Milestones in establishing Collective Action as a global norm



This chapter is an excerpt from the publication Collective Action in practice: a game-changer for business integrity. Stories, evidence and inspiration from the Basel Institute on Governance.

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Milestones in establishing Collective Action as a global norm

"Fostering and sustaining Collective Action is a challenge. It is crucial to take stock, assess what has been successful, and to disseminate best practices."

Julia Fromholz, Head of the Anti-Corruption Division of the Organisation for Economic Co-operation and Development, OECD

Promoting Collective Action as an international norm for tackling corruption and improving integrity in business conduct has been at the core of the Basel Institute's work since it was established in 2003.

This commitment has positioned the Basel Institute as an important contributor to the global discourse on preventing corruption, which is the focus of Collective Action. We have been working alongside leading international institutions to embed the approach into policy frameworks, standard-setting processes and national anti-corruption strategies. Through sustained engagement in international forums, at high-level conferences and through direct support to organisations around the world, we have helped elevate Collective Action from a promising concept to an established pillar of effective corruption prevention.

In international endorsements and frameworks United Nations | UN

Central to our work has been our long-standing engagement with the **United Nations Convention Against Corruption** (UNCAC). The world's most comprehensive and legally binding anti-corruption instrument is now ratified by 191 States Parties. UNCAC – particularly

Article 12, which addresses private sector involvement in corruption prevention – does not yet explicitly mention Collective Action. But the convention now recognises the critical role of non-state actors, including civil society and the private sector, in combating corruption through a multidisciplinary approach. Looking ahead, we see a clear opportunity for Collective Action to be formally recognised within the text of UNCAC.

Building on this foundation, we have a long history of working with the **United Nations Office on Drugs and Crime** (UNODC), which has become a strong proponent of Collective Action. Most recently, we contributed to their 2024 Resource Guide on State Measures for Strengthening Business Integrity, developed through a broad consultation process and published on the UNODC Business Integrity Portal.

In parallel, we have supported the implementation of the **United Nations Global Compact**'s Tenth Principle on anti-corruption, adopted in 2004. This principle calls on businesses to go beyond avoiding corruption and take proactive steps to embed integrity in their operations and supply chains. As part of our collaboration with the UNGC, the Basel Institute has provided strategic guidance and technical support to various UN Global Compact Country Networks implementing Collective Action initiatives.

The UNGC has also been our implementing partner for the second funding round of the Siemens Integrity Initiative, which significantly strengthened Collective Action efforts in Brazil, Japan and Nigeria. In these countries, we worked closely with local Global Compact Networks and key partners to catalyse multi-stakeholder initiatives: in Brazil in collaboration with the Instituto Ethos; in Japan in partnership with the Japan Federation of Bar Associations and the Anti-Bribery Committee Japan; and in Nigeria alongside the Convention on Business Integrity.

"Collective Action is the driver of systemic changes. By uniting different stakeholders and building trust, we can collectively find virtuous cycles of engagement. As the previous manager of Global Compact Network Brazil, I have seen how powerful it is to put competitors on the same table and find a minimum consensus around integrity and anticorruption, and how the discussions changed the actors and the companies that they represented."

Ana Aranha, Senior Manager, Business Integrity Accelerator, UNGC, previously Anti-corruption Manager, Global Compact Network Brazil

Our efforts have also contributed to political milestones. During preparations for the **UN General Assembly Special Session (UNGASS)** against corruption in 2021, we actively engaged in consultations. We also co-hosted, alongside the Swiss Federal Department of Foreign Affairs, a high-level side event on "Collective Action: Building Efficient Public-Private Partnerships". These efforts culminated in a major breakthrough: the political declaration adopted at the UNGASS 2021 marked the first time that UN Member States explicitly committed to promoting Collective Action and public-private partnerships to support business integrity and fair competition.

This international momentum has since spread to the **Conference** of the States Parties (CoSP) to the UNCAC. At the 10th CoSP in 2023, we led a session as part of the inaugural Private Sector Forum co-hosted by UNODC and UNGC. The forum and our session



Gretta Fenner (right) on a panel at the 2023 Private Sector Forum at CoSP10.

highlighted the tangible impact of Collective Action initiatives in building more ethical and transparent business environments. In a powerful call to action, more than 500 companies urged governments to intensify anti-corruption efforts and promote Collective Action.

This collective voice helped shape Resolution 12 dedicated to the private sector, tabled by Brazil, Norway and Saudi Arabia, and adopted at the 10th CoSP. The resolution calls on States Parties to develop frameworks that incentivise private sector integrity, including through codes of conduct and robust internal governance systems. It opens up important new opportunities to further institutionalise Collective Action within national policy and legislation. The Basel Institute will continue to support this momentum and help to drive it forward.



Xiaohong Li from the UNODC (right) moderating a panel on regulatory and normative approaches to Collective Action at our 5th International Collective Action Conference in June 2024. Photo: David Borter, LEO MEDIA GmbH / BBM PRODUCTIONS AG.

Organisation for Economic Co-operation and Development | OECD

The Basel Institute has played a significant role in advancing Collective Action within the framework of the OECD, particularly in relation to its core anti-corruption instrument, the Convention on Combating Bribery

of Foreign Public Officials in International Business Transactions (the **Anti-Bribery Convention**). This Convention, supported by a robust peer-review monitoring mechanism led by the OECD Working Group on Bribery, sets global standards for combating foreign bribery. It holds member countries accountable through rigorous, expert-led evaluations and country reports.

In 2021, the OECD marked a milestone in international anticorruption policy with the adoption of the revised Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions (2021 Anti-Bribery Recommendation). The Basel Institute was actively involved in the development of this Recommendation and successfully advocated for the formal inclusion of Collective Action as a key strategy for preventing and addressing foreign bribery. This was the first time that Collective Action had been explicitly endorsed in an international anti-bribery standard.

Our contributions are reflected in the Recommendation's recognition of Collective Action across three areas:

- Private sector awareness-raising: Member countries are encouraged to promote partnerships and collaborative initiatives between the public and private sectors to raise awareness and enhance detection and prevention of foreign bribery.
- Addressing the demand side of bribery: Governments are advised to consider actively fostering or participating in Collective Action initiatives with private sector actors and civil society to tackle both bribery and solicitation.
- Empowering business and professional organisations: The Recommendation highlights the role of these organisations in supporting companies to prevent and detect bribery. It recommends that they promote Collective Action as part of broader anti-corruption efforts.

Importantly, the inclusion of Collective Action in the 2021 Anti-Bribery Recommendation brings it under the scope of the OECD's peer-review mechanism. This allows civil society and the private

sector to monitor governments' engagement with Collective Action. It strengthens accountability and positions Collective Action not only as a tool for OECD countries but also as a model for adoption by non-member states in their national anti-corruption strategies. This further reinforces the emergence of Collective Action as a global norm.

Building on this landmark, the OECD has since embedded Collective Action in other standard-setting instruments, including the 2023 revision of the *Guidelines for Multinational Enterprises on Responsible Business Conduct.*

In addition to supporting its contributions to policy development, we have partnered with the OECD on a range of initiatives aimed at promoting and operationalising Collective Action. These include:

- High Level Reporting Mechanisms (HLRM) piloted in Colombia, Argentina and Ukraine, providing a safe channel for businesses to raise integrity concerns in public procurement processes.
- Compliance without borders, a peer-learning programme that connects state-owned enterprises and private companies to build compliance and anti-corruption capacity.
- The Infrastructure anti-corruption toolbox, which features Collective Action tools such as the High Level Reporting Mechanism, Integrity Pacts and Compliance without borders.
- Ongoing efforts to promote Collective Action to national governments and at regional forums, including through the OECD/Asian Development Bank Anti-Corruption Initiative for Asia and the Pacific.
- Active participation in the OECD Anti-Corruption Leaders Hub, a platform for exchanging innovations and scaling up effective anticorruption approaches globally.

Multilateral development banks

The Basel Institute has also played an important part in embedding Collective Action within the integrity frameworks of multilateral development banks (MDBs), particularly through its sustained collaboration with the **World Bank Group**. The Bank's *Integrity Compliance Guidelines*, published in 2010, were an early milestone.

Paragraph 11 explicitly encourages companies to participate in Collective Action to strengthen integrity programmes and promote ethical business conduct:

"Collective action: Where appropriate – especially for SMEs and other entities without well-established Programs, and for those larger corporate entities with established Programs, trade associations and similar organizations acting on a voluntary basis – endeavor to engage with business organizations, industry groups, professional associations and civil society organizations to encourage and assist other entities to develop programs aimed at preventing Misconduct."

The World Bank has since steadily expanded its support for Collective Action as a core strategy in its anti-corruption efforts. In 2023, it joined five other major MDBs in endorsing the harmonised MDB General Principles for Business Integrity Programmes, which formally recommend Collective Action as a means to advance business integrity across sectors and geographies.

We contributed to this momentum through our involvement in the 2023 and 2025 International Corruption Hunters Alliance (ICHA) Forum, an initiative convened by the World Bank to unite global anticorruption actors. On both occasions, we contributed to sessions focusing on business integrity and Collective Action, underscoring the relevance of collaborative approaches in navigating complex, fast-evolving integrity risks.

Our work also helps raise awareness of the World Bank's efforts to strengthen corporate integrity by collaborating with sanctioned companies to develop and implement robust compliance programmes. These engagements increasingly include a mentoring component, with more experienced companies guiding others. This reinforces Collective Action as a practical mechanism for peer learning and systemic improvement in the global development finance ecosystem.

World Customs Organisation | WCO

The Basel Institute has been a key partner to the WCO in promoting Collective Action as a practical and collaborative integrity approach in customs administrations. The WCO formally recognised the potential of Collective Action in 2017 during the 16th Session of its Integrity Sub-Committee. It was adopted as an innovative method to address corruption risks and enhance accountability in customs and tax administrations.

Since then, the WCO has actively encouraged its members to pursue Collective Action initiatives tailored to national contexts. The organisation has done so through its **Anti-Corruption and Integrity Promotion (A-CIP) Programme**, which supports customs authorities in co-developing locally-led integrity initiatives in collaboration with key stakeholders.

The Basel Institute has played a vital role in supporting the operationalisation of this agenda, delivering technical assistance, facilitating cross-sectoral dialogue and providing targeted training to help customs agencies build effective and inclusive Collective Action frameworks.



2025 WCO Collective Action event in Addis Ababa, Ethiopia.

Photo: WCO, used with permission.

In Ghana, for example, our support helped lead to the creation of a formal multi-stakeholder dialogue platform involving customs, the private sector and civil society. This platform has served as the basis for joint action plans designed to promote integrity, transparency and mutual accountability.

In June 2023, these efforts were highlighted during a high-level dialogue hosted by the WCO, where the Global Relationship Architecture (GRA) initiative brought together the WCO, the Basel Institute, the OECD, the UNODC and the UNDP to share lessons learned and discuss pathways to scale up Collective Action.

The WCO reaffirmed its commitment to fostering cooperation between public and private actors to combat corruption effectively, emphasising the need for shared responsibility and coordinated action. The Basel Institute's role as both a thought partner and technical advisor was underscored in this collaborative space, helping to shape and drive forward global standards for integrity in border management.

Business 20 | B20

The Business 20 (B20) represents the voice of business in the G20, an intergovernmental forum bringing together the world's major economies. As a platform for dialogue between the private sector, the G20 presidency, civil society and international organisations, the B20 has an influential voice in shaping global economic and governance agendas. Its recommendations carry significant weight and reflect evolving understandings of how businesses should integrate ethics and integrity into their operations and global value chains.

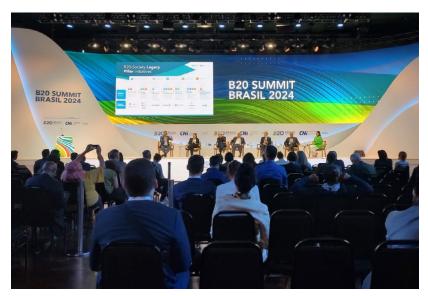
Since 2011, most B20 cycles have featured a dedicated task force on anti-corruption, integrity and compliance. These task forces develop policy recommendations that are submitted to the G20 Leaders' Statement and/or the G20 Anti-Corruption Working Group.

Throughout this period, Collective Action has consistently been recognised as a core recommendation of the business community and has featured prominently in the majority of **B20 Integrity and**

Compliance Task Force reports. These policy papers have become influential references for governments, civil society and the private sector, reinforcing Collective Action as a recognised standard for business integrity on the global stage.

The Basel Institute has been instrumental in shaping these outcomes. As a Network Partner, Knowledge Partner and Co-Chair of the B20 Integrity and Compliance Task Force in select years, we have substantially contributed to the inclusion and strategic framing of Collective Action in B20 policy recommendations. Our thought leadership and technical expertise have helped ensure that Collective Action remains a central pillar of the B20's anti-corruption agenda.

In 2024, under the Brazilian B20 presidency, we co-developed a major milestone: the first-ever Collective Action Key Performance Indicator (KPI). This tool tracks G20 governments' engagement in Collective Action initiatives, using data from our B20 Collective Action Hub. The KPI provides an objective, evidence-based benchmark that enables the B20 and wider Collective Action community to monitor progress and encourage further government involvement.



Scarlet Wannenwetsch introducing the KPI and the B20 Collective Action Hub at the B20 Summit in Brazil in 2024.

International Anti-Corruption Conference | IACC

Transparency International's IACC series is the largest global civil society-led forum on anti-corruption, bringing together stakeholders from civil society, academia, governments, international organisations and the private sector. Over the years, the IACC has served as an important platform for advancing Collective Action, with the concept featuring consistently in conference agendas and discussions.

The Basel Institute has contributed to elevating Collective Action within this high-profile forum through its participation in panels, workshops and strategic dialogues focused on multi-stakeholder solutions to corruption. We have worked closely with civil society and international partners to ensure that Collective Action is not only recognised in principle but integrated into practical strategies for reform and collaboration.

At the 21st IACC, held in Vilnius, Lithuania in June 2024, the importance of Collective Action was strongly reinforced during the High Level Segment. Senior government officials, leaders of international and regional organisations, civil society actors and business representatives jointly endorsed the need for sustained collaboration. A Joint Communiqué issued at the event identified priorities for 2025–2026, including the call to:

"Foster partnerships and sustained cooperation through collective action and encourage the adoption and effective implementation of compliance programs and ethical standards."

The High Level Segment further issued targeted recommendations for engaging the private sector in anti-corruption efforts, calling on stakeholders to:

"Promote partnerships between governments, civil society, and businesses to co-create, develop, and implement anti-corruption initiatives."

"Support the private sector in adopting robust compliance programs and ethical standards to prevent corruption within their operations."

These outcomes align closely with the Basel Institute's mission and ongoing work. By contributing our technical expertise and practical experience to IACC sessions, and by helping shape the dialogue on implementation, we continue to reinforce Collective Action as a vital component of effective and sustainable anti-corruption strategies worldwide.

At a regional level

Collective Action is gaining traction in regional anti-corruption frameworks as a practical means to strengthen integrity, promote collaboration and address transnational corruption challenges. While references remain scattered, recent developments show growing uptake of the approach across Africa, Southeast Asia and Latin America.

In **Africa**, the **Rabat Declaration** was adopted in October 2023, following a high-level conference hosted by the Moroccan Anti-Corruption Authority (INPPLC) and UNODC – with the Basel Institute and OECD as co-organisers. The declaration emphasises "the involvement of all stakeholders, with a shared vision and an action based on collective mobilisation".

The declaration acknowledges that corruption undermines investor confidence and economic competitiveness and identifies the private sector as a "leading actor in the efforts of prevention and fight against corruption". In a context of rapidly increasing foreign direct investment across the continent, Collective Action is positioned as a vital tool to build trust and safeguard sustainable economic growth.

In Southern Africa, the **Southern African Development Community** (SADC) has embraced Collective Action as a foundational element of its regional anti-corruption strategy. Its Protocol against Corruption

and the Strategic Anti-Corruption Action Plan (2023–2027) underscore the importance of multi-stakeholder cooperation in countering corruption and transnational organised crime. We have supported these efforts through specialised training for SADC anti-corruption prevention officers, with a focus on private sector engagement and the operationalisation of Collective Action.



2023 SADC training of anti-corruption agencies in Johannesburg.

The role of Collective Action in building resilient anti-corruption ecosystems is also increasingly recognised in **Asia and the Pacific**. The Basel Institute has contributed through knowledge sharing and technical inputs, helping to shape regional discussions on how Collective Action can reinforce national anti-corruption strategies and enhance cross-border cooperation.

In 2023, the Basel Institute joined the Advisory Group of the **Anti-Corruption Initiative for Asia and the Pacific (ACI)** of the Asian Development Bank and the OECD. This marks an expansion of our role in the region, building on our ongoing support to the ACI's Working Group on Business Integrity launched in 2019.

The initiative was formed in 1999 to cooperate with governments in the fight against corruption and support national and multilateral efforts to reduce corruption in Asia and the Pacific. Over the years, we have contributed to various ACI meetings focusing on Collective Action, including during the annual ACI Forum as well as during a dedicated side event at the 2025 OECD Global Anti-Corruption and Integrity Forum (GACIF).



Participants at the ACI meeting held on the margins of the 2025 OECD GACIF. Photo: OECD, used with permission.

Our engagement in the region also includes technical assistance provided to individual countries as well as peer learning sessions. One example is the ongoing support to the Anti-Corruption Commission of Bhutan.

The Basel Institute has also been providing technical assistance to the Asia-Pacific Economic Cooperation (APEC) Business Ethics for SMEs Initiative. This is the world's largest public-private partnership to strengthen ethical conduct and promote a level playing field in the biopharmaceutical sector. Our support includes contributions to



Vanessa Hans moderating a panel at the 2023 APEC Business Ethics for SMEs Forum in Washington D.C.

the Consensus Framework in the APEC Region 2022 Report and the Consensus Framework Resource Guide published in 2024.

In **Latin America** we also expanded our efforts to support Collective Action against corruption. The Collective Action approach to fighting corruption was discussed at the **Eighth Integrity Week** organised by Alliance for Integrity in Lima, Peru in 2023.

Our technical assistance in the region also included the development of **High Level Reporting Mechanisms** in Argentina and Colombia. Jointly developed by the Basel Institute on Governance, the OECD and Transparency International, the HLRM enables concerns about suspected bribery or unfair business practices in public tenders to be raised and resolved swiftly. Independent yet authoritative, it acts like an escape valve, defusing potential corruption-related issues before they cause damages. The concept is supported by the G20 and the B20 business leaders around the world.

"The HLRM is a flexible tool designed to provide companies with a user-friendly channel for signalling issues in their interaction with public officials. As such the impact depends very much on the buy-in from both private sector and public authorities. Experience shows that it has been very impactful in countries like Colombia and Ukraine (in the form of the Ombudsman's office), where the public authorities have set a clear tone from the top and the private sector has shown a willingness to use the mechanism. The potential of the HLRM for public procurement is huge but remains largely untapped."

Nicola Bonucci, former Director Legal Affairs at the OECD, and Board Member of the Basel Institute on Governance

In national strategies

Beyond international and regional frameworks, governments around the world have increasingly recognised the value of Collective Action for their domestic anti-corruption efforts. This endorsement can take

various forms: formal inclusion in national anti-corruption strategies (NACS), integration into laws and regulations such as public procurement laws, or, in some cases, through active government-driven Collective Action initiatives.

The Basel Institute has promoted and supported such national efforts, with a particular focus on embedding Collective Action into policy and practice. An overview of national endorsements can be found in the paper "Mainstreaming Collective Action: Establishing a baseline", published by the Institute in 2020.

We have worked closely with the **Network of Corruption Prevention Authorities (NCPA)** to increase awareness and uptake of Collective Action tools. In 2021, we delivered a presentation to NCPA members on the importance of inclusive anti-corruption strategies and the role of the private sector. Following the positive reception, a survey was launched to assess member engagement with the private sector and their interest in adopting Collective Action approaches.

Several bilateral follow-up meetings were held with interested authorities from France, Chile, Jordan, Palestine, Moldova and Albania, to provide tailored guidance on Collective Action and stakeholder engagement.

These consultations informed the development of a guidance document on "Engaging the private sector in Collective Action against corruption", co-developed with the NCPA. With 31 national corruption prevention authorities in its membership, the NCPA's endorsement of this guide contributed to significantly broadening awareness and uptake of Collective Action across diverse jurisdictions.

The Basel Institute also provided direct technical assistance to national anti-corruption authorities:

 In Chile, the Basel Institute's active participation in and contributions to public forums and bilateral





meetings with the Office of the Comptroller General to promote Collective Action led to the inclusion of Collective Action in Chile's national anti-corruption strategy.

- In December 2022, the Basel Institute conducted a mission to Mauritius that included a keynote address at a Public-Private Platform Against Corruption strategy session. The Institute's targeted contributions and sustained engagement played a role in the government's subsequent endorsement of Collective Action in its updated NACS.
- In Bulgaria, the Basel Institute's technical assistance led to the establishment of the Bulgarian Collective Action Platform (BCAP).
 The platform promotes an enabling environment for multistakeholder and bipartisan collaboration to improve integrity and address corruption and other unfair business practices.
- In Malawi, we contributed our multidisciplinary expertise to the 2019–2024 national anti-corruption strategy. It includes Collective Action and recognises that the private sector is "ready and willing to become a more active partner in fighting corruption".

Other endorsements

Non-financial reporting standards

As corporate sustainability and non-financial reporting frameworks evolve to reflect stronger expectations around business integrity, Collective Action has gained increasing recognition as a valuable component of anti-corruption strategies. Among the most influential frameworks is the **Global Reporting Initiative (GRI)**, whose standards are widely adopted by companies worldwide to disclose their environmental, social and governance (ESG) performance.

Its standard GRI 205: Anti-Corruption 2016 explicitly encourages organisations to report not only on internal compliance mechanisms but also on their involvement in Collective Action. This includes outlining a corporate entity's Collective Action strategy, listing the initiatives it participates in and describing the core commitments

associated with those efforts. While this guidance is voluntary, it signals the growing importance placed on collaborative approaches to integrity and transparency.

The Basel Institute supported the development of Collective Action recognition within the GRI framework by contributing insights and recommendations on how Collective Action can be meaningfully integrated into corporate anti-corruption disclosures. Our engagement helped ensure that the standard reflects the practical value of multistakeholder initiatives in strengthening business ethics across supply chains and markets.

Investors

Institutional investors are increasingly acknowledging the importance of Collective Action as a strategic tool to enhance market integrity, mitigate corruption risks and promote responsible business conduct. Leading investors are looking beyond internal anti-corruption policies when assessing companies. They increasingly view participation in multi-stakeholder initiatives as evidence of a firm's wider commitment to systemic integrity.

A compelling example of this shift is the work of **Norges Bank Investment Management (NBIM)**, which manages Norway's Sovereign Wealth Fund. Seeking to assess the effectiveness of corporate anticorruption efforts, NBIM initiated a dialogue with the pharmaceutical sector to explore what meaningful anti-bribery and corruption performance looks like in practice.

Facilitated by the Basel Institute, this engagement led to the formation of a Collective Action initiative among major pharmaceutical companies in 2020. The participants jointly developed a set of indicators to

define and measure effective anti-corruption programmes. Importantly, these indicators included a focus on participation







At the Corporate Integrity Forum in Korea in 2024, former UN Secretary General Ban Ki-moon highlighted the role of business integrity in achieving sustainable and equitable development. Photo: UNGC Korea, used with permission.

in Collective Action as a signal of serious, sustained commitment to integrity.

NBIM subsequently endorsed the indicators, encouraging companies to disclose their progress publicly. This reinforces Collective Action not only as a collaborative tool but also as a benchmark in responsible investment decisions.

Business and professional associations

Business and professional associations play a pivotal role in uniting diverse stakeholders, setting ethical standards and catalysing collective responses to systemic corruption risks. Their ability to convene industry actors and promote shared commitments makes them powerful platforms for advancing Collective Action.

One example is the International Federation of Accountants. In collaboration with the Institute of Chartered Accountants in England and Wales and the Basel Institute, the organisation released a landmark report in July 2024 titled *Integrated Mindset in Practice:* Professional Accountants in Business and Anti-Corruption Compliance.





The report highlights the unique capacity of professional accountants to lead and participate in Collective Action initiatives, drawing on their fiduciary role and expertise in transparency, accountability and risk management. It offers practical guidance for how accountants can engage in multi-stakeholder collaborations to strengthen anti-corruption measures within and beyond their organisations.

The International Chamber of Commerce (ICC) has also long championed Collective Action. Through its Commission on Anti-Corruption, the ICC has developed a range of tools and frameworks that encourage companies to work collaboratively to prevent bribery and extortion.

The Basel Institute contributed to this body of work with a chapter on whether anti-corruption Collective Action is a competition risk for companies, included in the ICC publication *Perspectives on Antitrust Compliance*. The chapter addresses common legal and practical concerns, clarifying how companies can safely and effectively engage in Collective Action while respecting competition law, and offering strategies to overcome perceived risks.

Through such collaborations, the Basel Institute continues to promote the integration of Collective Action into professional and business networks, ensuring that collective integrity is embedded not just in policies, but in the daily practices and shared standards of industries worldwide.