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**To:** WG-Business OHCHR <[wg-business@ohchr.org](mailto:wg-business@ohchr.org)>  
**Subject:** CALL FOR INPUT

Thank you for your invitation to submit input. Below you’ll see my responses to several questions and included my bio. Please let me know if I can be of further assistance.

**8.How can/should states, private sector and civil society work to better coordinate anti-corruption and business and human rights agendas to prevent harms along both dimensions through collective action, multi-stakeholder platforms.**

What we call corruption has become such a deeply embedded cultural norm in many contexts that demonizing it as corruption becomes a value judgement that can make the practice hard to influence. I would frame it, rather, as a campaign that asked targeted audiences questions like, “Wouldn’t it be nice if you didn’t have to pay extra for simple transactions?”  For businesses, I’d focus on pointed questions such as, “Wouldn’t it be nice if you could fully estimate the costs of your transactions?” The focus hear would be painting the picture of a life in which expenses could be calculated. This could help promote a sense of certainty and security which could appeal to many. Those benefitting from kickbacks would need messages such as “Wouldn’t it be nice to receive a livable wage rather than having to manipulate clients for extra cash?” If we focus on meeting the security (certainty) needs of all stakeholders, transparency can be sold as a way in which to meet this need. An advertising campaign that included social media would need to be designed and targeted at different audiences. There needs to be a focus on changing the culture without shaming. Studies are showing that naming and shaming behavior rarely creates long-term solutions. Sell people on the idea of transparency of transactions and trusted officials/employees are heroes. This advice comes both from my decade-long experience as an international advertising executive and my work on narrative approaches to conflict.

**9.What role should international financial institutions, and investors play in exerting leverage to ensure both prevention of corruption but also business respect for human rights?**

I begin here with a quote from Edmund Burke (1790) who defined society as “a partnership between those who are living, those who are dead, and those who are to be born.” In this spirit, a place to start with many financial institutions is their past violations as well as present. There needs to be a commitment to being transparent and atoning for the past in a way that shifts corporate ethos. Barclays bank provides a salient example. The institution had its hand in U.S. slavery, the Holocaust and continues to participate in various violations. Between 2018-2019, Barclays executives faced fraud charges for activists in Qatar and the former head of Barclays New York Foreign Exchange Operation was indicted for a multimillion-dollar front running scheme (U.S. Department of Justice 2018). Another Barclays CEO faced jail time in London for crimes related to the economic collapse of 2008.

JP Morgan also had its hand in both U.S. Slavery and the Holocaust. The company continues to face indictments for various crimes. In late 2019, CNN reported, “Three JPMorgan Chase traders in gold and other precious metals have been charged with alleged market manipulation by the US Department of Justice.”

Contemporary executives can address their pasts by making statements that differentiates their present-day values from those of their predecessors. They can also meaningfully contribute to transparency, commemorative sites, education, ensure their policies are not biased against certain groups and make donations to address the harm they’ve created. It may seem counter-intuitive to go after the past to change the present, but it can provide a surprisingly useful manner in which to engage in the discussions. It allows companies to atone and redefine themselves. Countries that engage in this process have much healing. I have an article on this topic in press with *the Journal of Business Ethics.* I can provide this and other relevant pieces upon request.

Thank you again for your consideration. I have included my bio below.

Bio: Sarah Federman

Ph.D., George Mason University  
M.A., American University of Paris  
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Sarah Federman specializes in the role of language in conflict, post-conflict contexts and the role of corporations in mass atrocity. She came to the University of Baltimore after completing her doctorate at George Mason University’s School for Conflict Analysis and Resolution. Federman has also taught courses SciencesPo Lille, Grinnell College, and the University of Malta.

Her doctoral research has attracted widespread attention. Federman studied of the role of the French National Railways (SNCF) in the World War II Holocaust deportations and the conflict that continues today in the United States over whether the company has done enough to make amends. Her work included archival research, over 120 interviews (with Jewish leaders, historians, legislators, lawyers and over 80 Holocaust survivors) and *pro bono*work with the U.S. House of Representatives, U.S. State Department and *The Washington Post.*

Considering the intersection of corporate behavior and conflict draws on Federman’s decade-long career as a senior advertising executive. Based first in Manhattan, then in Toronto and finally Paris, Federman negotiated with companies throughout North America, Europe, the Middle East, Africa and Asia. Some of the companies with whom she met include; Google, NFL, Viacom, Expedia, Discovery and most of the world’s largest advertising agencies. During her professional career, she completed Harvard Business School’s Key Executive Program, studying negotiation, entrepreneurship, strategy and accounting. Federman is fluent in French.

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Please check out our new book:

[Introduction to Conflict Resolution: Discourses and Dynamics](https://www.amazon.com/Introduction-Conflict-Resolution-Discourses-Dynamics/dp/1786608529/ref=sr_1_1?keywords=introduction+to+conflict+resolution+discourses+and+dynamics&qid=1563464431&s=gateway&sr=8-1)