# Annexure 1- A summary of key points made by chairpersons and speakers:

#### Day 1: Inaugural Session

Opening Address: Mr. T.K. Nair – Advisor to the Prime Minister of India; Asian Centre for Corporate Governance and Service – Mr. Nair noted the multiple strands of operation in public-private competition which require elaborate mechanisms. He said that the time has come for a new legal framework. In India there already exists a plethora of institutional framework that focus on fairness, transparency and efficiency such as the Central Vigilance Commission procurement guidelines and the General Financial Rules. The basic objectives of any legislation in this area should be to ensure economy, efficiency, integrity and to legally obligate procuring entities to comply with the mandatory provisions on key aspects such as time frames for decision making. In such a scenario competition will be maximised and providing flexibility to respond to diverse needs. Transparency accountability should be ushered in through online portals and swift grievance redress mechanisms. In the current situation, entities such as the State Department of Industries' Stores Purchase Wing focus on issuing Notice Inviting Tenders after which supervision and guidance during execution of the contract is neglected. India needs to aim for a transparent and efficient system in such public procurement so that the rest of the world may know that we are interested in transparency, efficiency particularly in government operations.

Mr. SudhirVasudev, Chairman, GCNI & CMD, ONGC - Mr. Vasudev noted the presence of the two advocacy groups - United Nations Global Compact as well as the United Nations Office of Drugs and Crime - in the process of increased transparency in the area of public procurement in India . He said that in today's corporate scenarios, there is an increased need for transparency, openness and accountability from the view point of ethical standards involving social responsibility towards stakeholders. Entities must mitigate risk and increase compliance through independent financial reporting. In such scenarios, the Board of directors is equally responsible for the timely disclosure of information and the equitable treatment of stakeholders. He stated the example of the ONGC website wherein collective and multi- tiered decision making for high purchases is clearly reflected. ONGC was also the first public sector entity in India to implement e-procurement and to adopt an Integrity Pact. Such measures have led to a drastic reduction of complaints. Also, all tenders are conducted publicly. There is an invoice tracking system which identifies each invoice with a Unique Identity to enable online tracking. ONGC conducts annual vendor meets as well, to ensure fairness and transparency in its vendor-relationships. Mr. Vasudev notes that various transparency measures introduced to procurement systems have morphed the process over time. In today's scenario where fitness is the key to competitive advantage, there is a need for streamlined processes. Entities must build strategic partnerships for long term positions to hedge risks. National companies need to consider long term strategic partnerships with private players thus enabling larger public-private partnership models. One of his key observations is that institutions that carry out public spending should be covered by the new Public Procurement Bill.

Ms. Cristina Albertin, Regional Representative for South Asia, UNODC-Ms.Albertin emphasised the need for collaborative efforts to achieve effective solutions which can be implemented jointly. She observed that corruption is a global problem. This is evident by the single fact that the United Nations Convention Against Corruption achieved a milestone of sorts in 2003 by becoming the first universal instrument against corruption garnering the required 40 signatures in record time! The Convention entered into force in 2005 and it aims to criminalise and prevent corruption. The Convention spans a variety of issues such as asset recovery as well as specific measures for private players and civil society. Earlier, corporate leaders believed they were victims of corruption. However the time has now come for companies to realise the need to promote ethics and transparency. Complicity in

bribery renders the company vulnerable and huge losses to brand and reputation in today's customer centric market. The Convention strives to highlight that economic offences such as unaccounted cash flows lead to loss of image in the market. India is a state party in 2011 to the UNCAC. The principles contained in this Declaration are of a voluntary nature, however, failure to implement these put companies at risk. The draft Public Procurement Bill in India has come at a perfect time. Article 9 of the Convention urges probity in public-private partnerships. Under the Siemens Integrity Initiative, UNODC is undertaking a national study involves a review of legislation to identify gaps under the Convention, a baseline survey involving law enforcement agencies, capacity building measures and case studies for the State of Karnataka.

**Ms. Olajobi Makinwa**, *Head, Transparency & Anti-Corruption Initiatives, UNGC* – briefly touched upon the negative impacts of corruption, especially with regard to procurement process in various countries. She gave a broad introduction about Global Compact Network India and emphasized how UNGC Principle 10 is being operationalized through the Collective Action Project.

Ms.Makinwa appreciated the Siemens support extended to the UNGC – UNODC initiatives in India. One of the basic principles of the UNGC is the implementation of ethical & moral practices, without which sustainability cannot be achieved. There are many aspects of sustainability, evident through ample statistics (eg. Transparency International) such as those on the impact of lack of transparency and corruption. Increased transparency reduces operational costs. In the anti-corruption domain, however, there has been too much talk and little action. It is a well-proven fact that corruption is the most difficult evil to eradicate. For instance, the provision of an anonymous hotline to report corruption is only 9 % in small companies whereas entities with over 5000 employees implement this measure more frequently. She observed that this is the perfect time to deliberate and take action in India's war on corruption. Efficient procurement is central to anti-corruption. There is a direct link between the amount of discretion and the opportunity for corruption. Citizens bear the brunt of corruption in public procurement. It is in India's best interest to domesticate the tenets of convention, ensuring a level playing field between the public and the private sector. Reference may also be had to the UNCITRAL Model Law on Public Procurement. Procurement processes are sensitive and a single agency cannot undertake reform alone; collective action is the need of the hour.

## Session 1- UNCAC and Procurement guidelines-

Chairperson: Ms.Olajobi Makinwa, Head, Transparency & Anti-Corruption Initiatives, UNGC -

Speaker 1: Mr. Sri kumar, Vigilance Commissioner, CVC - The CVC and Procurement Guidelines

Topic: Leveraging technology for increased transparency (PPT)

The points made during the presentation were as follows:

- 1. The CVC is guided by Article 51 A (j) of the Constitution of India which states that it is the fundamental duty of every citizen of India to strive towards excellence in all spheres of individual and collective activity so that the nation constantly rises to higher levels of endeavour and achievement.
- 2. The role of the CVC is advisory in nature.
- 3. Primary principles of the CVC include transparency, fairness, justice and equity.
- 4. Comprehensive legislation for public procurement is on its way for transparent and fair public procurement. But its operation in individual cases over a period of time is the responsibility of every procuring agency.
- 5. In order to improve Vigilance administration and to promote transparency and awareness and also to make the **tender process efficient and competitive**, CVC issued <u>circular</u>

- 98/ORD/1 dt.18.12.2003, wherein the **use of web site** for giving **publicity** to **open tenders** was made **mandatory** w.e.f. 1.1.2004 and later also short term contracts as a first step towards implementing e-procurement.
- 6. Commission vide office <u>order No. 13/3/05 dt. 16.3.05</u>, further directed that a practice must be adopted wherein all organizations under the purview of CVC must **post a summary every month** of all the **contracts/purchases made** above a certain threshold value. Subsequently, the website was also to give the details on -- actual date of start of work, actual date of completion, reasons for delay if any. There has been a progress to these directions too.
- 7. A CVC initiative: Operation Vigeye downloadable software to capture corruption.
- 8. Newer perspectives are enabling the CVC to move from a punitive & preventive role to proactive and predictive vigilance as well as participative vigilance.
- 9. Since public funds are involved in public procurement there is a need for democracy in decision making and ensuring the best value for money.
- 10. Currently, there are a multitude of laws, departmental manuals, GFRs& CVC guidelines in the space of public procurement.
- 11. The CVC Global Project Management System studies processes through cloud computing vigilance system vice crowd sourced data.
- 12. CVC is also currently working on the concept -Grading of Procurement systems in the Organizations whereby organizations would be graded.

#### Speaker 2: Mr. Anupam Kulshrehta, Former Deputy CAG

Topic: Challenges and possibilities of setting procurement guidelines (PPT)

- 1. There is a common perception that the three Cs are a hindrance to the procurement process in India CAG, CVC, CBI.
- 2. The question must be answered do we need fresh guidelines? Currently, all organisations have elaborate procurement guidelines. The need is for better implementation.
- 3. There are many procurement drivers need for goods and services, budgets, funds, nature of items, type & number of suppliers, after sales services and others that are organisation specific.
- 4. Illustrative example: expired medication on shop shelves that are not mentioned in audit accounts of stock-in-trade.
- 5. The boundaries of procurement, also known as the 'cannons of financial propriety' can be summed up as follows:
  - (1) That government money a public resource must be used with the highest standards of financial propriety, exercising the same vigilance as would be exercised by a person of ordinary prudence.
  - (2) A government official cannot authorise expenditure of public money for personal gain.
  - (3) Public expenses must not be sanctioned for the private benefit of an individual person or group of persons unless it is mandated through a court order or a recognised welfare policy.
  - (4) Expenditure incurred should not be more than what the occasion demands.
- 6. The dilemma lies in answering the question what is more appropriate for the occasion? A measure of discretion thus, becomes integral to the process.
- Controls assist in accountability; decreased control or transparency defeats the purpose. An
  inverse relationship exists between internal controls and transparency. Increased
  transparency reduces arbitrariness.

- 8. Discretion = Y Axis, Accountability = X Axis. Discretion is dynamic. An Ideal scenario is where discretion equals accountability on the graph.
- 9. Accountability must be adhered to in all aspects while taking action, or a lack of action, in decision making, in exercising discretion, in the organisation structure and in the work ethos.
- 10. Often-observed shortcomings: needs are not well-defined, incorrect assessment of quantity, substandard quality of goods and services and delays in procedure.
- 11. Currently, it is opined that too many guidelines and committees may make audits a constraint in the smooth execution and delivery of contract processes.

### Speaker 3- Mr. Arpinder Singh, Partner, Ernst & Young

# Topic: UNCAC & Procurement

- 1. A corporate perspective looks at the demand and supply of bribes.
- 2. The question to be asked what should be criminalised? Should it both those who demand and supply?
- 3. In terms of money laundering bribery of private sector employees is not covered. Embezzlement of funds is not covered.
- 4. There are multiple legislations in the arena the Prevention of Corruption Act, 1988, the Prevention of Money Laundering Act, the Public Interest Disclosure Bill 2010, the Prevention of Bribery of Foreign Public Officials Bill 2011, the Serious Fraud Investigation Office, data privacy laws, as well as the Competition Act.
- 5. There is a need for a regulatory perspective.
- 6. The problem of corruption throws up specific issues in different countries.
- 7. A recent survey indicates that RTI legislation has helped evangelism.
- 8. Collusion case study: early warning risk signal.
- 9. Lack of adequate incentives leads to shirking of work. In order to seek approvals/ licenses, there is a tendency to hire a smart middleman and solve everything.

### Session 2- Collective Action by Industry Associations-

### Chairperson- Mr.BhaskarChatterjee: Director& CEO, Indian Institute of Corporate Affair,

➤ Mr.Chatterjee stated that the panel would focus on the contribution of industry bodies and not just that of singular companies/ organisations and what they could do to strengthen this area. Do industry bodies have a form of accountability? Do they address this problem – if yes, what steps do they take? Also, what expectations do international entities such as Transparency International have from trade bodies?

#### **Speaker 1- Mr.SushantaSen**, Advisor, Confederation of Indian Industries

- 1. Corruption is endemic to the industry as well as the government sector. There is a need for a Code of Ethics which categorically states "neither can you bribe nor receive a bribe".
- 2. There is a need for concerted efforts across various sectors inculcating a culture of transparency.
- 3. Three Parliamentary committees have addressed the issue of corruption recently in matters of reduced discretion, in the auction of natural resources and to increase transparency in public procurement.
- 4. At the moment, in India we have a well drafted LokPal bill but the way forward is through good implementation.

- 5. There is a need to leverage e-technology and put the entire procurement process online for greater transparency.
- 6. Estimates rate public procurement at 10 15% of the GDP currently.
- 7. Looking at the Defence sector as an example, certain observations emerge: (a) The system of nominations from amongst PSUs needs to be reduced in order to make a level playing field. The ratio of public-private competition reduced to the current 80-20 (b) Single vendor situations should be avoided; need to formulate a process wherein a discussion can be had with potential bidders before a tender is issued. Currently, the rate of innovation in India is rather low, increasing public-private procurement will help innovation (c) There is a need for skills' based training amongst persons involved in procurement (d) There is a need for e governance/ e-procurement systems. Online transactions reduces red tape.

### Speaker 2- Mr. RajanKohli, Advisor, FICCI

- 1. Rampart corruption exists because of insatiable greed of human beings despite watchdog organisations. Processes have to be refined but unless the people who implement processes are not guided by lofty values, systems can be manipulated.
- Our value system is eroded. Material pursuits are a be-all-end-all. The education wing in FICCI is already working in the arena of educational reforms with the Ministry of Human Resource Development.
- 3. The Corporate Social Responsibility division of FICCI, with the support of the Aditya Birla Group support and the Institute of Corporate Affairs is working to bring about a Charter of organisational values.
- 4. In terms of public procurement FICCI presents the following observations (1) Encourage local manufacturing in the country which boosts domestic economy (2) Create a level playing field for all entities public or private as long as the manufacturing process occurs in India (3) Encourage transparency and encourage fair play (4) The legal framework should be minimally restrictive so that there is a full play of market forces ensures that the customer gets the best deal (4) There is need to increase the use of information technology in procurement and bidding procedures to reduce human conflict, bring efficiency and reduces corruption (5) There is deterrence value of anti-corruption laws implementation is weak. Legal reforms with Bar Council and Law Ministry are needed to change that situation.
- 5. The government should lead by example as it is the largest procurement entity in the country.
- 6. Discrimination in favour of PSUs leads to monopolies. Opening up communication is a successful model increase sharing with private players.

# Speaker 3- Ms. Anupama Jha, Transparency International, India

- 1. India is ranked 95<sup>th</sup> position out of 183 countries on the corruption perception index.
- 2. India is ranked 19th out of 22 counties in the Bribe Payers Index.
- 3. Earlier the perception was that corruption is a Government prerogative now private sector corruption is being acknowledged as well.
- 4. Companies have no culture of integrity in bad times people are desperate in good times they are greedy!
- 5. If the right tone is not set at the top then there is no integrity throughout the organisation.
- 6. Leading Public Listed companies do not have a strong anti-corruption culture. Although policies abound, there are no meaningful details.

- 7. A study conducted by TI India in 2009 2010 indicated that public reporting is a crucial link in the fight against corruption.
- 8. The revolving doors phenomenon is rampart in India, wherein public officials are related to private positions. This compromises integrity.
- 9. There is wide-spread bias amongst potential competitors. Pre-bidding bribe offers are rampart.
- 10. The Integrity Pact is a tool to check corruption in public procurement. In India, 44 state owned companies have adopted it.
- 11. A recent survey across 44 companies indicates that a lot remains to be done; websites especially need to carry updated information.
- 12. Unless there is commitment nothing works. Corruption leads to an increase in disparity will increase especially when private players are also stakeholders.

#### Comments by the Chairperson:

- 1. There is need for the private sector to turn the searchlight on itself.
- Transparency International should scrutinise the private sector as well. Need to familiarise
  with the common man's perception on private companies. Transparency International should
  monitor this perception for private companies.

### Session 3- Public Private partnership in Procurement:

### Chair person- Ms.CristinAlbertin, Representative, UNODC

Need to distinguish between unethical behaviour and corruption in the context of the UNCAC.

## Speaker 1: Mr.Abhaya Krishna Agarwal, Partner, Ernst & Young, (PPT)

- 1. Ernst & Young handles over 70 PPP in India and hence the presentation is based on experience.
- 2. What are the sources of corruption and what can be done to curb corruption?
- 3. Public-private partnerships actually have less avenues for corruption as there is a long-standing aversion in government departments to take on such projects due to their history.
- 4. A paradigm shift is being seen simple procurement is becoming complex; procurement of services is overtaking procurement of goods; strategic considerations are replacing cost considerations; from a low value low risk model, transactions are moving to a high value high risk; an overall light touch model is being replaced by an intrusive model.
- 5. A number of fraud and corrupt practices exist based on vested interest, bias, flawed scoping, shortened study periods, biased project specifications, predisposed selection parameters, deliberate changes in timelines, delay in approvals, lack of oversight, modification of contract, inadequate enforcement, renegotiation of contract and a lack of supervision.
- 6. Various mitigation options include the formulation of a clear strategy, streamline processes, the designing of visionary but practical KPIs, extensive detailing and strict enforcement, cross subsidizing of real estate, setting of condition precedents, adherence to timelines for approvals, the increased use of technology to record data and periodic third party reviews.
- Currently there is hardly any post audit of PPP projects. Therefore it is next to impossible to find out the value for money, or whether processes were efficient or if the intended benefit to stakeholders was achieved.

## Speaker 2: Mr. Venkatesh Nayak, Common Wealth Human Rights Initiative

- 1. Corruption is endemic to India based on a socio-cultural package. There are political dimension of corruption democracy is the single biggest source of corruption in India.
- 2. Transparency in PPP a dialogue between the Central Information Commission, the Planning Commission and the Government of India regarding the RTI Act led to the following observations (1) All agreements should make the PPP entity a public authority for the sake of the RTI Act. (2) CPIO should be equally responsible to share information. The upshot of the discussion was that there should be no need of an RTI application to obtain information about a PPP.
- 3. Based on the example case study of the Puducherry Port undertaken by the Common Wealthy Human Rights Initiative, information regarding the Puducherry Port PPP was declined under Sec 8 (1) (d) of the RTI Act. Further this, the matter has yet to be heard by the State Information Commission.
- 4. There has been a Parliamentary Special Mention to include PPP under the purview of the RTI Act.
- 5. A Recommendation there is a need for transparency in PPP throughout the life cycle of the project; if a new entity is made under a PPP, either the RTI mechanism or the concerned Ministry must permit information sharing.
- 6. The Law Department has yet to give a legal opinion on whether an entity as a result of a PPP is a Public Authority.
- 7. A Task Force of the Department for Personnel and Training has opined that in case of PPPs, all information should be in the public domain.
- 8. CHRI recommendations on the Draft Public Procurement Policy insist on the inclusion of project affected persons in all phases of a PPP project in the decision making process.
- 9. There is a need to do so while monitoring and evaluating in the form of social audits.
- 10. There is a need for Auditing Guidelines perhaps akin to the CAG principles. Currently there are no audit reports for PPP projects available in the public domain. Nor is there a central database of PPP under the Central Government. There is a need for guidelines to audit PPPs at various stages of the project.
- 11. Competition thrives because of regulation. That context is needed in India. Rules of the game need to be well-laid down which are developed on democratic consensus and made public. They must be citizen participation.

#### **Speaker 3- Mr.MukeshArya**, Red Flag Consultancy

Topic: Whistle Blower Mechanism

- 1. The whistle blower initiative is a governance structure that is effective in capturing concerns of those wanting to report. This mechanism builds stakeholder confidence and promotes awareness of fraud.
- 2. Clause 49, Listing Agreement to Stock Exchanges states that such whistle blower mechanisms are not mandatory. Only a few organisations have implemented it as a fraud policy.
- 3. Reference can be had to the US Sarbanes Oxley Act July 2002, Sec 301.4, Sec 806, Sec 1107
- 4. In India, there is widespread ignorance of the whistle blower mechanism for fear of reprisal. Moreover, motivated reports clog the systems and confidentiality is compromised. There are high exposure risks to the entity.
- 5. Best practices in whistle blower mechanisms include an arm's length distance of the mechanism from the management; allowing anonymous reporting; multiple

- channels of communication that are open  $365 24 \times 7$  and which are professional, secure, analytical, timely, reliable and consistent.
- 6. There is a distinction between solicited and unsolicited proposals amongst PPP projects (transport, infrastructure, power, environment, Millennium Development Goals, Tourism sectors)
- 7. Partnership models include BOT, LOT, BOOT, DBFO, Operation Concessions, JVs.
- 8. Major concerns are over the selection process, RFPs, negotiation/contraction, construction phase and operation phase.
- 9. Whistle Blower Mechanisms operate in various processes including the selection of projects, environmental issues, conflict of interest, formulation of process, eligibility conditions, evaluation criteria, transparency issues, non-transparent negotiation, kickbacks, modification of contracts, substandard quality of work, misuse of land acquisition, padding of costs, user charges, maintenance issues, conflict of issues, total project costs, revenue sharing issues, residual assets valuation.
- 10. Who installs such a whistle blower mechanism? Who do the reports go to? Who investigates? Who acts? Accountability? questions that need answering in the Indian scenario.
- 11. Currently, there is no professional facility in India nor any mechanism that can be put in place as a mandatory measure in PPP projects.
- 12. EthicsCall <u>www.ethicscall.net</u> whistle blower facility operated by Red Flag (oversight consultancy)

#### Day 2:

# Observation by special guests-

Guest 1: Ms. Bulbul Sen, IRS (Retd.), Consultant – CUTS, Jaipur, Observer

- 1. There is a need to integrate the international experience in the procurement part of the anti-corruption drive in India.
- 2. The issue cannot be tackled by the governments alone, the private sector too needs to keep up the pressure.
- 3. Gaps mentioned in the procurement scenario by various speakers must be built into the report.
- 4. In terms of public procurement, elements of good procurement practices such as open tendering, proper specifications, a comprehensive public procurement law must be adhered to.
- 5. There is relatively less transparency in the private sector regards dealing with defaulters. There is a lack of a comprehensive and strict code of ethics.
- 6. How do watchdogs participate in private sector monitoring?
- 7. Responsibility of industry associations role of monitors name and shame?
- 8. Bribery of public officials in the procurement of public goods and services is rampart.
- 9. Early finalisation of PPP rules involving the Department of Economic Affairs must involve public consultation. Rules on PPP need such transparency.
- 10. PPP projects do not respond to applications under the RTI Act 2005 Department of Personnel and Training should look into the matter as PPPs perform public functions.
- 11. Since India has ratified UNCAC in 2011 Art 16 (bribing of foreign public officials) applies to India.
- 12. There is urgent need for stringent whistle blower legislation.

- 1. The current efforts should focus on procurement too and not corruption.
- 2. There is a paucity of people skilled in procurement. It must be known on how they deal with procurement issues. Is there a need to apply conduct rules or is there criminal intent to defraud the public?
- 3. Mistrust leads to low integrity. If the government does not believe in the ability of its officers, then it leads to loss of integrity. Top management must be seen to be beyond reproach.
- 4. Trust deficit leads to guidelines that can always be manipulated. Most well versed with the guidelines usually tend to be the most corrupt.
- 5. Evidence of corruption is usually revealed through disproportionate assets.
- 6. Procurement is not the preserve of the honest. Honest men are not involved in procurement activities from fear of reprisal.
- 7. Anguish of the public servant. There is a vacuum of honesty if this is the only way of looking at the procurement activities.
- 8. Discretion vs. accountability; why are they seen at counter positions? Discretion WITH accountability is the way forward.
- 9. Where is corruption located? Perspective energy for corruption comes from the top to the bottom.
- 10. Procurement = process + execution. Contract = procurement + Execution. First alternative is correct as execution is vital.
- 11. Anti-cartel movements must be vociferous.
- 12. Procurement is an A Z process and not just a concept by itself.
- 13. There is a need to emphasize the contractor's responsibility in the process. Government is the principal employer to the sub- contractor. Contractor deviates from labour obligations and principal employer deviates from the contractor through a simple letter.
- 14. What about services? Procurement is not just for goods.
- 15. There is a need to study the phenomenon of internal corruption wherein bribes paid by one government department to another.

### Guest 3- Mr. Neville Gandhi, Regional complinance officer- SIEMENS

- 1. There is a greater need to implement existing guidelines. Repeated issuance of new guidelines causes confusion.
- 2. Implementation must be strict. Distinctions must be made between genuine slips and intentional fraud.
- 3. There is no mention of disciplinary sanctions in most guidelines.
- 4. Corruption is very acute in the private sector.
- 5. FICCI, CII and other trade groups could be flag bearers for a strong code of ethics for clean business.
- 6. There must be a level playing field in all avenues it is only then that merit can stand up. Dependencies on connections must be reduced. Accountability can curb corruption.
- 7. Corporates must not look at success vs. ethics but success AND ethics.

# Valedictory Session- Closing presentation by

Presentation 1: Ms.Cristina Albertin: Summing up the recommendations of the consultation

- 1. Guidelines and principles exist for procurement. Need to ensure implementation, checks and balances as well as disciplinary measures.
- 2. Private sector has to catch up beyond developing codes of conduct. Need to develop policies and proper procurement guidelines/mechanisms/principles for the private sector.

3. PPPs have increased and are increasing in India. PPPs seem to present a more complex and complicated mechanism for procurement and require therefore also mechanisms for transparency and accountability. Need to develop guidelines/mechanisms for these in PPPs.

### Presentation 2:- Ms.ObijawaMakinwa

- 1. Sharing of information between public and private is imperative going ahead.
- 2. There is a need to align India with UN & global best practice.
- 3. Research is needed as is information and expertise. Advocacy will be the next step.

## Concluding remarks- Dr. A.K. Balyan, Global Compact Network India, Petronet

- 1. Often contractors and workmen are in large number and are equal to / outnumber regular employees.
- 2. There are unique methods of corrupt practices one needs to be aware of all perspectives in order to fight it.
- 3. Most organisations have procurement procedures which must be updated in context of developmental phase.

## Vote of thanks- Ms. Shabnam Siddiqui, Project Director, Global Compact Network

Ms. Siddiqui thanked the chairpersons, speakers and participants for their valuable perspectives, time given and participation in a very lively deliberation. She made a special mention to Siemens for their support to the GCNI and UNODC projects on anti-corruption and to the partnership between UNODC and GCNI for this consultation. Concluding with an important observation that it is of utmost importance to build synergy around the issue of procurement in India as there was minimal knowledge sharing between the public and private sector, and the government though the intention and interest existed on all sides.