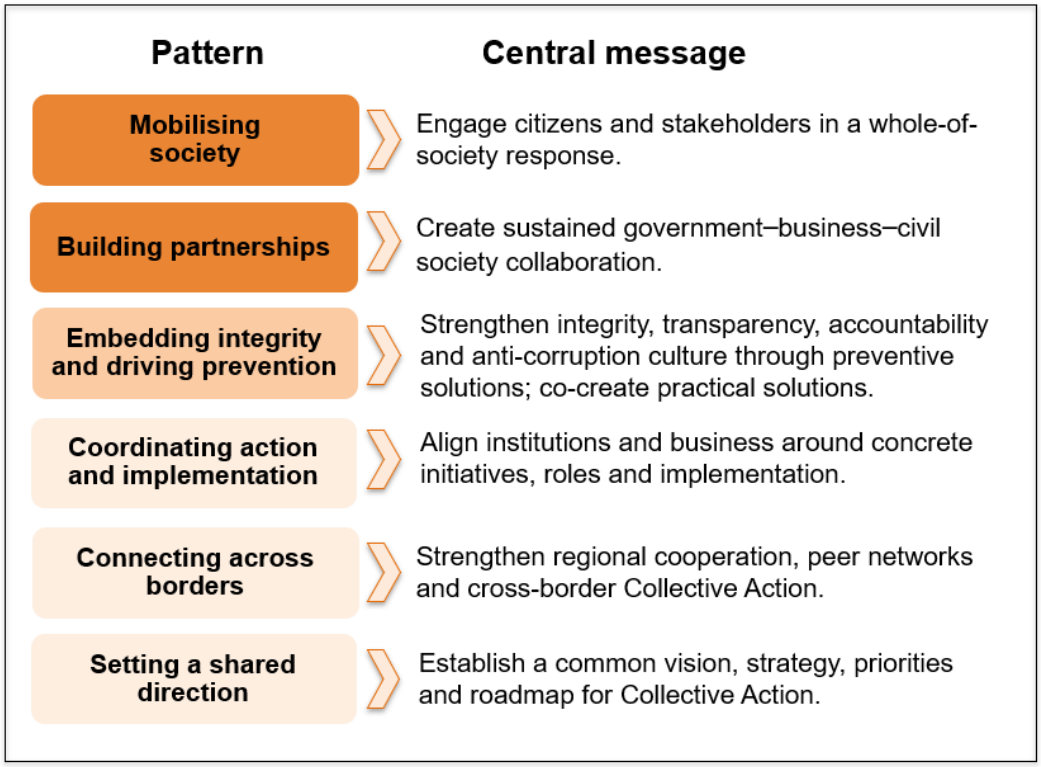


Figure 5: How selected country strategies, relevant statements and government documents describe collaboration/Collective Action.
Source: Authors analysis of documents listed in Annex 1.

The most prominent patterns focus on societal mobilisation and partnership building. Three countries, Malaysia, Indonesia and South Africa, describe collaboration that includes government, business and civil society.

Across the patterns, prevention of corruption is presented as a shared responsibility of government, the private sector, civil society and the public, guided by a shared vision of a society anchored in integrity. The statements emphasise inclusive mobilisation and coordinated collaboration through dialogue, partnerships, clearly defined accountability, mutual agreements and co-designed strategies and initiatives, including regional institutional engagement and structured private sector Collective Action.

The analysed statements describe intentions and do not show that a country has acted to translate the ambition in its strategy into practice. They do suggest, however, that Collective Action could act as a bridge between the endorsements and ambitions in strategies and agency statements and the practical delivery of those commitments.

3 Emerging themes providing opportunities for the uptake of Collective Action

Following the analysis of engagement patterns in Section 2, this section examines what these commitments can look like in practices. To do so, it sets the national anti-corruption strategies, equivalent frameworks and agency statements of the 12 priority countries alongside selected Collective Action initiatives in Thailand, Indonesia, Malaysia, Vietnam and South Africa (Annex 1 and Annex 3). Where the two meet, four common themes emerge:

1. Business integrity and corporate compliance to strengthen corruption prevention
2. Whole-of-society engagement, trust and protection
3. Digitalisation and emerging corruption risks
4. Shared integrity standards and SME supply chains

Each theme is discussed in turn below, using examples from existing case studies to point to opportunities for Collective Action.

3.1 Business integrity and corporate compliance to strengthen corruption prevention

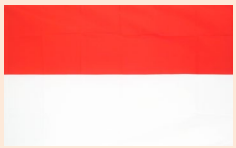
The national anti-corruption strategies, equivalent frameworks and agency documents analysed highlight business integrity and corporate compliance as a key emerging theme. This reflects a shift from a focus on compliance within individual companies towards a shared commitment to business integrity across the private sector. Securing leadership buy-in and developing shared standards ensures explicit commitment and a baseline for acceptable business conduct. Two case studies from Thailand and Indonesia help to illustrate this shift towards a shared business integrity responsibility between the public and private sectors and what that means in practice at the country level.



Thailand – Transforming integrity and compliance standards through Collective Action

The Thai Private Sector Collective Action Against Corruption (Thai CAC, initiative 1388 on the B20 Collective Action Hub) started in 2010 as a private-sector-driven initiative to raise awareness of corruption risks, promote best practices and guide changes in corporate governance frameworks, evolving into a leading voice on anti-corruption and a certifying body in Thailand. To be certified, a company completes a self-evaluation that is externally reviewed, and a public records check is carried out before the Collective Action Certification Committee grants approval.

Importantly, Thai CAC certification can now also support access to public procurement. Thailand's Anti-Corruption Cooperation Committee (ACCC) issued a notification to raise anti-corruption standards in public sector procurement, allowing bidders to submit certification from an ACCC-approved body, including Thai CAC certification and ISO 37001 relating to anti-bribery management (Tilleke & Gibbins 2024). This creates a direct link between participation in Collective Action, certification and eligibility to compete for public procurement opportunities.



Indonesia – A business-driven anti-corruption Collective Action initiative

The Koalisi Anti Korupsi Indonesia (KAKI, initiative 2034 on the B20 Collective Action Hub), or the Indonesia Collective Action Coalition Against Corruption, is an anti-corruption Collective Action initiative which was initiated by the Indonesian Institute for Corporate Directorship (IICD) and the Center for International Private Enterprise (CIPE). KAKI was established in 2020 as a platform designed to strengthen business integrity and advance private sector compliance in Indonesia. KAKI depends on a collaborative Collective Action model, thereby elevating the integrity baseline over individual organisational compliance to mitigate corruption. To engage in the initiative, companies sign a public “Declaration of Intent” which commits leadership to fully support doing business with integrity. The second step is to conduct a 75-point self-assessment of organisational compliance structures against principles within the checklist and submit the document with supporting evidence for certification. Where needed, the KAKI Secretariat helps companies to refine their anti-corruption and ethics management programmes.

A critical success factor for KAKI as a business-driven initiative is the credibility it has earned by building a strong network of high-integrity companies. This network gives KAKI influence when engaging with public bodies to advance efficiency, transparency and accountability within the Indonesian business ecosystem.

Based on the analysis above, we can identify the following Collective Action opportunities to strengthen business integrity and corporate compliance:

1. **Continue to strengthen dedicated platforms and intermediaries**: Trusted platforms to map and promote existing initiatives, share lessons learned and reduce fragmentation.
2. **Link the private sector to public incentives**: Ethical conduct can move from encouragement to expected behaviour when public sector incentives recognise credible private sector integrity efforts. The Thai CAC certification procurement standards demonstrate how Collective Action can create this link, with public procurement standards recognising credible integrity certification and creating an incentive for companies to participate. This illustrates how procurement requirements can be strengthened progressively, without making certification mandatory from the outset.

3.2 Whole-of-society engagement, trust and protection

Whole-of-society engagement, trust and protection emerged as another key theme where Collective Action connects to national anti-corruption priorities. Mechanisms such as risk assessments, preventive controls, whistleblowing systems, staff training in business integrity, best practice standards and stakeholder communication help to turn commitments into practice. Meaningful engagement depends on trust, on the protection of individuals who report and on visible accountability.



Malaysia – the Corporate Integrity System Malaysia (CISM)

CISM is a government-driven roundtable set up in 2010 that includes the private sector and public sector agencies including the Malaysian Anti-Corruption Commission (MACC), Malaysian Institute of Integrity (IIM), Transparency International Malaysia, Companies Commission of Malaysia (SSM), Securities Commission Malaysia (SC), Bursa Malaysia Berhad, Minister of Finance, Malaysia External Trade Development Corporation (MATRADE). It advances business integrity through a Corporate Integrity Pledge, which commits signatories to uphold anti-corruption principles and offers practical implementation support. The focus is to move companies from the Corporate Integrity Pledge to practice through a 12-dimension self-assessment and the "From Pledge to Practice" toolkit, which helps them identify gaps and set action plans (Companies Commission of Malaysia 2016).



Indonesia – Collective incident reporting system within the maritime sector

The Maritime Anti-Corruption Network (MACN) launched a Collective Action initiative in Indonesia in 2015 (initiative 1488 on the B20 Collective Action Hub).[4] This was in response to MACN member companies facing challenges in Indonesia, including ambiguous laws and regulations. Illicit facilitation payments and in-kind requests hampered the ease of doing business. Maritime companies refusing to pay or accommodate in-kind requests were often penalised through delays or by being fined for alleged non-compliance. The first point of focus then was to increase transparency and manage business integrity risks in import and export processes within the Jakarta Tanjung Priok port.

This Collective Action initiative applies MACN's anonymous incident reporting system. The reports are non-attributable and exclude any information which could identify ships or individuals. MACN uses the aggregated data (more than 70,000 incidents globally, according to MACN 2026), to engage with government through Collective Action. Acting

[4] The initiative was launched with support from the UK Foreign and Commonwealth Office and in partnership with the NGO Kemitraan.

as an intermediary, MACN ensures that evidence is provided to authorities, keeping the whistleblower's identity protected.

Based on the analysis of a whole-of-society engagement, trust and protection approach, we can identify the following Collective Action opportunities:

1. **Select trusted intermediaries to protect whistleblowers**: A neutral Collective Action body can collect anonymous, aggregated data and take it to government, so that evidence moves while the people who report remain protected. This is evidenced by the MACN approach.

2. **Close the loop with visible follow-up**: Engagement lasts only when reporters see results. Initiatives should publish what changed to build the trust that sustains reporting.

3.3 Digitalisation and emerging corruption risks

Reviewed agency documents and anti-corruption strategies consider digitalisation as a cross-cutting theme. It includes e-platforms, data management, digital public services and technology-enabled transparency, as well as new technology-related integrity risks. The emerging norm is that shared data enables early detection and strengthens prevention. The gap is that useful data often stays locked within single institutions and remains fragmented.



Indonesia – A shared prevention dashboard across government

Indonesia's Corruption Eradication Commission (KPK) manages the Monitoring Center for Prevention (MCP) in partnership with the Ministry of Home Affairs and the Finance and Development Supervisory Agency (BPKP). In 2024, the MCP was implemented in 546 local governments (KPK 2025a). It tracks eight intervention areas, including planning, budgeting, procurement and public services, against 26 indicators. Local and provincial governments access results from MCP KPK and the public via the JAGA[5] corruption prevention network digital platform (initiative 2200 on the B20 Collective Action Hub).



South Africa – Gauteng Provincial Government e-Tender portal

In 2021, the Gauteng Provincial Government introduced the requirement of a signed pre-contract Integrity Pact as a compulsory returnable document as part of the tender submission process to prevent corruption and ensure fair dealings in procurement (eNCA 2025).

[5] JAGA is an application to prevent corruption by encouraging transparency in public services and government asset management. See: https://jaga.id/.

All business bids and proposals must be submitted through the e-Tender portal. Any violation of the signed Integrity Pact leads to severe consequences, including contract cancellation, recovery of damages, financial penalties and blacklisting or default listing via the National Treasury. The digitalisation of the tender process is aimed at increasing transparency and oversight efficiency within the public sector bidding process.

Based on the analysis of digitisation and emerging corruption risks, we can identify the following Collective Action opportunities:

1. **Collect public and private data proactively as warning indicators**: Collective Action can bring business-held data, such as incident reports or supplier risk data, together with public dashboards to spot risk earlier and target joint prevention.

2. **Establish and confirm shared rules for digital integrity**: Joint standards on data access, privacy and the integrity of e-procurement and automated systems help ensure that digital tools reduce the risk of corruption rather than create new opportunities for it.

3.4 Shared integrity standards and SME supply chains

The analysis revealed a fourth cross-cutting theme: the private sector increasingly shares responsibility for integrity across sectors and supply chains. This is done through joint integrity agreements, shared supplier training and common responses to corruption risks. The gap is that small and medium-sized enterprises (SMEs) face a mixture of buyer, national and international requirements that they struggle to understand and meet.



Vietnam – A general measurement for business integrity

The Vietnam Chamber of Commerce and Industry (VCCI) and the United Nations Development Programme (UNDP) launched the Viet Nam Business Integrity Index (VBII) in 2022 to assess the business integrity of companies in the country (VGP News 2022; UNDP 2022). The index is designed for companies of any size, including SMEs, and was developed with support from UNDP's regional FairBiz programme (initiative 1593 on the B20 Collective Action Hub). This is particularly relevant in Vietnam, where many SMEs are integrated into global supply chains and therefore increasingly exposed to international business integrity expectations and standards. The index measures seven elements, from leadership commitment and codes of conduct to compliance and certification.



South Africa – Eskom Supplier Integrity Pact

Eskom Holdings SOC Ltd is a South African state-owned corporation operating across the electricity value chain. In 2016, Eskom introduced its Eskom Supplier Integrity Pact (revised in 2023) prescribing ethical behaviour for all its

suppliers (initiative 1608 on the B20 Collective Action Hub). The Integrity Pact requires suppliers to avoid dishonest, fraudulent, corrupt or anti-competitive conduct throughout procurement.

From February 2023 to 31 March 2026, as part of a supplier disciplinary process, the Eskom Supplier Review Committee restricted 101 suppliers from doing business with Eskom for integrity-related transgressions, including local SMEs (Eskom 2026). These restrictions show Eskom's commitment to consequence management. Affected suppliers were given a chance to respond before decisions were made. The restricted suppliers cannot engage in the procurement ecosystem for up to 10 years, and the cases are referred to the National Treasury for restriction of service provision across government.

Based on the analysis of shared integrity standards and SME supply chains, we can identify the following Collective Action opportunities:

1. **Developing standards together creates efficiency gains, with particular focus on SMEs, which then have clearer understanding of requirements from industry, national or international standards**: Business associations can be the key entry point for collaboration. Aligning standards with ISO 37001 will create a clear set of expectations for SMEs without duplication of efforts.

2. **Align standards and practical support by providing templates, training and mentoring through large buyers or industry chambers**: This is an opportunity to turn standards into something smaller companies can put into practice.

4 Global and regional collaboration

International commitments and regional collaboration enable policy harmonisation and cross-border cooperation. The infrastructure already exists, although it remains mostly government-to-government.

For example, South Africa's 2025 G20 Presidency, the first hosted on African soil, placed a focus on inclusive participation of the public sector, private sector, civil society and academia in preventing and combating corruption through the G20 Anti-Corruption Working Group (DPSA 2025). This focus aligns closely with the B20 South Africa Integrity and Compliance Task Force's recommendation to "amplify Collective Action and integrity standards for inclusive growth" (B20 South Africa 2025). The B20 recommendations reinforce the role of Collective Action and public-private partnerships in translating this broader G20 commitment into practical approaches that strengthen integrity and support inclusive growth.

Global and regional collaboration can also influence regional policy and practice through international standards and accession processes. Indonesia and Thailand, for instance, are in the OECD accession process, creating an opportunity to strengthen Collective Action through the application of OECD standards and recommendations (OECD n.d.-a).

South Africa, although not an OECD member, is a Party to the OECD Anti-Bribery Convention and is therefore subject to peer review of its anti-bribery framework by the OECD Working Group on Bribery (OECD. n.d.-b). The 2021 Anti-Bribery Recommendation recognises Collective Action as a tool for strengthening anti-bribery efforts (OECD 2021).

The accession process can therefore provide an additional mechanism to reinforce Collective Action at national and regional level, connecting global standards with existing regional structures and initiatives. This creates an opportunity to move beyond government-to-government cooperation and introduce business more systematically into regional anti-corruption mechanisms.

South Africa brought attention to the importance of the South African business ecosystem on the African continent as a host to the G20 in 2025. In the ASEAN region, the ASEAN Parties Against Corruption (ASEAN-PAC) links anti-corruption agencies of all 11 ASEAN member states. A 2026–2028 regional action plan was proposed during the 21st ASEAN-PAC Principals Meeting in Malaysia in 2025 and awaits adoption (UNCAC COSP11 2025; New Straits Times/Bernama. 2025).

Regional bodies such as ASEAN-PAC provide existing infrastructure for anti-corruption agencies that offer potential for Collective Action.

Collective Action opportunities through regional government-to-government bodies include:

1. **Give business a seat at regional anti-corruption bodies**. ASEAN-PAC and the Anti-Corruption Committee of the Southern African Development Community (SADC) could add a regular business-integrity dialogue, so that regional plans connect with initiatives such as Thai CAC, MACN and the Ethics Coalition for Business (EC4B) in South Africa.

2. **Build an ASEAN–Southern Africa exchange on integrity standards and procurement**. The two regions share priorities on procurement, whistleblower protection and SMEs. Peer exchange between, for example, Thai CAC and South African business coalitions could motivate practical implementation of set standards.

3. **Integrate the G20 multi-stakeholder priority into regional action plans**. The proposed ASEAN-PAC 2026–2028 action plan and the SADC 2023–2027 plan can draw on the G20 compendium of multi-stakeholder good practice, with Collective Action named explicitly.

4. **Integrate cross-border standards by promoting, through ASEAN-PAC, mutual recognition of credible certification** (Thai CAC, ISO 37001) to reduce duplication for companies operating across borders and strengthen Collective Action in the region.

Regional Collective Action approaches can translate high-level international commitments into practical opportunities for business engagement. When Collective Action is recognised and reinforced at global, regional and national levels, including through international standards, accession processes and regional action plans, it can create stronger incentives for companies to participate and provide governments with an established mechanism for structured engagement with the private sector. Over time, this can help institutionalise Collective Action as a recognised approach to business integrity, rather than leaving it as an ad hoc or project-based activity.

5 Conclusion and outlook

Since the 2020 study “Mainstreaming Collective Action: Establishing a Baseline”, anti-corruption Collective Action in ASEAN and South Africa has moved from the margins of voluntary practice into national policy. The report finds a clear shift towards greater recognition and government engagement, with seven countries (58 percent) referring to Collective Action or multi-stakeholder cooperation in national strategies or government frameworks, and nine (75 percent) having at least one documented public-sector Collective Action initiative.

This shift reflects a change in how corruption prevention is framed. National strategies increasingly present it as a shared responsibility of government, business and civil society, and governments are taking part in Collective Action initiatives as partners, not only as observers. Across the countries reviewed, this shared responsibility shows up in four areas: business integrity and corporate compliance, whole-of-society engagement, digitalisation and emerging corruption risks, and shared integrity standards and supply chains.

Collective Action has also been identified as an important anti-corruption tool to help:

- **Turn commitments into practice**: Governments can use the implementation of national anti-corruption strategies as the entry point for Collective Action, and link certification, pledges or Integrity Pacts to procurement eligibility or other incentives.
- **Build shared infrastructure**: Government, business and civil society can develop platforms, shared standards for SMEs, and common data and digital tools.
- **Build and leverage trust**: Collective Action initiatives can work to protect whistleblowers and build confidence between government, business and civil society. That trust can give business a seat at national and regional policy platforms, such as ASEAN-PAC and SADC, building on G20/B20 and OECD commitments.
- **Contextualise design and measure progress**: Initiatives can be tailored to local contexts, and impact indicators can be developed to track uptake at country, regional and global level.

These opportunities are separate options that can be taken up one at a time, and build on already existing national strategy action plans, procurement rules or a regional work plan. Business can respond by demonstrating how shared standards, platforms and incentives translate these commitments into action, strengthen accountability and contribute to a healthier business ecosystem.

In this way, Collective Action can move beyond isolated initiatives towards becoming an established and sustainable means of preventing corruption.

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Annex

Annex 1: How selected countries describe collaboration/ Collective Action

Core theme	Subtheme / description arising from the statements	Summary from strategies, media, government statements and agency documents
1. Mobilise society	**Whole-of-society participation and shared responsibility.** Collective Action is framed as requiring participation beyond government – including citizens, civil society, communities, academia, media and other societal actors.	**Brunei Darussalam**: The Anti-Corruption Bureau states that the fight against corruption "needs collective action" and calls for "the active commitment of business community" (ACB); ACB officers co-delivered UNODC youth anti-corruption education training in Brunei (UNODC 2025). **Cambodia**: The ACU Anti-Corruption Strategy and Policy – National Strategic Plan covers "the public sector, the private sector, civil society, the media, academia, and the general public" (ACU). Priority (4), p. 2: "strengthening cooperation between Anti-Corruption Institution and relevant partners from public and private sectors" (Cambodia NACS, 2025–2030). **Indonesia**: The KPK states that "all elements of society must actively participate, not just the KPK" (translated) (KPK 2025c). **Lao PDR**: The State Inspection Authority's 2026–2030 plan expands public awareness campaigns "to encourage broader participation in anti-corruption efforts" (KPL 2026). **Malaysia**: The NACS 2024–2028 calls for "a whole-of-society mobilisation" against corruption (Prime Minister's statement, p. i of the Malaysia NACS 2024–2028); the MACC says NACS is designed to "engage every segment of society" (The Vibes 2025). **Philippines**: The Office of the Ombudsman stresses a "whole-of-society approach" involving government officials, media, the private sector, civil society, academia and youth (Ombudsman 2026). **Singapore**: The CPIB states that "a collective approach to corruption prevention complements enforcement efforts" and credits a "vigilant public" (CPIB 2026). **South Africa**: The NACS is a "whole-of-society" strategy, "using the collective power of the whole of society" (pp. 3, 5) (The Presidency 2025). **Timor-Leste**: The Anti-Corruption Commission stressed the "active participation of public institutions, the private sector, and civil society" (Government of Timor-Leste 2025). **Vietnam**: Resolution 168/NQ-CP (11 Oct 2023) defines corruption prevention as "an important task of the entire political system and society" and aims to "mobilize the participation of the business community and the people" (Res. 168/NQ-CP); see also (VGP 2023).

2. Build partnerships	**Multi-stakeholder and public–private collaboration.** Government, business, civil society and institutions work jointly rather than in isolation. Includes dialogue, MOUs, public-private initiatives and institutional partnerships.	**Cambodia**: The ACU engages the private sector through "MOUs, Dialogue to promote clean business" (ACU 2026). **Indonesia**: The KPK and the Indonesian Chamber of Commerce (Kadin) work together on corruption prevention in five priority business sectors, with a task force for each (Kadin 2024). **Philippines**: Civil society groups and the private sector take part in consultations on the national anti-corruption strategy (Daily Tribune 2026); under the New Government Procurement Act, at least two civil society observers are invited to all levels of procurement (DBM 2025). **Singapore**: The CPIB works with businesses and professional bodies through its Anti-Corruption Partnership Network (CPIB 2026). **South Africa**: The NACS aims for "strong stakeholder partnerships … across all sectors" (p. 28) (Republic of South Africa 2021); it calls on state and non-state actors to "co-own, coordinate, and implement" its interventions (p. 5) (The Presidency 2025). **Thailand**: The NACC set up a joint working group with the Thai Private Sector Collective Action Against Corruption (Thai CAC) to encourage private-sector participation (THAI CAC).
3. Embed integrity and drive Prevention	**Institutionalise integrity, prevention and anti-corruption culture.** Collective Action is used to embed ethical behaviour, transparency and accountability and to develop practical preventive responses rather than relying only on enforcement.	**Indonesia**: The KPK's 2025 national campaign supports "anti-corruption education across all levels of society" and integrity in everyday life (translated) (KPK 2025c). **South Africa**: The NACS places "more emphasis on the prevention of corruption through good governance, transparency, integrity management and accountability" (p. 9) (Republic of South Africa 2021; The Presidency 2025). **Thailand**: The NACC's programme to embed a "culture of honesty" includes the Thai CAC, where 1,345 companies declared intent to join and 499 were certified (NACC 2023). **Timor-Leste**: The Anti-Corruption Commission linked the national strategy dialogue and UNCAC review to "the principles of integrity, transparency, and accountability"; 43 institutions took part, including civil society and the private sector (Government of Timor-Leste 2025). **Vietnam**: Resolution 168/NQ-CP encourages businesses "to build and deploy a culture of integrity in business activities" (Res. 168/NQ-CP).
4. Coordinate action and implementation	**Coordinate private-sector and institutional implementation.** Collective Action translates commitments into coordinated activities, sectoral action and business participation.	**Indonesia**: The KPK's 2025 campaign involves "regional governments, the private sector and the public" (translated) (KPK 2025c); the 15 Stranas PK prevention actions for 2025–2026 are coordinated by the KPK with the Presidential Staff Office, Home Affairs, Bappenas and KemenPAN-RB (KPK 2024c). **Malaysia**: The NACS requires that "all anti-corruption activities are coordinated collectively across governmental bodies, law enforcement agencies, non-governmental organisations, civil society groups, and various stakeholders" (p. 6), with the MACC as coordinating body (p. 49) (Malaysia NACS 2024–2028); 20 sub-strategies were underway by October 2025 (The Vibes 2025). **Thailand**: The NACC works with the Thai Private Sector Collective Action Against Corruption (Thai CAC) through a joint working group, and an MoU with over 51 state enterprises and other bodies targets private-sector governance (Thai CAC ; NACC 2026).

5. Connect across borders	**Regional and international cooperation.** Collective Action extends beyond national frameworks through ASEAN-PAC, ASEAN cooperation and other regional mechanisms. SADC – South Africa as member participates	**ASEAN-PAC**: The anti-corruption agencies of ASEAN states are parties, aiming "to establish and strengthen collaborative efforts against corruption among the parties" (ASEAN-PAC 2024a); Timor-Leste joined in 2025 (Malay Mail 2026). **Indonesia**: The KPK chaired ASEAN-PAC and opened its 20th meeting (Bali, December 2024) calling for "regional technology-based collaboration" (translated) (KPK 2024b). **Malaysia**: The MACC, ASEAN-PAC chair for 2025–2026, framed regional talks as supporting "collective action in line with international frameworks" (Malay Mail 2026). **Myanmar**: The Anti-Corruption Commission attended the 18th ASEAN-PAC Principals Meeting (Phnom Penh, November 2022), held under the theme "Together Against Corruption", and signed an MoU with Cambodia's ACU (ASEAN-PAC 2024b). **South Africa (SADC)**: South Africa is a SADC Member State. The SADC Anti-Corruption Committee reviews implementation of the SADC Protocol against Corruption through the Strategic Anti-Corruption Action Plan 2023–2027 (SADC 2024); the plan "provides a framework for coordinated regional action" (SADC 2026).
6. Set a shared direction	**Common strategy, vision and implementation framework.** National strategies provide a shared orientation, establish roles and translate collective commitments into coordinated plans and action.	**Lao PDR**: The State Inspection Authority set out a 2026–2030 plan, including stronger preventive and anti-corruption measures (KPL 2026). **Malaysia**: The NACS 2024–2028 has five pillars and 60 sub-strategies coordinated by the MACC (Malaysia NACS 2024–2028). **Philippines**: Development of the national anti-corruption strategy was launched on 1 July 2026, with civil society and private-sector consultations (Daily Tribune 2026); the Ombudsman wants it to be "a living framework for coordinated action" (Ombudsman 2026). **South Africa**: The NACS "provides a roadmap that can produce significant gains in the collective action to eradicate corruption" (p. 25) (South Africa NACS 2020–2030). **Timor-Leste**: A National Dialogue coordinated by the Anti-Corruption Commission is developing the national anti-corruption strategy (ENAK) "to establish an integrated and inclusive vision for combating corruption" (Government of Timor-Leste 2025). **Vietnam**: Resolution 168/NQ-CP sets the national strategy on corruption prevention and control to 2030 (Res. 168/NQ-CP).

Annex 2: National anti-corruption strategy or equivalent framework and Collective Action endorsement by country

Country	Included in 2020 baseline	Lead anti-corruption institution	Previous NACS cycle	Q1: Does the country have a current national anti-corruption strategy or framework?*	Current NACS / action plan timeline	Q2: Does that strategy, or an equivalent national framework/ legislation, endorse Collective Action?
Brunei Darussalam	No	Anti-Corruption Bureau (ACB)	None	No	No	No
Cambodia	No	Anti-Corruption Unit (ACU) / National Council Against Corruption	2020–2025	Yes	2025–2030	Yes
Indonesia	Yes	Corruption Eradication Commission (KPK)	2012–2025 (Stranas PPK)	Yes (Stranas PK; Presidential Regulation Perpres 54/2018)	2025–2026	Yes
Lao PDR	No	State Inspection and Anti-Corruption Authority (SIA)	2016–2020	In development (Lead-agency plan available, SIA Strategic Plan)	2026–2030 In development	No
Malaysia	Yes	Malaysian Anti-Corruption Commission (MACC)	2019–2023	Yes	2024–2028	Yes
Myanmar	No	Anti-Corruption Commission (ACCM)	2022–2025	Yes	2026–2030	Yes
Philippines	Yes	Office of the Ombudsman	2012–2016	In development	2023–2028 Development plan	No
Singapore	No	Corrupt Practices Investigation Bureau (CPIB)	None	No	No	No
Thailand	Yes	National Anti-Corruption Commission (NACC)	Phase 3: 2017–2021	Yes	Master Plan: 2018–2037 Action Plan: 2023–2027	Yes
Timor-Leste (ASEAN member as of 2025)	No	Anti-Corruption Commission (Comissão Anti-Corrupção)	2021–2025 Institutional Strategic Plan (PECA)	In development: *ENAK National Dialogue, Multi-stakeholder Steering Committee*	2026–2030 In development	No

Vietnam	Yes	Government Inspectorate of Vietnam	Phase 1: 2023–2026	Yes	Phase 2: 2026–2030	Yes
South Africa	Yes	The Presidency – The National Anti-Corruption Advisory Council (NACAC)	2014–2019 (Draft) Public Service Anti-Corruption Strategy (2002)	Yes	2020–2030	Yes

*Current national anti-corruption strategy or equivalent, e.g. lead agency action plan/strategy/framework.

Annex 3: Additional source data (B20 Collective Action Hub)

Country	B20/G20 KPI: Does the public sector of the country engage in a Collective Action initiative?	Collective Action details / description of initiatives	Regional government-to-government anti-corruption cooperation	OECD member status
Brunei Darussalam	Yes	Businesses collaborating with other stakeholders including academia, government agencies and civil society organisations	Regional government-to-government Association of South East Asia Nations (ASEAN) Parties Against Corruption (ASEAN-PAC)	Non-OECD member
Cambodia	No	Consultation with private sector; code or charter of business ethics	ASEAN-PAC	Non-OECD member
Indonesia	Yes	Integrity Pact; general Collective Action	ASEAN-PAC; ASEAN Economic Community (AEC)	OECD key partner
Lao PDR	No	**Other**: Business engagement named in National strategy	ASEAN-PAC	Non-OECD member
Malaysia	Yes	Integrity Pact; general Collective Action; incentives	ASEAN-PAC	Non-OECD member
Myanmar	Yes	Public-private engagement	ASEAN-PAC (2026 host country)	Non-OECD member
Philippines	Yes	Code or charter of business ethics (Integrity Initiative)	ASEAN-PAC	Non-OECD member
Singapore	Yes	General Collective Action; consultation with private sector	ASEAN-PAC	Non-OECD member
Thailand	Yes	Procurement Collective Action; Integrity Pact; code or charter of business ethics; incentives	ASEAN-PAC	OECD accession candidate

Timor-Leste	No	***Planned*** – development consultation with private sector	ASEAN-PAC (ASEAN member as of 2025)	Non-OECD member
Vietnam	Yes	General Collective Action; Code or charter of business ethics	ASEAN-PAC	Non-OECD member
South Africa	Yes	General Collective Action; Public-private engagement; stakeholders including academia, government agencies and civil society organisations; all of society	Regional Government to Government Anti-Corruption Collaboration as member of the Southern Africa Development Community (SADC)	OECD key partner
	75% (9/12) Collective Action Initiatives with Government as partner		**100%** participation in regional anti-corruption cooperation	

Sources:
https://collective-action.com/explore/b20-g20
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