

UNDERSTANDING LAND CORRUPTION AS A BASIS FOR PREVENTION

Findings from Liberia, Sierra Leone and Zambia

Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. With more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

www.transparency.org

Authors: Alice Wadström and Jean Brice Tetka

Contributors: Wesley Chibamba, Gerald D. Yeakula, Dr. Josephus Brimah and Edward B. Koroma

Every effort has been made to verify the accuracy of the information contained in this report and all information was believed to be correct as at March 2019; nevertheless, Transparency International cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

© Cover photo: [istockphoto.com/robertonencini](https://www.istockphoto.com/robertonencini)

ISBN: 978-3-96076-122-8



2019 Transparency International. Except where otherwise noted, this work is licensed under CC BY-ND 4.0 DE. Quotation permitted. Please contact Transparency International – copyright@transparency.org – regarding derivatives requests.

TABLE OF CONTENTS

02	EXECUTIVE SUMMARY
04	INTRODUCTION
05	METHODOLOGY AND SCOPE
06	WHAT DOES LAND CORRUPTION LOOK LIKE?
09	WHAT FACTORS ENABLE LAND CORRUPTION?
13	WHAT ARE THE EFFECTS OF LAND CORRUPTION?
14	TURNING RESEARCH INTO POLICY AND ACTION

EXECUTIVE SUMMARY

From forced eviction to loss of livelihood, social status, savings and even life, land corruption in Africa has serious and far-reaching consequences. Such corruption comes in many forms, and it must be understood – along with the factors that enable it – before it can be tackled.

In response, Transparency International chapters in Liberia, Sierra Leone and Zambia carried out baseline research into people's experience of land corruption, providing a broad overview of corruption issues and relevant legal frameworks.

Bribery, sexual extortion, collusion and fraud are common across all three countries, with patronage, cronyism and kickbacks also occurring. Various forms of poor legal framework, weak implementation, cultural discrimination and exclusion, and a lack of information about land rights enable corruption to thrive in all three countries.

Frequent consequences include insecurity of tenure, loss of livelihood, environmental damage, land disputes and diminished trust in public institutions, as well as reduced social stability, investment, economic growth and sustainable development.

These research findings are intended to inform policymaking and the design of targeted interventions to detect and prevent corruption over land in all three countries and beyond. By closing legal loopholes, ensuring regulations are implemented, addressing discrimination and exclusion, and providing accessible information about land rights and processes, policymakers and development actors can ensure security of tenure and land justice for all.



INTRODUCTION

Land corruption refers to corrupt practices in land administration and acquisition. It can be defined as “the abuse of entrusted power for private gain while carrying out the functions of land administration and land management”.

Corruption affecting both urban and rural land processes in Africa takes many forms, and it destroys lives – through forced evictions, damaged livelihoods, injustice, expense, distress and loss of social status. To enable policies and interventions to detect and prevent land corruption, it is vital that policymakers, decision-makers and development actors understand its various forms and the conditions in which it occurs. But this understanding is currently widely lacking. There is a reluctance among many actors to acknowledge land corruption directly, and where it is addressed, a lack of recognition that corruption in land governance takes many forms besides bribery.

In response, as part of Transparency International's Land and Corruption in Africa programme, national chapters in Liberia, Sierra Leone and Zambia produced baseline research reports between December 2017 and March 2018. Together, these reports provide an overview that highlights similar and different forms of land corruption across the three countries, identifying issues that require particular attention at national and regional levels.

By providing a picture of the forms, context and consequences of land corruption, the research findings offer policymakers in all three countries and beyond a basis for developing policies and interventions that will detect and prevent corruption related to land. Such measures are essential for ensuring justice, overcoming poverty and boosting economic development – as well as improving individual lives.

METHODOLOGY AND SCOPE

The baseline research was carried out in each country by collecting and analysing primary and secondary data from household questionnaires, key informant interviews, focus group discussions and desk-based literature reviews.

It focused on two key pillars: policy and legislation on one hand, and behaviour on the other. The policy and legislation section relied mainly on desk-based research and provided a summary of land-related laws and a brief assessment of their effectiveness. Focus group discussions informed this section through examples from real life, as given by government officials, traditional leaders, civil society organisations and community members. The section on behaviour provided a mapping of different project constituents' concerns and perceptions regarding land corruption. Participants used mobile phone applications for the household surveys, which posed key questions on their experience with land governance, such as whether they had been asked to pay a bribe, whether they had done so, and which agents were perceived as capable of taking their land. In Liberia, the research was carried out in four counties through a survey of 634 respondents. In Sierra Leone, it was undertaken in four cities spread across the country, with 507 survey respondents. The Zambia research covered 400 survey respondents in three districts, including Lusaka, the capital. Key informants for the surveys – such as government officials, private sector actors, civil society representatives and community members – were selected according to availability, accessibility, social status, and willingness to cooperate.

Drawing on this baseline research conducted by the three national chapters, this research paper intends to provide an overview of the different types of corruption that occur in each country and to identify similarities and differences. As the research included focus group discussions and interviews in addition to standardised surveys, it revealed a variety of issues and forms of corruption not explicitly explored in the household surveys. To address the complexity of land corruption, this comparative overview was structured so as to distinguish between corrupt practices themselves and the institutional or systemic factors that enable or exacerbate them – such as lack of appropriate laws, overlapping mandates among authorities in land administration, and decision-makers' lack of accountability. These factors enable corrupt individuals

to take advantage of unclear processes and mandates, and act with impunity for personal gain, to the detriment of individuals and communities.

Despite limitations such as small sample sizes and varying levels of detail in the household surveys, the research makes it possible to identify the probable consequences of land corruption. Its findings may not be exhaustive, and the absence of a particular phenomenon in one country's findings does not preclude the possibility of its presence. However, these findings provide useful indicators of how land corruption manifests itself across the three countries, and the structural issues enabling it.

WHAT DOES LAND CORRUPTION LOOK LIKE?

Bribery, collusion and fraud are forms of corruption occurring across all three countries. The agents of corruption tend primarily to be traditional leaders, public officials and private investors, landowners or companies.

The most corrupt type of agent varies according to country and the form of corruption in question. For instance, in Zambia, private investors are the agents most responsible for land grabbing, whereas community leaders are the main agents demanding bribes. This can be explained by Zambia's open-door investment policy encouraging foreign direct investment and enabling large-scale deals with international mining or agriculture companies. Customary land is generally more subject to corruption than statutory land, which could explain why community leaders are agents most commonly requesting bribes.

BRIBERY TOPS THE LIST

Bribery is the most common form of land corruption in all three countries. It occurs in different situations and at different levels of land administration. Respondents to the household surveys, which principally addressed bribery, revealed that the main reason a bribe was paid was to access relevant information and speed up land transactions (in Zambia) or to avoid eviction and secure land title (in Sierra Leone and Liberia). Such bribes are most commonly requested in the form of money and gifts in kind, with other forms including free labour and, in Zambia, the transfer of property deeds.

In Sierra Leone's land tenure process, land ministry officials and other stakeholders such as chiefs often inflate costs for their own benefit. This practice is made possible by land administration processes that lack both uniformity and transparency. For corrupt agents, controlling land rights is a means of dispensing political and economic power, with bribery often accompanying other forms of corruption such as patronage and nepotism. Bribery also occurs in the land dispute adjudication process in Liberia. In Zambia, bribery is common in connection with the conversion of customary land into state land, a process in which traditional authorities accept so-called "donations" from national or foreign investors who in turn are

granted land. Even if a chief intends to allow use of the land only for a limited period, the Ministry of Lands – in charge of issuing title deeds – normally grants applicants 99-year leaseholds. Transparency International Zambia confirms that bribery is one of the top land corruption issues in the country, largely due to the lengthy process involved in obtaining title deeds. People bribe officials to avoid waiting several months instead of the 21 days the process is supposed to take.

In Liberia, surveyors acting as intermediaries between owners and buyers receive money in exchange for providing surveys, without giving out a receipt. The research indicates the extent of bribery, with 12 per cent of Zambian respondents having been asked to pay a bribe, 80 per cent of whom paid. Ten per cent of Liberian respondents reported having been asked to pay bribes to resolve land issues, with 56 per cent having done so. In Sierra Leone, around 25 per cent of respondents had been asked to pay bribes, of whom 79 per cent did.

Bribes in all three countries are most often demanded by both community leaders and cooperative farmers associations. In Sierra Leone and Liberia, public officials also commonly demand bribes and are among the most frequent recipients. In Liberia, community leaders top the list, while in Zambia, "instances occur where national or foreign investors approach traditional authorities to acquire pieces of [customary] land for commercial agriculture, mining, etc., [...] in exchange for 'donations', gifts or money".¹

SEXUAL EXTORTION



The surveys carried out in Zambia and Liberia reveal instances of demands for sexual favours instead of monetary bribes. This is also known as "sextortion".

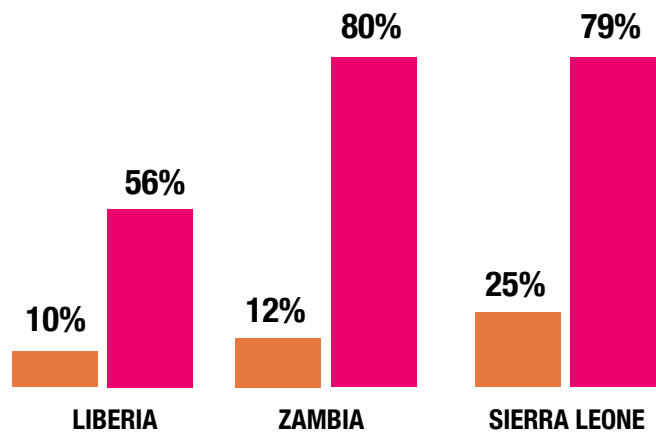
Women's low social status can expose them to this kind of exploitation when they seek to own land. The

A LOOK AT LAND CORRUPTION

BRIBERY


Bribery is the most common form of land corruption in all three countries. Bribes are most often demanded and received by community leaders, cooperative farmers associations and public officials.

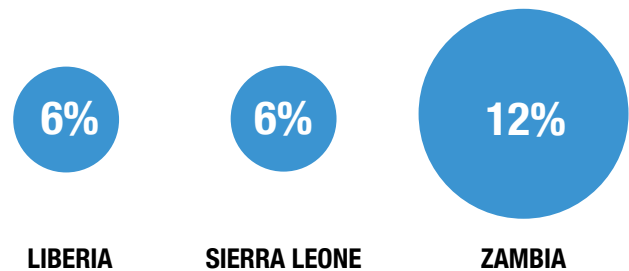
-  Percentage of survey respondents who had been asked to pay a bribe
-  Percentage of those asked to pay who paid the bribe



SEXUAL EXTORTION

The women most often asked for sexual favours when they try to own land are those with low social status and poor access to decision makers.

-  Percentage of individuals who know someone who has been asked to pay a bribe through sexual extortion:



COLLUDING TO GAIN LAND

Transactions behind closed doors to the detriment of affected communities are reported in all three countries.



LIBERIA

Interests of those entitled to land are often compromised when deals are sealed without community consultation.



SIERRA LEONE

Some private investors bribe local and traditional authorities to bypass community interests in land deals.



ZAMBIA

Collusion may take place in the form of chiefs receiving bribes in order to convert customary land into state land.

FRAUD, PATRONAGE AND KICKBACKS

Various forms of fraudulent activity occur in relation to land management in the three countries.



LIBERIA

Forging of land-related documents, fake measurements produced by surveyors and land administrators, and landowners moving property markers.



SIERRA LEONE

Shifting property markers for payment.



ZAMBIA

It is common for tribunal mandates to order cancellations of fraudulently produced certificates and titles.

Liberia survey highlighted cases where men request sexual favours in exchange for negotiating on behalf of women, as cultural norms prevent women from directly engaging with community leaders. One Liberian respondent stated that women and girls are rarely allowed to own land, and therefore need to ask their brothers to request land from traditional leaders, who can then give it to their sisters. Women without male relatives are especially vulnerable to men who offer to vouch for them. This absence of the right to access and own land, as well as lack of access to decision-makers, places women in a position of dependency on men, where they may find that there is no choice but to pay a bribe or provide sexual favours. In Liberia, 6 per cent of respondents knew someone who had been asked for a sexual favour in relation to land rights. In Zambia, the figure was 12 per cent. In Zambia, the research showed that paying bribes through sexual favours occurs more often in urban areas.

COLLUDING TO GAIN LAND

The research found that collusion occurs between various actors in land administration processes across all three countries, including in deals between private investors and traditional authorities. Transactions behind closed doors to the detriment of affected communities were reported in each country.

In Zambia, collusion may take place in the form of chiefs receiving bribes in order to convert customary land into state land and long leaseholds, without the consent of village heads or of the community. While this may be permitted by customary tenure and informal rules giving extensive discretion to traditional leaders, failure to consult affected individuals is contrary to the principle of “Free, Prior and Informed Consent”, a concept which Zambia authorities recognise. This form of corruption is designated as one of the most challenging land corruption problems by Transparency International Zambia. In Sierra Leone, some private investors allegedly² bribe both local and traditional authorities to bypass community interests in land deals. This can lead to citizens being relocated from their land without being fully consulted. Likewise, in Liberia, the interests of local people entitled to land are often compromised when deals are sealed without community consultation. Liberian landowners are also reported to collude with surveyors to shift “the positions of cornerstones or land markers so as to expand their landholdings”.

FRAUD, PATRONAGE AND KICKBACKS

Various forms of fraudulent activity occur in relation to land management in the three countries. The Liberia research mentions the forging of land-related documents, fake measurements produced by surveyors and land administrators, and landowners

moving property markers. Similarly, this moving of borders for payment occurs in Sierra Leone, and the Zambia report references the Land Tribunal’s mandate to “order cancellations of fraudulently produced certificates and titles”, which suggests fraud is a common phenomenon.

The Liberia research revealed that the president has a mandate to sign all public land deals, and that unsigned land deeds were found in the presidential mansion. This extensive mandate to approve land deals creates corruption risks in the form of patronage or favouritism. Similarly, in Zambia, actors use land as a form of patronage or the basis for clientelism, one of the country’s leading land corruption issues.

The research indicated that some Liberian authorities receive kickbacks as compensation for having granted hectares of land to concession companies without having carried out surveys or demarcation.

WHAT FACTORS ENABLE LAND CORRUPTION?

Corruption is enabled or exacerbated by structural flaws in the legal and administrative frameworks governing the relations between stakeholders in land governance. These include public authorities, local or traditional authorities, private actors, land owners and other individuals or groups making claims to land.

A PERMISSIVE LEGAL FRAMEWORK

Legal and administrative frameworks and processes concern the laws defining and sanctioning land corruption, and policies shaping decision-making processes in land administration. Laws and policies relating to land governance are of fundamental importance, as they constitute the basis on which decision-makers can be held accountable, and people can make claims and seek redress for violations of their rights.

All three country reports point out the critical problem of fragmentation, lack of uniformity and overlapping mandates and responsibilities in land administration processes. In Zambia, the many laws regulating land rights and management make the procedure hard to navigate and expose the public to a high number of duty bearers – in particular, politicians and traditional leaders. The most important piece of legislation is the 1995 Lands Act, but additional applicable laws include the Lands and Deeds Registry Act and the Housing (Statutory and Improvement Areas) Act. This creates incoherence and opportunities for corruption. The country lacks an official land policy to provide clear guidelines on land administration and how laws relating to corruption and land should be applied. Such a policy remains in draft form, rejected by traditional leaders on the basis that the proposals reduce their power to manage customary land.

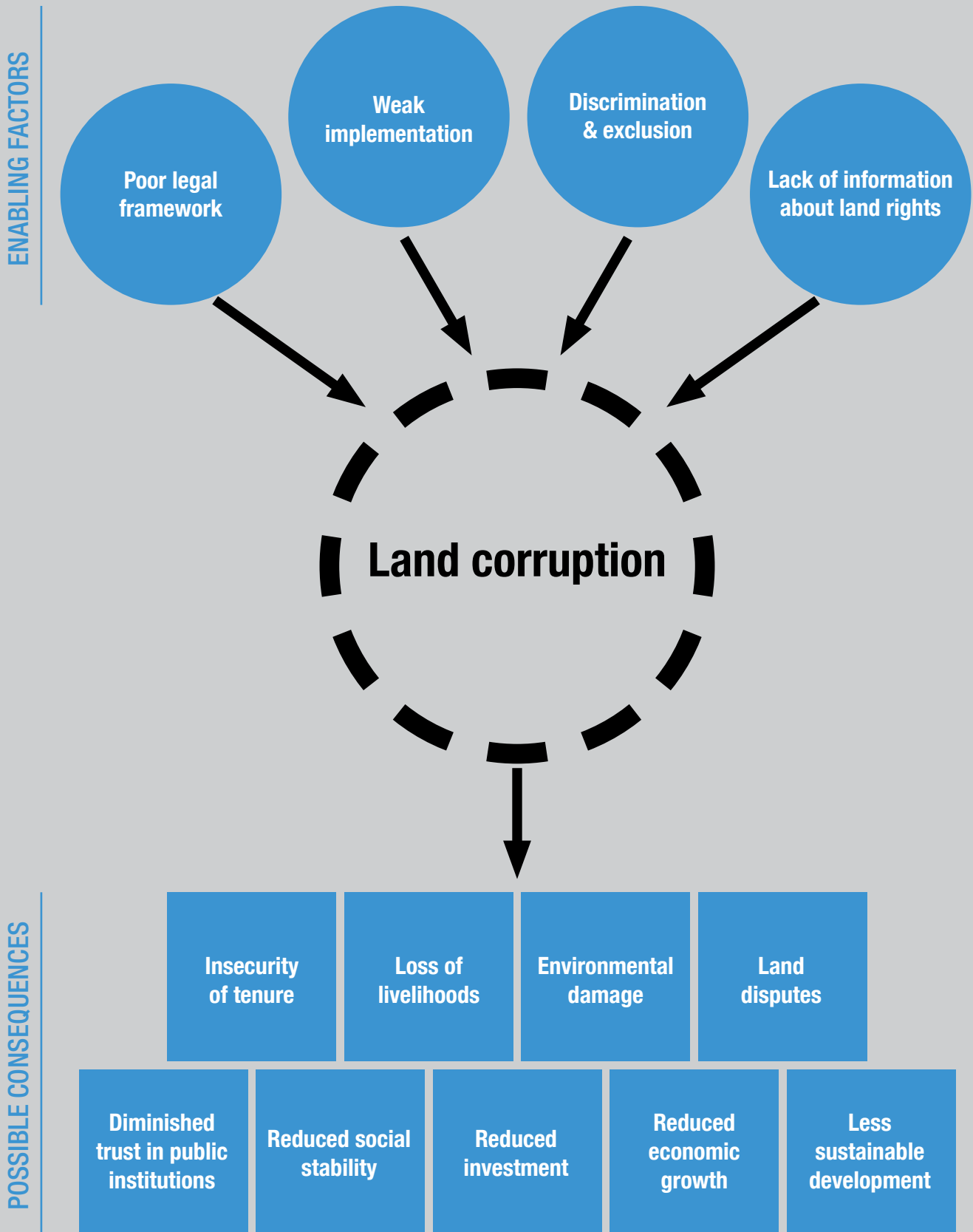
In Liberia, land policies and regulations are reported as fragmented, with land-related mandates dispersed among multiple sectors. This has recently been addressed with the passage of the Land Rights Law in September 2018, although how the law will be implemented remains to be seen. The Sierra Leone research also mentions conflicting land authorities, including traditional authorities, various state organs and land-owning families. The land administration

authority in Sierra Leone's Western Area is considered particularly lacking in transparency and consistency. The corruption that may flourish in these circumstances also causes land conflicts, when multiple authorities may take conflicting decisions over a single plot.

Such subnational variations are also evident in other countries, and additional research could seek to establish why land administration functions better in some sub-national regions. The Zambia and Sierra Leone reports mention lengthy and complex land administration procedures that encourage bribery. In Zambia, one respondent noted that in order to obtain land title, "it took three to four years to complete the official paperwork and get all the requisite bureaucratic clearances"³. With only two Ministry of Land offices in the whole country, most people also need to travel great distances to acquire title deeds – a further deterrent to following formal acquisition procedures.

The problem with the lack of standardised procedures extends to customary tenure systems, in which land is administered according to traditional norms and practices that vary from place to place, and where people normally do not have legal titles for their land. The informal character of customary tenure can lead to the double allocation of land, causing conflict within communities. The Zambia and Liberia research raises particular issues connected to customary land administration systems, including the absence of legal frameworks to govern them. In Liberia, customary land rights only acquired legal protection in 2018, under the new Land Rights Law. Zambia's lack of formal rules on customary tenure gives extensive discretion to traditional leadership, putting land users in an insecure position, "at the mercy" of their leaders. Zambia's customary land system is often undocumented. When documents are provided by traditional leaders, they are often not recognised by financial institutions

LAND CORRUPTION: ENABLING FACTORS AND CONSEQUENCES



involved in land governance. Similarly, there is a need for improved record keeping in traditional procedures in Liberia, and in Sierra Leone land records are said to be unsatisfactory as registration is not required by law and most land owners lack title deeds.

The Sierra Leone report indicates that formally defining the customary tenure system could help enhance the uniformity and transparency of rules.

The research in both Zambia and Liberia raises concerns about officials at different levels exercising excessive discretionary power in land administration processes. In Zambia, the 1995 Land Act grants discretionary exercise of power to the president under statutory law, and to chiefs under customary law, as well as to various other local and central authorities, traditional leaders and politicians. In Liberia, the discretionary power of multiple authorities is due to the absence of legislation and administrative rules defining the roles of diverse authorities in relation to land. The legal definition of public land is considered unclear, exacerbating the problem.

WEAK IMPLEMENTATION OF THE RULES

All three countries have issues with the efficiency and reach of the judiciary in upholding land-related laws, sanctioning existing corruption and holding perpetrators accountable. This leads to impunity for perpetrators, and a lack of access to justice and redress for victims. In Zambia, the central Land Tribunal may settle disputes, but the provisions apply mainly to state land, which is less prone to corruption than customary land. The Sierra Leone research points to corruption in the lengthy land adjudication process and a generally weak adjudication system in which the complaint process is unclear. Similarly, in Liberia the enforcement of redress mechanisms is reported to be weak, with focus group discussions suggesting “bribery is present at all levels, including magistrate and circuit courts”.⁴ Proper redress mechanisms do not appear guaranteed across the three countries. The research from Zambia suggests there are redress mechanisms available in some areas, but that they are not accessible to traditional communities, where issues such as lack of awareness and literacy can form barriers. Whistleblowers have legal protection, but the law is not adequately enforced, and there are no redress mechanisms for those falsely accused of corruption. Impunity for land corruption is an issue in all three countries. Zambia’s anti-corruption laws are not enforced by the mandated institutions and accountability measures are not implemented. The baseline research points out that accountability is particularly lacking with regards to land held by the state, especially in the Western Area of Sierra Leone, and land ministry officials have been able to engage in

illegal land sales with impunity.⁵

DISCRIMINATION AND EXCLUSION

Discriminatory practices reinforce pre-existing inequalities and the consequences of corruption. Corruption may lead to vulnerable groups in society being denied the right to access land, and the discrimination faced by some individuals can constitute an incentive for them to engage in corrupt practices such as paying bribes to access services or enjoy rights to which they ought to be legally entitled.

Exclusion of specific groups such as women or poor people appears to be facilitated in all three countries mainly by discriminatory or insufficient legislation, and cultural or traditional practices. In Zambia, constitutional provisions prohibiting discrimination are not applicable to personal and customary law. This means customary land tenure is exempt from inheritance and marriage laws, to the detriment of women in particular. Although land statutes in Zambia give the same rights to men and women in principle, women are usually side-lined over ownership, unless they own land through their husbands. The research in Liberia and Sierra Leone does not identify specific flaws in legislation that permit discrimination over land issues.

Gender and economic status play key roles in determining land ownership and use. Women, youth and poor people find it very difficult to access land. Land inherited by women or young people is sometimes illegally taken from them and given to rich people or private investors who have the financial power to pay bribes.

In Zambia, traditional or cultural practices that exclude or discriminate against women include expulsion from their property by their deceased husband’s family, and low participation in decision-making processes in rural areas. The same low participation can be found in Liberia, where cultural practices bar women from direct access to community and traditional leaders concerning land issues. In Sierra Leone, the low participation rate extends to both men and women, but men are given preference over women in land disputes, and a woman’s land rights can be denied by other family members based on customary inheritance processes. In communities such as the Boajibu, a woman can be denied land for being married to a foreigner, as the community does not want outsiders to access property.

An unusual feature of Liberian custom is that women in some areas form part of the traditional authorities to be consulted by prospective buyers before land deals, yet they have no say in the process. Cultural practices generally exclude women entirely from land-related negotiations, leaving women dependent on

men – usually husbands or relatives – to negotiate on their behalf. This places them in a vulnerable situation if men are unwilling to help. If women are forced by circumstance to ask men to whom they are not related to negotiate for them, they may be exposed to sexual extortion. In Zambia, this occurs mainly in urban settings, making it unclear whether difficulty in accessing negotiations with traditional leaders is an underlying cause, as in Liberia.

Although not mentioned in specific detail in the baseline research, sexual extortion was addressed as a form of bribery in the household questionnaires. As the baseline research confirms that women, due to their precarious position in society, are more prone to pay bribes, sexual extortion can also be considered to occur for the same reasons of social vulnerability. Zambia's baseline research shows that women pay bribes to a larger extent than men, explained by the fact that cultural obstacles hinder their access to land, and that land ownership has considerable socio-economic benefits for women, enhancing their willingness to pay bribes. Causes of sexual exploitation include women's vulnerability due to their exclusion from participating in land-related negotiations with traditional leaders, denial of their land and inheritance rights, and other forms of discrimination.

LACK OF INFORMATION

Access to information is crucial to making people aware of their rights to land and how to claim them. For access to information to be effective, a legal framework must be in place acknowledging these rights. In all three countries, people lack knowledge of their land rights, the land administration process, and how to acquire this information. Liberia has a freedom of information law which in principle allows everyone

to access public information, including in relation to land. In Sierra Leone, however, access to information can be denied by the authorities for reasons of national security. However, the Right to Access Information Act of 2012 does not define national security concerns, creating a situation of legal unpredictability, where access to information can be arbitrarily blocked. In Zambia, people feel unable to access information, although it is unclear whether this is due to lack of respect for the right to information, or the legal absence of such a right. Even where legal rights to information are granted, information needs to be expressed simply, in local languages and in ways that can overcome illiteracy if it is to help people fulfil their land rights.



WHAT ARE THE EFFECTS OF LAND CORRUPTION?

The research findings indicate that land corruption has consequences for both authorities and individual claimants. Public officials may bypass community leaders for the profit of private investors, acting against community interests and those of individual members. Private investors may bypass public officials and approach community leaders directly, who in turn may disregard community concerns. Drawing on the research findings, the likely consequences of land corruption include:

- insecurity of tenure, including forced displacement caused by double allocations of land or land grabbing
- harm to livelihoods of individuals and communities, particularly of small-scale producers, and rural and urban poor people. This can include loss of home or social status, and reinforced inequalities, making it harder for already vulnerable groups to access land and related services
- environmental damage caused by exploitation of land by private investors without regard to community interest or ecological concerns
- diminished legal and social legitimacy of actors in the land administration system, through the neglect of duties by public officials and failure to consider the interests and rights of communities or individual members
- investor disputes, forced evictions of investors, and compensation issues
- conflicts resulting from land disputes. Liberia has seen deaths in connection to land conflict. In Sierra Leone, conflicts arise over contested land boundaries – including family lands, chiefdoms, districts and provinces. These impact communities in a variety of ways, including in terms of housing, livelihoods, security and the social standing of individuals in the community
- diminished trust in public institutions, which itself may encourage further corruption
- undermining of social stability, investment, broad-based economic growth and sustainable development.

TURNING RESEARCH INTO POLICY AND ACTION

Effective policies and interventions to prevent land corruption require acknowledgement and understanding of the problem. Only then can the land rights of all women, men and children be protected.

Transparency International's research in Liberia, Sierra Leone and Zambia shows that governments need to deliver justice and clarity in land laws – both statutory and customary – by closing gaps, preventing overlap and ensuring comprehensive implementation. They must also prevent discrimination and exclusion, and ensure that appropriate information is accessible to all stakeholders, including people who are illiterate or who speak minority languages.

Both governments and businesses should support and protect land corruption whistleblowers. Businesses need to act responsibly, transparently and fairly when entering into land deals with governments and traditional authorities.

Citizens can also make a difference by reporting land corruption, not paying bribes and demanding accountability from political and traditional leaders in land affairs.

All of these measures can help tackle corruption and deliver land rights to all, ensuring the security of tenure and the livelihoods people need to live free from poverty and injustice.

ENDNOTES

1 Transparency International Zambia, *Land and Corruption in Africa Project Baseline Report* (Lusaka: Transparency International Zambia, December 2017) p15.

2 Transparency International Sierra Leone, *Land and Corruption in Africa Programme Baseline Survey Report* (Freetown: Transparency International Sierra Leone, February 2018) p32.

3 Transparency International Zambia, *Land and Corruption in Africa Project Baseline Report* (Lusaka: Transparency International Zambia, December 2017) p46.

4 Center for Transparency and Accountability in Liberia, *Land and Corruption in Africa Programme Baseline Survey Report* (Monrovia: Center for Transparency and Accountability in Liberia, February 2018) p45.

5 Transparency International Sierra Leone, *Land and Corruption in Africa Programme Baseline Survey Report* (Freetown: Transparency International Sierra Leone, February 2018) p12.

Transparency International
International Secretariat
Alt-Moabit 96, 10559 Berlin, Germany

Phone: +49 30 34 38 200

Fax: +49 30 34 70 39 12

ti@transparency.org

www.transparency.org

Blog: voices.transparency.org

Facebook: [/transparencyinternational](https://www.facebook.com/transparencyinternational)

Twitter: [@anticorruption](https://twitter.com/anticorruption)