



POLICY BRIEF

Future-proofing South African business against corruption

Colette Ashton and Erin Klazar

In a context of systemic corruption, business needs to lead the search for solutions. This policy brief highlights new research showing that integrity is in the long-term financial interests of companies. It presents two international good practice methods that business can use to proactively reduce corruption risk: anti-corruption collective action to prevent corruption in sectors; and anti-corruption compliance programmes to prevent and detect corruption in companies.

Key findings

- ▶ In a context of systemic corruption and weak political will, corruption in South Africa is a collective action problem requiring solutions beyond government initiatives.
- ▶ Businesses should play a leadership role in reducing corruption, not only as a matter of ethics, but in their medium- to long-term financial interests.
- ▶ New research shows that integrity is good for business.
- ▶ Anti-corruption collective action is an effective method when led by business and incentivised for optimal participation of all partners.
- ▶ Encouragingly, virtuous circles of integrity are emerging in the private sector:
 - The 2025 B20 Integrity and Compliance recommendations urge business support for collective action against corruption.
 - The Special Investigating Unit (SIU) has initiated anti-corruption forums locally.
 - Legal and policy reforms now provide incentives for businesses to adopt compliance programmes.
 - EOH has set a benchmark for corporate integrity.
 - The Gordon Institute of Business Science (GIBS) has published the Anti-Corruption Working Guide for South African Companies.
- ▶ However, challenges remain:
 - The emerging norm of integrity needs more support in order to grow.
 - Small, medium and micro-enterprises are disproportionately harmed by corruption and need targeted support.
 - A gap in the B20 recommendations is the lack of guidance requiring companies to implement anti-corruption compliance programmes.

Recommendations

Business:

- ▶ Co-found a collective action working group with civil society to design a South African anti-corruption success story.
- ▶ Publicise recent research that shows integrity is good for business.
- ▶ Promote the use of anti-corruption compliance programmes within companies and along supply chains.

Government:

- ▶ The National Prosecuting Authority should maximise the use of corporate liability for corruption created by the new Section 34A of the Prevention and Combatting of Corrupt Activities Act.
- ▶ The Companies and Intellectual Property Commission should educate companies about the GIBS' Anti-Corruption Working Guide for South African Companies.

- ▶ The South African Revenue Service should design tax incentives to reward SMMEs that implement anti-corruption compliance programmes.
- ▶ The SIU should adopt the International Anti-Corruption Academy's Collective Action methods to optimise its sectoral forums.

Civil society:

- ▶ Publicise the EOH anti-corruption success story.
- ▶ Support universities to research what drives companies to adopt anti-corruption compliance programmes.
- ▶ Support universities to research what drives private sector corruption, through case studies and interviews.
- ▶ Develop education pathways and qualifications to professionalise careers in anti-corruption compliance.

Introduction

Does a company reward integrity? Does it have a speak-up culture? Does the whistleblower function report directly to the Board? Answers to questions such as these reveal whether companies are genuinely committed to anti-corruption values.

The Zondo Commission exposed the ‘central role’ that private sector actors played in state capture.¹ Sixty-four percent of people believe that business leaders are corrupt.² The business community in South Africa is complex, and more research is needed into what influences behaviour in different sectors and companies. However, there are early indications that things may be changing: The Ethics Institute reports that companies in South Africa have ‘improved their overall ethical culture maturity compared to 2019, with a seven-point ranking improvement.’³

Research shows that the long-term costs of corruption to companies generally outweigh the superficial benefits

While corruption may offer short-term advantages to some companies, research shows that the long-term costs of corruption generally outweigh these superficial benefits. At company level, direct and indirect costs of corruption include decreased productivity, slower financial growth and more expensive access to capital.⁴ Small, medium and micro enterprises (SMMEs), in particular, face heightened risks that threaten their sustainability and financial growth.

Conversely, companies with anti-corruption compliance programmes generally experience greater commercial success than their counterparts.⁵ An organisational culture of integrity is linked to more sustainable long-term financial growth and greater stakeholder trust.⁶

International experts have identified the private sector in South Africa as a potential leverage point for anti-corruption reform because it is relatively sophisticated, exposed to international markets and vulnerable to reputational harm from corruption scandals.⁷ A shift towards better integrity in business could have a real impact on the greater problem.

This policy brief will identify virtuous circles in anti-corruption in South Africa, focusing on anti-corruption collective action projects and effective good faith anti-corruption compliance programmes. It will make recommendations on how business, government and civil society can help shift the private sector towards integrity.

Theory for anti-corruption in business

Corruption is a collective action problem

In developing countries with systemic corruption and weak political will for anti-corruption reform, corruption is a collective action problem.⁸ A collective action problem arises when a group acts against its long-term best interests because some members are ‘free riders’ who maximise their own short-term gains. While corruption may benefit some companies in the short-term, it harms the sector the company operates in and the country as a whole.

Where corruption is pervasive, people often expect others to engage in unethical behaviour. As a result, individuals lack incentives to act honestly or to enforce anti-corruption measures on others:

The short-term costs of being honest are comparatively very high, since this will not change the game. Hence, unwilling or incapable of bearing the costs ... people will instead continue to choose corrupt alternatives before noncorrupt ones.⁹

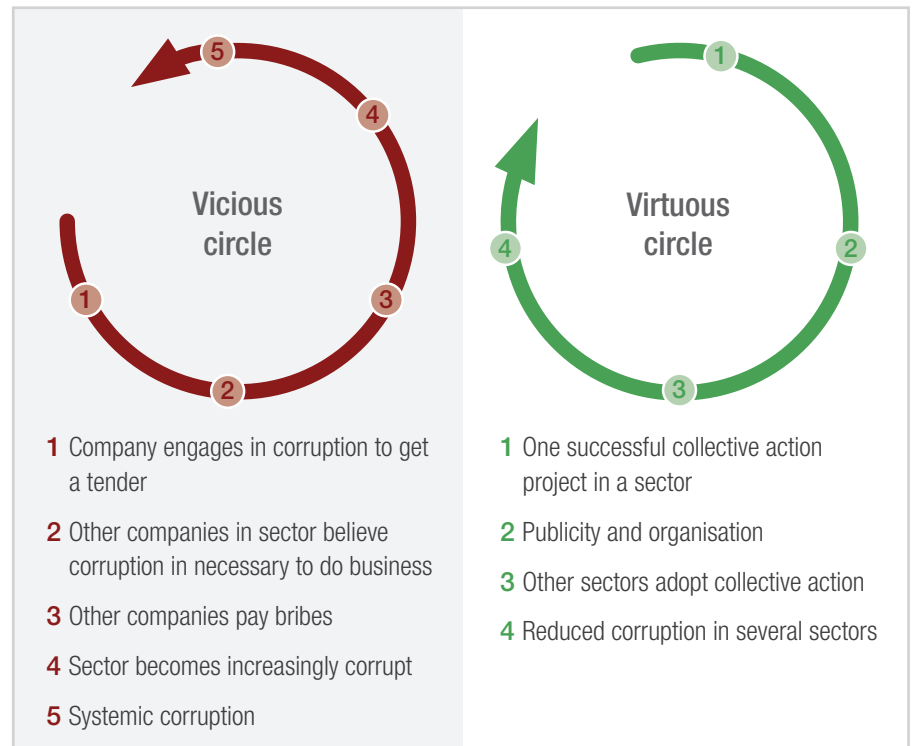
Collective action theory implies that, in a context of systemic corruption, South African companies are unlikely to choose integrity. Initiatives that seek to affect the behaviour of the group as a whole, such as in a specific sector, are likely to be more effective.

Vicious and virtuous circles

Finding solutions to South Africa’s corruption problem requires analysts to shift their focus from the problem towards solutions. This can be achieved by identifying ‘virtuous circles’ in anti-corruption and finding ways to strengthen them.

Complex systems, such as systemic corruption, are made up of feedback loops called vicious circles. These are ‘amplifying, reinforcing, self-multiplying’¹⁰ processes that cause runaway destruction, such as systemic corruption.

Chart 1: Systemic corruption and collective action



Source: ISS

Vicious circles can be counteracted by virtuous circles, a self-reinforcing loop in which positive actions or conditions generate further benefits, leading to sustainable and cumulative improvement over time.¹¹ Identifying and reinforcing virtuous circles is an international good practice anti-corruption method that can help countries move from a condition of greater corruption to one of better governance.¹²

Over time, virtuous circles can shift a broader system from a low-trust, high-corruption equilibrium to one where integrity is embedded in organisational culture and public expectations, making corrupt behaviour both riskier and less socially acceptable

There is no formula for strengthening virtuous circles, but deliberate strategies can create reinforcing feedback loops that embed beneficial norms and practices, making change resilient to setbacks and shifting harmful systems towards greater integrity.¹³ Context-specific drivers of improvement in virtuous circles can be identified through research methods such as systems mapping.

Anti-corruption collective action

The 2021 Organisation for Economic Co-operation and Development Anti-Bribery Recommendation encourages member states (including South Africa) to use collective action as an anti-corruption tool.¹⁴

Collective action is a process in which business, government and civil society work together to raise standards of business integrity and address specific corruption problems. By working together, participants improve

THE

OECD

ENCOURAGES THE USE OF
COLLECTIVE ACTION
AGAINST CORRUPTION

their collective ability to achieve meaningful change. The fundamental principle is that ‘the stronger the community, the less vulnerable the individual initiatives and the greater the potential impact on the anti-corruption and business environment.’¹⁵

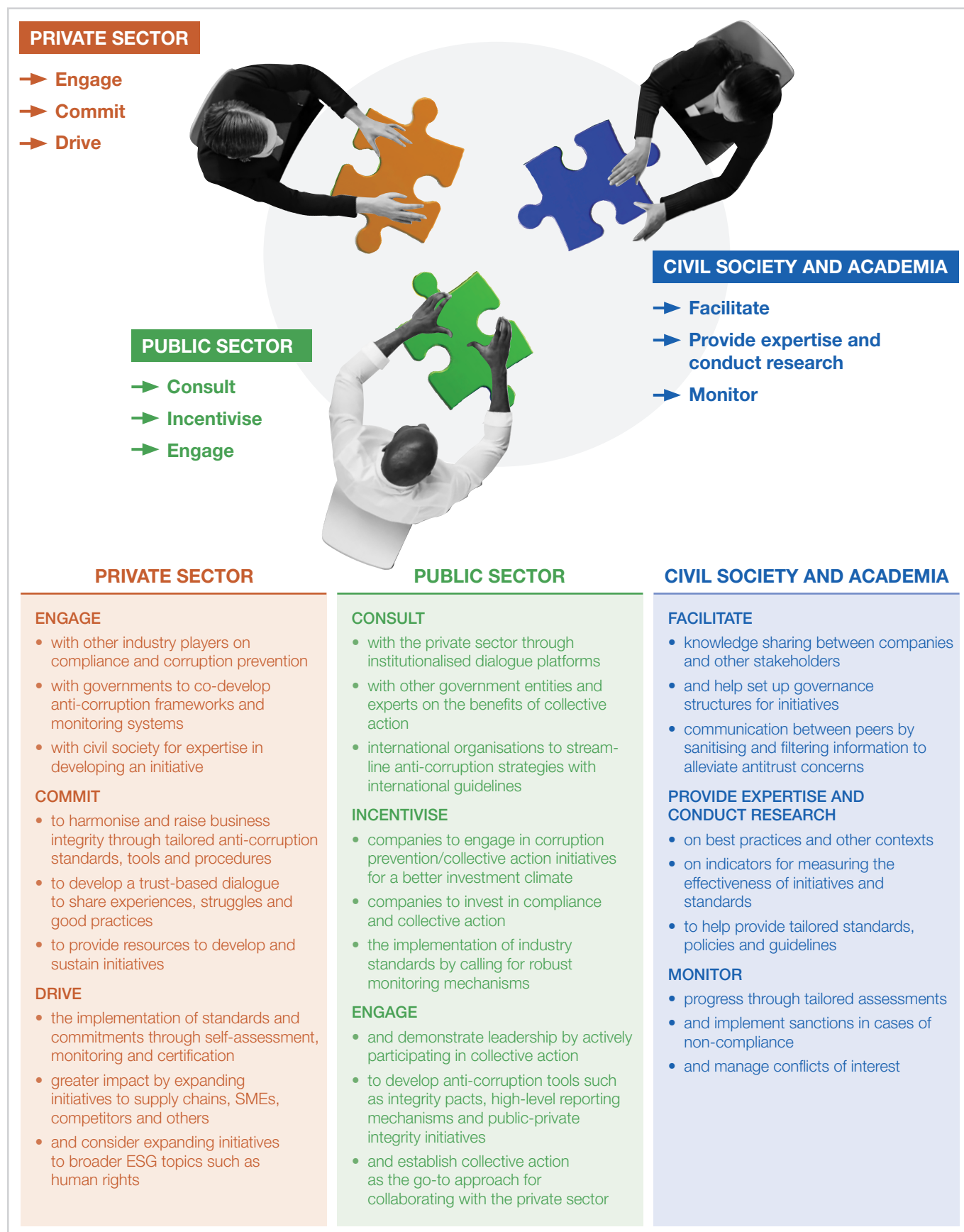
Collective action builds on the principle of business-driven integrity, in the interests of business. Business is the key stakeholder, providing leadership and resources, while government and civil society tend to take on more supportive roles.¹⁶

Chart 2: The four types of collective action



Source: UN Global Compact, A Playbook on Anti-Corruption Collective Action¹⁷

Chart 3: Collective action



Source: S Wannenwetsch, Anti-corruption collective action – a typology for a new era, Basel Institute on Governance, Working Paper 56, March 2025

Successful collective action projects

The Maritime Anti-Corruption Network (MACN) is a global movement that has achieved substantial reductions in corruption levels in ports in several countries, such as Argentina, Mexico and Nigeria. There are several key factors contributing to the success of the MACN:

- Legal and reputational risk of extra-territorial enforcement by the United States of America and United Kingdom for shipping companies that pay bribes
- Substantial funding from business for the collective action project
- Strong civil society secretariat providing organisational support
- Intelligent project design, including root cause analysis
- Strong, ethical leadership of country-based projects

In Nigeria, the MACN successfully cooperated with government to improve anti-corruption enforcement in Lagos Harbour reducing incidents of bribery in that port by 96.2% between 2019 and 2022.¹⁸

Designing effective collective action

The Collective Action Impact Centre at the International Anti-Corruption Academy designed a methodology for collective action based on what works in practice. This method, called 'Anti-Corruption Collective Action' provides a range of effective tools.

Programme designers apply systems theory to map sector-specific vicious circles of corruption, identifying key actors and drivers of corruption and plotting leverage points for policy intervention. They also plot virtuous circles, identifying leverage points to strengthen them.

Recognising that political will is essential for project success, designers identify ethical individuals across business, government and civil society. Through detailed stakeholder analyses, designers identify potential allies and the incentives that could motivate them, then work to provide those incentives. This strategy has the potential to address the problem of the 'lack of political will' that hampers many anti-corruption projects.

The process of running the project is arduous and requires continuous trust building among parties. Trust is 'required to move beyond superficial interactions

between the private sector and government towards real collaboration.'¹⁹

Emerging collective action

Special Investigating Unit's sectoral anti-corruption forums

The Special Investigating Unit has convened sectoral anti-corruption forums in vulnerable sectors such as local government and health. These forums bring together business, government and civil society to work towards reducing corruption in the sectors.

Reports on these Special Investigating Unit forums reflect both the strengths and challenges of multi-stakeholder anti-corruption projects. On the one hand, participants say that the forums have helped them shift from a siloed to a collaborative approach.²⁰ On the other hand, the forums face resource constraints. While businesses participate, they do not provide leadership or funding, as the forums are primarily government-driven initiatives.

The reports highlight the need for enhanced planning based on a Theory of Change. The International Anti-Corruption Academy's Anti-Corruption Collective Action method offers a suitable framework, with incentives that motivate maximum stakeholder participation.

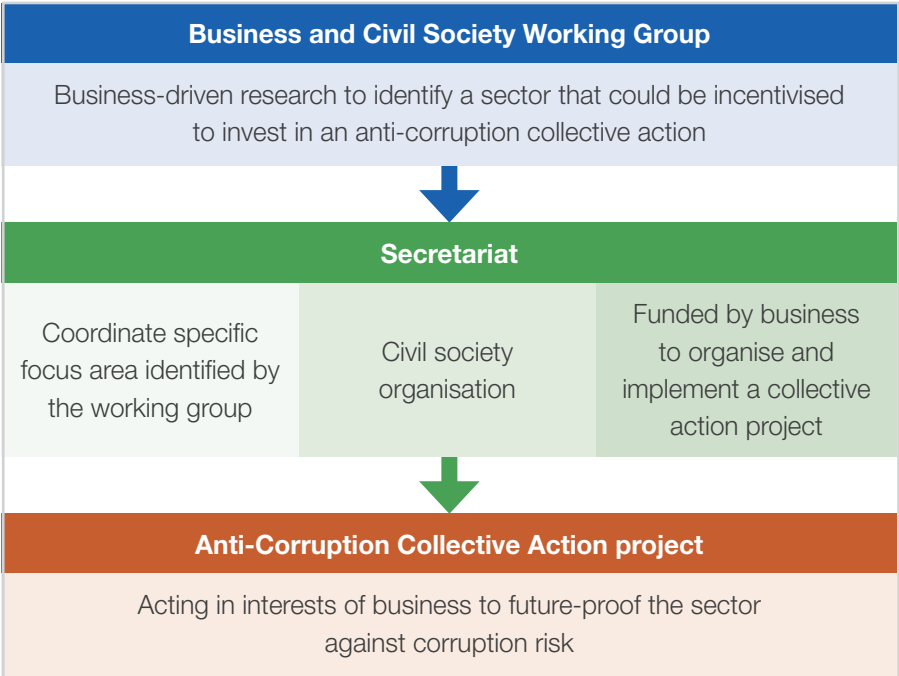
B20 Integrity and Compliance recommendations

The B20 business collective represents business interests in the G20, a multi-stakeholder forum for international economic cooperation. The B20 South Africa Summit in November 2025 is an anti-corruption virtuous circle with a special focus on collective action. The B20 Integrity and Compliance Taskforce recently released recommendations, including one about collective action.

Recommendation 3.1 provides that business should 'strengthen support and incentives for organisations to engage and drive Collective Action for inclusive growth ... Collective Action can complement, enhance and further develop current and future laws and regulations whenever the latter are weakly enforced.'

This kind of collective action is currently missing in South Africa and will require collaboration with civil society, leveraging its research and convening strengths. Civil society and the private sector should form a Business and Civil Society Working Group to design an international best-practice Anti-Corruption Collective Action project. It will identify sectors most affected by corruption and motivated to participate. Based on this, sector-specific secretariats, led by civil society and funded by the private sector, will coordinate projects tackling major corruption issues. These initiatives can future-proof sectors by establishing compliance standards and programmes that reduce corruption risks and boost resilience.

Chart 4: Starting a collective action project in South Africa



Source: Authors

Anti-corruption compliance programmes

Adopting an anti-corruption compliance programme enables a company to take full responsibility for preventing and detecting corruption by its employees and partners.

An anti-corruption compliance programme is a system of internal controls and procedures designed to prevent, detect and remediate corruption in a company. Once a niche area, it has evolved to a prominent field of legal practice, academic research and corporate strategy worldwide.²¹

One key trend is the shift from ‘tick-box’ or ‘paper’ compliance programmes, which rely on rules and punishment, to ‘effective good faith’ compliance programmes. This approach cultivates a genuine culture of integrity in companies, using behavioural science to incentivise integrity and deter



ANTI-CORRUPTION
COMPLIANCE PROGRAMMES
PREVENT AND DETECT
CORRUPTION IN COMPANIES

corruption and data analytics to enhance risk assessment and continuous monitoring. It aligns with the latest version of the ISO 37001 Anti-Bribery Management System standard, an updated international standard that prioritises building an 'anti-bribery culture.'²²

Drivers of anti-corruption compliance

An Organisation for Economic Co-operation and Development study exploring why companies adopt anti-corruption compliance programmes provides a research basis for policymakers to incentivise this behaviour.²³

The leading drivers of increased use of these programmes are:

- Reputational risk (88.7%)
- Enforcement risk (80.7%)

Other drivers are:

- Changes in business activities
 - Mergers and acquisitions may need robust compliance programmes
 - Public offerings
- Commercial advantage
 - Minimising losses
 - Securing contracts
 - Competitive advantage
 - Supply chain pressure
 - Pressure from investors or partners

Recent changes in the enforcement of the United States' (US) Foreign Corrupt Practices Act may influence global anti-corruption compliance trends. In early 2025, the US Department of Justice paused investigations to revise guidelines, resuming later with a narrower focus on high-impact cases tied to US national interests.^{24, 25} This selective approach may discourage some multinational companies from fully implementing effective anti-corruption programmes in the future.

The B20 Integrity and Compliance Recommendations contain no mention of anti-corruption compliance programmes.²⁶ Given the large global movement towards adopting these programmes, this gap is an anomaly – and a missed opportunity to reinforce a virtuous circle in anti-corruption.

Emerging virtuous circles in anti-corruption compliance

There is a research gap in the academic literature regarding corporate anti-corruption compliance programmes in South Africa. In the absence of empirical research, this policy brief makes preliminary findings about their use.

EOH: a norm leader for anti-corruption values

EOH, one of South Africa's largest technology services companies, became a symbol of corporate renewal after a major corruption scandal. Appointed as Chief Executive Officer during the crisis, Stephen van Coller testified before the Zondo Commission, cooperated with regulators, dismissed employees implicated in financial misconduct, sued former executives for damages and laid criminal charges against employees involved in corruption.²⁷

Stronger controls, standardised reporting, ethics training, team incentives and digital audits reduced misconduct and improved accuracy. An organisational culture that had normalised unethical behaviour shifted towards stability and integrity, reinforced by a broader anti-corruption mission supporting open engagement with regulators, investors and the public. These measures helped rebuild trust and attract external support.^{28, 29}

Despite short-term costs, EOH restructured its balance sheet, reduced debt and returned to profitability. By 2023, it was declared a 'normal business,' showing how strategic interventions can transform destructive cycles into embedded integrity across leadership, culture, operations and external engagement.³⁰ EOH has played an invaluable role in publicising a new norm for ethical business in South Africa.

New Section 34A of the Prevention and Combating of Corrupt Activities Act

Strengthened law enforcement can create and reinforce virtuous circles: effective enforcement raises levels of legal and reputational risk for companies. Companies can manage these risks by adopting effective, good faith anti-corruption compliance programmes.

Promulgated in April 2024, Section 34A of the Prevention and Combating of Corrupt Activities Act establishes that

a company can be held criminally liable for corruption primarily bribery, committed by a person associated with it. If a representative of a private company or state-owned entity is found guilty of offering, agreeing to offer, or giving any form of gratification from which the business benefits or intends to benefit, the company itself is deemed guilty. However, companies can raise a defence by proving that adequate procedures, meaning an effective anti-corruption compliance programme, are in place to prevent corruption.³¹

This framework intends to create a strong incentive for companies to implement robust anti-corruption compliance programmes.³² However, in the absence of well-publicised enforcement action by the National Prosecuting Authority (NPA), the incentive is not as strong as it could be.

NPA's policy directive on corporate alternative dispute resolution

The NPA, in line with the Zondo recommendations, allows companies to resolve serious corruption cases without a full trial using its policy directive on corporate alternative dispute resolution (C-ADR).³³ Companies can avoid a guilty verdict by self-reporting to law enforcement authorities, paying substantial reparations, implementing robust anti-corruption programmes and ensuring further transparency through published outcomes.³⁴

Under the Prevention and Combating of Corrupt Activities Act 2024, a company can be criminally liable for corruption committed by a person associated with it

C-ADR is an international good practice system, faster and more cost effective than more traditional methods of justice. It provides leniency in exchange for effective good faith anti-corruption compliance programmes, incentivising their use. The South African Law Reform Commission is currently researching an amendment to the Criminal Procedure Act to provide for a more formal type of C-ADR, known as Deferred Prosecution Agreements.³⁵

Stronger application of guidelines and standards

While South Africa's King Code of Corporate Governance (King IV and V) sets a benchmark for ethical business, it does not provide detailed guidance on anti-corruption measures.

The Gordon Institute of Business Science (GIBS) Centre for Business Ethics, together with Business Leadership South Africa, has created the Anti-Corruption Working Guide for South African Companies presenting eight categories of principles to help leaders strengthen anti-corruption policies and foster virtuous cycles of ethical behaviour.³⁶



CORPORATE ALTERNATIVE
DISPUTE RESOLUTION IS
FASTER AND CHEAPER
THAN TRADITIONAL
JUSTICE METHODS

Chart 5: GIBS guidelines

Category	Description	Virtuous circle connection
1. Tone from the top and Board	Board sets, monitors and reports on anti-corruption functions.	Leadership commitment creates a reinforcing loop of ethical behaviour, building trust and reinforcing programme credibility.
2. Anti-corruption policy	Public zero-tolerance policy integrated into induction, covering codes, breaches and whistleblower protection.	Clear rules and transparency improve compliance, rebuild reputation and reinforce employee adherence.
3. Anti-corruption function	Independent compliance department reports to non-executive directors; managers' key performance indicators include anti-corruption; access to auditors.	Independent oversight ensures accountability; linking key performance indicators to ethics reinforces desired behaviour and strengthens culture.
4. Policy substance	Covers lobbying and donations, large contracts, audits, clawbacks, conflict training and beneficial ownership disclosure.	Closes loopholes and improves detection; clawbacks and training reinforce ethical norms and reduce opportunistic behaviour.
5. Risk assessments	Regular assessments of bribery risks in acquisitions, promotions, contracts and incentives.	Proactive identification of risks counters ethical drift and creates continuous improvement loops.
6. Whistleblowers	Encourage confidential reporting with protections and incentives.	Reporting exposes hidden corruption, creating loops of transparency, accountability and collective vigilance.
7. Reparations	Fair, transparent compensation for harms, including clawbacks.	Makes corruption costly, rebuilds trust with stakeholders and reinforces ethical recovery loops.
8. Ethical lobbying	Public, Board-approved policy on political activities, disclosure, training and advocacy for fair laws.	Transparency and responsible engagement build legitimacy, public trust and a reinforcing loop of ethical behaviour.

Section 34A of the Prevention and Combating of Corrupt Activities Act used in combination with C-ADR has the potential to reinforce the tentative, emerging virtuous circle of anti-corruption compliance in South Africa. Stronger enforcement could both pressure and incentivise companies to adopt anti-corruption compliance programmes. Soft law, such as the GIBS anti-corruption guidelines, provides a vision to inspire, and benchmarks to measure corporate integrity.

SMMs and the effect of global supply chains

According to the Annual Financial Statistics 2023 for South Africa, small firms generated 21% of total turnover, up from 16% in 2013, but down from the 24% peak in 2021.³⁷ SMMs have expanded their footprint in South Africa's formal economy over the past decade, especially in construction (17% to 40%), while sectors such as mining and utilities remain dominated by large

enterprises. Despite the growing influence, SMMEs are more vulnerable to corruption.

Corruption in global supply chains disproportionately harms SMMEs, especially in developing economies, where rising corruption is often linked to financial fragility.³⁸ Corruption raises costs, slows growth and distorts markets, eroding trust and weakening self-correction.³⁹ Limited resources, underused government support and low awareness of complex risks heighten SMME vulnerability, while weak integrity also exposes larger partners, underscoring the need for strong supply chain compliance.^{40, 41}

To increase the adoption of anti-corruption compliance among SMMEs, National Business Initiative programmes, education initiatives and incentive mechanisms can be optimised through a multi-faceted approach involving both the private sector and government.⁴² This includes:

- Capacity building and programmes – tools and initiatives to enhance ethics, compliance and leadership for SMMEs
- Education on core challenges – training on compliance, procurement, whistleblowing, sustainability, and diversity, equity and inclusion
- Financial support – subsidies, targeted funding and incentives for sustainable and ethical business practices
- Recognition and preferential treatment – supplier certification, public recognition and government-backed participation targets
- Accountability and enforcement – penalties, publicised actions and corporate responsibility for ethical supply chains

Integrating these measures will support National Business Initiative programmes to improve anti-corruption compliance in South African SMMEs, backed by private- and public-sector support.⁴³

Despite progress on programme content, deeper sectoral research is needed to design smart tax and procurement incentives that reward SMMEs for adopting anti-corruption compliance.

Strengthening virtuous circles of anti-corruption compliance

In competitive markets in developing countries, corruption often creates reinforcing vicious circles – firms paying bribes can secure contracts, expand networks and crowd out ethical competitors. Other companies may feel pressure to participate or risk losing business. Small bribes may seem rational but repeated misconduct increases costs and erodes trust and growth across the system.

Reinforcing ethical behaviour can transform harmful cycles into virtuous ones, building trust and fairer markets

Creating virtuous circles requires strategic action by business - including public commitments, safe reporting channels, whistleblower protection, acting on reports and rigorous due diligence.^{44, 45, 46} Collaboration amplifies impact, with larger firms mentoring smaller partners and collective action uniting business, government and civil society. Reinforcing ethical behaviour can help to transform harmful cycles into virtuous ones, creating increased trust, resilience and fairer markets.

Emerging virtuous circles rely on strong governance and ethics policies to build credibility, attract investors, strengthen controls and protect against risk. In light of research showing that integrity is good for business, investing in improved anti-corruption compliance should be seen as building a strategic asset that enhances opportunity, efficiency and resilience.^{47, 48, 49}

Companies cannot control levels of systemic corruption in South Africa. However, they can invest in improving their own anti-corruption compliance programmes and require their supply chains to do the same. They can also reduce corruption risk and improve competitiveness in their immediate environment through collective action in their sectors. They can proactively take steps to reduce their corruption risk and future-proof their business against corruption.

Notes

- 1 Public Affairs Research Institute, Independent Assessment for the National Anti-Corruption Advisory Council of the 60 Presidential Commitments to Implement the State Capture Commission Recommendations, in National Anti-Corruption Advisory Council Final Report 2025: Appendix S, 82, www.thepresidency.gov.za/appendices-nacac-final-report-2025.
- 2 S Gordon and G Pienaar, Corruption and behaviour change: tracking social norms and values in South Africa, Human Sciences Research Council, December 2024, hsr.ac.za/wp-content/uploads/2025/04/Corruption-and-Behaviour-Change_Tracking-Social-Norms-and-Values-in-South-Africa-HSRC-Report-Dec2024.pdf.
- 3 P Vorster, A Ou-Yang and L Groenewald, South African Business Ethics Survey 2023, The Ethics Institute, www.tei.org.za/wp-content/uploads/2023/05/SABES-2023.pdf.
- 4 Transparency International, The relationship between business integrity and commercial success: a review of evidence and findings, U4 Helpdesk, 18 August 2025, www.knowledgehub.transparency.org/helpdesk/the-relationship-between-business-integrity-and-commercial-success-1.
- 5 Ibid.
- 6 Ibid.
- 7 International Anti-Corruption Academy, Workshop: leverage points to create anti-corruption reform, 2020.
- 8 A Persson, B Rothstein and J Teorell, Why anticorruption reforms fail – systemic corruption as a collective action problem, *Governance*, 26:3, 2013, 250.
- 9 Ibid, 257.
- 10 DH Meadows, *Thinking in systems*, London: Earthscan, 2009, 30, www.research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/climate-communications/psychology-amp-behavior/Meadows-2008.-Thinking-in-Systems.pdf.
- 11 Ibid.
- 12 A Mungiu-Pippidi, The quest for good governance: learning from virtuous circles, *Journal of Democracy*, 27:1, 2016.
- 13 DH Meadows, *Thinking in systems*, London: Earthscan, 2009, 146–149, www.research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/climate-communications/psychology-amp-behavior/Meadows-2008.-Thinking-in-Systems.pdf.
- 14 Organisation for Economic Co-operation and Development (OECD), The 2021 Recommendation on Anti-Bribery, www.oecd.org/content/dam/oecd/en/topics/policy-issues/anti-corruption-and-integrity/2021-oecd-anti-bribery-recommendation-overview.pdf.
- 15 S Wannenwetsch, Anti-corruption collective action – a typology for a new era, Basel Institute on Governance, Working Paper 56, March 2025, www.baselgovernance.org/sites/default/files/2025-03/WP56_CA%20typology%20for%20a%20new%20era.pdf.
- 16 GF Zinkernagel, Collective action and the B20 agenda, Basel Institute on Governance, 26 November 2013, www.unodc.org/documents/treaties/UNCAC/COSP/session5/SpecialEvents/2013_11_26_GrettaFennerBasellInstitute.pdf.
- 17 UN Global Compact. Uniting Against Corruption: A Playbook on Anti-Corruption Collective Action, 2021, www.unglobalcompact.org/library/5896.
- 18 MACN, Great momentum in fighting maritime corruption in Nigeria, 16 May 2022, www.macn.dk/great-momentum-in-fighting-maritime-corruption-in-nigeria/.
- 19 S Wannenwetsch, Anti-corruption collective action – a typology for a new era, Basel Institute on Governance, Working Paper 56, March 2025, www.baselgovernance.org/sites/default/files/2025-03/WP56_CA%20typology%20for%20a%20new%20era.pdf.
- 20 Special Investigating Unit, Impact of Health Sector Anti-Corruption Forum, 2024, 8–9; Special Investigating Unit, Impact of Local Government Anti-Corruption Forum, 2024.
- 21 GP Miller, Compliance: past, present and future, *University of Toledo Law Review*, 48, 2017, 437.
- 22 International Standards Organisation, ISO37001:2025 Anti-Bribery Management Systems, 2025 www.iso.org/standard/37001.
- 23 OECD, Corporate anti-corruption compliance drivers, mechanisms and ideas for change, 23 September 2020, www.oecd.org/en/publications/corporate-anti-corruption-compliance-drivers-mechanisms-and-ideas-for-change_4245d0fc-en.html.
- 24 S Holland and N Bose, Trump loosens enforcement of US law banning bribery of foreign officials, *Reuters*, 11 February 2025, www.reuters.com/world/us/trump-loosen-enforcement-us-law-banning-bribery-foreign-officials-2025-02-10/.
- 25 T Blanche, Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA), Memorandum for Head of the Criminal Division, US Department of Justice, 9 June 2025, www.justice.gov/dag/media/1403031/dl.
- 26 B20, Integrity and Compliance, 2025, www.b20southafrica.org/wp-content/uploads/2025/09/B20-Integrity-and-Compliance.pdf.
- 27 Daily Investor, Stephen van Coler is a hero – but not to everyone, 9 October 2023, www.dailyinvestor.com/technology/33169/eoh-ceo-stephen-van-coller-is-a-hero-but-not-to-everyone/.
- 28 S Gelb, Addressing corporate corruption in South Africa: the EOH experience, Corruption Watch, July 2023, www.corruptionwatch.org.za/wp-content/uploads/2023/08/NBI-Addressing-Corporate-Corruption-in-South-Africa-The-EOH-Experience_29-Aug-2023.pdf.
- 29 M Mthombeni, A Moore and M Ward, EOH Holdings Ltd: from blacklist to market confidence through corporate structure and governance, 2021, www.thecasecentre.org/products/view?id=180877.
- 30 S Gelb, Addressing corporate corruption in South Africa: the EOH experience, Corruption Watch, July 2023, www.corruptionwatch.org.za/wp-content/uploads/2023/08/NBI-Addressing-Corporate-Corruption-in-South-Africa-The-EOH-Experience_29-Aug-2023.pdf.
- 31 P Hill, Section 34A – Prevention and Combatting of Corrupt Activities Act 12 of 2004 ('PRECCA'), 2024, <https://www.dmlforensics.co.za/section-34a-prevention-and-combatting-of-corrupt-activities-act-12-of-2004/>.
- 32 OECD, OECD Anti-Bribery Convention Phase 4 Report on South Africa: Implementing the Convention and Related Legal Instruments, 2025, www.oecd.org/content/dam/oecd/en/publications/reports/2025/07/oecd-anti-bribery-convention-phase-4-report-on-south-africa_2ad373e8/32776d08-en.pdf.
- 33 N Alp et al., New corporate ADR policy brings South Africa in line with international best practice, Webber Wentzel, 17 May 2024, [www.webberwentzel.com/News/Pages/new-corporate-adr-policy-brings-south-africa-in-line-with-international-best-practice.aspx#:~:text=The%20National%20Prosecuting%20Authority%20\(NPA,such%20as%20non%2Dtrial%20resolutions](http://www.webberwentzel.com/News/Pages/new-corporate-adr-policy-brings-south-africa-in-line-with-international-best-practice.aspx#:~:text=The%20National%20Prosecuting%20Authority%20(NPA,such%20as%20non%2Dtrial%20resolutions).
- 34 OECD, OECD Anti-Bribery Convention Phase 4 Report on South Africa: Implementing the Convention and Related Legal Instruments, 2025, www.oecd.org/content/dam/oecd/en/publications/

- reports/2025/07/oecd-anti-bribery-convention-phase-4-report-on-south-africa_2ad373e8/32776d08-en.pdf.
- 35 The Presidency, Progress Report on Implementation of Actions in the President's Response to the Recommendations of the State Capture Commission, July 2025, www.thepresidency.gov.za/sites/default/files/2025-07/PROGRESS%20REPORT%20ON%20IMPLEMENTATION%20OF%20ACTIONS%20IN%20THE%20PRESIDENT%E2%80%99S%20RESPONSE%20TO%20THE%20RECOMMENDATIONS%20OF%20THE%20STATE%20CAPTURE%20COMMISSION.pdf.
 - 36 GIBS, An Anti-Corruption Working Guide for South African Companies, 2023, <https://content.gibs.co.za/cmscontent/media/2cunviwo/anti-corruption-working-guide-for-south-african-companies.pdf>.
 - 37 Annual Financial Statistics measure turnover data by business size and are released by Statistics South Africa as part of a review of South African businesses.
 - 38 L Anh-Tuan and D Anh Tuan, Corruption and financial fragility of small and medium enterprises: international evidence, *Journal of Multinational Financial Management*, November 2020, www.researchgate.net/publication/345349534_Corruption_and_financial_fragility_of_small_and_medium_enterprises_International_evidence.
 - 39 GIBS, An Anti-Corruption Working Guide for South African Companies, 2023, <https://content.gibs.co.za/cmscontent/media/2cunviwo/anti-corruption-working-guide-for-south-african-companies.pdf>.
 - 40 DH Meadows, *Thinking in systems*, London: Earthscan, 2009, 30, www.research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/climate-communications/psychology-amp-behavior/Meadows-2008.-Thinking-in-Systems.pdf.
 - 41 OECD, OECD Anti-Bribery Convention Phase 4 Report on South Africa: Implementing the Convention and Related Legal Instruments, 2025, www.oecd.org/content/dam/oecd/en/publications/reports/2025/07/oecd-anti-bribery-convention-phase-4-report-on-south-africa_2ad373e8/32776d08-en.pdf.
 - 42 National Business Initiative (NBI), EC4B Factsheet, 2025, www.nbi.org.za/wp-content/uploads/2025/06/EC4B-Factsheet-v3.pdf; NBI, Understanding the South African SMME ecosystem through an ethical lens, 2025, www.nbi.org.za/wp-content/uploads/2025/05/Ethical-Report-Link.pdf; NBI, Ethical Supplier Press Release, 2025, www.nbi.org.za/wp-content/uploads/2025/06/NBI-Ethical-Supplier-Press-Release.pdf; NBI, Tips and tails guide, 2025; NBI, Addressing corporate corruption in South Africa: the EOH experience, 2023, www.nbi.org.za/wp-content/uploads/2023/08/NBI-Addressing-Corporate-Corruption-in-South-Africa-The-EOH-Experience_29-Aug-2023.pdf.
 - 43 NBI, EC4B Factsheet, 2025, www.nbi.org.za/wp-content/uploads/2025/06/EC4B-Factsheet-v3.pdf.
 - 44 DH Meadows, *Thinking in systems*, London: Earthscan, 2009, 30, www.research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/climate-communications/psychology-amp-behavior/Meadows-2008.-Thinking-in-Systems.pdf.
 - 45 OECD, OECD Anti-Bribery Convention Phase 4 Report on South Africa: Implementing the Convention and Related Legal Instruments, 2025, www.oecd.org/content/dam/oecd/en/publications/reports/2025/07/oecd-anti-bribery-convention-phase-4-report-on-south-africa_2ad373e8/32776d08-en.pdf.
 - 46 GIBS, An Anti-Corruption Working Guide for South African Companies, 2023, <https://content.gibs.co.za/cmscontent/media/2cunviwo/anti-corruption-working-guide-for-south-african-companies.pdf>.
 - 47 B Ullah, Financial constraints, corruption, and SME growth in transition economies, *The Quarterly Review of Economics and Finance*, 75:C, February 2020, www.sciencedirect.com/science/article/abs/pii/S1062976918302655?.
 - 48 Transparency International help desk, The relationship between business integrity and commercial success: a review of evidence and findings (1995 – 2025), 2025, www.u4.no/publications/the-relationship-between-business-integrity-and-commercial-success-2025.
 - 49 INSYST TAC SDN BHD, Fighting corruption with standards: a deep dive into ISO 37001, 28 April 2025, www.insystac.com/fighting-corruption-with-standards-a-deep-dive-into-iso-37001/.

Read our latest publications on anti-corruption efforts in South Africa
at www.issafrica.org



POLICY BRIEF

The future of South Africa's Special Investigating Unit

David Bruce, Colette Ashton and Cheryl Frank

The Special Investigating Unit (SIU) is one of South Africa's most effective anti-corruption agencies. It has a good civil litigation track record, an organisational culture of excellence and is supported by a dedicated Special Tribunal. Given the large scale of corruption in the country, several reforms could further strengthen the unit. The research for this policy brief was undertaken in cooperation with the SIU.



POLICY BRIEF

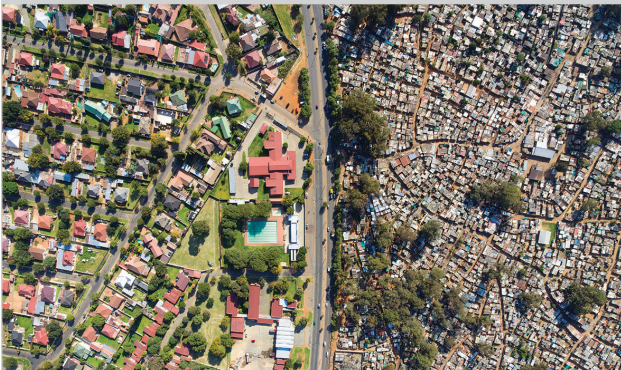
Emerging theory for effective anti-corruption reform in South Africa

Colette Ashton

To remedy systemic corruption in South Africa, policymakers must look beyond the discourse of transparency and accountability to emerging anti-corruption theory. Policy research in this field should be multi-disciplinary, grounded in empirical research and informed by decolonial thought. There is a need for more research into the unique types and drivers of corruption at national, local and sector-specific levels, to inform policy reform.

Rethinking anti-corruption in South Africa: pathways to reform

Colette Ashton



This report analyses South Africa's anti-corruption institutions in relation to international good practice. It highlights problems with their functional independence and organisational culture. It identifies a serious gap in the area of prevention. Among the recommendations are that South Africa undertake feasible, incremental improvements to existing institutions and engage the private sector to help prevent and detect corruption.



POLICY BRIEF

Why the SAPS needs an internal anti-corruption unit

Johan Burger and Stefan Grobler

It is possible to combat police corruption – as long as leaders are committed and the right capacity is available. The South African Police Service (SAPS) recently announced that it is establishing 'a dedicated capability in the Detective Service to conduct criminal investigations against members allegedly involved in corrupt and fraudulent activities'. This policy brief offers a number of arguments for why this approach makes good sense.

About the authors

Colette Ashton is a Research Consultant at the Institute for Security Studies. She is an anti-corruption lawyer and a champion of ethical business practices. She holds a Master's degree in Anti-Corruption from the UN-founded International Anti-Corruption Academy and a BA Hons LLB from the University of Cape Town.

Erin Klazar is an investigative researcher with an Master's in IT (Information Science) degree from the University of Pretoria. She has multi-disciplinary experience in anti-corruption work, including at the State Capture Commission. She is currently a part-time senior researcher with the Anti-Corruption Coalition at the Centre for Business Ethics, Gordon Institute of Business Science (GIBS).

About the ISS

The Institute for Security Studies (ISS) partners to build knowledge and skills that secure Africa's future. The ISS is an African non-profit with offices in South Africa, Kenya, Ethiopia and Senegal. Using its networks and influence, the ISS provides timely and credible policy research, practical training and technical assistance to governments and civil society.

About the ACC

The Anti-Corruption Coalition (ACC), hosted within the Centre for Business Ethics at GIBS, was established for collaboration and coordination between private actors: media, academia, civil societies and business. Building on lessons from the Zondo Commission, the ACC collects, collates and analyses diverse sources of information on corruption. Together with leveraging its convening power, its aim is to develop a comprehensive database to enhance understanding of corruption, as well as support targeted research and action for anti-corruption stakeholders.

Development partners

This policy brief is funded by United Kingdom International Development. The ISS is grateful for support from the members of the ISS Partnership Forum: the Hanns Seidel Foundation, the European Union, the Open Society Foundations and the governments of Denmark, Ireland, the Netherlands, Norway and Sweden.