



10 March 2023

Ms. Preeya Khongwir  
Committee Assistant to the Working Group on Bribery in International Business Transactions  
Organization for Economic Cooperation and Development (OECD)  
2, rue André Pascal  
75016 Paris

Via email: [Preeya.KHONGWIR@oecd.org](mailto:Preeya.KHONGWIR@oecd.org)

**Re: OECD Phase IV Evaluation of Canada**

Dear Ms. Khongwir,

On behalf of the Canadian Centre of Excellence for Anti-Corruption (CCEAC), a not-for-profit organisation dedicated to the promotion of ethics, compliance, and anti-corruption measures in Canada and around the world, please accept this submission regarding Canada's efforts to implement the OECD Anti-Bribery Convention.

An important part of the mandate of the CCEAC is to support and promote collective action in addressing corruption. Indeed, the structure and model of CCEAC is anchored on multi-sectorial engagement and collective action to facilitate exchange, communication and networking to leverage the knowledge, experience and best practices of others to help build capacity to combat corruption in Canada and globally.

CCEAC is one of few Canadian organizations that is actively engaging in activities that directly respond to *paragraph IV(ii) of the 2021 Recommendation*<sup>1</sup>, which states that each member country take concrete steps to examine "awareness-raising in the private sector, in particular among enterprises operating abroad, including small and medium size enterprises, for the purpose of preventing and detecting foreign bribery as well as, where appropriate, through targeted, profession and sector-specific initiatives

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<sup>1</sup> Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions, OECD/LEGAL/0378. <https://legalinstruments.oecd.org/en/instruments?mode=advanced&typelds=2>

[...] and through collective action and partnerships between the private and public sector in awareness-raising activities”.

CCEAC has been working with Canada's Trade Commissioner Service (TCS) for a number of years to help raise awareness and provide training on anti-corruption risks and proper compliance measures to small and medium sized Canadian enterprises working in jurisdictions around the world. CCEAC has also designed and delivered anti-corruption training and capacity building programs in Paraguay, Indonesia, and Ecuador among others following a collective action and multi-sectorial approach that leverages the CCEAC model. This model focuses on bringing together people, organizations, and stakeholders with different expertise to share knowledge and best practices in a collaborative manner as well as provide access to practical information and tools from various sources. The ultimate goal is to create an international network that fosters and facilitates exchange and anti-corruption capacity building in various jurisdictions.

CCEAC is also part of the Basel Institute on Governance's Collective Action Mentoring Program that specifically aims to develop and support collective action initiatives around the world by connecting NGOs and other organizations to inspire collaborative efforts to combat corruption.

While CCEAC has been very active in helping to implement elements of the OECD Anti-Bribery Convention and the 2021 Recommendation, we believe that Canada as a whole should place more emphasis on supporting collective action approaches and projects such as CCEAC that focusses on awareness, prevention and capacity building. While there is some momentum in Canada, we hope that this evaluation of Canada's implementation of the OECD Anti-Bribery Convention will lead to increased focus on collective action as a means to combat corruption and build capacity at the grassroots level where it is most needed to make a difference.

For your reference, please find attached an outline of the CCEAC mission and objectives attached.

Sincerely,



Patrice Poitevin  
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