

PROCESS FOR MANAGEMENT OF CORPORATE MEMBER INTEGRITY BREACHES

Key principles

1. Membership is a core part of TI Australia's business and partnership model.
2. As part of the process of membership and as outlined under 2025's Ethical Collaboration Policy and Partner Screening policies, TI Australia undertakes partner screening and due diligence assessment.
3. The assessment aims to ensure all partnerships are undertaken in alignment with TI Australia's 2024 to 2028 Strategic Objectives:
 - a. Building open, accountable and healthy democracies
 - b. Holding corrupt actors to account
 - c. Safeguarding the energy transition from corruption
 - d. Mobilising partnerships for transparency and integrity.
4. All members are required to undertake a Membership Evaluation Questionnaire upon becoming a member. This is reviewed by the team for alignment to TI Australia's principles.
 - a. Members are required to undertake the Questionnaire every three years to assess ongoing alignment.
 - b. TI Australia takes a risk-based approach to corporate membership of TI Australia and regularly reviews existing members and new members using the Questionnaire as a primary, but not the only, tool.
5. Members are informed as part of the assessment process that TI Australia uses the Questionnaire as part of the process and that a consequence of non-alignment with TI Australia values may be termination or suspension of membership. Non-alignment may include, but is not limited to:
 - a. Bribery and corrupt conduct
 - b. Illegal conduct
 - c. Integrity breaches
 - d. Unethical conduct
 - e. Conduct not in alignment with TI Australia values.
6. TI Australia takes a risk-based approach to membership and reserves the right to terminate or suspend membership if continuing association poses risk to, including but not limited to, the following:
 - a. Reputation
 - b. Governance risks
 - c. Funding opportunities
 - d. Existing key stakeholders, such as civil society partners
 - e. Strategic alignment.

Process

The process for management is as follows:

1. If TI Australia receives a notification of an alleged breach of integrity or misconduct by a corporate member, it must be escalated immediately:

- a. If a staff member receives this information, it is to be reported to the CEO.
 - b. If the CEO receives information, it is to be reported to the Chair of the Fundraising and Membership Committee and / or the Chair of Board.
2. Usually, the CEO and Chair of F&M Committee will discuss the matter and make contact with relevant contact at corporate member. Allegations are to be outlined alongside TI Australia's concerns. The organisation is to be given opportunity to respond to allegations, face to face where possible. During this meeting, the organisation will be reminded of potential consequences in line with membership requirements and informed of the process.

TI Australia undertakes to keep details confidential while these discussions are underway.

3. Following this meeting, the CEO and Chair, and Membership and Fundraising Committee and/or Board where necessary, will meet to determine next steps. These steps will depend on a range of criteria, including but not limited to:
 - a. Severity of the alleged breach or misconduct
 - b. The nature of response from the organisation
 - c. Potential risks to TI Australia through continuing membership.
4. If it is determined that:
 - a. The alleged breach or misconduct was not severe
 - b. The alleged breach or misconduct was isolated in nature
 - c. The organisation appears to be taking all reasonable steps to address the breach or misconduct
 - d. The risk posed by the breach or conduct is sufficiently low.

The organisation may remain a member of TI Australia. The relevant contacts will be informed in writing.

5. If it is determined that:
 - a. The alleged breach or misconduct was severe
 - b. The alleged breach or misconduct was systemic in nature
 - c. The organisation does not appear to be taking all reasonable steps to address the breach or misconduct
 - d. The risk posed by the breach or misconduct is sufficiently high.

The organisation may be terminated or suspended as a member of TI Australia. The relevant contacts will be informed in writing.

6. In some instances, the corporate member might be offered the opportunity to provide evidence in support of remaining a member. Any further discussion of membership will be undertaken by the M&F Committee and Board and a final decision made. This will then be communicated in writing.
7. If no additional information is provided, the decision will stand.

Relevant documents

- Ethical Collaborations Policy
- Partner Screening Guidance and Documents
- Membership Evaluation Questionnaire
- Transparency International Australia 2024-2028 Strategic Objectives