

A graphic illustration on a textured, light brown background. At the top, three cloud-like shapes contain images of classical columns, a crumpled metal surface, and US dollar bills. Below these, two large blue hands are shown from the wrist up, palms facing each other, holding a large green handprint. The green handprint is filled with a dense forest canopy. At the bottom, three vertical green handprints are visible, also filled with forest imagery.

FIGHTING IMPUNITY AND CORRUPTION TO PROTECT ENVIRONMENTAL DEFENDERS

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Working paper

The role of business in fighting impunity and corruption to protect environmental defenders

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INTRODUCTION

Across the world, environmental defenders strive to protect the environment and promote human rights linked to it. The UN Declaration on Human Rights Defenders (1998) and subsequent interpretations by the UN Special Rapporteur on the situation of human rights defenders define these individuals or groups as those who peacefully defend the environment, land, and natural resources, including the rights of communities to a healthy environment.¹ They can be Indigenous Peoples, community leaders, women, youth, journalists, whistleblowers, lawyers, and activists challenging environmental harm and advocating for sustainable development. They also include those who expose corruption related to environmental issues.

Concerningly, however, environmental defenders are facing increasing threats to their lives, livelihoods and freedoms. Between 2012 and 2023,² over 2,100 land and environmental defenders were killed with 196 murders being recorded in 2023 alone.³ These alarming figures underscore a serious global concern, reflecting entrenched challenges at the intersection of human rights, governance, and environmental protection, seriously jeopardising global efforts to address the climate crisis.

Recent research by the Alliance for Land, Indigenous and Environmental Defenders (ALLIED) shows that defenders face a wide range of non-lethal attacks, which often precede deadly violence, highlighting the importance of early intervention. In 2022, for instance, ALLIED identified 916 non-lethal attacks across 46 countries, while recognising that this is just the tip of the iceberg as many attacks go unreported. Non-lethal attacks include threats, arbitrary detention and politically motivated criminal charges.⁴

Amongst environmental defenders, those from marginalised and vulnerable groups face greater risk of threats and attacks. For instance, land defenders from Indigenous communities, who make up less than six per cent of the world's population, disproportionately face violence, accounting for nearly a quarter (24.2 per cent) of all documented attacks. These defenders often operate in and protect critical ecosystems that are essential to combating climate change.

Corruption acts as a powerful catalyst of these attacks, driving violence and perpetuating an environment of impunity. According to the United Nations Office on Drugs and Crime (UNODC), corruption facilitates and conceals environmental crimes, from illegal logging to wildlife trafficking. Corruption undermines environmental governance by legitimising illegal activities and facilitating criminal operations, while enabling violence against those who speak out and hindering law enforcement and justice for witnesses and victims of crimes.⁵ Environmental defenders are at far higher risk of violence, intimidation and murder in countries with high corruption levels.⁶ For example, in northern Tanzania, nearly all defenders interviewed for a study cited corruption as a key driver of violence in pastoralist communities.⁷ These testimonies echo broader global patterns, where corruption not only enables environmental harm but is also instrumental in silencing those who challenge it.

THE ROLE OF BUSINESSES: ALLIES OR FOES?

The private sector holds significant influence over global environmental and human rights outcomes. Industries in the extractives, agriculture, infrastructure, and large-scale development sectors often have to navigate corruption risks and human rights abuses, due to their engagement in complex regulatory environments, high financial stakes, and impacts on land and resource rights. Numerous cases have documented corporate

involvement – directly or indirectly – in violations against the rights of environmental defenders (see select cases below).

Yet, under the UN Guiding Principles on Business and Human Rights (UNGPs), businesses are entrusted with a responsibility to prevent, address, and remedy human rights abuses (see Annex). Importantly, they also have the potential to serve as key allies in preventing harm against environmental defenders and promoting ethical governance. Transparency, accountability, robust internal compliance and reporting mechanisms, and a firm stance against corruption and impunity are essential to upholding this corporate responsibility, business and human rights standards, and to meeting Environmental, Social, and Governance (ESG) commitments.

The Benefits of Listening to and Protecting Environmental Defenders for Companies

Listening to and protecting environmental defenders offers significant and valuable benefits for companies, helping them align with long-term value creation and effective risk management⁸:

- **Prevention and mitigation of liability:** Providing protection and safe reporting channels for environmental defenders allows companies to detect and address potential environmental and corruption risks early, before they escalate. This proactive approach enables organisations to identify and address unlawful activities early, mitigating risks that could lead to legal liabilities, avoid regulatory scrutiny, and reduce the risk of fines or penalties.
- **Prevention and mitigation of financial losses:** Listening to and protecting environmental defenders can prevent financial losses tied to environmental mismanagement, such as penalties for violations, litigation costs, or lost opportunities due to reputational damage.
- **Improved relations with local communities and governments:** Supporting environmental defenders often involves actively engaging with local communities and addressing their concerns. This builds trust and mutual respect, paving the way for smoother project approvals, fewer conflicts, and more collaborative partnerships with local authorities and community leaders. A track record of ethical engagement in one region can enhance a company's reputation and social license, making it easier to replicate and expand projects in other regions, particularly where community relations and environmental issues are sensitive.
- **A public signal of commitment to integrity and social responsibility:** As demand for sustainability and environmental responsibility grows, companies are increasingly expected to demonstrate these values in practice. Through actively supporting environmental defenders, businesses can show investors, stakeholders, and the public that they are committed to sustainability and human rights. This can help them establish a reputation as ethical leaders in the industry.

This paper examines the relationship between corporates, corruption, and threats to environmental defenders, with a particular focus on the private sector's role in enabling harm. It maps the scale and complexity of the issue, presents case studies, and provides a framework for action grounded in anti-corruption and business integrity principles. The selected case studies illustrate how failures of business integrity – compounded by various forms of corruption – lead to threats, attacks, and violence against those who defend the environment. Crucially, these cases show that corruption does not merely accompany environmental harm; but that it is often a root cause of the violence against those defending environmental and human rights. Corruption also operates in tandem with impunity, allowing perpetrators to avoid accountability and reinforce a cycle of fear and violence. Understanding this dynamic is essential for designing effective responses, including stronger business integrity frameworks, civic space protections, and accountability mechanisms.

FORMS AND TYPOLOGIES OF CORRUPTION

Transparency International defines corruption as the abuse of entrusted power for private gain⁹. Before examining the specific impacts of corruption on environmental defenders, particularly the forms of corruption involving the private sector, it is essential to first understand how corruption is deeply intertwined with broader patterns of human rights violations and systemic discrimination. Corruption is often the mechanism that enables environmental damage, facilitates human rights abuses, and reinforces unequal power structures - particularly where private sector interests intersect with weak governance and climate-related vulnerabilities.

The pervasiveness, form and level of corruption can significantly affect the protection or realisation of human rights. It undermines the ability of states to fulfil their human rights obligations, especially toward vulnerable or marginalised individuals and groups. Corruption weakens institutions - including those mandated to protect people - diverts public resources, and restricts access to essential services such as healthcare, education, and housing. International human rights bodies, including the United Nations Human Rights Council, have emphasised that anti-corruption efforts must be aligned with human rights obligations, highlighting their importance to achieving the 2030 Agenda for sustainable development.¹⁰

A joint study by Transparency International (TI) and the Equal Rights Trust¹¹ reveals how corruption and discrimination are deeply interconnected, especially in the lived experiences of marginalised communities. The report identifies four ways this relationship manifests: (1) increasing the exposure of marginalised groups to corruption, (2) enabling inherently discriminatory forms of corruption such as sexual¹², (3) exacerbating the unequal impact of corruption, and (4) creating barriers to reporting and accessing justice. Drawing on evidence from diverse contexts, the study shows how these dynamics affect people on the basis of multiple and intersecting forms of discrimination, including but not limited to, age, sex, sexual orientation, gender identity and expression, race, ethnicity, and religion or belief. These interconnections are recognised and confirmed by statistics: in Brazil for example, most human rights defenders that had been victim of violence in 2023-2024 were indigenous (34.6 per cent) or Afro-descendant (18.5 per cent).¹³ Similarly, in Guatemala, about half of the 106 documented killings and disappearances of land and environmental defenders between 2012 and 2024, were Indigenous Peoples.¹⁴

FORMS OF CORRUPTION USED BY BUSINESSES AGAINST ENVIRONMENTAL DEFENDERS

The UN Working Group on Business and Human Rights notes that it is “well-established that corruption involving business actors harms the human rights of workers and communities affected by it”.¹⁵ Businesses may exploit weak regulatory and governance safeguards to engage in various forms of corruption - including bribery, judicial interference - and collude with state actors to suppress human rights and environmental defenders, obstruct justice, and shield themselves from accountability. Bribes to law enforcement, manipulation of courts, and collusion between business and state often result in defenders being denied human rights, protection from harm, or access to legal recourse. In many cases, companies, in collusion with state actors, engage in corrupt or illegal practices to silence any form of dissent, criminalise legitimate activism, and shield perpetrators from

accountability, contributing to a hostile and dangerous environment for defenders. This creates a chilling effect that discourages others from speaking out and erodes public trust in institutions, including the justice system.

Corruption also worsens and sustains impunity for violence and harassment against environmental defenders. In Honduras, for example, the impunity rate for environmental crimes, including attacks against environmental defenders, reached 94 per cent in 2024, with only 56 out of 966 environmental crime reports filed by citizens resulting in a conviction.¹⁶ Similarly in Brazil, the Pastoral Land Commission found that only nine cases – less than four per cent - of over 230 documented killings of between 2009 and 2018, led to a trial. The UN Special Rapporteur on the situation of human rights defenders, Mary Lawlor, described impunity in Brazil as “endemic”, noting that perpetrators were often known but protected through ‘powerful interests’.¹⁷

These statistics show that impunity is not accidental; it is frequently acquired in exchange for money and favours, allowing perpetrators to evade justice. Global Witness has repeatedly documented cases where environmental defenders, despite facing serious threats or attacks, found no protection due to complicity or deliberate inaction of corrupt officials.^{18 19} Often, authorities do not investigate environmental crimes for fear of reprisals or to protect criminal networks. Just under a third of all cases of killings and disappearances recorded in 2024 by Global Witness are linked to organised crime, becoming one of the main drivers over the years.²⁰ Understanding the different forms of corruption, the overlap with environmental crimes, and their direct, potential impacts on environmental defenders, is therefore crucial for businesses, policymakers, and civil society groups seeking to mitigate these risks.

To fully grasp the scale of this challenge, it is necessary to understand how corruption is used to shape regulatory frameworks, undermine enforcement mechanisms, and facilitate environmental harm. From here, attention must turn to the specific forms of corruption used by businesses that directly impact environmental defenders, before examining the most affected sectors, notably those involving land and natural resource governance.

HOW CORRUPTION UNDERMINES THE RIGHTS OF ENVIRONMENTAL DEFENDERS

Corruption enables harmful projects to advance unchecked, dismantles accountability mechanisms, and weakens the rule of law meant to protect communities and ecosystems. It also creates the conditions of impunity in which environmental defenders are threatened, silenced, or attacked for opposing these abuses. This section outlines three main types or manifestations of corruption that facilitate such outcomes: bribery and illegal payments, undue influence and state capture, and gendered forms of corruption.

These types or manifestations of corruption often occur in a context of collusion between public officials and companies, which enables and compounds harms to environmental defenders and the communities they represent. For instance, in Colombia, during a 2018 country visit, the UN Special Rapporteur on the situation of human rights defenders received testimony indicating that defenders had been “threatened and targeted by international or national companies, particularly by those in the extractive or hydroelectric sector”. The visit also revealed “allegations of collusion between companies and politicians, sometimes at very high levels”.²¹ These relationships allow projects to proceed despite community opposition and weaken institutional responsiveness to threats. Since that visit, violence has escalated, with over 64 environmental defenders being killed in Colombia in 2019 alone – the highest number recorded globally that year. In many contexts, governments attempt to fast-track projects, bypassing EIAs and community consultations - often under the guise of national interest or security. This opens opportunities for corruption as it bypasses established processes as well as corresponding mandatory consultations.

Bribery and illegal payments

Bribery remains one of the most widespread and entrenched form of corruption. In Brazil, for example, mining companies have routinely bribed public officials to illegally secure mining permits, bypass environmental assessments, avoid mandatory community consultations, and gain favours from local authorities. These practices undermine environmental and social impact assessments, with bribery often influencing land conditions and mining permit applications. Corruption in the awarding of mining rights increases the risk of harm to

communities.^{22 23} In Brazil, Indigenous communities like the Kayapó have faced threats, violence, and even death for opposing mining activities on their lands.^{24 25}

Another example comes from Peru. In 2003, the Peruvian government transferred control of three million hectares of forest – covering 80 per cent of the Alto Tamaya-Saweto territory and other Indigenous lands – to private companies linked to illegal logging, agribusiness, and drug trafficking. Despite decades of efforts by Indigenous communities to gain legal recognition of their ancestral lands, the state prioritised commercial interests, enabling massive environmental destruction. In response, community members submitted over 100 reports documenting environmental crimes and persecution. These reports were met with silence, and in 2014, four community leaders were murdered. Investigations by Transparency International's Peruvian chapter, Proética, in collaboration with local journalists, revealed that agro-industrial companies had bribed local officials to obtain land titles for palm oil and cacao plantations. In 2023, Proética brought these cases before the Inter-American Commission on Human Rights, which urged the Peruvian government to investigate, sanction those responsible, and engage meaningfully communities.²⁶

Undue influence and state capture

Undue influence may occur when companies and industry groups influence decision-making primarily through lobbying – be it in direct or indirect communication with public officials to shape policy outcomes. Legitimate lobbying and advocacy can contribute to informed policymaking by bringing a range of expertise and perspectives into the process. Influence becomes undue when actors with significant resources and privileged access seek to manipulate public decisions through covert, misleading, or deceptive means, which may include distorting public discourse, misrepresenting evidence, or exerting pressure on officials.^{27 28}

These dynamics can have serious implications for environmental defenders, who often challenge projects and policies shaped by undue influence or state capture. They include a shrinking civic space, weakened legal protections, and heightened risks of retaliation, intimidation, and violence. In Bulgaria, for example, defenders opposing the destruction of protected areas in Pirin National Park and other Natura 2000 sites encountered significant obstacles. Construction and tourism companies had allegedly exerted undue influence over permitting authorities, leading to decisions that bypass environmental safeguards.²⁹ Defenders objecting these projects were subjected to harassment and smear campaigns.³⁰

The Hidro Santa Cruz case in Guatemala exemplifies state capture and its detrimental impact on environmental defenders and Indigenous rights as the Guatemalan government has been accused by some testimonies to have acted together with the company to criminalise defenders.³¹ The Hidro Santa Cruz company, a subsidiary of the Spanish firms Ecoener and Hidralia, sought to construct a hydroelectric dam on Q'anjob'al ancestral territory without Free Prior and Informed Consent (FPIC), violating a human rights principle recognised in international law. The project targeted the Q'am B'alam River, a site of cultural and ecological significance to the community.³² Numerous environmental defenders were arbitrarily detained and imprisoned without due process, some for over two years, but all were eventually released due to lack of evidence.

Evidence suggests institutional bias, as state authorities and judicial bodies consistently acted in favour of the company, approving the project without legitimate environmental or social assessments. Following sustained community resistance and international advocacy, including the withdrawal of financial backers, Hidro Santa Cruz officially terminated the project in 2016.³³ It is important to note that the Hidro Santa Cruz hydroelectric project in Guatemala began in the early 2000s, with more active development and community opposition intensifying around 2008–2011. The most notable resistance and repression events occurred between 2011 and 2013, when arrests, detentions, and violence against environmental defenders were widely reported. This case illustrates how state capture allows corporations to co-opt public institutions such as the police and judiciary, and the serious risks Indigenous communities and environmental defenders face when resisting this influence.

Gendered forms of corruption

Gendered forms of corruption refer to corrupt practices that disproportionately impact individuals based on gender, reinforcing inequalities and denying access to justice, services, and decision-making. Women environmental human rights defenders (WEHRDs) face unique and compounded risks where corruption intersects with gender-based violence (GBV) and structural discrimination. These risks are further exacerbated by

intersectional factors such as ethnicity, class, and socio-economic status. Indigenous women, in particular, are often criminalised, stigmatised, and subjected to violence, often GBV, for defending land and natural resources. Institutional corruption and entrenched discriminatory norms sustain impunity, leaving many without protection or redress.³⁴ In Chile, between 2023–2024, among 47 reported cases of attacks/harassment on environmental defenders, 70 per cent targeted women. Over half of the cases that made it in the justice system remained unresolved by the end of 2024, while just two per cent reached outcomes favourable to defenders.³⁵

Transparency International's Defying Exclusion report highlights how women in certain communities are frequently excluded from land ownership and decision-making, while corrupt local elites manipulate land titling and benefit-sharing processes in favour of men or politically connected groups. This dual burden of gendered discrimination and corruption limits women's ability to claim land, assert environmental protections, or protest harmful projects, exposing them to heightened risks of displacement, criminalisation, and violence.³⁶

A 2023 study of Filipina defenders found that rural, Indigenous, and low-income women are disproportionately targeted in environmental conflicts due to intersecting vulnerabilities. Many were assassinated by state-backed forces or corporate-linked hitmen, often after being red-tagged as insurgents to justify state violence. These women opposed mining, logging, biomass expansion, and land grabs, which frequently involved bribery of local authorities and protection for perpetrators. The study also noted that in several cases, companies had leveraged corrupt ties with government entities to forcibly acquire land, bypass consent processes, and silence dissent – often leaving defenders with no institutional protection. Women's leadership was met with retaliatory killings, GBV, and threats against family members, demonstrating how structural corruption reinforces gendered discrimination and violence.³⁷

Despite their central role in defending environmental and community rights, WEHRDs remain unprotected by states. Addressing this requires gender-responsive safeguards and legal accountability for corruption that addresses gendered-based repression. For example, the case of indigenous environmental leader Berta Cáceres, who was murdered in 2016, continues to highlight this gap. While treated as a homicide in court, civil society organisations and defenders in Honduras insist it should be recognised as a political femicide – a gender-motivated killing linked to environmental and political activism. This underscores the need for legal frameworks that consider and respond to gendered dimensions of violence against environmental defenders.

EXAMPLES OF CORRUPT PRACTICES THAT IMPACT PEOPLE AND THE ENVIRONMENT

This table³⁸ summarises how corruption is systematically used within environmental governance, highlighting its socio-environmental impacts and its role in enabling human rights violations, especially against environmental defenders and affected communities.

(Adapted from NREGI, Diagnosing Corruption Module: Socio-Environmental, 2023)

Corrupt practices	How it occurs	Consequences for people, environment and defenders
Undermining the integrity of environmental and social impact assessments (ESIAs)	<ul style="list-style-type: none"> • Misleading statements, manipulation of data, or omission of key information during project assessments. • Bribery, conflicts of interest and collusion between companies and safety of environmental assessors in the preparation of ESIs. • Bribery of officials to secure acceptance of flawed or incomplete assessments. • Government favouritism towards particular companies during project approval processes. • Withholding of ESIs from affected stakeholders, limiting access to essential information. 	Projects with serious environmental and social risks proceed without mitigation, leading to grave socio-environmental impacts, pollution, biodiversity loss, and harm to communities.

Manipulation of community consultation and land access negotiations	<ul style="list-style-type: none"> • Manipulation or neglect of Free, Prior and Informed Consent (FPIC) of Indigenous Peoples, a right protected under international law. • Consultation processes bypassed, reduced to mere formalities, or conducted in bad faith. • Insider deals, payoffs, or bribery used to distort outcomes. • Collusion between local leaders, companies, and government officials to manipulate negotiations for personal or political gain through bribes, gifts, or employment offers. • Inducements to authorities to alter land conditions or designations, often in connection with permit applications. 	Forced displacement, land grabs, disruption of livelihoods, conflicts, exclusion of Indigenous and rural communities from decision-making, overlooking the needs and priorities of local communities, resulting in an increase in poverty.
Undue private influence over laws, regulations and oversight institutions	<ul style="list-style-type: none"> • Bribes or inducements to policymakers and regulators, including gifts, hospitality, or subcontracting opportunities, used to weaken environmental and social protections and Corporate Social Responsibility (CSR) regulations. • Bribes to anticorruption agencies or the judiciary to influence prosecutions, sentencing, or other judicial outcomes. • Political interference aimed at obstructing investigations or diverting enforcement efforts away from powerful actors. • Policy or regulatory capture, often involving financial interests held by public officials or their associates, facilitated by the “revolving door” between government and companies, or through excessive political financing and informal lobbying. 	Weak enforcement of environmental and social safeguards, allowing harmful or unsafe projects to proceed unchecked and eroding public trust in oversight institutions.
Concealment of environmental damage and avoidance of responsibility for rehabilitation	<ul style="list-style-type: none"> • Falsifying or concealing data on environmental damage. • Conflicts of interest between companies and safety or environmental assessors, including certifiers and auditors. • Bribery to distort safety or environmental assessments. • Bribery to avoid rehabilitation obligations, including influencing officials, community leaders, or the judiciary. • Undue influence to weaken or bypass legal rehabilitation and remediation requirements. 	Long-term environmental degradation, unsafe tailing facilities in mining operations, and abandoned polluted sites affecting communities and ecosystems.
Corruption in contracting, subcontracting or hiring, enabling unsafe or unfair working conditions	<ul style="list-style-type: none"> • Suppression or weakening of workers' rights to protect the interests of powerful elites or politically exposed persons with stakes in projects. • Hiring practices favouring specific social or ethnic groups. • Bribery by individuals seeking employment, solicited by local governmental or traditional authorities. • Bribes or inducements for acceptance of poor or exploitative labour conditions, for instance, to conceal the presence of child labour within supply chains. 	Labour rights violations, hazardous working conditions, and increased prevalence of child and forced labour.
Extortion enabling human rights abuses and unsafe working conditions	<ul style="list-style-type: none"> • Threats or use of violence by armed actors. • Sexual corruption which disproportionately affects women. • Exploitation through unsafe working conditions or child labour, particularly common in informal artisanal and small-scale mining (ASM) operations. 	Insecurity and violence in project areas, often affecting women and marginalised groups disproportionately.

Undermining civic space and broader communities, and criminalisation of accountability actors (i.e., defenders)

- Collusion between companies and government officials with vested interests to override community rights and socio-environmental protections.
- Payments or benefits to non-state armed groups or organised criminals to intimidate or attack accountability actors.
- Bribes or inducements to law enforcement to harass, arrest, or intimidate defenders.
- Undue private influence over laws restricting the right to protest, including disproportionately harsh penalties for civil disobedience.

Shrinking civic space, silencing of dissent, heightened risks of violence against defenders, and impunity for perpetrators.

HIGH-RISK SECTORS: LAND AND NATURAL RESOURCES

Corruption risks are particularly acute within land and natural resource governance, occurring at all phases of the value chain, and especially in early stage of managing a resource.³⁹ Sectors such as extractives, agribusiness, forestry, water management, and large-scale infrastructure often involve high-value assets, discretionary decision-making, and limited public oversight – conditions that allow bribery, collusion, and undue influence to flourish.

Over the past decade, the Business & Human Rights Resource Centre has tracked lethal and non-lethal attacks on defenders and found that mining (1,681), agribusiness (1,154), fossil fuels (792), renewable energy (454) and logging (359) are the sectors most frequently associated with such attacks. These five sectors are deeply connected to the climate crisis: fossil fuels and the agribusiness are among the top polluting industries, while mining, agribusiness, fossil fuels and logging are leading drivers of deforestation.⁴⁰

As illustrated in the table above, in many contexts, companies and politically connected actors often acquire land or resource rights through questionable or corrupt means. This includes the manipulation of environmental and social impact assessments, interference in land titling processes, and undue influence over permitting authorities. When safeguards such as FPIC are ignored or inadequately implemented, Indigenous Peoples and local communities bear the brunt of the consequences.

Transparency International's Addressing Land Corruption in Africa report⁴¹ highlights the private sector's role in exacerbating corruption in land acquisition and project approval. Companies, especially in extractives and agribusiness, have bypassed consultation requirements and exploited weak institutions to secure land at the expense of communities.

Within resource governance, the extractive sector, particularly mining, is under renewed scrutiny as countries accelerate the shift to clean energy. The growing demand for minerals such as lithium, cobalt, and copper has intensified competition over resource-rich territories. Transparency International Australia's Global Transition, Local Transformations report⁴² reveals that more than half of global reserves for eleven out of fourteen key transition minerals are located in countries with high perceived public sector corruption. In these contexts, opaque licensing, undue corporate influence, and weak regulatory enforcement are significantly elevated.

Without clear accountability standards for states and strong corporate governance, the global energy transition risks replicating many of the failures that have historically undermined sustainable development in the resource sector. Advancing rights-based, transparent, and accountable land and natural resource governance will require strong leadership from both public and private actors. For businesses, this means not only meeting legal obligations but also proactively upholding anti-corruption and human rights standards across their operations and supply chains.

CASE BY CASE

CASE STUDIES OF CORPORATE CORRUPTION TARGETING ENVIRONMENTAL DEFENDERS

The following case studies illustrate how corruption, often facilitated or driven by private sector actors, directly contributes to adverse consequences for environmental defenders. From regulatory capture and bribery to legal harassment and complicity in violence, these examples reveal that businesses can be both perpetrators of harm, complicit and / or beneficiaries of impunity. They also expose the structural conditions, including weak enforcement of laws and regulations, opaque decision-making, and compromised oversight processes and institutions, that allow corporate misconduct to persist unchecked. By drawing from diverse sectors and geographies, these cases demonstrate that business practices are never neutral: they either enable or resist the corruption that endangers defenders. Strengthening business integrity and accountability is therefore not optional but essential to protecting the environment and upholding the rights of those who work to defend it.

ENERGY TRANSFER (UNITED STATES) – SLAPPS, SURVEILLANCE, AND UNDUE INFLUENCE

Energy Transfer LP (ET), a major United States (US)-based energy infrastructure company, has faced criticism for its approach to responding to public opposition from Indigenous communities and activists in connection with its pipeline projects, including the Dakota Access Pipeline (DAPL).⁴³ This is despite ET's public commitment to strong environmental, social, and corporate governance⁴⁴, publication of comprehensive annual CSR reports⁴⁵, the availability of a code of business conduct and ethics, including on stakeholder engagement⁴⁶, and even an anti-bribery and corruption policy⁴⁷.

According to ET's website, the company is committed to operating its business in a manner that "honors and respects all people and the communities".⁴⁸ ET's code of business conduct and ethics and associated stakeholder engagement policy require every employee to build trust in communities through respect, engage early with affected stakeholders when planning a project, provide accurate and timely information, listen to stakeholder concerns in good faith, and respond to concerns in a timely manner.⁴⁹ While these are promising commitments, several allegations and practices documented in relation to ET projects raise concerns for environmental defenders. In fact, according to the Business and Human Rights Resource Centre, ET has been associated with 70 'HRD attacks'.⁵⁰ ET has responded to 60 per cent of requests from the Resource Centre for more information on such attacks, cases, and allegations.

In 2016 and 2017, significant protests emerged against the construction of the DAPL primarily led by the Standing Rock Sioux Tribe. These protests were driven by concerns over threats to the Standing Rock Sioux Tribe's water supply, violations of Indigenous rights, and broader environmental risks. The movement drew national and international attention. Since 2016, sweeping fossil fuel anti-protest laws have been enacted in 18 U.S. states, largely in response to the Standing Rock Sioux Tribe protests.^{51 52} Greenpeace notes "close relationships between fossil fuel entities and government officials have succeeded in many efforts that shrink civic space and heighten the consequences for engaging in peaceful protest."⁵³

In response to the DAPL protests, ET initiated legal action against Greenpeace, which was one of hundreds of NGOs that supported the protests, and did not play a prominent or leadership role:

- 2017: ET filed a federal Racketeer Influenced and Corrupt Organizations (RICO) lawsuit against Greenpeace, seeking US \$300 million in damages. The lawsuit alleged defamation, conspiracy and other claims, accusing Greenpeace of disseminating false information and encouraging illegal activities to obstruct the pipeline's construction.⁵⁴
- 2019: A federal court dismissed the abovementioned lawsuit, citing insufficient evidence to support ET's claims.⁵⁵ ET then refiled the case in North Dakota state court.
- 2025: That same case against Greenpeace went to trial, leading to a jury verdict ordering Greenpeace to pay over US \$660 million in damages for defamation and related claims.⁵⁶ Greenpeace intends to appeal this verdict, with monitors, journalists, and lawyers widely criticising the trial for significant irregularities that denied Greenpeace its right to a fair process.⁵⁷

Many legal experts in the US consider this case to be a Strategic Lawsuit Against Public Participation (SLAPP)⁵⁸, intended to deter Greenpeace and similar organisations from engaging in advocacy and protest activities against oil and gas pipelines.⁵⁹ The substantial financial penalties imposed raise concerns about the potential chilling effect on environmental activism and the broader implications for free speech and the right to peaceful protest.

A **SLAPP suit**, or Strategic Lawsuit Against Public Participation, is a type of lawsuit intended to censor, intimidate, and silence critics by burdening them with lengthy, costly, and stressful litigation until they abandon their criticism or opposition. SLAPP suits are typically brought by individuals, corporations, or entities against those who speak out on issues of public concern, such as environmental issues, corruption, consumer rights, or civil rights.

Characteristics of SLAPP Suits

- Intimidation and silencing: The primary goal of a SLAPP suit is generally not to win the lawsuit but to intimidate critics into silence by imposing significant legal costs and time burdens. The litigation process itself becomes the punishment.
- Lack of merit: SLAPP suits often lack true legal merit and are used to deter public participation in debates. They attempt to portray constitutionally protected free speech activities as wrongful, criminal, or terrorist.
- Forum shopping: Plaintiffs may engage in forum shopping to find courts more favourable to their claims.

Anti-SLAPP Laws

To counter SLAPP suits, many jurisdictions have enacted anti-SLAPP laws to reduce the time and cost burdens on the defendants facing these improper abuses of the legal system. These laws allow defendants to file motions to dismiss SLAPP suits early in the litigation process, requiring plaintiffs to demonstrate a likelihood of success on their claims. If the plaintiff fails to meet this burden, the lawsuit can be dismissed, and the plaintiff may be required to pay the defendant's legal costs.

As of the date of publication of this report, Greenpeace has asserted that the verdict poses a threat to free speech and the right to peaceful protest. The organisation is also exploring legal avenues in other jurisdictions to challenge the ruling, including using the EU anti-SLAPP law.⁶⁰

ET has also tried to initiate legal proceedings against others, widely considered SLAPPs. For instance, ET filed a lawsuit against Water Protectors, including the then-Chairman of the Standing Rock Sioux Tribe, which was also later dismissed.⁶¹ In 2022, ET co-founder and chairman Kelcy Warren filed a defamation lawsuit against former Texas gubernatorial candidate Beto O'Rourke, after O'Rourke remarked that Warren's US \$1 million donation to Governor Greg Abbott's re-election campaign was "pretty close to a bribe," implying it was a "quid pro quo"

intended to secure favourable treatment for energy companies following ET's reported US \$2.4 billion profit during the 2021 Winter Storm Uri. The Texas Third Court of Appeals dismissed the case under the state's anti-SLAPP law, and the Supreme Court declined to take up the case.⁶²

ET has faced multiple regulatory enforcement actions related to environmental violations. In Pennsylvania, ET was convicted of criminal charges tied to the construction of its Mariner East 2 and Revolution pipelines.⁶³ In a separate case, a Federal Energy Regulatory Commission (FERC) inspector's report described the company as having a "corporate culture that favoured speed and construction progress over regulatory compliance".⁶⁴

During the 2016–2017 Standing Rock protests, ET reportedly hired private security firms, most notably TigerSwan, to monitor and gather intelligence on protesters, Indigenous groups, and journalists. Investigations by *The Intercept* revealed the use of counterterrorism-style surveillance tactics, undercover operations, and significant spending on police equipment.⁶⁵ TigerSwan later faced legal action for operating without a license in North Dakota.⁶⁶ Reports, including Greenpeace's *Dollars vs. Democracy 2023*, note that the fossil fuel industry, including ET, has developed close relationships with government officials and law enforcement agencies. The same report outlines ET's involvement in advocating for state-level legislation in the US that criminalises environmental protest-related activities (e.g., providing food and water, overly broad trespassing policies, etc.).⁶⁷

SLAPPs have been consistently used as a tool to target defenders. The Business & Human Rights Resource Centre has tracked more than 530 instances brought or initiated by private actors against HRDs between 2015 and 2024.⁶⁸ In 2022, EarthRights International documented 152 such cases over the preceding decade involving the fossil fuel industry in the US alone.⁶⁹

ADANI CARMICHAEL COAL MINE (AUSTRALIA) – UNDUE INFLUENCE AND REGULATORY CAPTURE

The Adani Carmichael Coal Mine in Queensland, Australia, is one of the most controversial mining projects in the world. Apart from climate and environmental impacts, the case demonstrates how corporate power, alleged regulatory capture, and legal intimidation can contribute to the harassment and criminalisation of environmental defenders.⁷⁰ ⁷¹ From the outset, the project faced strong opposition from Traditional Owners,⁷² notably the Wangan and Jagalingou People, environmental defenders, and civil society organisations, who raised concerns about land dispossession, destruction of sacred sites, groundwater depletion, and biodiversity loss.⁷³

Bravus Mining and Resources (Bravus), who operate under the Adani Group, is responsible for the construction of the Carmichael mine and project.⁷⁴ On its website, the company claims it is committed to being a sustainable business, citing the use of ethical business and governance practices to leave a positive social and environmental impact.⁷⁵ Consistent with these claims, Bravus has published a wide range of corporate governance policies,⁷⁶ including a stakeholder feedback and grievance policy,⁷⁷ a policy on working with communities,⁷⁸ and a policy outlining Bravus' commitment to undertaking operations in a manner which meets legal obligations and environmental objectives.⁷⁹ The company also invites public feedback via a dedicated phone number and email address, noting that Bravus is "committed to genuine community engagement ... including the receipt and actioning of comments and feedback".⁸⁰

However, the continuation of the Carmichael project, despite public concerns raises questions around the extent to which these policies and principles are implemented in practice. In 2021, a study by RMIT University found that top mining companies, exploit weak native title laws and "flout international human rights conventions when negotiating with Indigenous Australians over land use".⁸¹ The researchers called on the state government of Queensland to hold an independent inquiry into the Bravus Carmichael mine project, and the process it used to obtain a land use agreement. Bravus, who had initially requested the study be terminated, responded by claiming that the study contained inaccurate information and "strongly rejected" the portrayal of events.⁸²

More broadly, reports have suggested that Adani pursued multiple SLAPP-style legal actions against activists,⁸³ seeking civil injunctions and damages aimed at curbing non-violent direct action⁸⁴. Further still, in 2019, leaked documents revealed Adani's direct lobbying of Australian state and federal officials to fast-track environmental approvals and water licences, disregarding procedural weaknesses and the ongoing opposition from affected Indigenous communities.⁸⁵

Despite these well-documented violations of community rights and environmental protection procedures, neither Adani nor involved officials have yet faced significant legal consequences. While impunity persists, Transparency International Australia and other organisations have flagged the Adani-Bravus case as emblematic of a situation where commercial interests were prioritised over human rights, public participation, and environmental safeguards.^{86 87}

VALE BRUMADINHO DAM (BRAZIL) – REGULATORY FAILURES, AND SUPPRESSION OF ENVIRONMENTAL DEFENDERS

On 25 January 2019, a tailings dam owned by Vale S.A., one of the world's largest mining companies, collapsed in Brumadinho, Minas Gerais, Brazil, releasing a wave of toxic sludge that killed 270 people. Among the victims were Vale employees, local residents, and members of surrounding communities.⁸⁸ The disaster struck just over three years after a previous fatal dam collapse at Mariana, involving a Vale and BHP Billiton joint venture. Despite repeated internal and external warnings about the dam's structural risks⁸⁹, including from environmental defenders, technical staff, and whistleblowers, Vale failed to take action to prevent the tragedy in Brumadinho.

A report⁹⁰ from the Global Anti-Corruption Consortium (GACC), a collaboration between Transparency International and the Organized Crime and Corruption Reporting Project (OCCRP), produced with the support of Transparency International's chapter in Brazil, revealed that Vale S.A. had benefitted from and actively contributed to the weakening of Brazil's environmental governance framework. Central to this was the creation of the Superintendence of Prioritised Projects (Suppri) in 2017, a body that fast-tracked environmental licensing for "strategic" mining and infrastructure projects, largely at the request of major companies like Vale. Suppri significantly reduced oversight by bypassing multi-stage evaluations, external expert reviews, and public consultations. The number of licences issued in Minas Gerais surged from 7,000 to 40,000 annually, while the average time to approve a licence dropped from 51 days to fewer than 10.

Between January 2017 and July 2019, Suppri reviewed 25 licensing applications from Vale, 21 of which were classified as "high risk". Nineteen of those were approved, including the Brumadinho dam itself. In November 2018, just weeks before the collapse, Suppri's leadership privately urged members of the state's Mining Activities Chamber to downgrade the dam's official risk classification, despite internal technical reports and whistleblower warnings indicating imminent danger; eight weeks later, the dam failed.⁹¹

Whistleblowers and environmental defenders raised serious concerns about the Brumadinho dam's instability and inadequate oversight well before its collapse, but their warnings were dismissed or ignored. This reflects deep failures in Vale's internal integrity systems and broader institutional safeguards meant to listen to and provide space for environmental and human rights defenders in Brazil.

The GACC report also revealed that Vale's influence extended into the political sphere. In the 2014 elections, Vale donated approximately R\$82.2 million (US \$33.6 million) to political campaigns across Brazil, including R\$15 million in the state of Minas Gerais. Over 100 sitting legislators received donations from mining companies, with then-Governor Fernando Pimentel receiving significant contributions from Vale subsidiaries. Experts interviewed for the report, including academics and transparency advocates, characterised Suppri as a mechanism that facilitates state capture, allowing companies like Vale to shape environmental decision-making in their favour, while systematically excluding defenders and community voices.

Prosecutors charged 16 people, including 11 Vale executives and the then-CEO Fabio Schvartsman, with homicide, citing that executives had knowledge of the risks since at least November 2017.⁹² The Prosecutors also charged Vale and TUV SUD, the German company responsible for inspecting the dam, with environmental crimes.⁹³ Vale has, since the tragedy, announced and pursued a range of measures to "fully repair" the damage caused to the people and territories affected by the collapse of the dam.⁹⁴ And yet, efforts to secure full criminal accountability have stalled, and protections for those who raised the alarm remain inadequate.

Today, Vale claims to have learnt lessons from the Brumadinho tragedy and commits to increasing transparency with its stakeholders; striving, it says, "to be a company that increasingly places people at the centre of decision-

making".⁹⁵ The company now evaluates and reports on a range of environmental, social, and governance (ESG) commitments, aligned with the UN Sustainable Development Goals and the principles of the UN Global Compact.⁹⁶ The company has published an array of policies and guidelines, including a Code of Conduct, an anti-corruption policy,⁹⁷ a corporate policy and guide on human rights,^{98 99} and approaches community engagement as a comprehensive, strategic process.¹⁰⁰

The Business and Human Rights Resource Centre has submitted 47 response requests in relation to concerns around Vale's multinational operations, including 11 'HRD attacks', eight lawsuit profiles, and 14 other allegations. The company boasts a 100 per cent response rate.¹⁰¹ Vale also meets 5 out of 6 indicators being tracked by the Resource Centre, including the availability of a company policy that describes its approach and commitment to human rights, whether the company is a supporter of the Extractive Industries Transparency Initiative, and whether it is a member of the Voluntary Principles on Security and Human Rights.

Despite all this, environmental defenders and whistleblowers who attempted to prevent the Brumadinho disaster continue to face intimidation, institutional neglect, and legal uncertainty.^{102 103} Civil society organisations such as the Affected Families Commission continue to advocate for broader recognition that the disaster represents not only a corporate failure but a labour and human rights crime, enabled by regulatory capture, corporate lobbying, and the silencing of dissent through institutional indifference and opaque governance mechanisms.

PALM OIL PLANTATIONS (INDONESIA) – LAND RIGHTS VIOLATIONS, AND LEGAL HARASSMENT OF DEFENDERS

Indonesia's palm oil sector has long been associated with land conflicts, environmental degradation, human rights violations, and corruption.¹⁰⁴ However, beyond environmental harm, the sector exemplifies how corruption creates an environment of impunity where environmental defenders face escalating threats, intimidation, and violence when they challenge harmful business practices.¹⁰⁵ The expansion of palm oil plantations across the provinces of Sumatra, Kalimantan, and Papua has occurred in contexts marked by bribery, regulatory capture, and undue influence, which have severely restricted the work of environmental defenders and the ability to exercise their rights.

The most recurrent pattern involves companies bribing local and regional officials to bypass environmental regulations, secure plantation permits (Hak Guna Usaha - HGU)¹⁰⁶, and avoid community consultation obligations. In such cases, defenders who attempt to blow the whistle on or resist such corruption and governance violations often find that the regulatory and judicial systems are inaccessible or complicit, also due to corruption.¹⁰⁷ Global Witness reports that land and environmental defenders in Indonesia face criminalisation, including arrests, trials, and fines, often linked to protests against palm oil mills involved in land conflicts and deforestation. The country is highlighted as one of the deadliest for defenders in Southeast Asia, with 12 killed between 2015 and 2021, and dozens more subject to non-lethal attacks.¹⁰⁸

This corrupt and dangerous environment has allowed impunity to flourish. Law enforcement and judicial authorities have frequently failed or refused to investigate or prosecute attacks against defenders. In some cases, defenders are criminalised under ambiguous charges such as "encroachment" or "damaging plantation property".^{109 110} Community leaders opposing land grabs in West Kalimantan, for example, have been repeatedly arrested and subjected to legal harassment, while perpetrators of violence against them, often linked to private security companies or company-affiliated militia groups, go unpunished.¹¹¹

The International Federation for Human Rights (FIDH), highlights cases of criminalisation of defenders by PT Astra Agro Lestari (AAL), where Indigenous farmers and community leaders were reportedly arrested on fabricated charges after protesting land grabs. This includes instances where farmers were imprisoned for allegedly stealing from their own lands.¹¹²

Further exacerbating this hostile environment are practices akin to SLAPPs. Several defenders and journalists investigating illegal deforestation and palm oil land grabs have faced defamation charges under Indonesia's Electronic Information and Transactions (ITE) Law. This law is widely regarded¹¹³ as a legal tool misused to silence

critical voices. Further, security forces and private companies are reported to have employed repressive measures including surveillance, online harassment, and physical violence to stifle environmental activism.¹¹⁴

The combination of regulatory capture, bribery, and weak judicial protections has created a context where defenders are exposed to threats, harassment, and violence. This pattern is not incidental but structurally embedded. As impunity for attacks against defenders persists, communities are deterred from asserting and realising their land rights or challenging harmful projects. The Indonesian case shows that corruption does not simply accompany environmental harm, it is a driving force behind the repression of those defending environmental and human rights.

TOWARDS CORPORATE ACCOUNTABILITY

BUSINESS INTEGRITY AS A PILLAR OF PROTECTION

As evidenced across the case studies, national, regional, and multinational corporations and businesses are fundamentally failing to meet core international standards on business integrity, anti-corruption, and human rights. Widespread corruption and malpractices such as bribery, regulatory interference, misuse of legal mechanisms, and the obstruction of community rights stand in contrast to the obligations and expectations set out in the United Nations Convention against Corruption (UNCAC), the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and prevailing ESG and sustainability frameworks, including those on Transformational Governance by the UN Global Compact.

In Brazil, investigations revealed that Vale S.A. obtained favourable safety certifications for its Brumadinho dam through fraud while pushing for an overall weakening of environmental governance, despite clear structural risks, with subsequent intimidation of community advocates and delayed legal proceedings. In Australia, the Adani Bravus Carmichael coal mine advanced amid allegations of political lobbying, insufficient engagement with Traditional Owners, and legal actions against environmental defenders. In Indonesia, palm oil companies acquired land and permits through illicit payments to public officials, displacing rural and Indigenous communities and exposing defenders to criminalisation. In the US, Energy Transfer responded to opposition to the DAPL project with a SLAPP suit, private surveillance operations, and close coordination with law enforcement, raising concerns about the shrinking of civic space and the targeting of peaceful protests. These different types and instances of corruption and malpractice can be grouped into three main pathways through which they impact defenders:

- **Enabling harmful activities:** Corruption facilitates actions that damage the environment and / or violate the rights of local communities - conditions that often prompt defenders to mobilise in response.
- **Facilitating retaliation:** Corruption is used to intimidate, discredit, criminalise, or otherwise retaliate against defenders, undermining their efforts and silencing opposition.
- **Undermining accountability:** Corruption enables impunity and weakens accountability mechanisms, allowing those responsible for attacks on defenders to escape justice.

In this context, the private sector can play a pivotal role. Business integrity is essential for reducing corruption-related risks and preventing harm to communities and the environment. Companies must adopt strong anti-corruption compliance programmes, conduct meaningful human rights and environmental due diligence, and ensure transparent and inclusive engagement with affected communities. A commitment to integrity can also help companies safeguard their long-term social licence to operate and build trust with stakeholders.

RECOMMENDATIONS

INTEGRITY BEYOND COMPLIANCE

Corruption-enabled impunity against environmental defenders often involves state institutions, law enforcement, and judicial systems, but the private sector also bears significant responsibility, and holds real potential to foster safer, more ethical operating environments. While a broad range of actors, from regulators to civil society, are critical to lasting solutions, the following recommendations focus on the business integrity approach: how companies themselves, investors, and policymakers can actively prevent corruption-linked abuses and help protect those who challenge environmental harm.

Protecting environmental defenders requires more than reactive or punitive measures after violations occur. It demands a proactive, systemic approach: internal reforms by businesses and strong enabling environments shaped by legal and regulatory accountability. The following actions outline how different actors can contribute meaningfully to this effort.

For businesses

Companies must go beyond formal compliance to acknowledge their role in shaping governance environments, particularly in high-risk sectors. Business practices can either reinforce corruption and impunity or serve as a force for accountability, justice, and human rights protection.

- Publicly commit to zero tolerance of attacks against environmental defenders.
- Develop and implement corporate human rights policies with specific procedures for responding to threats, retaliation or violence against environmental defenders and other critics of company operations.
- Respect FPIC and EIA requirements, ensuring transparent, meaningful, and safe stakeholder engagement, with particular attention to affected communities.
- Ensure public access to information and corporate data on projects, licenses, impacts and sustainability commitments, including through open data portals to enable oversight and independent analysis.
- Disclose beneficial ownership, political donations, and lobbying activities to mitigate undue influence and enhance public trust.
- Refrain from any direct or indirect political engagement, including lobbying and campaign financing that supports restrictions on civic space, or undermines laws aimed at holding companies accountable for human rights and environmental abuses.
- Embed anti-corruption and human rights due diligence across operations and supply chains, and include contractual clauses for terminating partnerships upon evidence of adverse human rights or environmental impacts.

- Establish effective grievance and remediation mechanisms that are accessible to defenders, workers, and affected communities.
- Implement robust internal whistleblowing systems aligned with international best practices (e.g. Transparency International principles), ensuring confidentiality, protection, and transparent follow-up.
- Foster stronger coordination across compliance, legal, CSR, and sustainability teams to ensure a holistic, rights-based and gender-responsive approach to risk management and corporate accountability.

Businesses must recognise that voluntary commitments are insufficient. Public endorsements of standards must be backed by binding accountability mechanisms, legal liability, and independent oversight.

For policymakers and regulators

To support systemic change, legal and regulatory frameworks must close governance loopholes, strengthen oversight, and protect those who expose abuses.

- Mandate corporate anti-corruption and human rights due diligence, in line with emerging standards and legislative frameworks such as the EU Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD).
- Strengthen oversight and integrity institutions (including anti-corruption bodies) to ensure enforcement and transparency in licensing, land allocation, and environmental impact assessments.
- Enact legislation to protect defenders, including strong anti-SLAPP laws.
- Adopt comprehensive whistleblower protection laws with effective enforcement mechanisms.
- Improve transparency in political financing and corporate lobbying.
- Support independent audits and civil society monitoring of high-risk sectors and projects.

Effective governance is essential to deterring misconduct, enabling remedy for harms, and creating a business environment where defenders are not only protected but respected as stakeholders in sustainable development.

For investors and financial institutions

Investors have a key role in shaping corporate conduct by embedding accountability into financial decision-making and ensuring that capital flows do not contribute to rights violations.

- Integrate anti-corruption indicators into ESG assessment and reporting criteria.
- Undertake rigorous, gender-sensitive due diligence on potential investees, including screening for past involvement in corruption, environmental and human rights harm or retaliation against defenders.
- Comprehensively assess corruption, human rights and environmental risks of potential projects, including the risk of reprisals against communities or other stakeholder who may voice opposition.
- Make financing contingent on concrete commitments to protection of whistleblowers and human rights defenders, meaningful and inclusive engagement with affected communities, transparency and accountability.
- Strengthen internal and independent grievance mechanisms and establish clear protocols on cases of reprisals against EHRDs.

Investment decisions must go beyond reputational risk assessments to address structural risks to civic space, human rights, and environmental governance.

Ultimately, protecting environmental defenders is not only a matter of risk mitigation; it is a matter of upholding human rights, preserving civic space, and promoting sustainable, inclusive governance. Tools such as integrity self-assessments, whistleblower frameworks, and contractual safeguards offer practical entry points for businesses, while legal reforms and stronger regulatory oversight provide the necessary foundation for lasting change.

ANNEXES

THE ROLE OF THE UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

The United Nations Guiding Principles on Business and Human Rights (UNGPs) unanimously endorsed by the UN Human Rights Council in 2011, serve as the authoritative global standard outlining the responsibilities of states and businesses with regard to human rights. The UNGPs are structured around three interrelated pillars: protect, respect and remedy.

The first pillar affirms that states have a duty to protect individuals from human rights abuses by third parties through effective legislation, policies, and adjudicative mechanisms. The second pillar emphasises that businesses have a responsibility to respect human rights, which includes avoiding harm, addressing any adverse impacts, adopting appropriate policies, implementing human rights due diligence processes, and providing remediation where harm has occurred. The third pillar highlights the obligation of both states and companies to ensure that victims of human rights abuses have access to effective remedies, through judicial or non-judicial means.

Developed through an extensive and inclusive consultative process, the UNGPs have achieved broad international legitimacy and apply to all businesses regardless of size, sector, ownership structure, or geographical location. Simultaneously, the UN Working group on the UNGPs has further emphasised that corruption must be addressed as a systemic barrier to fulfilling all three pillars.

In the context of this paper, the UNGPs are especially relevant lies in settings where state institutions fail to uphold their protective obligations. In such cases, businesses are expected to exercise heightened human rights due diligence. This expectation is especially pertinent in countries with weak or authoritarian governance and in situations of conflict as well as high-risk sectors like mining, agribusiness, infrastructure, and large-scale natural resource extraction, where operations often intersect with land disputes, environmental degradation, and the suppression of dissent.

RESOURCES FROM TRANSPARENCY INTERNATIONAL FOR STRENGTHENING BUSINESS INTEGRITY

Business integrity is fundamental to corporate accountability and a critical safeguard against corruption-related harm especially in contexts where environmental defenders are at risk. To go beyond performative compliance, businesses must embed strong anti-corruption, transparency, and accountability mechanisms across their operations, supply chains, and governance structures.

The following tools and resources developed by Transparency International support business integrity, particularly through whistleblower protection, responsible land governance and political integrity.

Whistleblower protection: a frontline defence against corporate impunity

Whistleblowers are often the first to uncover corrupt or harmful practices, yet they remain one of the most vulnerable groups. Protecting them is not only a moral imperative but a strategic necessity for upholding corporate accountability and preventing environmental harm. Whistleblowing systems allow organisations to detect and address wrongdoing early, before it escalates into legal, financial or reputational crises.

Transparency International's Internal Whistleblowing Systems Self-Assessment Framework (2024)¹¹⁵ is a comprehensive tool for public and private organisations to evaluate and strengthen their internal reporting systems. Grounded in internationally recognised principles for the design and operation of effective internal whistleblowing systems, the framework promotes safe reporting, meaningful follow-up, and robust protection and support for whistleblowers. It covers areas such as:

- Defining the system's scope and who it covers.
- Clarifying roles and responsibilities, with clear leadership accountability.
- Promoting effective communication to build transparency, trust, and accountability.
- Providing secure, accessible and confidential reporting channels, including options for anonymous reporting.
- Guaranteeing robust protection and support for whistleblowers, persons concerned and third parties at risk.
- Committing to continuous review and improvement to ensure ongoing effectiveness.
- Embedding gender equality and social inclusion sensitivity into the systems.
- Taking restorative actions and sanctions against those found guilty of wrongdoing following the whistleblowers' reports, as well as those who engage in retaliation against whistleblowers.

The framework empowers organisations to build whistleblowing systems that are credible, inclusive, and aligned with best practice - fostering a culture of integrity and accountability. It draws from Transparency International's Internal Whistleblowing Systems: Best practice for public and private organisations¹¹⁶ and the ISO Guidelines for Whistleblowing Management Systems, reinforcing that protection must extend to consultants, volunteers, and former workers, not just employees, and must prohibit retaliation in all forms, including smear campaigns, job loss, and financial harm.

Many of the key principles that apply to internal whistleblowing systems are also relevant to external complaint mechanisms, which enable environmental defenders who do not have a working relationship with the company – unlike whistleblowers – to safely report conduct that is unlawful, abusive, or harmful.

These mechanisms should uphold core principles such as:

- Accessibility and inclusiveness, ensuring all relevant stakeholders can report concerns.
- Protection from retaliation, even for those outside the organisation.
- Confidentiality and anonymity, to safeguard identities and reduce risk.
- Fair and transparent follow-up, including timely responses and corrective action.
- Support for complainants, particularly when they face personal or professional risk.
- Ongoing monitoring and review, to strengthen accountability and trust.

Business integrity: a toolkit for medium-sized enterprises

Transparency International and the World Economic Forums' Business Integrity Toolkit¹¹⁷ is designed to help small and medium-sized enterprises implement meaningful anti-corruption programmes. It outlines practical steps to build a culture of integrity, including:

- Leadership commitment - companies are encouraged to embed anti-corruption goals at the highest level of governance, ensuring leadership actively models ethical behaviour.

- Risk management - emphasis is placed on integrating corruption risks into enterprise-wide assessments, especially in high-risk sectors like extractives, land, and infrastructure.
- Stakeholder engagement - businesses are advised to engage meaningfully and transparently with affected communities to build trust and avoid conflict.
- Due diligence - the toolkit supports robust third-party risk assessments, which are crucial in contexts where land deals, permits, or regulatory approvals may involve undue influence or collusion.
- Disclosure and reporting - transparency on political donations, lobbying, and beneficial ownership is identified as a critical safeguard against policy capture.
- Monitoring and accountability - internal audits and independent assessments are recommended to track compliance and respond to breaches.
- Aligning with international frameworks like the CSRD and the CSDDD for mandatory human rights and environmental due diligence.

The toolkit also links integrity to strategic advantage. Companies that demonstrate commitment to ESG values are more attractive to investors, more resilient to risk, and better positioned to form meaningful partnerships. This is especially important in sectors where due diligence is becoming a regulatory requirement and a market differentiator.

Standards for political integrity and corporate influence

Transparency International's Standards for Integrity in Political Finance¹¹⁸ underscore the risks posed by unregulated political donations and lobbying. The standards call for mandatory transparency in political financing, bans on anonymous and foreign contributions, and enhanced scrutiny of corporate influence on policymaking. Businesses should align their political engagement with these standards, ensuring that political contributions are disclosed, justified, and subject to board oversight. This is particularly important in contexts where corporate political financing is linked to regulatory capture.

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