



Diagnosing Corruption in the Extractive Sector: A Tool for Research and Action

2nd edition

SUSANNAH FITZGERALD, ALEX GILLIES, SEBASTIAN SAHLA, MATTHIEU SALOMON AND TOM SHIPLEY

DECEMBER 2023

Contents

| | |
|---|-----------|
| Summary | 3 |
| Introduction | 7 |
| The approach | 17 |
| Step 1: Choose a sector or commodity and set goals | 19 |
| Step 2: Review existing data | 21 |
| Step 3: Select the areas of focus | 27 |
| Step 4: Diagnose corruption | 30 |
| Step 5: Prioritize forms of corruption for action | 36 |
| Step 6: Develop an action plan | 40 |
| Step 7: Implement the action plan | 46 |
| Sources and consultations | 50 |
| ANNEXES | 53 |
| Step 1 - Sample terms of reference for independent expert | 53 |
| Step 2 - Workbook for reviewing existing data | 55 |
| Step 2 - Summary report templates | 55 |
| Step 3 - Selection table template | 57 |
| Step 4 - Research guides | 58 |
| Step 4 and Step 5 - Diagnostic table template | 59 |
| Step 6 - Action plan template | 60 |

Summary

Corruption in the extractive sector can undermine the efforts of resource-rich countries to reduce poverty, diversify their economies, achieve democratic governance and address the climate crisis. Its destabilizing impacts are global too. Foreign enablers often help corruption schemes to function, and illicit funds may flow abroad. This guide from the Natural Resource Governance Institute (NRGI) is designed to support evidence-based, multi-stakeholder action to address this challenge.

The tool lays out a structured, participatory process, enabling users to:

- Use evidence and consultations to identify the forms of corruption most likely to occur and negatively impact a country's extractive industries.
- Diagnose the causes of these forms of corruption.
- Build and implement an evidence-based anticorruption action plan, focused on preventing future corruption.

Each assessment involves three key actors: the organization that undertakes the assessment (the “user”), an independent expert leading the research (the “independent expert”) and a wider set of stakeholders, who are consulted at various stages of the process. We recommend hiring an independent expert to support the process, though users could potentially choose to undertake the research (steps 2 and 4) themselves.

Figure 1. Seven steps for diagnosing corruption in the extractive sector



The assessment process has seven steps:

- 

1 Choose a sector and set goals: The user identifies the sector or commodity and the level of governance that will be assessed, and formulates a set of broad goals that describe the motivations for conducting the diagnosis. The user's priorities should inform this step and it should not involve research.
- 

2 Review existing data: Through desk research, the independent expert reviews a core set of existing data and analysis on corruption and governance in the country's extractive sector (e.g., data from the Extractive Industries Transparency Initiative (EITI), NRG's Resource Governance Index, past corruption cases), using the guiding questions in the Step 2 Workbook (see annex) for reviewing existing data. The independent expert produces a summary report which provides the evidence base for narrowing the scope of the assessment in Step 3.
- 

3 Select the areas of focus: Based on the Step 2 analysis and multi-stakeholder input received during Workshop 1 (the first of two or three multi-stakeholder consultation workshops), the user completes a selection table to identify the most relevant areas of focus for in-depth analysis and eventual action planning.
- 

4 Diagnose corruption: The independent expert conducts in-depth research and analysis on the chosen areas of focus to identify common forms of corruption, why they occur and how different actors might help to address them. The annexes contain a research guide for each area of focus. Research methods include interviews, focus groups, desk research and surveys. The independent expert then drafts a report and completes a table summarizing the findings.
- 

5 Prioritize forms of corruption for action: Drawing on the diagnostic table and multi-stakeholder input received during Workshop 2, the user prioritizes the forms of corruption identified in Step 4, based on their likelihood and impact, and the feasibility of reform.
- 

6 Develop an action plan: With support from the independent expert, the user engages a relevant set of stakeholders to develop an action plan (also during Workshop 2, or Workshop 3 if Steps 5 and 6 are planned sequentially). The action plan targets the forms of corruption prioritized in Step 5. It sets objectives and lays out strategic actions for pursuing them. The diagnostic report and the action plan are then published.
- 

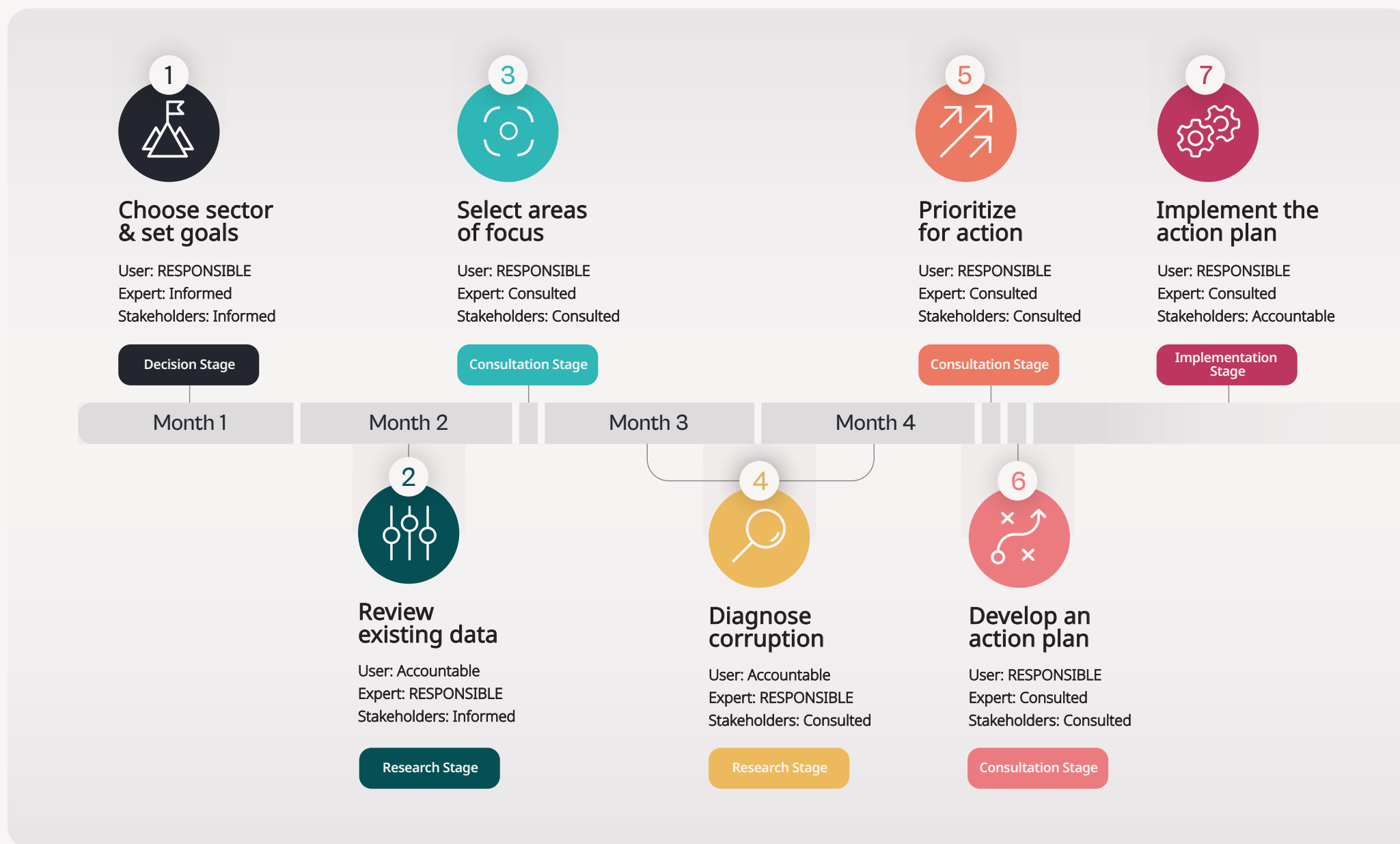
7 Implement the action plan: The user devises a dissemination and advocacy strategy to share the findings of the diagnostic process, support implementation by relevant actors and monitor progress in implementing the agreed action plan.

We have designed the tool to be flexible, allowing users to adapt the content and process to meet their needs. Timelines will therefore vary, though we estimate the average process will take between four and six months for steps one to six, with follow-up in the subsequent months as part of Step 7. See Figure 2.

Initially published in August 2021, this updated version of the tool published in December 2023 incorporates insights from use of the tool in five different contexts:

Mongolia, Colombia, Philippines, Guinea and Chile. This updated version includes a greater emphasis on implementing the action plan, which emerged as the most challenging part of the process. We have created a new, seventh step explicitly focusing on this issue and bringing in lessons for successful anticorruption efforts from other sectors to help users transform plans on paper into real-life reforms and ultimately concrete impacts.

Figure 2. Timing and responsibilities





Introduction

Corruption in the extractive sector can undermine the efforts of resource-rich countries to reduce poverty, diversify their economies, achieve democratic governance and address the climate crisis. Its destabilizing impacts are global too. Foreign actors often enable corruption schemes to function, and illicit funds may flow abroad. This diagnostic tool allows users to identify and understand the most concerning forms of corruption in different areas of their country's extractive sector governance, and to develop an action plan for addressing them.

What can users achieve with the tool?

The tool's overall aim is to support focused, evidence-based, multi-stakeholder action to address corruption in the extractive sector.

It lays out a structured, participatory process enabling users to:

- Use evidence and consultations to identify forms of corruption most likely to occur and negatively impact a country's extractive industries.
- Diagnose the causes of these forms of corruption.
- Build and implement an evidence-based anticorruption action plan, focused on preventing future corruption.

The tool builds on NRG's experience analyzing hundreds of extractive-sector corruption cases and promoting anticorruption safeguards in resource-rich countries around the world. To inform its design, NRG conducted an in-depth review of other corruption risk assessment methodologies and consulted a wide range of experts (see "Sources and consultations").

Who is the tool for and when is it best used?

A range of actors want to help prevent extractive sector corruption. They need to decide how to target and design their interventions and involve allies in this strategic process. This tool is meant to meet their practical needs.

Users of the tool could include government agencies (national, subnational and local), anticorruption agencies, parliamentarians, international organizations, civil society groups, impacted communities, and private companies and investors. Initial users of the tool included Extractive Industries Transparency Initiative (EITI) Multi-Stakeholder Groups (MSGs), as part of the EITI's renewed effort to address corruption challenges in the oil, gas and mining sectors.¹

There are several contexts in which conducting a corruption diagnostic exercise may be particularly opportune.

¹ Charlotte Boyer, and Matthieu Salomon, *How Anticorruption Actors Can Use the EITI Standard* (Natural Resource Governance Institute, 2023).

These include when:

- A country's political leadership charges the anticorruption commission with leading reforms, following a major extractive-sector scandal.
- A ministry of mines or petroleum wants to create an evidence base and secure stakeholder support for its efforts to improve integrity.
- A country decides to sign up to the EITI as part of its anticorruption reforms, and the EITI's MSG wants to be sure its efforts target the leading corruption risks.
- An MSG receives feedback from its EITI validation report that the EITI process is not relevant enough to address the corruption challenges facing the country.
- International financial institutions want to assess corruption risks in the sector, prior to a major investment or loan, and identify whether there are additional measures that stakeholders could take to prevent past problems from recurring.
- A civil society group or coalition decides to strengthen engagement on extractive sector corruption and needs to develop a strategic plan.
- An international donor incorporates the assessment as part of planning a new phase of engagement on extractive sector governance in a country.
- The energy transition is changing the dynamics in a country or region's extractives sector—for example, through growing investment and interest in the extraction and processing of certain minerals or in the fossil fuel phaseout—and new corruption risks emerge.

How does the tool work?

The tool is designed to be flexible, as users will have different needs and varying amounts of time and resources. It takes a modular approach, so that users can focus on the part of their country's extractive sector where their priorities lie.

Each assessment involves three key actors: the organization that undertakes the assessment (the "user"), an independent expert leading the research (the "independent expert") and a wider set of stakeholders from government, industry and civil society who are proactively consulted at several stages of the process. We recommend that the user hires an independent expert to support the process. However, if users have adequate resources and expertise, they could potentially undertake diagnostic research (Steps 2 and 4) themselves.

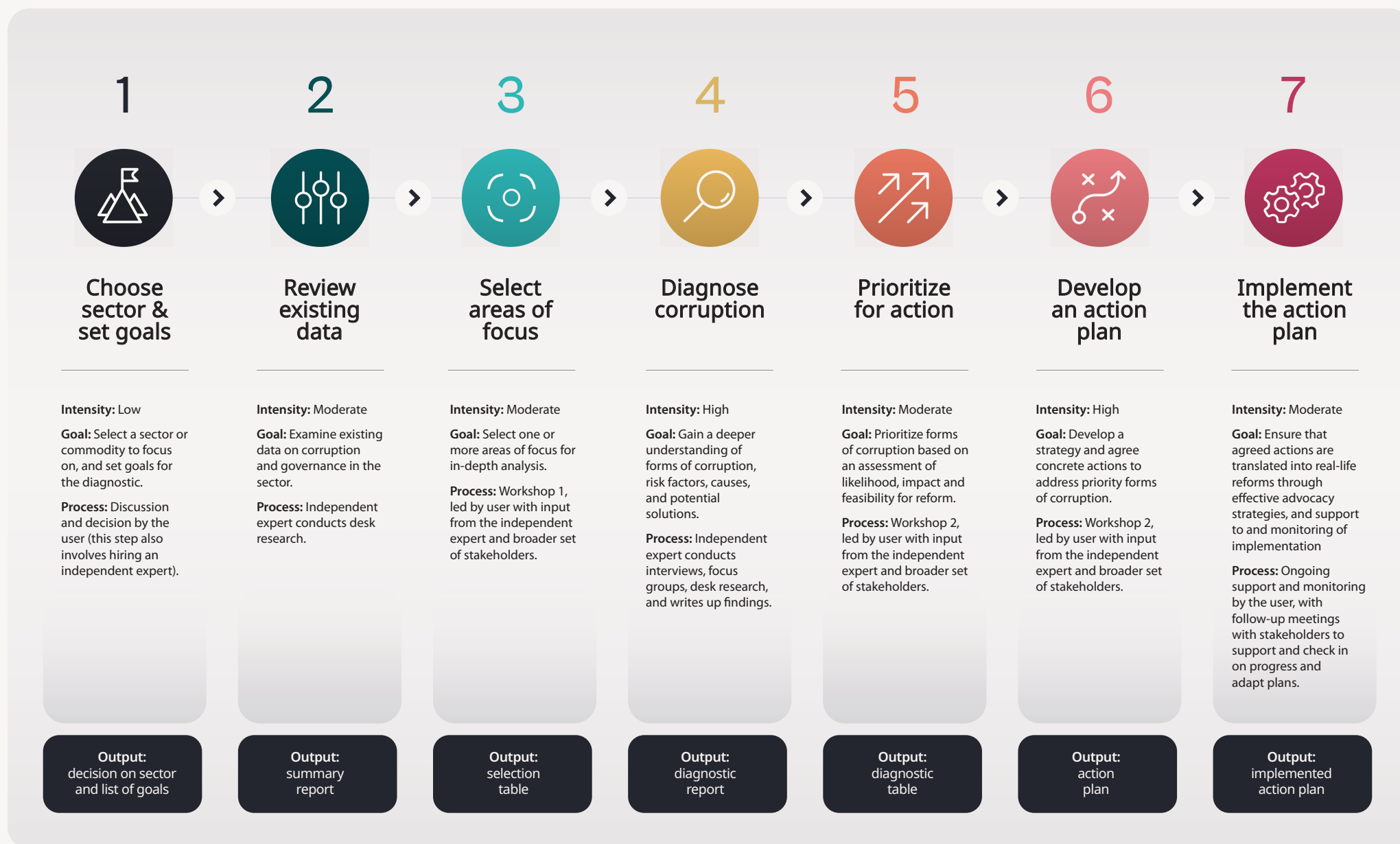
The process comprises seven steps, depicted in Figures 2 (above) and 3 (below).

- **Step 1:**
Choose a sector and set goals.
The user decides which sector (oil and gas, or mining) to focus on, and potentially chooses a specific commodity (gold, coal, copper, etc.) and level of governance for assessment. Users also formulate the broad goals that motivate their decision to conduct the assessment.
- **Step 2:**
Review existing data.
The independent expert collects existing information and data about corruption and governance challenges in the sector, using the guiding questions in the Step 2 Workbook for reviewing existing data (see annex). They then write a summary report using the guidance below and Step 2 summary report templates (see annex).

- **Step 3:**
Select the areas of focus.
The user draws on the summary report and feedback received during the first of two or three multi-stakeholder consultation workshops to select which area or areas to focus the diagnostic on. The areas of focus could include a stage of the extractive sector decision chain, or one of several cross-cutting topics.
 - **Step 4:**
Diagnose corruption.
The independent expert conducts in-depth research and analysis about the chosen areas of focus to identify the leading forms of corruption, why they occur and how different actors might help to address them. Research methods include interviews, focus groups, desk research and surveys. For each area of focus, we provide a detailed Step 4 research guide (annex) to steer this effort.
 - **Step 5:**
Prioritize forms of corruption for action.
Through a second workshop bringing together a broad range of stakeholders, the user prioritizes for action the forms of corruption identified in Step 4, based on an assessment of their likelihood and impact, and the feasibility of reform.
 - **Step 6:**
Develop an action plan.
During the same multi-stakeholder workshop (or another one if steps 5 and 6 are planned sequentially), a plan of action is discussed. The final plan will target the forms of corruption of greatest concern, with clear objectives and action items.
 - **Step 7:**
Implement the action plan.
The user devises a dissemination and advocacy strategy to share the findings of the diagnostic process, support implementation by relevant actors and monitor progress in implementing the agreed action plan.
- Users could also choose a lighter process, or a much deeper one. This guidance describes what we expect will be a standard use case. This should not restrict users from considering other options, such as conducting a broader but less detailed analysis which covers a larger number of focus areas, but looks at each in less depth.



Figure 3. Seven steps for diagnosing corruption in the extractive sector



What do we mean by corruption?

Definitions of corruption vary, including around the actions, actors and forms of benefit they cover.² For the purpose of assessing corruption in the extractive sector, we have chosen a broad approach.

We use Transparency International's definition of corruption as "the abuse of entrusted power for private gain." One advantage of this definition is that it is widely recognized and used globally. It is also a broad definition which can cover many of the abuses of power and other forms of wrongdoing observed in the extractive sector.

To expand on how we understand Transparency International's definition, we consider that:

- Corruption covers a range of different types of actions including bribery, embezzlement, nepotism, cronyism, influence peddling and self-dealing.
- Corruption can include legal and illegal actions. Some forms of corruption are not necessarily prohibited by a country's laws, particularly since the beneficiaries of corruption may play a role in setting those laws. The concepts of policy capture or state capture are critical to understanding extractive sector corruption in many countries (see Box 2).
- The gains and harms from corruption are not just monetary, but often political. Bribes often feature the exchange of money for a favor. But individuals also pursue corruption for their longer-term political interests or for the benefit of a wider group. In many settings, corruption is systemic in nature, rather than transactional.

- Various private and public actors can be "entrusted with power." Government officials, companies, non-governmental organizations, community leaders and private individuals can abuse this trust and perpetrate corruption.
- Corruption plays out at the local, national and international levels. While this tool focuses on sector-level assessments for specific countries, our approach takes account of the critical roles international actors often play in enabling corruption.

Extractive sector corruption, in its diverse forms, inflicts great harm on society. Revenues that could finance social services, infrastructure and other public goods end up benefiting a small number of well-connected individuals instead.

Corruption leads to poor-quality regulation, lowering tax receipts and allowing sector operations to inflict social and environmental damage. It is gendered in its impact, usually harming women and gendered minorities disproportionately over men, and worsening inequalities between them.

Indigenous peoples and other minority and vulnerable groups often endure outsized harm as well. Corruption undermines the business environment, raising the sector's operating costs and disadvantaging those companies committed to operating with integrity. It also damages political systems, causing destabilizing scandals and disenfranchisement among citizens.

² For discussions on the definitional debate see Hough, D. *Analysing Corruption*, Newcastle: Agenda Publishing (2017); Philip, M. "The definition of political corruption" in Heywood, P. (ed.), *Routledge Handbook of Political Corruption*. Oxford: Routledge (2015); Heidenheimer, A.J. "The context of analysis" in Heidenheimer A.J. (ed.) *Political Corruption: Readings in Comparative Analysis*. New Brunswick, NJ: Transaction Books (1970).

→ Box 1.

Definitions: corruption, policy or regulatory capture, and state capture

Corruption is traditionally understood as involving some form of transaction which subverts the proper implementation of policies or regulation, such as in cases of bribery. However, corruption can also take the form of policy, regulatory or state capture, through which the process of creating policies or regulation is corrupted. This can involve both illegal and legal means.

Policy or regulatory capture is the process by which public policy decisions or the content or application of regulations are consistently or repeatedly directed away from the public interest and towards those of a specific industry, group or person. This may occur through illegal processes, such as bribery, but also through legal channels such as political donations, excessive gifts and hospitality, or lobbying³.

State capture describes “the efforts of individuals or firms to shape the formation of laws, policies and regulations of the state to their own advantage by providing illicit private gains to public officials.”⁴ For instance, in some countries, it has not been made illegal for a public official to pursue commercial interests which conflict with their public duties. In others, powerful companies influence officials to weaken the regulations that apply to their operations.

In cases of state capture:

“What is captured is not just regulation but core state functions, including the ability to shape the rules of the game through constitutional and

legislative reform, but also the power of patronage which facilitates appointments to key power-holding or scrutiny bodies, and the power to distribute state assets and public money, and powers to regulate the space in which other oversight bodies such as the media and civil society act. State capture occurs when those who are entrusted with these powers abuse them consistently to shape the rules, appointments, allocation of state funds and rights in ways that make them less public-interest serving and more tailored to benefit narrow interest groups.”⁵

State capture is a broader and more encompassing process than policy or regulatory capture, addressing the entire functioning of the state, rather than just particular sectors. With all forms of capture, there is an intentionality to the process which distinguishes it from more general governance failures or incompetence.

The concept of state capture was first developed in the context of post-Soviet states’ transition to democracy and the role of oligarchs in shaping this process, and may therefore be particularly relevant for other countries that have undergone a similar transition.

3 OECD (2017), Preventing Policy Capture: Integrity in Public Decision Making, OECD Public Governance Reviews, OECD Publishing, Paris, doi.org/10.1787/9789264065239-en; Carpenter, D., & Moss, D.A. (Eds.). (2013). Preventing regulatory capture: Special interest influence and how to limit it. Cambridge University Press.)

4 J. Hellman, and D. Kaufmann (2001) Confronting the Challenge of State Capture in Transition Economies’, IMF Finance and Development 38(3). www.imf.org/external/pubs/ft/fandd/2001/09/hellman.htm; See also J. Hellman and D. Kaufmann (2018) ‘State Capture in Transition: Submission to the Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State’. resourcegovernance.org/sites/default/files/documents/state-capture-in-transition.pdf

5 E. Dávid-Barrett, (2023) State capture and development: a conceptual framework. Journal of International Relations and Development 26, 224–244. doi.org/10.1057/s41268-023-00290-6

How do we analyze corruption?

There are many possible approaches to assessing corruption in a sector.⁶ We call this a diagnostic tool because we follow a “problem-based” approach. In the Step 4 in-depth research, the first priority is to identify the most concerning forms of corruption, and then proceed to examining the risk factors and underlying causes that help explain them and how they might be prevented in the future. The tool also prioritizes involving multiple stakeholders in the process. While there is substantial overlap, this approach differs from corruption risk assessments, which are commonly used by an individual organization to map its own risk exposure. These assessments often reach their end point with the presentation of risks and mitigation measures the organization can take, rather than multi-stakeholder options for preventing the corruption from happening in the first place.

The forms of corruption which sit at the heart of the analysis are the practices in which entrusted power is abused for private gain. When we analyze why different forms of corruption occur or might occur in the future, we look at both risk factors and underlying causes. The risk factors increase the likelihood of the corruption occurring, such as the absence of competitive tenders or the absence of effective oversight. The underlying causes are the more systemic and structural factors that explain the corruption, such as the prevailing political context. In the diagnosis process, analysis of the forms of corruption, the risk factors and the underlying causes are all important.

Figure 4 below illustrates these distinctions through some commonly observed examples in the extractive sector. In practice, people will often talk about the three interchangeably, and users should not worry about overlaps, as long as the key points are all captured.

Figure 4. Examples of forms of corruption, risk factors and underlying causes

| Form of corruption | Risk factors | Underlying causes |
|--|---|--|
| Business interests exercise undue influence over the content of regulations which govern the sector. | There is no public consultation on the regulation. International businesses have unfettered access to the public officials designing regulation. | Reliance of the current political leadership on financing and support from certain large corporations. |
| A state-owned enterprise (SOE) routinely awards procurement opportunities to politically connected companies which are unqualified to do the work. | SOEs are not required to comply with national public procurement legislation. The SOE frequently makes use of single-source bidding. | Political leaders use the SOE for purposes of self-enrichment and patronage. |
| Companies pay bribes to public officials to speed up the process of issuing operating permits. | There are many unnecessary and time-consuming steps in the process for obtaining permits. | Frequent leadership changes in the regulator have allowed inefficiencies to remain in place. |

⁶ To inform this tool, we reviewed 17 anticorruption assessment tools, listed in the “Sources and consultations” section.

In Step 4, the research guides help the independent expert to identify common forms of corruption and match these with risk factors and underlying causes. As the analysis is brought together in Step 5, the tool requires the user to make judgements on the likelihood and impact of specific forms of corruption, as well as the feasibility of reforms, to help in their prioritization for action planning.

What anticorruption measures might make a difference?

There is widespread discussion around what anticorruption interventions are effective. One reason for the diversity of views is the large evidence gap around the effectiveness of different types of anticorruption intervention.⁷ Many experts are concerned that conventional anticorruption approaches, many of which have a strong law enforcement focus, have not returned the expected results.⁸

The U4 Anticorruption Resource Centre has mapped out six different policy perspectives on how to fight corruption.⁹ Our tool draws from several of these perspectives. We stress the importance of strong contextual analysis as a basis for identifying appropriate reforms, encourage collective action within and across different groups of stakeholders, and prioritize analysis of the transnational nature of corruption. Above all, we know there is no “one-size-fits-all” approach, so users of the tool have great flexibility in designing their action plans.

To help identify possible ingredients, we have organized potential anticorruption measures into the categories below. As the categories suggest, explicitly “fighting corruption” may not always be the most viable objective—“you don’t fight corruption by fighting corruption.”¹⁰

Other objectives, linked more directly to the forms of corruption observed and the associated risk factors and underlying causes, could hold more promise.

These fall into the following categories:

- **Enhancing transparency** to facilitate oversight and deter wrongdoing
- **Strengthening oversight and participation**, including oversight by governmental, parliamentary and civil society bodies, and opportunities for public participation
- **Promoting integrity** through robust and well-enforced anticorruption measures
- **Reforming institutional and regulatory processes**, such as removing procedural bottlenecks, consolidating accounts, preventing overlapping roles that create conflicts of interest, or strengthening regulatory capacity
- **Increasing fair competition** to counteract favoritism and uneven playing fields that benefit narrow interests
- **Strengthening the enforcement of rules**, making the implementation of regulations more unbiased and effective
- **Addressing foreign enablers**, given the transnational nature of extractive sector corruption and the common role played by such players.

Further discussion on action planning is provided in Step 6.

7 Johnson, J. Taxell, N. and Zaum, D. “Mapping evidence gaps in anticorruption. Assessing the state of the operationally relevant evidence on donors’ actions and approaches to reducing corruption.” U4 Issue 2012:7 (2012); Department for International Development. “Why corruption matters: understanding causes, effects and how to address them. Evidence paper on corruption.” (2015).

8 See, for example, Khan, M., Andreoni, A. and Roy, P. “Anticorruption in adverse contexts: a strategic approach.” SOAS (2016).

9 Jackson, D. “How change happens in anticorruption. A map of policy perspectives.” U4 Issue 2020:14 (2020). The six policy perspectives are: state modernisation, indirect anticorruption, localisation, nurturing norms, big bang and transnational.

10 Daniel Kaufmann, Raw Talks, “You don’t fight corruption by fighting corruption.” (2017).

What is new and distinctive about our approach?

We are far from the first organization to develop a framework for assessing corruption forms and risks. As noted above, we examined 17 existing tools for assessing corruption and broader governance risks. They included approaches developed by international financial institutions, development agencies, NGOs and private-sector actors. We also sought advice from experts with in-depth experience designing and implementing such frameworks. Full lists of the resources we reviewed and the consultations we conducted are in the “Sources and consultations” section on page 46. We hope to make a distinct contribution by building on the strengths of existing methodologies and adapting them to help facilitate evidence-based, multi-stakeholder assessments of corruption in the extractive industries.

This tool therefore reflects the following principles:

1. **Focusing on the extractive industries.** The tool draws extensively on the analysis of past extractive sector corruption cases and reflects sector-specific dynamics. It covers the sector’s full decision chain—from the decision to extract to the management of revenues—as well as several cross-cutting topics that reflect leading integrity challenges.
2. **Generating “action-worthy” findings.** Action planning cannot be an afterthought. The tool aspires to keep it in mind throughout the assessment process, not just at its end. Drawing inspiration from other tools, particularly the Mining Awards Corruption Risk Assessment (MACRA) tool developed by Transparency International’s Accountable Mining Program, this tool encourages users to identify and prioritize corruption forms that are not just actionable but also action-worthy—not just the low-hanging fruit, but the decisive forms of corruption that impact people’s lives.
3. **Ensuring inclusive, multi-stakeholder participation.** Broad-based buy-in is critical for building momentum around reforms. The tool incorporates multi-stakeholder input at several stages. It stresses the importance of including marginalized groups in the research and ensuring they are part of developing the action plan. In the extractive sector, marginalized groups commonly include women and gendered minorities; minority ethnic, racial and religious groups; young people, and people with disabilities.¹¹
4. **Balancing adaptability and rigor.** The tool takes a modular approach that allows users to adjust the scope to suit their needs, and to focus on areas where corruption is most significant and where action appears most promising.
5. **Drawing on robust and diverse data sources.** Generating broad-based acceptance of findings and proposed actions requires credible evidence and triangulation across data sources. Our tool draws on valuable existing resources, including EITI disclosures, governance indices and past case information, as well as new information, particularly from interviews, focus groups and surveys.
6. **Capturing systemic corruption.** In some countries, powerful groups have rigged the extractive sector to suit their narrow interests, at the expense of the wider public. This type of systemic corruption or capture is much harder to address than one-off instances of bribery, for instance. Yet we include it in the assessment, given its prevalence and the harms it can inflict.
7. **Assessing law, practice and the gap in between.** To understand how vulnerable a sector is to corruption, it is not sufficient to examine what laws and institutions exist on paper. What matters more is how well they function in practice. Recent years have seen legal reforms in many countries to prevent corruption, but weak implementation remains a widespread challenge.¹² Drawing inspiration from the focus on assessing this implementation gap in the World Bank’s *Mining Sector Diagnostics*, our approach emphasizes the understanding of issues that arise from the way in which processes are implemented, rules are enforced and decisions are made in practice.

11 Our approach to analysing the gendered impact of corruption draws on Transparency International Australia’s incorporation of gender into its revised “Mining Awards Corruption Risk Assessment Tool (MACRA),” (November 2020). Other resources include: International Association for Impact Assessment. *Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects* (2015), and IFC. *Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets* (2007). While primarily written for a private-sector audience conducting impact assessments, these resources provide useful information on how to identify and engage stakeholders, including vulnerable or marginalized groups.

12 See Michael Findley, Daniel Nielson and Jason Sharman, *Anticorruption Measures*, FACTI Panel (2020); NRG, *Resource Governance Index: From Legal Reform to Implementation in Sub-Saharan Africa* (2019).



The approach

The assessment has seven steps (see Figures 2 and 3). The rest of this document provides details on how to carry out each step. The annexes contain additional guidance for specific steps.

Three key actors are involved in each assessment:

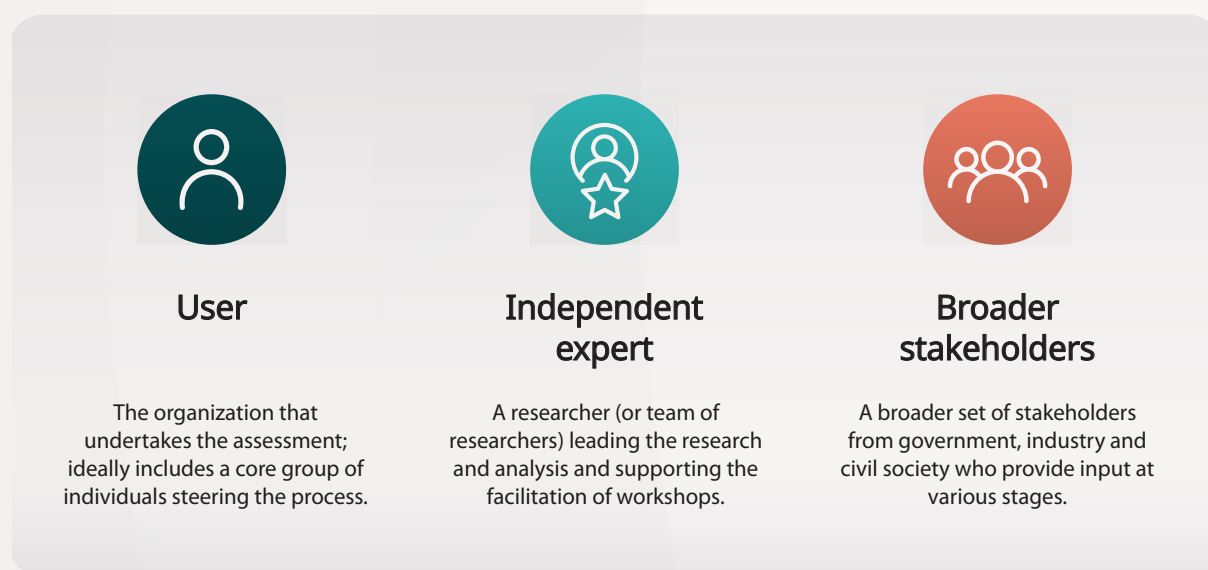


Figure 5. Key actors involved in the assessment process

→ Box 2.

Finding the right independent experts

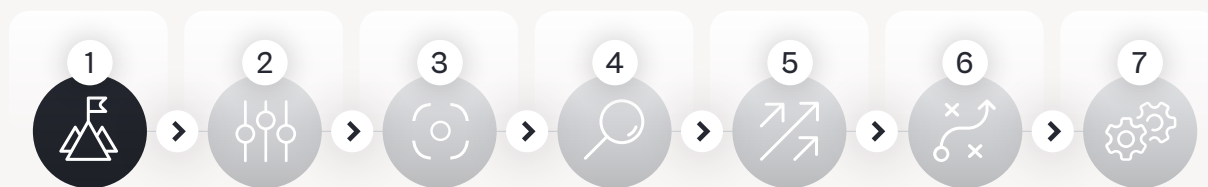
The independent expert (or experts), when used, will play a critical part in the assessment, so it is worth investing in finding the right person or team. In most cases, it will be preferable for the team to include a national of the country in question. Language skills should also be considered, given the need to conduct sensitive interviews. If sufficient budget is available, building a team of experts with different perspectives may be a successful approach. Strong familiarity with the country's extractive sector is essential. The experts should be experienced researchers with the credibility to engage with stakeholders across the sector on sensitive issues. The Step 1 annex includes a sample Terms of Reference for an expert, which users could adapt.

The time and resources needed to carry out an assessment will vary depending on the scope, particularly the number of areas of focus selected in Step 3. We estimate that a full assessment, containing in-depth analysis of one or two areas of focus from Step 1 to Step 6, would take approximately four to six months to complete. This covers the time needed to prepare for the assessment, including identifying and commissioning the independent expert, but excludes the time needed for dissemination and follow-up once the assessment is complete, which is covered in Step 7.

Exact timelines will inevitably vary and will be shaped by factors such as how long it takes to arrange interviews with key stakeholders and to organize consultation and planning workshops. Certain activities, such as one-to-one interviews in person, may be more time-consuming but worth dedicating time and resources to if they support a more robust diagnostic process. Users should not feel too bound by the suggested timeframes, although they should be careful that the process does not take too long, as this can mean losing momentum or missing important advocacy opportunities.

To implement a successful and efficient process, the user and independent expert should take care to:

- Remain focused throughout the process on the need to develop an impactful action plan, which requires building relationships with key stakeholders as early as possible.
- Move efficiently through Steps 1–3, as most effort and energy should go into exploring the chosen areas of focus and what can be done there (Steps 4–6).
- Ensure multi-stakeholder participation at appropriate stages, particularly Steps 3, 5 and 6, to gain insights and support for the action plan.
- Rigorously document the evidence that underpins the diagnosis and the decisions reached at Steps 3, 5 and 6.



Step 1. Choose a sector or commodity and set goals

Goal:

Choose a sector, commodity and level of governance, and set goals for conducting the corruption diagnostic in the country.

Process:

Discussion and decision by user. This should be a brief, preliminary step.

Output:

Decision on which sector or commodity and level of governance in which to diagnose corruption, and a set of goals. Identification of key stakeholders.

Overview

The user starts the process by selecting a specific sector or commodity and level of governance to assess and defining a set of goals which describe the user's motivation for conducting this corruption diagnostic. This step should be brief and not require any in-depth research. In most cases, the decision can be made at a single meeting convened by the user.

1.1 Choose sector, commodity and level of governance

The user decides which sector to focus on (oil and gas, or mining), or alternatively selects a specific commodity (such as gold, coal or gemstones, or a defined "group" of commodities such as "critical minerals"). In most countries, relatively separate systems govern the hydrocarbon and mineral sectors.

It would therefore be difficult to conduct a single assessment that covers both. If a user wants to assess corruption related to both sectors, we suggest running two separate exercises, though in some countries there may be selected corruption issues that overlap.

In countries where subnational authorities have significant governance responsibilities, the user may also decide to conduct the assessment for a specific subnational area only.

This may make sense if extraction or processing facilities are concentrated in a certain area or if there are divergent subnational approaches or conditions—for example, regional or locally focused scandals.

For guidance on how to carry out an assessment with a subnational focus, users can consult the account of the tool's use in analyzing the oil sector in Colombia's Casenare department.¹³

¹³ Yessica Prieto Ramos and Sergio Cordoba, "Colombia's Experience Tackling Subnational Corruption in the Hydrocarbon Sector," *Crudo Transparente*, December 2023.

When choosing which sectors, commodities or geographical or governance areas to focus on, factors influencing selection could include:

- evidence (such as past cases) and perceptions of where corruption is most prevalent and harmful
- the current or future economic importance of the sector or commodity
- environmental and social impacts of the sector or commodity
- where there is momentum around reform.

1.2 Set goals for the corruption diagnostic

The user identifies up to three broad goals that are motivating the corruption diagnostic. The goals should relate to the user's priorities and their view on the most pressing issues for the sector. The goals could relate to reducing a certain form of corruption or could address broader issues where corruption may be an obstacle to progress.

Examples include:

- strengthening governance of the sector through enhanced oversight
- reducing social and environmental harms in the sector
- increasing the revenues generated for government
- improving public or investor confidence in the sector.

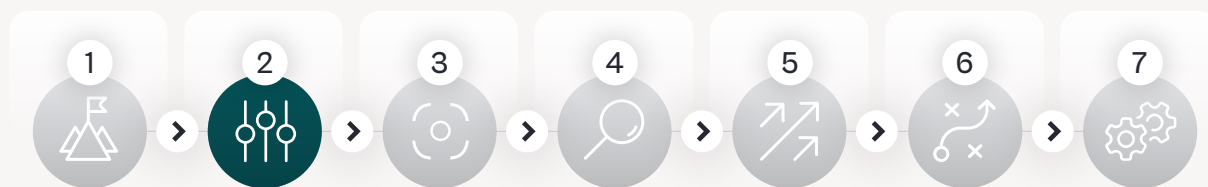
These goals will help keep the corruption diagnostic focused on real-world priorities. The user will revisit the goals in Step 6.

1.3 Identify key stakeholders

When users have defined the scope of the diagnostic (sector, commodity, governance level), they should start thinking about key stakeholders as early in the diagnostic process as possible, particularly to ensure effective implementation of their action plan.

At this point, the user should create a preliminary list of government agencies (national, subnational and local), international organizations, civil society groups, impacted communities, and private companies and investors that are relevant to the selected focus area.

Users may also wish to include other interested actors, such as parliamentarians or local government representatives, anticorruption agencies, international organizations or NGOs focused on the extractives sector or corruption, and any victims of corruption. Drafting this list should be a light exercise. It does not require specific research to inform it, and should be based on users' existing knowledge and experience.



Step 2. Review existing data

Goal:

Summarize relevant existing data and analysis about corruption and governance challenges in the sector to inform the selection of areas of focus in Step 3.

Process:

Desk research by the independent expert using the Step 2 Workbook.

Output:

A completed Step 2 Workbook and a brief report summarizing the desk research.

Overview

In Step 2, the independent expert collects and reviews a small number of existing sources of data and analysis using the Step 2 Workbook (see annex) and summarizes the findings in a brief report. The Step 2 Summary Report template (see annex) illustrates how this report could be structured.

This review will:

- Create a shared body of background knowledge for the user, the independent expert and the wider group of stakeholders involved in the process.
- Inform the selection of the area or areas of focus for in-depth analysis. Extractive sector governance involves a wide set of activities and many different actors. Every corner of this terrain can be prone to corruption. Rather than trying to tackle all forms of corruption at once, it is more strategic to address corruption in specific areas. The user will select one or several areas of focus via multi-stakeholder consultation in Step 3, drawing on the findings from Step 2.
- Ensure the in-depth diagnostic research in Step 4 benefits from existing data and analysis.

To structure the review, the independent expert answers a set of questions about six areas of focus (see Box 2):

1. Is the area significant, either now or in the foreseeable future? Significance could be economic, political, social or environmental.
2. Is this an area where corruption does or could cause harm?
3. Are there realistic opportunities for action and positive change?

Step 2 should be efficient, not exhaustive, and draw on a small number of readily available sources. The independent expert should not conduct any primary research at this stage. We estimate that completing the Workbook and drafting the report should require approximately 10-15 days' work from the independent expert.

While there are eight potential topics that the independent expert could consider, the decisions made by the user in Step 1 mean that they may not need to look at all of these in depth. For example, if the user has decided to look at a transition mineral supply chain in their country, they will not need to look at the questions regarding vested interests in the fossil fuel sector and can leave these as "not applicable."

Likewise, if there is no artisanal or small-scale mining in a mineral supply chain, the independent expert could also leave these answers as "not applicable." The independent expert should take a common-sense approach to the amount of time and research invested in different questions, especially since this should be a relatively quick research task.

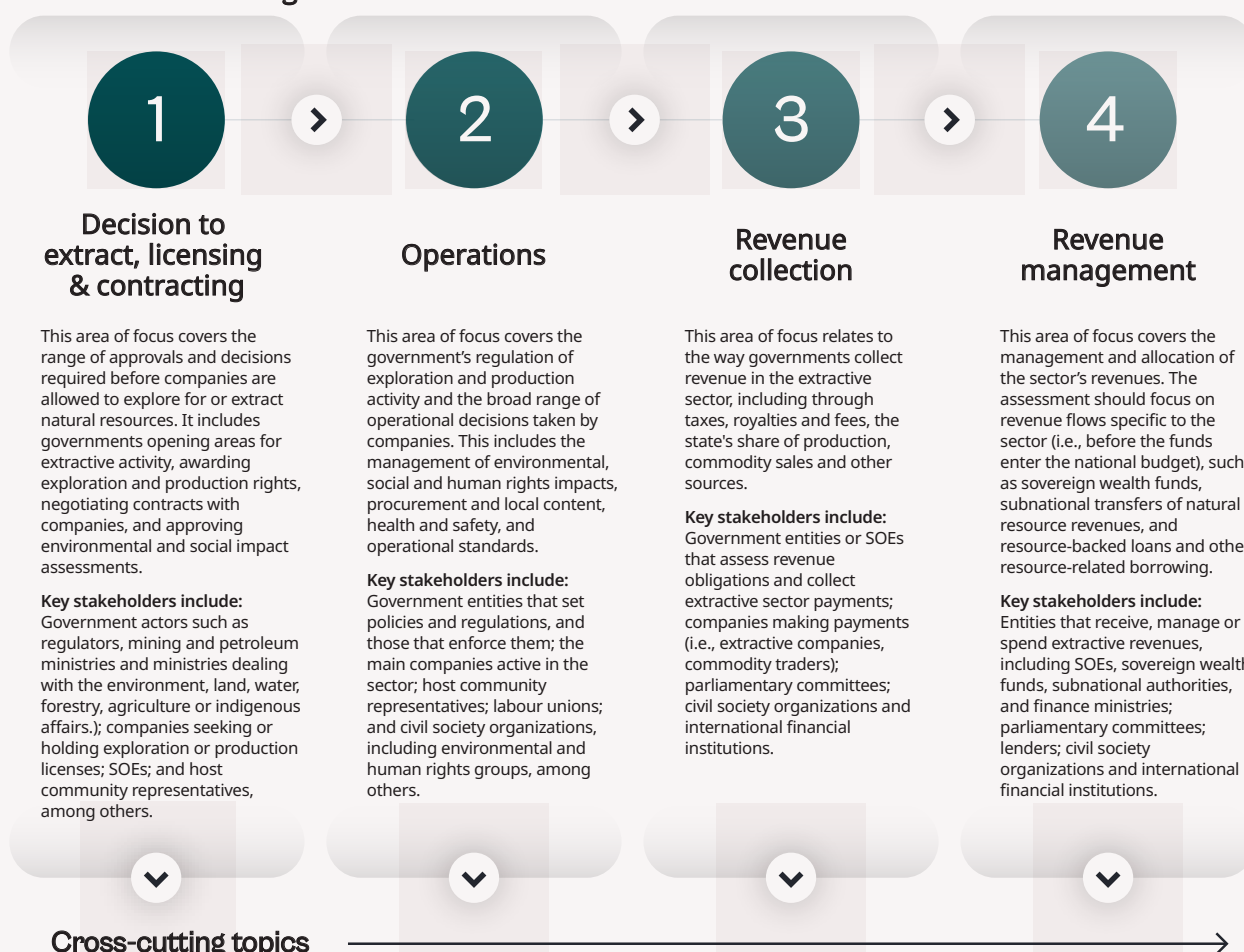


Credit: Mariusz_prusaczyk / Getty Images

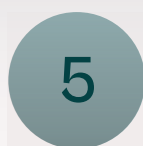
Explanation of areas of focus (next page)

The Step 2 desk review helps the user select areas of focus for in-depth analysis later on in the assessment process. The areas of focus comprise four extractive industries decision chain stages and two cross-cutting topics. Below we explain each briefly, and list some of the key stakeholders involved. While relevant stakeholders will vary from country to country, the lists could inform choices about who should be included in the consultation workshops and the Step 4 research.

Decision chain stages



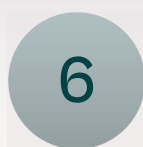
Cross-cutting topics



State-owned enterprises

This area of focus covers the role of SOEs in the extractive sector. Depending on the role of the SOE(s) in question, this could cover licensing, regulation, revenue collection and management, and commercial functions (which may include production, as well as refining, distribution and marketing of products or activities unrelated to extractives).

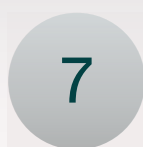
Key stakeholders include: The government entities that serve as SOE shareholders or are responsible for setting SOE policy or oversight; the SOE itself; the SOE's corporate partners (e.g., joint venture partners, commodity trading partners, suppliers and lenders); parliamentary committees and civil society organizations.



Artisanal and small-scale mining

This area of focus includes the whole extractive industries value chain as it applies to artisanal and small-scale mining (ASM). ASM is defined in this guide as being largely (although not exclusively) informal and associated with low levels of mechanization, capital, safety measures, health care and environmental protection.

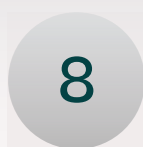
Key stakeholders include: ASM cooperatives, communities and associations; government policy, regulation and enforcement entities at national, regional and local levels; civil society organisations; traders and trade associations; exporters and international standard-setting organizations, such as the OECD.



Socio-environmental impacts

This area of focus covers the intersection between corruption and social and environmental abuse in the extraction and processing of metals and minerals. Corruption can play an important but often overlooked role in facilitating, obscuring and impeding accountability for social and environmental abuse in the extractives sector.

Key stakeholders include: government policy, regulation and enforcement entities dealing with mining, environment, land, water, forestry, agriculture, Indigenous affairs and social affairs; local communities and Indigenous Peoples; civil society and community groups; workers and trade unions; companies operating in the sector, including subcontractors, and security officials.



Fossil fuel phaseout

This area of focus addresses the fossil fuel sector (oil, gas, coal), and examines how corruption might impede the transition to clean energy. It looks at decisions in fossil fuel producing countries around whether to keep extracting these resources and how to prepare for the likely drop in demand. The focus is on corruption risks within the fossil fuel sector that could disrupt progress (not wider issues around renewables governance, climate financing, etc.).

Key stakeholders include: Government entities responsible for extractive, energy and climate policy; the SOE; producing companies; parliamentary committees; and civil society organizations, including climate-focused groups.

→ Box 3.

Examples of forms of corruption across areas of focus

| Licensing | Operations | Revenue collection | Revenue management |
|---|---|---|--|
| <p>Corruption in award decisions – bribery, favoritism, collusion or manipulation</p> <p>Manipulation of environmental and social impact assessment processes or community consultations</p> <p>Undue private influence over licensing laws and regulations</p> | <p>Corruption to enable avoidance or deviation from operational obligations, or the predatory or biased enforcement of these obligations</p> <p>Government officials acting as gatekeepers and soliciting favors from companies, or companies making facilitation payments</p> <p>Corruption in award of supplier contracts or hiring decisions</p> <p>Aiding and abetting smuggling and other criminal activity or extortion by armed actors</p> | <p>Undue influence over revenue collection laws and regulations</p> <p>Bribery or favoritism to influence contract terms</p> <p>Biased enforcement or company manipulation of fiscal obligations</p> <p>Commodity sale corruption</p> <p>Illegal taxation, money laundering, and misappropriation or embezzlement of revenues</p> | <p>Sovereign wealth fund self-dealing</p> <p>Bribery in the selection of sovereign wealth fund financial service providers</p> <p>Bribery in the allocation of resource-backed loans</p> <p>Misappropriation of borrowed funds</p> |
| State-owned enterprises (SOEs) | Artisanal and small-scale mining (ASM) | Socio-environmental impacts | Fossil fuel phaseout |
| <p>Bribery, collusion or favoritism in licensing, contracting, trading deals or regulatory activities and approvals</p> <p>Misappropriation or embezzlement of SOE finances</p> <p>Companies or officials unduly influence SOE regulation and rulemaking</p> | <p>Extortion and bribery of unlicensed ASM miners</p> <p>Favoritism, nepotism or abuse of traditional powerbroker status in licensing decisions or assigning land to ASM operations</p> <p>Officials or politicians' involvement in ASM trading</p> <p>Smuggling, tax evasion, misappropriation of revenue, or promotion of money laundering or illicit financial flows</p> | <p>Undermining the integrity of Environmental and Social Impact Assessments (ESIA) and manipulation of community consultation</p> <p>Concealment of environmental damage and avoidance of rehabilitation claims</p> <p>Corruption in subcontracting or hiring enables unsafe or unfair working conditions</p> <p>Extortion enables human rights abuses and unsafe working conditions</p> <p>Erosion of civic space and criminalization of accountability actors</p> | <p>Officials favor the fossil fuel sector in ways that counter the public interest</p> <p>Falsification of emissions data</p> <p>Corruption in asset transfers</p> <p>Favoritism or bribery in the allocation and expenditure of energy transition funds</p> <p>Corruption in shutdown and decommissioning processes</p> |

2.1 Compile existing materials

The independent expert identifies and compiles a small set of the most relevant information on governance and anticorruption in the country's extractive sector. The Step 2 Workbook contains suggested data sources.

Sources will include:

- **Existing knowledge.** The user and independent expert may be able to answer some of the questions in the Step 2 Workbook based on their existing knowledge.
- **Sector data.** Data on licensing, operations, revenues and other aspects of the extractive sector will shed light on the scale of different transactions and processes. Potential sources include EITI reporting and validation scorecards, and data from government agencies, SOEs, companies, industry analysts and international financial institutions.
- **Governance indices.** NRGi's Resource Governance Index (RGI) is the primary data source for answering several of the questions about transparency, oversight and governance, and for identifying gaps between law and practice. Other questions draw on additional cross-country indices.
- **Information on past corruption cases.** This includes court filings, domestic or foreign media reporting, and media and NGO investigations, which shed light on where corruption has occurred in recent years.

- **Country-specific corruption and governance reports.** These include recent reports by government, industry, NGOs, international institutions, academics and other actors about corruption and extractive sector governance. Sources could include EITI validation reports, the [MACRA](#) country assessments from Transparency International's Accountable Mining Program, the World Bank's [Mining Sector Diagnostics](#) or reports by anticorruption commissions.

2.2 Answer the questions in the Step 2 Workbook

Drawing on the selected core sources, the independent expert answers each question in the Workbook with "yes", "no" or "somewhat" and writes one paragraph explaining the answer, providing the reference for that conclusion.

Not every question needs to be answered in detail (or at all), especially if not relevant to the sector in question or not possible due to data availability. The priority is for the independent expert to provide an organized overview of trends across the six areas of focus, rather than a comprehensive review.

2.3 Write a summary report

The independent expert writes a short report (10-15 pages) summarizing the findings of the desk research. The aim should be to clearly and concisely draw out the most pertinent findings to inform the user's selection of areas of focus in Step 3. The summary report should not aim to be exhaustive or overly detailed but instead focus on presenting the most important information from the desk review.

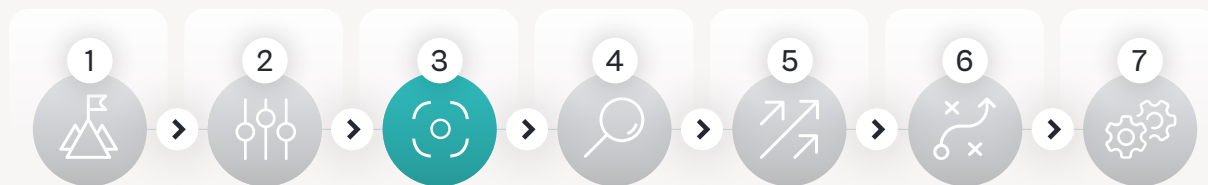
Given that the users and stakeholders may find that the most important issues to address are spread across different stages of the value chain, the independent expert should also consider outlining these specific subsections in the summary report. Box 2 summarizes some of the main forms of corruption across the value chain steps.

It is essential that the independent expert allocates sufficient time to analyzing and presenting their findings. The Step 2 Summary report template (see annex) illustrates how the report could be structured.

In brief, it could include:

- Executive summary (one page)
- Overview of findings for the areas of focus covered (eight pages, if all areas are covered):
 - Area 1: Decision to extract, licensing and contracting
 - Area 2: Operations
 - Area 3: Revenue collection
 - Area 4: Revenue management
 - Area 5: State-owned enterprises
 - Area 6: Artisanal and small-scale mining
 - Area 7: Socio-environmental impacts
 - Area 8: Fossil fuel phaseout
- Overview of contextual factors (two pages)
- First draft of the selection table from Step 3 (two pages). See Step 3 guidance below.





Step 3. Select the areas of focus

Goal:

Identify one or more areas of focus for in-depth analysis and action.

Process:

User reviews Step 2 report and selects one or more areas of focus, drawing on the multi-stakeholder feedback received during Workshop 1.

Output:

Completed selection table.

Overview

In this step, the user organizes Workshop 1 and draws on the workshop discussions and the Step 2 research to select one or more areas of focus described in Box 2. We recommend that users select only one or two areas of focus if they want to complete the exercise within four months. Users wishing to diagnose corruption across a larger set of focus areas should concentrate on fewer forms of corruption within each area of focus. This prevents the diagnostic process from becoming unmanageable, particularly from the perspective of implementing the action plan.

Step 3 is a key moment for gathering ideas and support from a diverse set of stakeholders. We suggest that the user organize a workshop (Workshop 1) that includes relevant government, industry and civil society representatives. Alternatively, the user could get input from stakeholders through one-on-one meetings if preferred. Along with selecting the priority areas of focus, the objective of Workshop 1 is to create a common understanding of corruption issues in the sector, build support and understanding of the diagnostic process and its aims, and begin mobilizing the coalition of actors who will eventually need to take action.

3.1 Complete a draft selection table

As part of the Step 2 report, the independent expert will complete a first draft of the selection table (see Figure 6). For this table, we recommend using a simple, three-tiered scoring system: “yes,” “no” and “somewhat.”

For example, the independent expert may wish to categorize some sections as “somewhat” if a focus area as a whole is not a priority, but there are subsections of that focus area which feel important to address, such as issues around community consultation over the decision to extract; licensing and contracting, or health and safety in operations. These subsections could be noted in or below the draft selection table.

Figure 6. Illustrative selection table

| Areas of focus | 1. Is the area of focus significant? | 2. Is corruption in this area a serious and harmful problem? | 3. Are there opportunities for action and positive change? |
|--|--------------------------------------|--|--|
| Decision to extract; licensing and contracting | No | No | No |
| Operations | Somewhat | Somewhat | No |
| Revenue collection | Yes | Somewhat | Yes |
| Revenue management | Yes | No | No |
| SOEs | Yes | Yes | Yes |
| ASM | No | Somewhat | No |
| Socio-environmental impacts | Yes | Yes | Somewhat |
| Fossil fuels phaseout | Yes | Somewhat | No |

3.2 Conduct multi-stakeholder consultation and select the areas of focus

The user organizes Workshop 1, bringing together a range of stakeholders to inform the selection of the area or areas of focus for in-depth analysis in Step 4.

Participants will vary from country to country, but could include:

- Government ministries overseeing key aspects of the sector (e.g., ministries of mines, petroleum, the environment or finance) and relevant state-owned enterprises
- Public institutions with oversight and anticorruption functions (e.g., anticorruption agencies, auditors general, attorneys general, parliamentary commissions or committees)
- Private-sector representatives (e.g., extractive companies including production, service and trading companies, industry associations, consultants or analysts focused on the industry or on corruption risk issues)
- Civil society organizations, such as those specializing in the extractive sector, anticorruption, transparency, human rights, the environment and climate change.
- Representatives from communities impacted by the extractive sector, or identified victims of corruption
- International actors such as donor agencies, embassies, financial institutions and NGOs.

In selecting participants, the user should include the range of stakeholders needed to help design and implement successful anticorruption reforms. The user must ensure that marginalized groups, including women and gendered minorities, as well as indigenous populations and ethnic minorities, are represented and able to actively contribute to discussions.

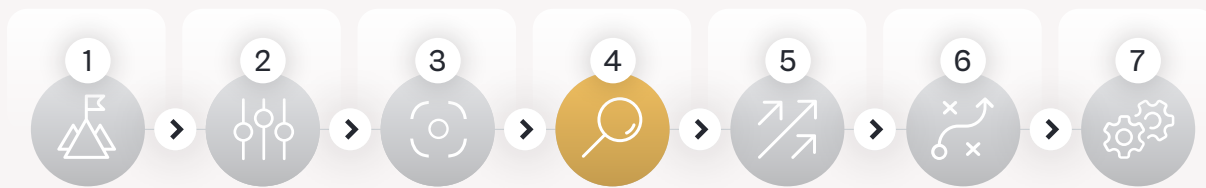
While the exact details of how to conduct Workshop 1 will vary between users, we recommend the following:

- Participants review the independent expert's Step 2 report and draft selection table before the workshop.
- The independent expert presents the results of the Step 2 desk research and the draft selection table to the workshop participants.
- Participants discuss the findings and potentially amend the scores in the draft selection table. Depending on the size of the workshop, it may be necessary to divide the participants into break-out groups.
- Based on the discussions and the revised selection table, the participants reach agreement on which area of focus should be the subject of the in-depth diagnostic and action planning (steps 4–6).
- The proceedings should also secure agreement from the participants to support and participate in the subsequent steps, such as Step 4 interviews and the Step 6 action-planning workshop.

The user may also wish to reach out to certain groups to get their input through one-to-one meetings, if these are considered more relevant and efficient. Such bilateral consultations should take place before Workshop 1, so that the user can consider their findings during the final selection of areas of focus.

In some contexts where organizing multi-stakeholder consultations may be challenging for different reasons, the user can rely only on such one-to-one meetings to consult and inform the selection of areas of focus. In such cases, it will be important for the user to take the time to go back to stakeholders consulted to explain the ultimate selection and share views expressed by other actors as necessary, in order to demonstrate how each opinion has been taken into account. Such an approach will require good and continuous communication with all stakeholders. Though potentially more time-consuming, this approach may be more fruitful in terms of overall impact and buy-in to the action plan.

In many cases, the user will have from the outset a good idea of where they would like to focus. As noted above, Steps 1–3 are meant to be relatively light. While the selection table will help to organize and inform the selection discussion, there is nothing scientific about the scoring. If the independent expert's assessment and workshop discussions result in several areas of focus receiving similarly high scores, group members should use their judgment to select issues that correspond with their priorities and understanding of the sector.



Step 4. Diagnose corruption

Goal:

In the selected areas of focus, gain a deeper understanding of the leading forms of corruption, why they arise and potential responses.

Process:

The independent expert conducts primary research, including focus groups and interviews, and summarizes the findings in a report.

Output:

Corruption diagnostic report, including a draft diagnostic table.

Overview

In this step, the independent expert digs deep into the chosen area or areas of focus. This is the core of the assessment and should uncover new insights.

The purpose of this step is to answer three overarching questions:

- Which forms of corruption are of significant concern?
- What causes these forms of corruption?
- What anticorruption steps could help prevent them?

Based on this research, the independent expert identifies the leading forms of possible corruption. They then write a diagnostic report and complete a first draft of the diagnostic table that will be finalized in Step 5. We estimate that Step 4 will require approximately (at least in most cases) 30 person-days of work from the independent expert, but this may be spread out over a longer time period, particularly if time is needed for travel to interviews or research.

4.1 Develop a research plan

The independent expert develops a research plan in consultation with the user, matching the time and resources available, as well as their views on what methods will work best in the context. Box 3 contains some guidance on the research process.

Possible sources of information could include:

- **Interviews**, including with former and current government officials, industry representatives, civil society representatives from local, national and international groups, diplomats and representatives of international organizations, journalists, academics and analysts, and community representatives. To identify the list of people to interview, the independent expert can use the preliminary questions outlined in the Step 4 research guides for each area of focus. Face-to-face interviews can help build trust and relationships and should be prioritized where time and resources allow, including via travel to areas where extraction is taking place. To allow some level of consistency between interview answers, the independent expert could adapt the questions from the Step 2 Workbook or Step 4 modules.

- **Focus group** discussions with different stakeholders, including civil society, industry and government officials, and those with direct experience of institutions and processes that may be vulnerable to corruption. Lessons from other corruption assessment exercises suggest that organizing focus groups from a single category of stakeholder (e.g., just industry representatives) encourages more open and frank discussion.
- **An online survey or questionnaire** to receive structured feedback from a larger number of stakeholders—although a survey is not necessary and should only be undertaken when there are sufficient time and resources available. If it is difficult for the independent expert to secure interviews with key stakeholders, they could offer to send them a questionnaire to respond to by email. This may help gather information where there are research challenges, but this information will likely be less in-depth than the insights gathered from interviews, so should be seen as a second preference option.
- **Desk research**, including revisiting the materials used in Step 2. It could be useful to review again some of the reports consulted, in greater

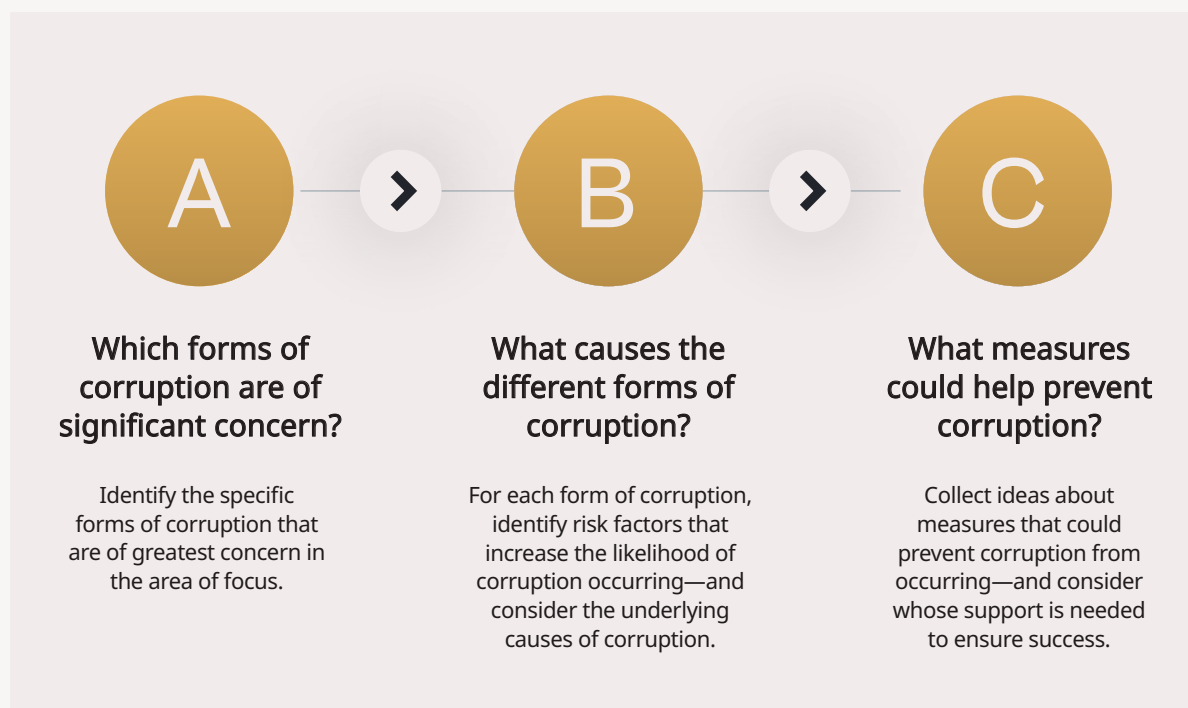
depth, such as EITI reports focusing on specific issues.¹⁴ This could include trying to quantify the number of known corruption cases or allegations in a sector, which could help the expert to communicate an issue’s impact to decision makers more effectively.

4.2 Conduct in-depth research on the three overarching questions

Drawing from the data sources above, the independent expert gathers ideas and information about the three overarching research questions. In practice, there will be overlap between the forms of corruption, risk factors and underlying causes. Users should not worry about this categorization too much. The priority is that the research captures the main issues in one place or another.

For each area of focus, we provide a Step 4 Research Guide, found in the annexes. This guide includes detailed sub-questions, definitions of terms, and lists of common forms of corruption, risk factors, causes and mitigation measures specific to each focus area.

Figure 7. Overview of Step Four research questions



14 Charlotte Boyer, and Matthieu Salomon, *How Anticorruption Actors Can Use the EITI Standard* (Natural Resource Governance Institute, 2023).

A. Which forms of corruption are of significant concern?

- **Aim:** The independent expert should identify and learn about the most concerning forms of corruption and select those that are of the greatest concern in the focus area. We recommend identifying no more than 10 leading forms of corruption, with 2–4 likely more typical. The selection should be guided by comparing and triangulating ideas that emerge from different sources, and prioritizing the forms of corruption likely to appear again in the future; that would inflict significant harm (of any form, such as lost revenues, lost public or investor confidence, political instability or environmental damages) and that appeared prominently in several data sources or were raised by several stakeholders.
- **Definition:** Forms of corruption, which sit at the heart of the analysis, are the practices where entrusted power is abused for private gain (see Introduction).
- **Examples:** The award of exploration licenses to politically connected yet unqualified firms; the discretionary spending of funds from SOE accounts to finance election-related patronage, or oil companies offering officials bribes or other benefits if politicians revise the tax code in their favor. The Step 4 Research guides provide further examples.
- **Information sources:**
 - Interviewees and focus group participants can explain which forms of corruption concern them most and why.
 - Past corruption cases can illustrate forms of corruption which may occur again.
 - Existing research can point to specific corruption challenges, while broader economic, environmental and social data can help to identify what sort of harm a certain form of corruption might cause. Revisit Step 2 materials here.
 - A survey could allow a wider set of stakeholders to indicate, for example, which of a list of possible corruption forms are of greatest concern.

B. What causes the different forms of corruption?

- **Aim:** For each form of corruption, the independent expert should identify several risk factors and underlying causes.
- **Definition:**
 - Risk factors increase the likelihood of corruption occurring. They can include weak laws and rules, institutional capacity gaps, engrained patterns of behavior, the past record of the main companies or agencies involved, or the absence of actors supporting anticorruption reform.
 - Underlying causes are the factors that motivate the corruption or enable it to continue. In some cases, motives are simple—a company seeking a valuable contract or an official wanting to get rich. But often corruption reflects a more complex mix of personal, political and economic agendas.
- **Examples:**
 - Risk factor: For the allocation of exploration licenses to politically connected yet unqualified firms, risk factors could include the absence of competitive tenders, overly ambitious local content targets, and weak anticorruption systems within the companies involved. The Step 4 Research guides contain common examples of risk factors for each area of focus.
 - Causes: These could be tied to the political context, such as politicians needing to reinforce support in upcoming elections, or to extractive sector trends, such as an increase in revenues or heightened competition among companies. The agendas of influential actors can also cause corruption, such as a president leaning on the national oil company to award contracts to political allies. The Step 4 Research guides contain common examples of causes for each area of focus.
- **Key sources of information:**
 - Interviewees and focus group participants can identify the factors that make the corruption more or less likely to occur and offer their interpretation of what is driving corruption.
 - Past corruption cases can illustrate all the systems that did not work and therefore allowed the corruption to take place.

- Governance data and existing research can point out risk factors, especially in terms of gaps and strengths in laws, regulations, transparency and oversight mechanisms. See Step 2 sources, for instance.

C. What measures could help prevent corruption?

- **Aim:** The independent expert should collect ideas about what measures might help prevent the forms of corruption. These measures should build on existing strengths that make the corruption less likely to occur—strengths that will be identified during the research process. The independent expert may also identify which solutions will not work. These ideas will be further explored and developed during Step 6, when the action planning takes place, but the Step 4 research provides a way to collect some early ideas.
- **Definition:** The measures would be actions that could help to prevent corruption. They can target the forms of corruption, the risk factors or the underlying causes.
- **Examples:** Depending on the form of corruption, mitigation measures could include enhancing transparency, strengthening oversight and participation, promoting integrity, enacting institutional and process reforms, increasing fair competition, strengthening the enforcement of rules and addressing the role of foreign enablers. The Step 4 Research guides suggest potential anticorruption measure in each area.
- **Key sources of information:**
 - Interviewees and focus group participants can provide ideas on what could work, and what will be less likely to succeed. Questions could include: If you could change one thing in this area, what would it be? What measures have worked to prevent corruption elsewhere in the sector, and which efforts have not delivered results?
 - Past cases can reveal what is working, in terms of uncovering or punishing corruption, but also what has not succeeded in preventing corruption.

- Governance data could suggest ideas for what could be improved, such as low scores on transparency or oversight measures. Past anticorruption efforts might also offer lessons for what has worked and what has not. Independent experts should draw on the data collected in the Step 2 Workbook.
- A survey could collect a larger set of opinions about which measures are most likely to be successful in preventing corruption.

4.3 Analyze and summarize the findings

The independent expert writes a narrative report and completes the first half of the diagnostic table. The report should answer the three main questions, clearly specifying the leading forms of corruption identified in the research for each area of focus. It should be concise, ideally around 20 pages in length. We recommend including the following sections, with the precise outline agreed between the user and the independent expert:

- Executive summary, including a clear outline of the leading forms of corruption (three pages)
- Summary of research process and methods, including positive surprises and negative challenges encountered (one page)
- A description of each of the leading forms of corruption identified (two pages per form), including:
 - evidence for why these represent significant concerns (Question A)
 - risk factors and underlying causes that make the corruption more likely to emerge (Question B). Often, the causes or anticorruption measures may relate to more than one form of corruption.
 - ideas about how corruption can be prevented in the future, either by addressing the risk or its causes (Question C)
- The first half of the draft diagnostic table (see Figure 8 below and the Step 4 and Step 5 diagnostic table template in annex) which will be further developed and finalized during Steps 5 and 6.

→ Box 4.

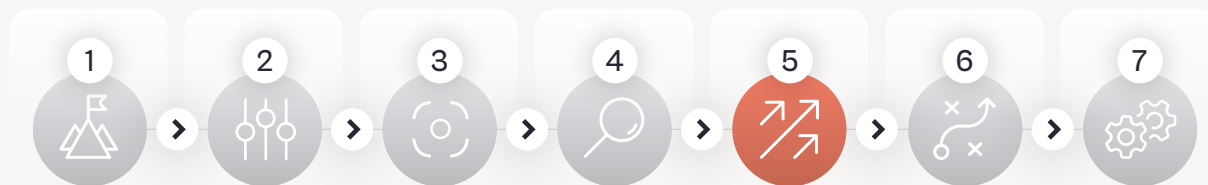
Advice on conducting the step 4 research

Because corruption is a sensitive topic, it is important to undertake the research in a careful and strategic manner. The following considerations may help:

- **Be flexible:**
The research process will be fluid, with the findings and analysis evolving with each interview or discussion. Unexpected revelations may occur. As a result, the independent expert should not expect to cover the same pre-determined set of research questions with each interviewee. Instead, they should tailor the approach for each interview, continuously update the questions and pursue promising new leads.
- **Keep the end goal in mind:**
The goal of this diagnostic process is to produce a practical action plan. The independent expert should regularly consider what the information they are encountering means in terms of action. They should raise the question of “what can be done” regularly with all stakeholders, which will uncover useful ideas and build a basis of support for future actions.
- **Triangulate findings:**
Stakeholders will inevitably have biases and offer conflicting information. To arrive at credible findings, the independent expert should triangulate what they are told by seeking confirmation from multiple stakeholders with a range of perspectives. It may be necessary, in some instances, to present several different views.
- **Find insiders who can address the specifics:**
Generic or abstract discussions will not inform the diagnosis or the action planning. Independent experts should seek out interviewees who have direct experience with the key actors and processes. Former government or industry representatives can be a particularly valuable resource, as they can often speak more freely than current representatives. Particularly when interviewing current officials, the independent expert may wish to consider areas where the interviewee becomes more guarded as these may be higher-risk areas for corruption.
- **Gather the insights of women and marginalized groups:**
The independent expert should proactively seek the views of marginalized groups and take precautions to ensure that no participants are harmed through the research process. For example, the views of women and gendered minorities are commonly under-represented in research. To collect diverse views, independent experts should consider how to create safe spaces where participants are most comfortable speaking, such as organizing focus groups for women community groups. Extra care should be given to anonymizing comments made by individuals from marginalized groups, if requested, as they may be more readily identifiable. The MACRA tool from Transparency International’s Accountable Mining Program provides additional guidance on incorporating gender specifically into the research process.

Advice on conducting the Step 4 research (continued)

- **Offer and respect confidentiality:**
At the start of the conversation, the independent expert should be very clear about how they will use and attribute the information, make sure the interviewees are comfortable with that, and be sure to respect what was agreed. Interviewees should have the choice of providing information anonymously and the independent expert should offer this proactively, particularly if they are conducting their research in a country or region where anticorruption actors or whistleblowers have faced security risks. One practical option is to suggest the information is cited by stakeholder type (e.g., “an oil company official said...”). Where there is a request for anonymity, the independent expert should not only ensure that this is respected in the materials they produce, but also take care to securely store and manage the information they collect.
- **Choose language carefully:**
The term “corruption” can scare off interviewees. It will be crucial to explain this exercise is about preventing future corruption, not identifying or punishing past corruption. Using positive terms like integrity, governance, transparency and accountability can also help. The questions in Step 4 are worded in a direct manner, which may need to be adjusted when interviewing certain stakeholders.
- **Avoid making accusations:**
Public accusations of corruption can prompt negative reactions from those involved, including possible legal action. To avoid these issues, the report should take great care in describing any allegations or accusations of corruption, and anonymize entities wherever needed. Along with the country context, the source of the allegation will determine how it should be written up. The report could identify an entity found guilty of corruption in a credible court of law, but may want to anonymize an entity whose potential corrupt conduct is known only through rumor or assumptions.
- **Secure support:**
Some stakeholders may be reluctant to speak, particularly if they are unsure about whether the diagnostic process has support from the relevant authorities. In some contexts, the user may choose to secure high-level support (such as an official letter of mission) to help establish the independent expert’s credibility. For countries implementing the EITI, for example, this could come from the senior official who oversees the EITI.



Step 5. Prioritize forms of corruption for action

Goal:

Prioritize the forms of corruption identified in Step 4, choosing the ones to address in the Step 6 action planning.

Process:

User organizes a multi-stakeholder consultation process (Workshop 2) and completes the prioritization columns in the diagnostic table.

Output:

Completed diagnostic table.

Overview

Following the Step 4 research, the user will want to involve a range of stakeholders to again secure their ideas and support. One recommended approach is to organize Workshop 2, where different groups can contribute to both the prioritization (Step 5) and the action planning (Step 6). This workshop will likely require two days or more. The user will draw on the Step 4 findings and the feedback received during the workshop to prioritize the forms of corruption for action.

Alternatively, the user could consult with individuals or small groups on the prioritization, and focus the workshop on just the Step 6 action planning. Or they could hold two workshops. As mentioned in Step 3, in some contexts where organizing multi-stakeholder consultations may be challenging for different reasons, the user can also rely on one-to-one meetings with different stakeholders to consult and inform the prioritization exercise. The user decides on the best approach, with inputs from the independent expert and other relevant actors.

A number of other strategic questions are outlined in Step 6.1 and are worth considering before organizing the workshop.

5.1 Convene Workshop 2 or another form of multi-stakeholder consultation

Prior to the workshop, the user and other participants review the independent expert's report, particularly the diagnostic table identifying the leading forms of corruption in the selected areas of focus. At the workshop, the independent expert presents a summary of the findings and answers any questions.

Workshop participants should include the actors who could help prevent corruption in the selected area of focus, as well as those who would benefit from its prevention. Women, gendered minorities, indigenous communities and marginalized groups should be included in the process. Step 3 provides suggestions of possible stakeholders to involve.

The participants then discuss the report findings, focusing particularly on reaching a loose agreement on the list of leading forms of corruption, working from the draft list prepared by the independent expert in Step 4. As part of this review, the participants may choose to merge similar forms of corruption to avoid duplication and overlap.

If the group identifies any major gaps, it can also add further corruption forms to the diagnostic table. We recommend aiming to end up with a list of no more than 10 forms of corruption.

It is not necessary for the group to achieve consensus around all the report's conclusions—perhaps an impossible task when it comes to such a sensitive topic as corruption. The independent expert's report should be viewed as an input to prioritization and action planning, rather than the final word on the subject.

As mentioned in the section above, in appropriate contexts, the user could consult with individuals or small groups on the prioritization, and focus the workshop on just the Step 6 action planning, or they could hold two workshops. The user decides on the best approach, with inputs from the independent expert and other relevant actors.

5.2 Prioritize forms of corruption for action

Once there is loose agreement on the most common forms of corruption, the participants prioritize them using columns D–G of the diagnostic table. Only the top priority forms of corruption will be considered during the Step 6 action planning.

To achieve this, the independent expert facilitates a prioritization exercise where participants assess each form of corruption on the diagnostic table in terms of:

- their likelihood
- their impact
- the feasibility of positive change.

Participants should work through each form of corruption listed on the diagnostic table and assign numerical scores (from 1=low to 5=high) for each of these three factors. The independent expert could complete a first draft of the diagnostic table before the workshop, to be used as a basis for discussion.

The scoring should draw on the findings from Step 4 and include a brief write-up explaining the rationale behind it. To calculate the overall score for each form of corruption, we suggest that the impact score (Column E) counts double, since the diagnostic aims to tackle the most serious corruption challenges. This kind of prioritization is far from an exact science.

However, assigning numerical scores can help organize discussion about which issues are most deserving of attention.

The following guidance applies to the scoring:

- **Likelihood (Column D):** The evidence for assessing likelihood draws on the information gathered on forms of corruption (Column A) and causes (Column B) in Step 4, as detailed in the independent expert's report.

Scoring:

- 1 = the form of corruption has not been observed in the past and is extremely unlikely to materialize in the future.
- 5 = the form of corruption has been frequently observed in the past and appears very likely to materialize again in the future.

Guiding questions:

- Has this form of corruption been prevalent in the past?
 - How likely is this form of corruption to occur in the future?
 - Do developments in the sector indicate that this form of corruption is important now or will be important soon (e.g., due to plans for upcoming licensing rounds, asset sales or changes to fiscal terms)?
-

- **Impact (Column E):** The evidence for assessing impact draws on the information gathered on forms of corruption (Column A), as detailed in the independent expert's report.

Scoring:

- 1 = the form of corruption has caused little or no harm in the past and has little potential to do so in the future.
- 5 = the form of corruption has caused significant harm in the past and could do so again in the future.

Guiding questions:

- Will reducing corruption here have a large positive impact for citizens? For instance, would reducing corruption in this area:
 - Reduce the scale of economic losses to corruption?
 - Disrupt harmful political practices, such as the capture of resource revenues by a small group of elites?
 - Reduce negative environmental or social impacts in the sector?
 - Reduce inequalities and the exclusion experienced by marginalized groups due to corruption?
 - Improve the performance and operational efficiency of the sector?
 - Remove barriers to the energy transition or other priority public interest concerns?

-
- **Feasibility (Column F):** The evidence for assessing feasibility draws on the information gathered on the underlying causes of corruption (Column B) and possible measures to address it (Column C) in Step 4, as detailed in the independent expert's report.

Scoring:

- 1 = there are no opportunities to meaningfully address this form of corruption in the foreseeable future.
- 5 = there are significant opportunities to make meaningful progress in addressing this form of corruption in the foreseeable future.

Guiding questions:

- Is there existing momentum around reform in this area?
 - Are specific reforms already underway that could be built on?
 - Is there a risk of duplicating existing efforts?
 - Are there concrete opportunities to prevent this form of corruption going forward?
 - To what extent are key stakeholders, including international ones, supportive or opposed to reforms in this area?
 - Would the beneficiaries of this form of corruption block any efforts at reform?
- **Overall score (Column G):** The overall score helps to prioritize the list of corruption forms.
 - Scoring: Add D + E + E + F.
 - This serves to double the weight assigned to impact. The result is a score out of 20.
 - The higher the score, the higher the priority the issue should be given during action planning in Step 6.

5.3 Present the results

Once the scoring is completed, the independent expert finetunes the diagnostic table and adds it to the diagnostic report from Step 4.

Once the list of prioritized forms of corruption has been completed, it is time for strategy and action planning (Step 6).

Figure 8. Illustrative diagnostic table

| Step 4: Diagnosing corruption | | | Step 5: Prioritizing for action | | | |
|--|--|--|---|---|---|--------------------------|
| A. What forms of corruption are of significant concern? | B. What causes the different forms of corruption? | C. What measures could help prevent corruption? | D. Likelihood | E. Impact | F. Feasibility | G. Overall score (D+E+F) |
| SOE maintains supply contracts with a small, consistent set of politically well-connected companies, despite cost overruns and performance concerns. | <p>Risks: Frequent extension of contracts, or renewals without tender; high levels of campaign donations from these companies to top politicians; SOE does not regularly publish supplier or tender data.</p> <p>Causes: Close alliance between political leaders and the heads of certain companies, where both sides support each other's ambitions.</p> | <p>More transparency in SOE procurement.</p> <p>Limits on no-bid contract renewals.</p> <p>Transparency and oversight of campaign donations.</p> | <p>Score: 4</p> <p>Supply contracts have gone to the same companies for more than 10 years, and the pattern looks likely to continue in the years ahead.</p> | <p>Score: 4</p> <p>Supply contracts represent a large portion of SOE spending at a time when revenues are in short supply.</p> <p>Stakeholders suggest the cozy relations between policymakers and these companies may harm the public interest.</p> | <p>Score: 2</p> <p>This pattern of contracting is well established and has powerful beneficiaries. The issues have been highlighted by the press, but the government and the SOE have not indicated any plans to reform SOE procurement. However, low revenues increase incentives for cost-saving measures.</p> | Score: 14 |
| SOE's oil-trading partners include intermediary companies that lack the finances to purchase oil cargoes, and resemble shell companies. They have obtained the contracts on false pretenses. | <p>Risks: SOE procedures for selecting trading partners lack prequalification standards.</p> <p>Large foreign traders are willing to buy oil from these anonymous shell company intermediaries.</p> <p>The EITI reporting on SOE trading partners is not timely.</p> <p>Causes: For decades, oil trading contracts were used as a vehicle for patronage. This is a very engrained pattern.</p> | Stakeholders emphasized the potential of the new SOE law. EITI reporting could help if made timelier. | <p>Score: 3</p> <p>While many trading contracts are awarded to credible firms, some go to intermediary companies without relevant experience. The number of awards is expected to increase shortly, in line with SOE production.</p> | <p>Score: 2</p> <p>The presence of intermediaries could reduce the revenues collected from oil sales by the SOE. The current system also harms the reputation of the trading sector.</p> | <p>Score: 4</p> <p>The law requires that the SOE select the most qualified bidders, but the standards have not been elaborated. The SOE has indicated an intention to do so. New regulations are unlikely to prompt much opposition, although overturning past awards would be contentious.</p> | Score: 11 |



Step 6. Develop an action plan

Goal:

Set objectives and agree a clear set of actions to address the forms of corruption prioritized in Step 5.

Process:

The user develops an action plan through multi-stakeholder consultation (Workshop 2).

Output:

Completed action plan.

Overview

Step 6 is the most critical step in the process, where the analysis is brought together to inform an action plan. Workshop 2 is at the heart of the action planning process. As noted above, the same workshop could begin by completing Step 5 and then proceed to Step 6.

There are four elements to the action planning:

- 6.1. Strategizing
- 6.2. Setting objectives
- 6.3. Selecting specific actions
- 6.4. Documentation.

We recommend that the user undertake 6.1 before the workshop, and that the workshop involve sessions on 6.2 and 6.3.

6.1 Strategizing

Prior to beginning the action planning process, the user needs to consider certain strategic choices.¹⁵ If the Step 5 and Step 6 workshops are combined, this strategizing will need to take place beforehand.

Step 5 will have produced a prioritized list of corruption forms. However, anticorruption reform is a politicized process and not as simple as matching the most serious risks with the most effective technical solutions. The largest problems may not correlate with those which are most feasible to address, particularly when acting would threaten the interests of powerful groups. Political opportunities to address corruption come and go, and resources are also usually limited.

With support from the independent expert, the user should therefore think strategically about how to push an ambitious agenda that also takes account of the political context.

¹⁵ The approach taken draws on the latest research into addressing corruption—in particular, Heywood and Pyman's guidance on developing [anticorruption strategies](#), as well as the [corruption functionality framework](#) developed by Marquette and Peiffer, which encourages practitioners to look beyond fighting corruption for corruption's sake, to focussing on the ultimate societal goals which corruption may be impeding.

They should consider whether the timing is right for measures which disrupt the status quo, whether reforms will align with the interests of different stakeholders, and how the action plan can be crafted in such a way that it has broad-based support in the sector, even if it generates opposition from some groups.

The user, with support from the independent expert, should consider certain strategic questions in advance of the action planning workshop—although the workshop discussions may make the user revisit these questions.

The questions include:

- **How many forms of corruption to tackle:** What is an ambitious, but manageable, number of forms to take on, given the resources available?
- **How to tackle high-impact issues while keeping momentum:** Addressing high-impact issues is preferable, but achieving tangible results is also crucial. Selecting a feasible agenda can help build momentum, but the user should be wary of a reform program which avoids difficult issues and becomes about “window dressing.” Getting the balance right is crucial.
- **Key individuals and agencies to involve and incentivize:** Are the people needed to implement measures really present at the workshop, including relevant actors outside the sector, such as anticorruption experts?
- **Alignment with existing reforms:** The research should have identified relevant existing reform processes in the sector. How can the plan align with existing efforts and not duplicate or conflict with what is already happening? How can the plan build on the successes of earlier efforts and avoid their shortcomings?
- **The visibility and branding of reforms:** The user may wish to talk openly about addressing corruption or present the issues in another way (such as addressing integrity, lowering costs or unlocking improved performance). Does the user want to be identified as the key advocate for reforms or do they want specific institutions or actors to take ownership? The answer may depend on whether anticorruption is currently a priority for political leaders.

Should the action plan encourage publicity or is it better to work behind the scenes?

- **Goal-oriented planning:** The user should revisit the goals identified in Step 1 and consider what kind of action plan will help to move them forward. For the user to successfully drive forward the plan, it needs to align with their wider ambitions and objectives.

There is no one route for anticorruption reform, and the answers to these questions will depend on the situation. With this strategic thinking and the Step 4 research in mind, the user can move to convening Workshop 2.

6.2 Setting objectives

After revisiting the Step 1 goals, the user should guide workshop participants in a discussion to identify objectives to address the prioritized forms of corruption. In most cases, 1–3 objectives will be enough. In some cases, they will target the form of corruption (Column A). In others, they may target the risk factors and underlying causes (Column B).

A good objective:

- Provides clear direction for a reform program, while allowing flexibility around the methods used to get there.
- Avoids vague language. It should be clear what success would look like. For instance, “reduce corruption in the selected area” is not a good objective. It is non-specific and, in practice, it is difficult to track progress in reducing corruption.
- Reflects the Step 4 findings, especially about the underlying causes of corruption. Too often, the careful analysis conducted during diagnostic exercises does not clearly follow through to action planning. The objectives must reflect what was learned during Step 4.

Some examples of objectives are provided in Figure 9. The objectives agreed at the workshop should be added directly to the action plan template (see Figure 10 below and the Step 6 action plan template in the annex).

Figure 9. Examples of objectives

| Types of objectives | Example objectives |
|------------------------------------|--|
| Transparency | Bring detailed transparency to the area of SOE procurement. |
| Oversight and participation | Increase the engagement of oversight actors in future licensing processes, including the media, civil society, the anticorruption commission and parliament. |
| Integrity | Strengthen private companies' internal anticorruption policies and practices. |
| Institutional and process reforms | Introduce and publish prequalification requirements for oil trading partners, to reduce the number of shell companies and intermediaries. |
| Increasing competition | Require the SOE and its joint venture partners to award contracts over a certain value via competitive tender. |
| Strengthening enforcement of rules | Generate a multi-stakeholder review of the regulatory exemptions granted to certain companies. |
| Addressing foreign enablers | Require beneficial ownership reporting in licensing processes, to reduce use of offshore shell companies. |

6.3 Selecting specific actions

During the workshop, using the template provided (see Figure 10 below and the Step 6 action plan template in the annex), participants identify the actions that could help bring about the objectives. The actions should be timebound, assigned to a specific actor and trackable using specific indicators.

In selecting actions, the group should consider whether they could cause harm or adverse impacts. For example, if the current country leadership is using anticorruption actions to sideline their political opponents, the action plan should avoid exacerbating this problem. Reforms that increase revenues generated from the sector are not helpful if those funds will be diverted for illegitimate purposes.

Similarly, the group should consider how the proposed actions can help address, rather than entrench, existing inequalities. For example, many anticorruption measures seek to increase participation in sector processes or to secure the release of more data and information for scrutiny.

These measures will not meet their aims if access to these processes is still constrained, such as when traditional male leaders act as gatekeepers in community consultation processes, or if marginalized groups lack the skills to understand and use new data. In such scenarios and more generally, the workshop participants should always reflect on how to enhance participation by marginalized groups and avoid replicating damaging power disparities and patterns of exclusion.

Drawing on NRGi's experience in the sector, the Step 4 research guides provide some examples of reform measures for each focus area. NRGi has also carried out research into successful anticorruption reforms in other sectors, such as forestry, shipping and agriculture.¹⁶

Key features of such reforms include:

- Engaging all relevant stakeholders throughout the action planning process to secure buy-in for reforms
- Setting clear and specific objectives which balance feasibility and ambition
- Ensuring clear ownership and incentives, and lines of responsibility for actions
- Setting clear indicators and conducting regular monitoring to assess progress
- Building in flexibility and being prepared to adapt plans to changes in the context.

6.4 Documentation

Following Workshop 2, the independent expert writes up the final agreed action plan. They may also need to revise the Step 4 report to incorporate inputs and comments from participants. Once finalized, the action plan should be made publicly available, along with this revised report—including the prioritization table produced in Steps 4 and 5.

¹⁶ Tom Shipley, *Anticorruption Reform: Learning From Experience Across Sectors* (Natural Resource Governance Institute, 2023).

Figure 10. Illustrative action planning table - Users may wish to add more columns based on their needs—for example, supporting actors, budget/resources required)

| Prioritized forms of corruption (add from the diagnostic table) | | | | | |
|--|---|-----------------------------------|------------|---|---|
| SOE maintains supply contracts with a small, consistent set of politically well-connected companies, despite cost overruns and performance concerns. | | | | | |
| SOE's oil-trading partners include intermediary companies that lack the capacity to lift crude oil, and resemble shell companies. They have obtained the contracts on false pretenses. | | | | | |
| Objective 1 | | | | | |
| Increase transparency, oversight and stakeholder engagement around SOE procurement and licensing, to encourage reform and deter corruption. | | | | | |
| Proposed action | Proposed responsible actor(s) | Timeline | Next steps | Indicators of progress | |
| 1 | EITI produces twice-annual report on SOE procurement and licensing (including selecting traders) and presents report to key audiences. | EITI MSG | 2021-2022 | MSG to include reports in annual work plan and identify consultant to undertake the assignment. | Number of reports; number of discussions with parliament, civil society, SOE and private-sector audiences; media coverage of the issue. |
| 2 | EITI arranges meetings between SOE leadership and Open Contracting professionals. | EITI MSG | Q4 2021 | MSG to reach out to Open Contracting for advice. | Meetings held. |
| 3 | Civil society coalition agrees to publish analysis benchmarking SOE's procurement and licensing systems against other SOEs, identifying areas for reform. | Civil society coalition | Q4 2021 | Civil society coalition to develop Terms of Reference for the research. | Publication of report; attention it receives. |
| 4 | EITI and an industry association collaborate on a survey of SOE contractors on procurement issues. | EITI MSG and industry association | Q2 2021 | Industry association to draft survey and list of recipients. | Survey administered and results communicated to SOE and government. |
| 5 | Parliamentary committee holds a hearing on implementation of the new SOE law. | Committee chair | Q4 2021 | Committee chair presents the idea at the next committee meeting | Hearing held, resulting in clear benchmarks for future progress. |

Figure 10. (continued.)

| Objective 2 | | | | | |
|--|--|-------------------------------|----------|--|---|
| Introduce greater competition into SOE tenders and license awards. | | | | | |
| Proposed action | | Proposed responsible actor(s) | Timeline | Next steps | Indicators of progress |
| 1 | Ministry of Petroleum raises need for procurement reform at next SOE board meeting. | Minister | Q2 2021 | Board meeting. | Board meeting minutes. |
| 2 | SOE adopts and publishes new regulations for prequalification for trading partners. | SOE | Q4 2021 | Relevant committee meets to discuss and reports back on outcome. | Standards drafted, adopted and applied. |
| 3 | SOE requires competitive tenders for the renewal of contracts over a certain value. | SOE | Q2 2022 | Relevant committee meets to discuss and reports back on outcome. | Standards drafted, adopted and applied. |
| 4 | SOE publishes tender information on its website, including applicants, winners and winning bids. | SOE | Q2 2022 | SOE to build new page on its procurement portal website. | Reports available on website. |



Step 7. Implementing the action plan

Goal:

To better understand the operating environment, opportunities and challenges for implementing the action plan.

Process:

The user devises a dissemination and advocacy strategy to share the findings of the diagnostic process, support implementation by relevant actors, and monitor progress in implementing the agreed action plan.

Output:

Implemented action plan.

Overview

Implementing the action plan can be one of the most challenging parts of the diagnostic process, particularly when vested interests wish to maintain the status quo.

To promote effective advocacy, dissemination and monitoring of the findings and action plan, this step supports users to:

- better understand decision makers' priorities
- develop plans for dissemination and advocacy
- support, monitor and follow up on the progress of their action plan.

The approach taken for this step will depend on a political understanding and analysis of the country or region where the diagnostic process has taken place, and the extent to which key decision makers have been involved in the process.

7.1 Understanding decision makers' priorities

Building on previous steps of the diagnostic process, in particular on the Step 5 report and Step 6 diagnostic table, it is important that users identify and understand the decision makers who have the power to implement the actions in the plan.

If they have been involved in the diagnostic process from the beginning—for example, through an EITI Multi-Stakeholder Group—this task will be easier. The user can even directly ask them during the action planning process, including the Step 6 workshop or bilateral discussions, if they believe there will be any hurdles or obstacles to the action plan implementation. For example, even if a ministry of mines agrees with a proposed action, the user may still have to convince the ministry of finance, if there are cost implications.

If it has been difficult to convince key stakeholders, such as government representatives or companies operating in the sector, to participate in the process, the user may have to develop a more active advocacy strategy. Developing a successful advocacy strategy depends on understanding what and who may persuade the relevant decision maker to implement the action.

To achieve this, the user may wish to carry out a power-mapping exercise. This should involve:

- **Researching decision makers' policy positions to better understand their priorities.** These could be found in public statements, speeches, announcements, political party manifestos, voting records or company annual reports covering commitments on anticorruption or sustainability. With a better understanding of decision makers' priorities, the user can tailor their message to fit those priorities. For example, they could frame tackling corruption as a way to address environmental and social concerns, increase investment and business confidence in a country or region, or build public trust.
- **Understanding who a decision maker listens to.** For effective advocacy, the messenger can be just as important as the message. If a decision maker has been reluctant to engage with civil society, it may be worth considering who could influence them instead and relaying the message via these groups. They could include international organizations, business groups, potential investors, constituents or media outlets.
- **Considering who may be opposed to implementation of the action plan and developing counter messages.** There may be vested interests who oppose implementation of the action plan because they benefit from the current status quo. To develop effective messaging and counter-messaging if needed, it may be worthwhile researching the arguments used by these groups. This could be done by identifying these actors and researching their public statements and arguments, using similar sources to those listed in the first bullet point. If anticorruption reforms have failed in the past, it may also be helpful to look at the reasons given for why they were not passed and developing counter-arguments to these points.

With this information, the user can consider the best approach to dissemination and advocacy. They may be experienced in advocacy and in the sector, and so have a good sense of how to answer these questions already. If not, they may wish to consider including an extra 3-5 days in the independent expert's contract to carry out research on the above questions. As mentioned previously, these questions could be also discussed during the workshops organized during Steps 5-6, or during bilateral meetings conducted as part of the same steps.

7.2 Dissemination and advocacy

After publication of the action plan, the focus should switch to dissemination and advocacy to ensure that the actions outlined in the plan are implemented. This may be easier or harder depending on the nature of participation in the diagnostic process. If the user was able to secure buy-in from key decision makers such as government officials or companies early in the process, these stakeholders may have already agreed to the actions assigned to them. If not, the user may need to dedicate more time to dissemination and advocacy to secure this buy-in at a later stage. While not impossible, this will be a more challenging task, because decision makers may feel less ownership of the actions.

If consistent with the overall strategy, the user could publicize the materials via different communication channels—for example, making them available on the EITI website, organizing a launch event and providing material directly to media outlets.

When deciding how best to share the findings of the action plan, the user should consider the following factors:

- **Were decision makers such as ministers, government officials or companies, who can implement the actions identified, actively involved in the diagnostic process?** If so, they may require less convincing than those who were unable or unwilling to participate in the process from the outset, and a less public approach may work better—although decision makers involved in the diagnostic process may also be willing to publicly outline their plan of action to demonstrate their political commitment to fighting corruption. The user should discuss the best strategy with those decision makers.
- **What opportunities are there to share the findings?** These may include events in the sector or where decision makers meet, such as a Chamber of Commerce, political party conferences or international fora. There may also be significant political moments coming up, such as an election, which users can use to push for commitments to implement the actions identified through the diagnostic process to advance reform.

- **What advocacy tools are available to keep the issue on the agenda?** These may include writing letters to key decision makers, including in collaboration with other stakeholders involved in the diagnostic process; organizing meetings with key decision makers; joining advisory boards or councils where the user can flag the concerns; attending annual general meetings, supporting allies in parliament to ask relevant questions on corruption or the progress of actions, or using access to information laws.
- **What media outlets do key decision makers read or listen to?** If the user is aiming to publicize the diagnostic process in the media, they may want to prioritize contacting outlets where the diagnostic findings will be more likely to reach key decision makers—for example, a newspaper with a similar editorial position to the government stance, or a business-focused channel. The user could contact these outlets to let them know about events where the diagnostic findings and recommended action plan will be presented, offer to write an opinion piece, or participate in a radio or television interview.
- **How can users harness social media?** Social media can help the user spread the word about the issues and actions identified. Developing a joint campaign with identified allies with shared messaging, hashtags and images may help draw more attention to the recommended actions.

For all dissemination and advocacy plans, the user should consider whether a more public approach will benefit or hinder advocacy efficiency. Some decision makers may respond better to formal, technical outreach, whereas others may respond to increased public attention on the issue of corruption. While public attention can help raise the profile of the diagnostic findings and recommended actions, the nuances of the argument may be lost via this approach, so users should be particularly careful about how they use it, especially if anticorruption actors have faced threats in their country or region.

7.3 Support, monitoring and follow-up

The user should track implementation of the action plan using the progress indicators. However, it is rare for action plans to be implemented entirely as envisaged, particularly for a task as challenging as addressing corruption. The country context will change based on political, economic and commercial developments. Reform disrupts the status quo and different actors may seek to block or marginalize the planned actions.

Regular follow-up is needed, and the user should be ready to adapt the plan in the face of changing circumstances, and adapt their support for implementation of recommended actions. They could, for instance, convene periodic meetings among the key collaborators to assess progress against the indicators identified in the action plan. At these meetings, the user should continually consider whether any of the strategic choices or action items require adaptation. Follow-up and monitoring can also help maintain momentum and enthusiasm for the process, ultimately strengthening support for reform. The user should carefully document any successful implementation of recommended actions and resulting concrete change, and use this “success story” to push for further reform, publicly or otherwise, depending on the best strategy. Conducting another assessment, perhaps limited in scale, could uncover what has changed and what new measures are required.¹⁷ The user will need to judge when a repeat assessment would be most useful. This might be after an agreed time or specific events, such as changes in government or milestones in the country’s EITI status.

If resources allow, users may wish to hold further follow-up workshops, six months or one year after the action plan was agreed, to assess progress, retain stakeholders’ interest and adjust plans as necessary in response to political opportunities or developments. If resources are constrained, it would be more cost effective to host these meetings online, although in-person discussions can be more impactful for strengthening relationships and commitment to joint goals.

¹⁷ In 2011, Transparency International estimated that 50 percent of risk assessments are conducted on a one-off basis. Transparency International, [Corruption Risk Assessment Topic Guide](#) (2011).



Sources and consultations

Existing tools

As part of the background research informing this tool, we reviewed a range of existing methodologies and frameworks to assess corruption and governance risks. Our review was structured to reflect the diversity in methods and approaches developed by four main groups of actors: International financial institutions, development agencies and international organizations, NGOs and the private sector.

The sample focused primarily on diagnostic and corruption risk assessment tools, but also included broader assessment methodologies. As defined by U4, dynamic analyses, such as corruption risk assessments and diagnostic tools, “identify drivers of corruption, as well as opportunities and constraints for addressing them,” whereas “static analyses, such as integrity system studies and corruption ‘measures,’ may identify problems and areas of risk.”¹⁸

Figure 11. Overview of existing tools

| | Organization | Tool | Year |
|----|---------------------------------------|--|---------------|
| 1 | Transparency International (TI) | Mining Awards Corruption Risks Assessment (MACRA), 2nd and 3rd editions | 2017 and 2020 |
| 2 | World Bank | Mining Sector Diagnostic (MSD) | 2018 |
| 3 | UNDP | Practitioner’s Guide for Corruption Risk Mitigation in the Extractive Industries | 2016 |
| 4 | World Bank | Governance and Anticorruption Diagnostic Surveys | Early 2000s |
| 5 | IMF | Approach to Governance Diagnostics | 2018 |
| 6 | USAID | Anticorruption Assessment Handbook | 2009 |
| 7 | OECD | Public Sector Integrity – A Framework for Assessment | 2005 |
| 8 | TI | Anticorruption Diagnostic Framework | 2020 |
| 9 | TI | National Integrity System (NIS) Assessments | 2001 |
| 10 | African Development Bank | Addressing Sector Governance and Corruption Risks in Infrastructure Projects | 2009 |
| 11 | UN-REDD+ | Guidance on Conducting Corruption Risk Assessments | 2014 |
| 12 | Financial Action Taskforce/World Bank | Risk Assessment Support for Money Laundering/Terrorist Financing | 2007 |
| 13 | TI | Government Defence Integrity Index | 2020 |
| 14 | UN Global Compact | A Guide for Anticorruption Risk Assessment | 2013 |
| 15 | Critical Resource | “LicenseSecure” Assessment Methodology | 2010 |
| 16 | TRACE | Bribery Risk Matrix | 2019 |
| 17 | TI | Diagnosing Bribery Risk | 2013 |

18 U4, Guide to using corruption measurements and analysis tools for development programming (2019).

Literature review

We also reviewed existing analysis of corruption risk assessments by academics and experts in the field. The aim was to identify expert commentary on existing approaches, highlighting strengths, weaknesses and potential gaps, as well as to identify common challenges and pitfalls.

The resources consulted included:

-
- | | |
|--|--|
| 1. Transparency International, <i>Corruption Risk Assessment Topic Guide</i> (2011) | 11. United Nations Development Program (UNDP), <i>Conceptual Framework—Corruption Risk Assessment at Sectoral Level</i> (2018) |
| 2. Transparency International, <i>Mapping the Corruption Assessment Landscape</i> (2012) | 12. UNDP, <i>A Practitioner’s Guide for Corruption Risk Mitigation in Extractive Industries</i> (2016) |
| 3. Transparency International, <i>Corruption Risk Assessment and Management Approaches in the Public Sector—Helpdesk Answer</i> (2015) | 13. <i>Control Risks: Risk—An Organizational Perspective</i> (2014) |
| 4. U4, <i>Using Corruption Risk Assessments for REDD+</i> (2014) | 14. OECD, <i>Data-Driven Approaches for Enhancing Corruption and Fraud Risk Assessments</i> (2019) |
| 5. EU Regional Cooperation Council, <i>Corruption Risk Assessment in Public Institutions in South East Europe</i> (2020) | 15. Petkov, <i>Looking for consistency in corruption risk assessment: How key guidance materials stack up</i> (2018) |
| 6. The Global Anticorruption Blog (GAB), <i>Corruption Risk Assessments: Am I Missing Something?</i> (2018) | 16. Sharma et al., <i>Corruption Risk Assessment Methods: A Review and Future Direction for Organisations</i> (2016) |
| 7. GAB, <i>Corruption Risk Assessments: Some Observations on Private-Sector Analyses</i> (2014) | 17. U4, <i>Corruption Self-Assessment Tools for the Public Sector</i> (2016) |
| 8. Heywood and Pyman, <i>Strategy, Scale and Substance</i> (2020) | 18. U4, <i>Guide to using corruption measurements and analysis tools for development programming</i> (2019) |
| 9. IM4DC, <i>Action Research Report: Constructing a Diagnostic Framework on Corruption Risks in Mining Sector Licensing</i> (2015) | 19. U4, <i>The Basics of Corruption Risk Management</i> (2015) |
| 10. Marquette and Peiffer, <i>Corruption Functionality Framework</i> (2020) | 20. OECD, <i>Corruption in the extractive value chain</i> (2016). |
-

Consultations

We consulted over 50 experts from NRGi and external organizations, through one-to-one conversations and workshops to inform the development of the tool. Several individuals and organizations, noted in the acknowledgements, also provided valuable insights and feedback on draft versions.

We would particularly like to thank participants from the following organizations for their contributions:

-
1. GIZ
 2. EITI International Secretariat
 3. Transparency International Secretariat
 4. Transparency International Accountable Mining Program
 5. Columbia Center for Sustainable Investment
 6. Control Risks
 7. Global Financial Integrity
 8. Global Integrity
 9. Global Witness
 10. International Council on Mining and Metals
 11. Independent Research Institute of Mongolia
 12. Norwegian Agency for Development Cooperation
 13. NYU Stern School of Business
 14. Swiss Agency for Development Cooperation
 15. U4 Anticorruption Centre
 16. The World Bank
-

Annexes

Step 1: Sample terms of reference for independent expert

[Example only. Written for contexts in which the EITI is commissioning the assessment. To be adapted as required.]

Background

Brief overview of the organization

The Extractive Industries Transparency Initiative (EITI) is the global standard for the good governance of oil, gas and mineral resources. It aims to ensure transparency and accountability in how a country's natural resources are governed. [Country] has been a member of the EITI since [year].

The national multi-stakeholder group (MSG) is the lead body responsible for implementation of the EITI. The group is comprised of representatives from government, companies and civil society. Its responsibilities include setting objectives for EITI implementation, ensuring and monitoring disclosure of EITI data, approving annual workplans and activity reports, and leading outreach activities.

Brief overview of the project

In line with its mandate to support accountability in the sector, the MSG is undertaking a corruption diagnostics assessment focusing on [sector/commodity X].¹⁹ [The MSG has set up an anticorruption sub-group/committee to lead on this work.]²⁰ The overall aim of the assessment is to support evidence-based, multi-stakeholder action to address corruption in the sector.

The assessment process will allow the MSG to:

- Draw on evidence and consultations to identify which forms of corruption are most likely to occur and negatively impact the country's extractive industries.

- Diagnose the causes of corruption.
- Build an evidence-based anticorruption action plan, focused on preventing future corruption.

The assessment will result in an action plan and strategy which will guide anticorruption efforts in the sector.

Responsibilities

The MSG seeks an independent expert/team of experts, working as consultant(s), who will work closely with the group to carry out the assessment. The independent experts will lead on the research for the assessment and the drafting of reports, and will help facilitate discussions on the forms of corruption identified and potential responses.

Specific responsibilities will include:

- Conducting desk-based reviews of existing data sources on corruption trends in the sector
- Identifying and conducting in-depth analysis of leading forms of corruption in the sector, examining how they occur and how different actors might help to address them
- Leading interviews and convening focus groups with stakeholders in the sector
- Preparing draft scoring and prioritization of forms of corruption
- Regular liaison with the MSG [or a sub-group] to set the scope and priorities for the assessment

¹⁹ If already decided on by the MSG—Step 1 of the assessment.

²⁰ If relevant.

- Facilitation of two workshops with MSG members and potentially external stakeholders to discuss corruption risks and collaboratively develop an action plan.

Specific deliverables will include:

- Completion of a Workbook reviewing existing data on corruption and governance in the sector, accompanied by a 10-15-page summary of findings
- A concise report, of around 20-30 pages, analyzing leading forms of corruption
- Completed draft prioritization tables
- A draft action plan, to be finalized with MSG members.

The independent expert(s) will report to the MSG [or a sub-group]. The MSG will provide a resource document with guidance on how to conduct the assessment.

Competencies required

The MSG seeks experienced experts with exceptional research skills, facilitation experience and ability to engage stakeholders across the sector on this topic.

Specific competencies required are as follows:

- Strong knowledge of the country's extractive sector, including technical and political aspects relevant to assessment of corruption risks
- Experience analyzing corruption and integrity issues
- Some familiarity with EITI processes and resources
- Experience conducting stakeholder interviews on sensitive topics
- Strong desk-based research skills and report drafting competencies
- Experience facilitating workshops with senior stakeholders
- Good project and time-management skills
- Fluency in [local language] and good knowledge of English or French.

[These might be divided into required and preferred competencies.]

Location

The expert(s) should be available to conduct research and facilitate workshops in [country].

Indicative timeframe

It is expected that the project will run over [number] months from [month-month], requiring a total of around [number] days of work. The start date will be [date].

Submitting your interest

If you are interested in applying for this position, please submit the following documents to xxx@eti.org:

- Your CV, to a maximum of two pages
- Your daily fee rate, including any applicable taxes and fees
- Two recent examples of work you have completed
- Two referees.

Application closing date: [date]

Step 2: Workbook for reviewing existing data

See separate Excel file.

Step 2: Summary report templates

Complete the following table for each area of focus:

| STEP 2 SUMMARY REPORT | |
|--|--------------------------|
| [INSERT NAME OF AREA OF FOCUS, e.g., "Area 2: Operations"] | |
| 1. Is this area significant? | [Yes/No/Somewhat] |
| [Write a 1-2 paragraph summary drawing on the answers in sheet 1 of the Step 2 Workbook] | |
| 2. Is corruption in this area a serious and harmful problem? | [Yes/No/Somewhat] |
| [Write a 1-2 paragraph summary drawing on the answers in sheet 2 of the Step 2 Workbook] | |
| 3. Is this an area where there are opportunities for action and positive change? | [Yes/No/Somewhat] |
| [Write a 1-2 paragraph summary drawing on the answers in sheet 3 of the Step 2 Workbook] | |

Complete the following table for the contextual factors:

| CONTEXTUAL FACTORS | |
|--|--------------------------|
| 1. Is corruption a serious problem in the country beyond the extractive industries? | [Yes/No/Somewhat] |
| [Write a one-paragraph summary drawing on the answers in the “contextual data” sheet of the Step 2 Workbook] | |
| 2. Are civil society, journalists and citizens able speak out freely and safely? | [Yes/No/Somewhat] |
| Write a one-paragraph summary drawing on the answers in the “contextual data” sheet of the Step 2 Workbook] | |
| 3. Is the political system free and competitive, and does it protect the rule of law? | [Yes/No/Somewhat] |
| [Write a one-paragraph summary drawing on the answers in the “contextual data” sheet of the Step 2 Workbook] | |
| 4. Does the extractive sector suffer from an implementation gap between laws and practices? | |
| [Write a one-paragraph summary drawing on the answers in the “contextual data” sheet of the Step 2 Workbook] | |
| 5. Are the sector’s largest companies subject to strong anti-corruption standards? | |
| [Write a one-paragraph summary drawing on the answers in the “contextual data” sheet of the Step 2 Workbook] | |

Step 3: Selection table template

Complete the following table (using yes/no/somewhat):

| SELECTION TABLE (STEP 3) | | | |
|--|--------------------------------------|--|--|
| Areas of focus | 1. Is the area of focus significant? | 2. Is corruption in this area a serious and harmful problem? | 3. Are there opportunities for action and positive change? |
| Decision to extract; licensing and contracting | | | |
| Operations | | | |
| Revenue collection | | | |
| Revenue management | | | |
| State-owned enterprises | | | |
| Artisanal and small-scale mining | | | |
| Socio-environmental impacts | | | |
| Fossil fuel phaseout | | | |

Step 4: Research guides

For each area of focus, we provide guidance on the leading forms of corruption, risk factors, causes and potential mitigation measures in separate files.

I. Decision to extract; licensing and contracting

See separate file.

II. Operations

See separate file.

III. Revenue collection

See separate file.

IV. Revenue management

See separate file.

V. State-owned enterprises

See separate file.

VI. Artisanal and small-scale mining

See separate file.

VII. Socio-environmental impacts

See separate file.

VIII. Fossil fuel phaseout

See separate file

Step 4 and Step 5: Diagnostic table template

| Step 4: Diagnosing corruption | | | Step 5: Prioritizing for action | | | |
|---|---|---|---------------------------------|-----------|----------------|--------------------------|
| A. What forms of corruption are of significant concern? | B. What causes the different forms of corruption? | C. What measures could help prevent corruption? | D. Likelihood | E. Impact | F. Feasibility | G. Overall score (D+E+F) |
| | Risks: Causes | | Score: | Score: | Score: | Score: |
| | Risks: Causes | | Score: | Score: | Score: | Score: |
| | Risks: Causes | | Score: | Score: | Score: | Score: |
| | Risks: Causes | | Score: | Score: | Score: | Score: |

Step 6: Action plan template

| Prioritized forms of corruption (add from the prioritization table) | | | | |
|---|-------------------------------|----------|------------|------------------------|
| Objective 1 | | | | |
| Proposed action | Proposed responsible actor(s) | Timeline | Next steps | Indicators of progress |
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| Objective 2 | | | | |
| Proposed action | Proposed responsible actor(s) | Timeline | Next steps | Indicators of progress |
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |

About the authors

For the August 2021 first edition: Alexandra Gillies is an NRGi advisor. Matthieu Salomon is an NRGi senior governance officer. Sebastian Sahla is a consultant for NRGi and was previously an associate in NRGi's Myanmar office. Tom Shipley is a consultant for NRGi.

For the December 2023 updated edition: Matthieu Salomon is NRGi lead on anticorruption. Susannah Fitzgerald is an NRGi governance officer.

Acknowledgements

The authors would like to thank Andrew Bauer, William Davis, Anna Fleming, Patrick Heller, Daniel Kaufmann, Liz McGrath, Aubrey Menard, Dorjdari Namkhajantsan, Robert Pitman, Aaron Sayne, Amir Shafaie, Aye Kyithar Swe, Erica Westenberg and Nicola Woodroffe from NRGi for their support in reviewing drafts of the tool and providing extensive feedback and suggestions. Special thanks to Aaron Sayne for his contribution to the design of the tool and to Alexandra Malmqvist for her support during the preparation of its publication.

During our preparatory work, we benefited from ideas and feedback shared by a number of experts and organisations listed in the "Sources and consultations" section. In addition, the authors would like to thank Nicole Bieske, Lisa Caripis and Michael Erdiaw from Transparency International's Accountable Mining Program; Stephanie Trapnell from Transparency International Defence and Security; Sophie Lemaitre, Guillaume Nicaise and Aled Williams from the U4 Anti-Corruption Resource Centre; Thomas Lassourd and Jaqueline Taquiri from IISD/IGF; Lakshmi Kumar from Global Financial Integrity; Luke Balleny and Edward Bickham for reviewing drafts of the tool and providing valuable suggestions. Any remaining mistakes and weaknesses are our own.

We would like to thank all those who provided valuable input to the revision of the tool, in particular based on their experience of using it, including Ramandeeep Chhina, independent consultant who worked on the integrity survey in the Philippines, Mohamed Cisse from NRGi (Guinea office), Sergio Córdoba Rojas from Crudo Transparente (Colombia), Borgil Surenhuu, independent consultant who led the diagnostic research in Mongolia, and Telye Yurisch from Fundación Terram (Chile).

Finally, special thanks to consultants André Ufer and Richard Kent for their contributions in developing the research guides for Step 4 on ASM and socio-environmental impacts respectively.

About NRGi

The Natural Resource Governance Institute is an independent, non-profit organization that supports informed, inclusive decision-making about natural resources and the energy transition. We partner with reformers in government and civil society to design and implement just policies based on evidence and the priorities of citizens in resource-rich developing countries. Learn more at www.resourcegovernance.org

