GLOBAL
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INITIATIVE

COLLABORATION IN CHANGING TIMES

GNI ANNUAL REPORT 2021

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OPENING LETTER

DEAR FRIENDS,

In 2021, we experienced many of the same challenges that we faced in 2020 and reconfirmed our members' and staff's commitment to maintaining energized spaces of engagement. This was also a year of introspection about GNI's value proposition, mission, and operations in a fast-moving external environment and of increased visibility, thanks to our active participation in international fora and timely policy statements and submissions.

The COVID-19 pandemic accelerated our reliance on digital services. It has underscored the impacts of digital divides, security flaws, and the wider use of tactics, technologies, and authorities to access user data and restrict Internet access. In order to be better prepared for the future and work more efficiently with our growing membership across our strategic pillars, GNI took the following important steps to assess our role in the information and communications technology (ICT) ecosystem:

> **A strategic review with external expert support** guided by an inclusive and participatory approach. We

At its Annual Meeting of members, GNI members unanimously elected Agustina Del Campo as its first official Vice Chair.

GNI 2021 Annual Meeting of Members

conducted thematic surveys and interviews of our members. This was followed by the formation of a small group, consisting of the GNI Executive Committee and two non-board NGO members, to discuss and prepare recommendations around GNI's scope. These recommendations will be an important building block for upcoming surveys and discussions on the assessment process, membership growth, and diversity, equity, and inclusion (DEI).

> **A review of the assessment cycle of 2018/2019** to reflect on lessons learned and identify potential improvements. This resulted in several recommendations to enhance the assessment process, already incorporated in the revamped **Assessment Toolkit** to be used in the 2021/2022 assessment cycle.

> **A revision of our policy priorities,** which have guided our policy engagements since 2017. We conducted a member-wide survey and one-on-one conversations to inform next steps in line with our wider strategic review.

Together with our members, we worked on letters, statements, submissions, presentations, and resources to highlight the threats to freedom of expression and privacy as governments adopt new tactics to access user data and pass regulations to try to control what users can or cannot access around the world. In Latin America, for example, GNI addressed public officials in Chile and Colombia, expressing concern about draft laws to regulate digital content. And after months of internal discussions with our members, we launched a statement and resource page to define and explain **"direct access,"** where legal and technical arrangements allow government authorities to access data streams directly.

GNI was present at relevant international events and convenings, taking every opportunity to raise our collective voice on behalf of freedom of expression and privacy

> "This was also a year of introspection about GNI's value proposition, mission, and operations in a fast-moving external environment and of increased visibility, thanks to our active participation in international fora and timely policy statements and submissions.

rights in the ICT sector. We led workshops and sessions at the Freedom Online Coalition (FOC), the Internet Governance Forum (IGF), and the U.S. government-led Summit for Democracy to discuss human rights due diligence and impact assessments, meaningful transparency in the ICT sector, and network shutdowns, alongside government officials and digital rights activists from around the world. We also continued to stay closely involved with the Council of Europe's **digital partnership**, the Christchurch Call Advisory Network, the Global Internet Forum to Counter Terrorism (GIFCT), the Internet and Jurisdiction Policy Network, the OECD Project on Voluntary Transparency Reporting for Terrorist and Violent Extremist Content, and Technology for Development.

As an indicator of our increased visibility, our work received attention from well-known media outlets, such as *Asia Times*, *National Public Radio*, *New York Times*, *Nikkei Times*, *The Conversation*, *TIME Magazine*, *Voice of America*, and the *Wall Street Journal*.

GNI was excited to see our membership continue to grow in numbers and diversity. This year we welcomed 13 new members, fellows, and company observers from Bolivia, India, Peru, Paraguay, Senegal, the Philippines, Uganda, the U.K., and the U.S.

In order to facilitate the growth and inclusive engagement of GNI's increasingly diverse membership and provide additional capacity, support, and expertise to the independent chair, the executive director, and staff, we formally created the position of vice chair and were delighted to welcome Agustina Del Campo as the GNI Vice Chair. In this role, which she fulfills in her personal capacity, Agustina will support our efforts to increase GNI's ability to shape regulatory developments and understanding of corporate responsibility around the world.

Last but not least, we are tremendously grateful to our members, staff, board, and donors for their valuable contributions and unwavering commitment to our mission and for making this a year of continued resilience and dedication.

David Kaye

David Kaye

Independent Chair

Judith Lichtenberg

Executive Director

SPECIAL FEATURE: AN INTERVIEW WITH AGUSTINA DEL CAMPO

Agustina Del Campo was elected to occupy the position of GNI Vice Chair during GNI's 2021 Annual Meeting of Members. She has a law degree from the Catholic University in Argentina and an LL.M. in International Legal Studies from American University, Washington College of Law, where she led the Impact Litigation Project and coordinated research and litigation of several freedom of expression cases before the Inter-American Commission and Court on Human Rights. Agustina has extensive experience in human rights training, particularly as it relates to freedom of expression and the press in the Inter-American human rights system.

How do you envision your new role as GNI Vice Chair will support GNI as it enters its second decade?

A role similar to that of the vice chair was already informally in place before my appointment. It was successfully executed by Bennet Freeman, whose contributions were key to GNI's growth during its first decade. Still, the formal creation of the position represents the institutionalization of the role and an intentional broadening of leadership opportunities to account for a growing and increasingly diverse membership. A complementary relationship between the independent Chair, Vice Chair, Executive Director, GNI staff, and the Board, is key to enabling further growth, while simultaneously ensuring the meaningful and equitable engagement of all members, including founding, more experienced, and new members from all parts of the world.

My vision for the Vice Chair role is threefold:

1. To allow for broader diversity and complementarity within the leadership, particularly as we go through a strategic review process that will, to a large extent, determine the future of the organization;

2. To allow for further growth and global impact, capitalizing on GNI's expertise and membership as the field and its needs become more complex;

3. To serve as a bridge between the membership – especially new members and Global South members – and the independent chair and staff when appropriate.

I was an alternate board member of GNI, representing *El Centro de Estudios en Libertad de Expresión y Acceso a la Información* (CELE), for a few years. CELE was part of the first group of non-European/non-US academic participants to join GNI in 2013. I am also, and have been since its creation, an active participant in GNI's women's group and a mentor to new members, particularly from Latin America. Over the years I have helped foster, attract, and support new members as they became familiar with the organization, its methods, structures, and values. Among the incentives to join GNI is the organization's ability to convene an international community of stakeholders on equal footing who can work together jointly and openly on policy, learning, and oversight. GNI is truly unique in how it is structured, how long it's been functioning, and what it seeks to accomplish.

Still, it's a work in progress: In 2008 we started with 23 participants, 21 headquartered in the US and two in Europe. By 2013, when CELE joined, we had around 30 participants, including only a few non-European, non-US participants (CELE, Centre for Internet & Society, and Bolo Bhi). We now have more than 90 members, with most of the growth over the last five years coming from Africa, Asia, and Latin America. GNI has also grappled with understanding how our Principles apply to new scenarios and risks, including those where the involvement of governments is less evident. The foundation and currency of GNI is trust, which takes a long time to build and must be constantly nurtured as the organization grows.

As regulatory frameworks change, GNI is faced with opportunities and challenges. Capitalizing on GNI's multistakeholder structure and geographic diversity while also integrating and accounting for gender, culture, context, idiosyncrasies, and values in all four pillars of the organization's work is key to building a more ambitious future for GNI.

What do you consider to be one of GNI's most important achievements in 2021?

As regulatory and co-regulatory initiatives proliferate - promoting, designing, and discussing new content and privacy frameworks as well as reporting, transparency, and due diligence obligations for companies - participants' resources have been stretched. GNI's ability to keep participants engaged, foster collaboration around lessons learned, and share consensus-driven recommendations are among its main achievements. The strategic review process that GNI is currently undergoing also represents a key merit: the ability to question and reassess the value of the organization in a changing landscape for a global and more diverse membership.

What do you think are some of the main threats to freedom of expression and privacy online? Do you think that these have been exacerbated by the COVID-19 pandemic?

While the threats to freedom of expression and privacy remain largely the same today as they were 50 years ago, technology has created new avenues through which these threats materialize. Technology offers new, more creative, and more efficient means to implement surveillance, content filtering, or censorship across different territories and even across borders. What we are seeing in Latin America proves true in other regions as well. For example, while technology has propelled freedom of speech to the center of the regulatory landscape, surveillance and state

access to user data seem to have been deregulated in many countries, leaving users and companies more vulnerable to potential government abuse. Regulatory efforts addressing freedom of expression online seem to be overwhelmingly directed at renegotiating international standards rather than guaranteeing the enforcement of existing ones. Increasing mandates to deal with harmful, but legal, content, content filtering and blocking, and abusive intermediary liability regimes also make companies vulnerable to state abuse.

At the same time, the pandemic exacerbated threats to privacy and free speech. In Latin America, debates over health data and privacy migrated out of Congresses and into the Executive branch. Research from **CELE's legislative observatory** shows that proposals to expand limitations on freedom of expression also increased during the pandemic, including fake news bills that failed to meet basic human rights standards.

What opportunities do you see to promote the GNI Principles and support the continued growth and inclusion of GNI's increasingly global membership?

As new geopolitical, technological, policy, and regulatory challenges and opportunities emerge, institutions are needed that are capable of promoting honest, difficult conversations among stakeholders, bridging gaps between public and private sectors, and fostering greater respect and accountability for human rights.

The ICT sector has both witnessed and generated many changes over the last decade, including rapid and ground-breaking technological developments and astonishing social reach. The COVID-19 pandemic, maybe more than anything else, has evidenced this transformation, highlighting the sector's potential to contribute to the universal realization of human rights, while simultaneously showing its potential for grave and massive human rights violations. In this context, discussions over internet governance and regulation have increased in complexity and nuance, and there is a need for bigger and better institutional channelling.

Questions are being asked about relevance, needs, value, objectives, and means. GNI has an opportunity to emerge as a unique, consensus-driven organization that gathers companies from different sectors and regions together with academics, civil society, and investors in an ongoing dialogue over opportunities and challenges to a rights' centred approach to governance. The GNI Principles, Implementation Guidelines, and assessment process contain valuable lessons and best practices capable of shaping much-needed incipient public policy and regulation. These are exciting times, as we as a community define the role we want the organization to play. I look forward to continuing to work with GNI colleagues across different constituencies in this new role!

2021 BY NUMBERS

GOVERNANCE

20
BOARD MEMBERS

17
BOARD ALTERNATES

6
COMMITTEES

3
WORKING GROUPS

FRAMEWORK

18
MEDIA FEATURES

3
BLOG POSTS

7,989
FOLLOWERS ON TWITTER

1,491
NEW TWITTER FOLLOWERS

ACCOUNTABILITY

11
ASSESSORS

9
REACCREDITED ASSESSORS

2
NEW ASSESSORS

11
COMPANIES FOR ASSESSMENT

1
ASSESSMENT TOOLKIT

1
ASSESSOR TRAINING

POLICY

19 POLICY ADVOCACY OUTPUTS

2
POLICY REPORTS

16
LETTERS, STATEMENTS, & SUBMISSIONS

1
WEBPAGE

18 POLICY EVENTS

13
PUBLIC EVENTS

5
EXPERT WORKSHOPS & BRIEFINGS

LEARNING

8
LEARNING CALLS

153
ATTENDEES AT LEARNING CALLS

2
ONBOARDING MODULES

1
ANNUAL LEARNING FORUM

8
BREAKOUT SESSIONS

1 STRATEGIC REVIEW

1 POLICY PRIORITIES REVIEW

MEMBERSHIP

84 MEMBERS, FELLOWS, & OBSERVERS

18
COMPANIES

3
OBSERVERS

31
CIVIL SOCIETY ORGANIZATIONS

19
ACADEMICS

10
INVESTORS

3
FELLOWS

13 NEW MEMBERS

3
COMPANIES

2
OBSERVERS

3
CIVIL SOCIETY ORGANIZATIONS

3
ACADEMICS

1
INVESTOR

PROMOTING RESPONSIBLE DECISION MAKING IN THE ICT SECTOR

HUMAN RIGHTS DUE DILIGENCE GUIDANCE AND TOOLS

Both the United Nations Guiding Principles (UNGPs) and the **GNI Framework** consider human rights impact assessments (HRIAs) as an important part of companies' broader approach to human rights due diligence (HRDD). Under both sets of principles, HRDD includes assessing actual and potential human rights impacts on individuals, integrating and acting upon the assessment's findings, tracking responses, and communicating how impacts are addressed.

The **GNI Principles** further state that "Participating companies will identify circumstances where freedom of expression and privacy may be jeopardized or advanced…" The corresponding **GNI Implementation Guidelines (IGs)** clarify that if HRDD identifies such circumstances, participating companies will employ HRIA and develop effective risk mitigation strategies as appropriate.

This year, the GNI Human Rights Due Diligence Working Group (HRDD WG) continued to develop tools and resources for HRDD/IAs to support companies and other practitioners with

the implementation of the UNGPs and the GNI Principles. The working group started to collaborate with **Business for Social Responsibility (BSR)** to help provide strategic direction and oversight.

Together, GNI and BSR hosted the panel **"Stakeholder Roles for Human Rights Due Diligence"** at the Internet Governance Forum and organized a learning call with BSR's Dunstan Allison-Hope, Hannah Darton, and Lindsey Andersen, who lead BSR's engagement with the tech sector.

BSR's expertise implementing HRIAs and their report **Human Rights Assessment: Identifying Risks, Informing Strategy** featuring best practice methodologies for HRIAs, offer important guidance as companies strive to be transparent without hindering their ability to mitigate human rights risks.

GNI's IGs are increasingly relevant in this space as companies look to further develop best practices to address business impact and mitigate risks. The IGs include further guidance on carrying out HRIAs, noting that they should be ongoing, account for changing risk, and initiated early enough to inform a new activity or relationship. The IGs emphasize HRIAs will necessarily vary in detail and scope. However, the IGs state that companies should consistently:

> Prioritize the use of HRIAs where risks and opportunities are most salient;

> Draw upon a variety of sources;

> Consider risks and effects of not having operational control (regarding joint ventures);

> Review and evaluate domestic legal authorities and compliance with international and regional human rights norms;

> Utilize learning from real-life cases;

RightsCon 2021: Digital technologies, human rights due diligence, and the state-business nexus

Join GNI and the UN Human Rights B-Tech Project for a Community Lab session on Human Rights Due Diligence

Usama Khilji
Director, Bolo Bhi

Isabel Ebert
Adviser, UN Human Rights B-Tech Project

Ramiro Alvarez Ugarte
Researcher, Centro de Estudios en Libertad de Expresión y Acceso a la Información, Universidad de Palermo

Alexandria Walden
Global Head of Human Rights, Google

Fiona Cura-Pitre
Head of Human Rights, Nokia

Meg Roggensack
Adjunct Professor of Law, Georgetown University

Patrik Hiselius
Senior Advisor, Human / Digital Rights, Telia Company

Ilia Siatitsa
Acting Legal Director, Privacy International

globalnetworkinitiative.org

In December, GNI contributed to a UN Human Rights B-Tech Project blog series, building on the community lab discussions during 2020 RightsCon. In **Empowering human rights in the State-business nexus: Digital technologies and human rights due diligence**, Research and Program Associate Sarina Phu explores a potential "smart mix" of regulatory measures and company practices to preserve rights in scenarios where States are customers, such as: States as purchasers of digital technologies, political leaders as users of social media, and States as owners or controllers of companies.

> "GNI offers opportunities to discuss human rights impacts assessments across sectors and align on how to best comply with the GNI Principles."

MORTEN KIRSTIANSEN, TELENOR

> Develop processes and mechanisms to incorporate results into company policy and practice; and

> Demonstrate to consulted stakeholders the findings are considered by senior management.

GNI's IGs include relevant governance recommendations to ensure such processes are overseen by senior management and incorporated into company decision making. They also provide examples of scenarios where HRDD has identified the need for HRIAs, such as market entry/exit, new product development, or the reformulation of internal policies based on government demands.

GNI is committed to continuing discussions with its members and external stakeholders regarding how best to integrate HRDD approaches into company decisions.

WEBINAR: *How can we apply human rights due diligence to content moderation?*
Focus on the EU Digital Services Act

THURSDAY, 29 JULY 2021
17:30 CET – 18:20 CET // 11:30 AM ET – 12:20 PM ET

RSVP at:
cdt.org/events

Join the **Centre for Democracy & Technology** and the **Global Network Initiative (GNI)** for a high-level panel discussion to seek concrete solutions to this question.

The high-level panel will be an online public event, where leaders in the area of business and human rights and online speech will discuss the challenges and opportunities put forward by due diligence in the DSA.

Speakers include:

• **David Kaye**, Chair of GNI Board & former UN FX Special Rapporteur
• **Peggy Hicks**, Director, UN Human Rights (OHCHR)
• **Patrick Breyer**, MEP, Rapporteur of LIBE opinion on the DSA

GNI and GNI member, the Center for Democracy & Technology (CDT), held a private **roundtable**, followed by a high-level **public** panel focused on the human rights risk assessment and auditing approach of the European Commission's Digital Services Act (DSA) proposal. Read the summary of the public event **here** and the event report from the closed-door roundtable **here**.
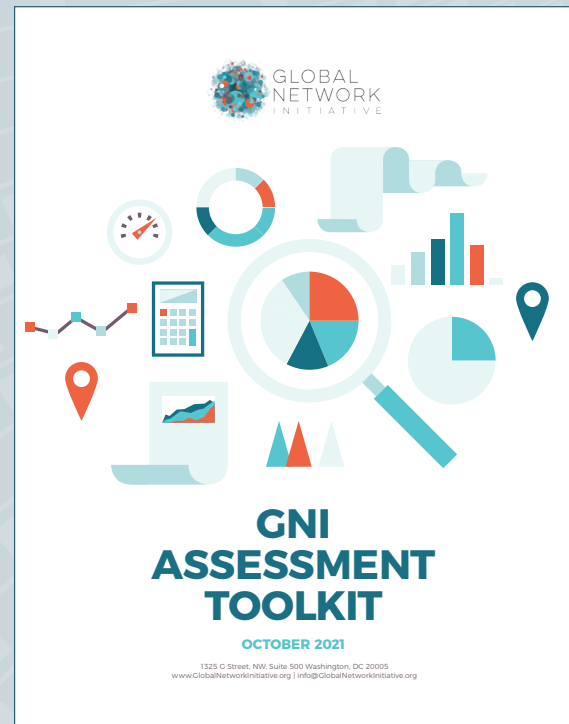
THE ASSESSMENT PROCESS IN MOTION

ASSESSMENT REVIEW AND IMPROVEMENTS

After completing the 2018/2019 assessment cycle, the GNI Board and Accountability Committee completed a review of the assessment process, reflecting on lessons learned and possible improvements. In order to keep the process manageable and ensure that all parties involved have sufficient time to prepare for assessment reviews, GNI reviewed the overall planning of assessment and the timings of the assessor training and assessment review meetings of the **2021/2022 assessment cycle**.

These efforts brought about several improvements to the assessment process, which have already been incorporated into the revised **Assessment Toolkit** to be used in the 2021/2022 assessment cycle. The revamped Assessment Toolkit offers a new user-friendly design that allows users to take notes in the document itself when completing **Appendix I: Process Review Questions** on governance, due diligence & risk management, freedom of expression & privacy, transparency & engagement, and follow up & improvement. Users can also take notes directly in **Appendix II: Case Study Template** to identify specific cases for each company in order to show whether and how the company implemented the GNI Principles in practice.

The Toolkit, which draws upon the **Global Reporting Initiative (GRI)** and the **UN Guiding Principles Reporting Framework**, offers a useful methodology that can aid private sector stakeholders in their efforts to avoid, minimize, or otherwise address the adverse impacts of government

GNI ASSESSMENT TOOLKIT

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OCTOBER 2021

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demands, laws, or regulations, and put into practice the principles of internationally recognized human rights to the greatest extent possible. The Toolkit may also be used by companies to conduct self-assessments of existing policies and procedures. See **Appendix IV: Mapping the GNI Principles to Implementation Guidelines**.

The GNI assessment process has offered a window into companies' HRIA efforts, including through **Public Assessment Reports** that describe companies' HRDD/IA processes and recommendations for GNI and member companies. In B-Tech's paper, **Bridging Governance Gaps in the Age of Technology - Key Characteristics of the State Duty to Protect**, GNI is referenced as an example of a multistakeholder approach for States to address human rights risks: "Transparency about specific and severe human rights risks, and the due process needed to respond to these risks, such as how companies respond to government requests to remove content, suspend social media user accounts or limit/inhibit access or shut-down of telecommunications infrastructure. Transparency initiatives from States in these types of areas will most likely need to be developed via robust multi-stakeholder processes—such as the Global Network Initiative—given the centrality of States to the possible infringement on rights."

PRE-ASSESSMENT PREPARATIONS

The 2021/2022 independent company assessment cycle will include 11 companies. BT and Ericsson will be assessed for the first time. The telecommunications operators and vendor company members that joined GNI in March 2017 – Nokia, Orange, Telenor Group, Telia Company, and Vodafone Group – will be assessed for the second time. Facebook will be assessed for the third time and Google, Microsoft, and Yahoo (formerly Verizon Media) for the fourth time. A new page dedicated to the **2021/2022 assessment cycle** was created

> "Assessment is a way to show how a company's processes work out in practice. This is helpful both inside and outside of the company. It is also a secure way to share and discuss company matters and obtain feedback to make improvements in processes that are constantly evolving. It is a learning opportunity that helps us identify areas that need further clarification for external audiences.
>
> **FIONA CURA-PITRE, NOKIA**

to collate all relevant links, including the revamped **Assessment Toolkit** and a **Summary of the Case Selection Guidance**.

The pre-assessment preparations not only allowed the assessment process to stay on track, but also to increase its agility and the involvement of GNI members:

> The Accountability Committee created a template to be used by the Case Selection Guidance Working Group (CSG-WG) to suggest cases to companies and their assessors for inclusion in the assessment. It reflects that suggested cases must be within the reporting period, include a rationale for case inclusions with an explanation as to why a case was suggested, and refer to specific GNI Principles and/or Implementation Guidelines. It also explains that the CSG-WG may – by way of exception – suggest cases that occurred during the gap period of 1 July 2018 – 1 October 2019, which should include a rationale for the inclusion of a case that falls in the gap period.

> The CSG-WG worked to revise the existing General Part of the Case Selection Guidance document. This resource provides GNI participants and assessors with indicators and examples of how government laws or practices may require ICT companies to hand over user data, facilitate abusive surveillance, restrict anonymity, or restrict access to content. With inputs from the wider GNI membership, the CSG-WG also identified and drafted cases of government requests or company policies and procedures pertaining to each company, in accordance with the criteria outlined in the Assessment Toolkit.

> The CSG-WG, which reviews the criteria to nominate and select case studies as part of GNI company assessments, consists of board members and board alternates and includes representatives from the academic, civil society, and investor constituency. The working group included 20 percent more non-company representatives from outside Canada, Europe, and the U.S. than in the previous assessment cycle.

> In October, GNI delivered an assessor training to all the accredited assessors to review the overall assessment process, timeline, and relevant documentation, including the GNI Principles, the GNI Implementation Guidelines, and the Assessment Toolkit. With support from GNI academic members Jess Fjeld and Vivek Krishnamurthy, the training offered an overview of both the Process Review and Case Studies. GNI's pro bono legal counsel led a discussion on handling attorney-client privilege and confidentiality when conducting the assessment. The training was well received, and assessors valued the "practical guidance on how to approach case studies" noting that "the presenters were dynamic and consistently on-point."

> GNI **welcomed** two new assessor organizations: Threefold Sustainability Advisory Services and Venable LLP, which former assessor SSP Blue is now a part of. They joined the pool of assessors accredited to conduct **assessments of member companies**. In addition, the following companies were reaccredited as eligible assessors for the 2021/2022 assessment cycle:

» AJA Europe Ltd.	» Foley Hoag LLP
» Deloitte Statsautoriseret Revisionspartnerselskab	» iTrust Ethics
	» KPMG Assessors S.L.
» DNV	» Moores Rowland (MRI)
» Ernst & Young (EY) SL	» Osborne Clark

NEW MEMBERS AND OBSERVERS

GNI is committed to being global in terms of geography and diversity of its members.

In 2021, GNI welcomed 13 new members and observers. This continued growth and increasing diversity enables GNI to more effectively advocate for and uphold the GNI Principles around the world and face the ever-changing regulatory environments with different perspectives. The company constituency was joined by Cloudflare after completing its observer period, as well as Change.org and Verizon. Cloudflare is the first GNI company member focused primarily on web-infrastructure and security services; Change.org is the largest platform for social change hosting petitions started by the public from around the world; and Verizon is the first U.S.-based telecommunication company to join GNI. These additions to our company constituency will further strengthen our efforts to promote responsible company conduct across the ICT sector.

The civil society constituency welcomed four organizations, including former GNI-Internews fellows: Hiperderecho from Peru, Internet Freedom Foundation from India, TEDIC from Paraguay, as well as Unwanted Witness from Uganda. The academic constituency was joined by Courtney Radsch and Sejal Parmar in their independent capacities, as well as the Programme on Democracy and Technology at the Oxford Internet Institute as an academic institution. The investor constituency welcomed Federated Hermes.

> " Ensuring GNI is truly a global organization with input, leadership, and participation from all parts of the world is critical as we think about our mission going forward and re-evaluate our place in the evolving ICT global landscape. At the same time, GNI is committed to enhancing our approach toward meaningful engagement and inclusion of all its members. "
>
> **DAVID KAYE, GNI**

GNI's Women's Group held several meetings throughout the year to reflect on different topics, including issues related to diversity, equity, and inclusion. Members of the group exchanged notes on professional development and mentoring experiences; discussed what intersectionality means in the GNI context and how it impacts our work; and talked about the GNI strategic review, particularly as it relates to membership growth and meaningful engagement in GNI.

GNI also welcomed two new observer companies: Uber and Zoom, and three fellows: Foundation from Media Alternatives from the Philippines, Internet Bolivia from Bolivia, and E-JICOM from Senegal.

Membership from outside Europe and North America increased 3% from 2020 and represents 28% of total membership in 2021. This includes 6% from Africa, 13% from Asia, and 9% from Latin America and the Caribbean (LAC). GNI closed the year with 85 members: 31 civil society organizations, 18 companies, 19 academics, 10 investors, 3 company observers, and 3 fellows.
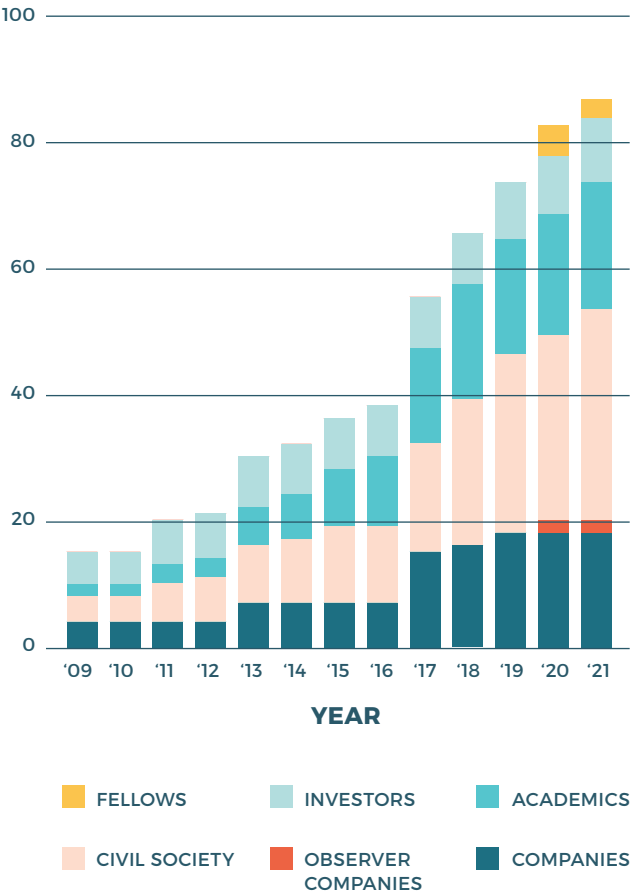
> GNI membership represents an ongoing learning experience allowing us to meet a diverse spectrum of inspiring and diverse actors continuously facing common challenges in the ICT sector and working together to address them.
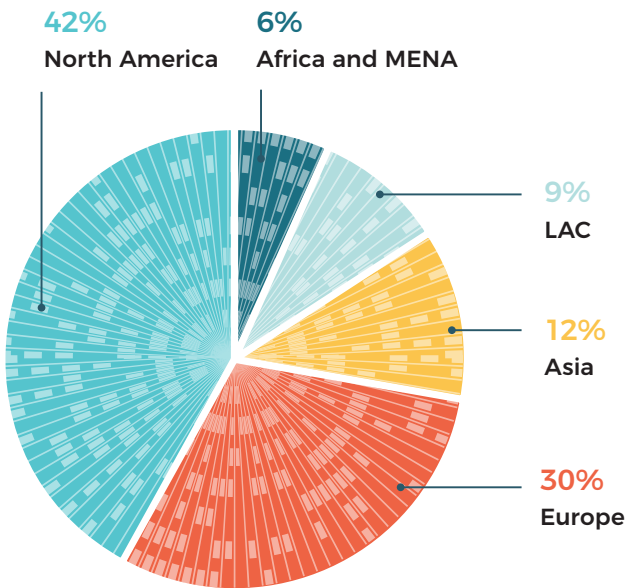>
> **DOROTHY MUKASA,
> UNWANTED WITNESS**

GNI'S GROWTH BY CONSTITUENCY (includes Fellows & Observers)

YEAR

Legend:
- FELLOWS
- INVESTORS
- ACADEMICS
- CIVIL SOCIETY
- OBSERVER COMPANIES
- COMPANIES

MEMBERS BY REGION

- **42%** North America
- **6%** Africa and MENA
- **9%** LAC
- **12%** Asia
- **30%** Europe

JOINING THE ACADEMIC CONSTITUENCY

Courtney Radsch joined GNI in her individual capacity. She was Advocacy and Communications Director at GNI member, Committee to Protect Journalists, for seven years and works independently on technology policy and media sustainability.

Programme on Democracy and Technology at the Oxford Internet Institute joined GNI as an academic institution. The Programme investigates the interaction of algorithms, automation, and politics, and examines how automated bots are using social media networking sites to manipulate global public opinion.

Sejal Parmar joined the academic constituency in her individual capacity. She is a lecturer at the School of Law at the University of Sheffield, where she is also Director of the Human Rights Forum, Deputy Director of Sheffield Centre for International and European Law, and a Fellow at the Centre for Freedom of the Media.

JOINING THE CIVIL SOCIETY CONSTITUENCY

Hiperderecho is a Peruvian digital rights organization that promotes and defends fundamental human rights in the digital space, working to protect Peruvians' individual and collective freedoms through community education, critical research, policy advocacy, and technology development. Hiperderecho participated in the 2020 GNI-Internews Fellowship Program.

Internet Freedom Foundation (IFF) is an Indian digital rights organization that advocates for the protection of fundamental rights and deepened digital liberties as society becomes increasingly reliant on technology. IFF participated in the 2020 GNI-Internews Fellowship Program.

TEDIC is a digital rights and civic technology organization based in Paraguay, focusing on privacy concerns that arose during the COVID-19 pandemic. TEDIC investigates the risks and impacts of electronic voting, state surveillance, and the protection of personal data in Paraguay's private sector and in public databases. TEDIC participated in the 2020 GNI-Internews Fellowship Program.

Unwanted Witness is based in Uganda and was established in 2012 to advocate for a free, open, and inclusive Internet that contributes to the realization of human rights and good governance.

JOINING THE COMPANY CONSTITUENCY

Change.org became a member, having been an observer member from 2015 to 2016. Change.org is an open platform operating globally. It is the largest platform for social change.

Cloudflare became a GNI member after completing their 12-month observer period. With a network that spans more than 100 countries, Cloudflare is the first GNI company member focused primarily on web-infrastructure and security services.

Verizon became the first U.S.-based telecommunication company to join GNI. Verizon is one of the world's leading providers of technology and communications services and its customers range from individual wireless consumers to multinational enterprises.

JOINING AS COMPANY OBSERVER MEMBERS

Company observers participate in GNI's learning and policy activities during the 12-month observer period.

Uber is based in San Francisco, California and offers services in 10,000 cities across more than 70 countries around the world. Uber's app-based platform services include ride-hailing, food delivery, package delivery, bicycle and scooter rentals, and freight transportation and logistics.

Zoom is based in San José, California and provides internationally accessible video-first communications and content-sharing services.

JOINING THE INVESTOR CONSTITUENCY

Federated Hermes provides specialized capabilities across equity, fixed income, and private markets, in addition to multi-asset strategies and proven liquidity-management solutions. Federated Hermes offers world-leading stewardship services and company engagement on strategic and sustainability concerns to promote investors' long-term performance and fiduciary interest.

GNI EMERGING VOICES FELLOWS

GNI's Emerging Voices Fellowship (formerly known as the GNI-Internews Fellowship) is gaining increasing attention and recognition, recieving more than 350 applications this year. GNI selected the following organizations to represent our priority regions: Asia, Latin America, and sub-Saharan Africa.

Lisa Garcia represents the **Foundation for Media Alternatives** (FMA), based in the Philippines. Established in 1987, FMA focuses on human rights issues as they relate to technology. Lisa is the executive director and leads projects on online freedom, data protection, privacy, and gender issues in the ICT sector. She is conducting research on policies and standards among social media platforms, in addition to governmental policies, as they relate to the Philippines' electoral system.

Hamadou Tidiane Sy represents **E-JICOM**, based in Senegal. E-JICOM is a journalism school, founded by Tidiane a decade ago, and features a new media and digital lab. Tidiane is interested in researching emerging technologies that interfere with the privacy of citizens and press freedom.

Eliana Quiroz represents **Fundación Internet Bolivia**, based in Bolivia. Fundación Internet Bolivia works on data protection, democracy and digital participation, digital economy, and equity and digital divides. They are currently working with the legislative assembly on municipal laws related to personal data protection. Eliana is researching the impacts of misinformation on the legitimacy of Bolivia's electoral institutions.

> "
> My experience this year as a GNI fellow surpassed my expectations. What I valued most was the opportunity to learn about the debates surrounding emerging issues, such as the protection of personal data and freedom of expression on the Internet. Participating in discussions with both companies and civil society organizations allowed me to understand their positions and interests. This will give my organization the ability to develop more refined advocacy strategies with both governments and technology companies that take into account global and local debates.
> "
>
> **ELIANA QUIROZ, FUNDACIÓN INTERNETBOLIVIA**

SCOPING NEW INITIATIVES

Following a series of inclusive and participatory conversations, GNI started a strategic review in 2021 to help the organization determine how it can maximize its unique added value in the evolving global landscape. The strategic review process identified GNI's scope, growth and DEI, and organizational structure as the main areas to examine and gather feedback on from members. Through membership-wide surveys, one-on-one interviews, and attendance to different activities organized by GNI's working groups and committees, external consultants led discussions to arrive at recommendations for board approval. For instance, the strategic review identified concrete suggestions to facilitate and prepare members for meetings.

GNI also identified important issues to examine with its members in order to develop a shared understanding of and accountability for meaningful and active participation. The implementation of these and other recommendations are in line with GNI's commitment to meaningful engagement as delineated in the GNI Member Handbook and Membership Strategy (2018) as well as with the GNI Board's commitment to make "enhancement of meaningful engagement" a key priority for the 2020-2023 board term.

GNI members' expertise and interests drove other initiatives focused on what exactly transparency means in the digital context. Around the world, countries are advancing new approaches to technology governance and regulation, many requiring technology companies and governments to provide certain kinds of information to the public, researchers, and relevant regulatory and oversight bodies. If properly informed by diverse, expert, and cross-sectoral input, these regulations have the potential to enhance meaningful transparency and foster innovative and productive collaboration. If not, they could result in facile tick-box exercises, unintentionally create precedents that less-democratic governments can exploit, or establish burdensome requirements that impede collaboration and limit competition. These insights and recommendations have led to the "Action Coalition on Meaningful Transparency" (ACT) organized under the auspices of the Danish Government's Technology for Democracy initiative. The ACT is guided by a civil society steering group, which includes GNI and several GNI members. The broader Action Coalition will welcome participation from academics, companies, civil society representatives, investors, government officials, and representatives of multilateral organizations from around the world.

The objective of the ACT is to identify connections between and bring together the many initiatives that have coalesced around the need for more meaningful transparency to better align and reinforce existing efforts. Toward this end, the ACT will clarify relevant definitions and terminology; develop shared understandings of and map relationships between existing initiatives attempting to enhance transparency and collaboration around digital data; increase the visibility of underrepresented actors and communities in international conversations; and facilitate coordination among different stakeholders and initiatives.

GNI IN THE NEWS

> "**Twitter vs. India**," *New York Times* by Shira Ovide, February 11, 2021

> "**Cybersecurity bill to plunge Myanmar into darkness**," *Asia Times* by Dominic Oo, February 14, 2021

> "**The Internet is Splintering**," *New York Times* by Shira Ovide, February 17, 2021

> "**India Threatens Jail for Facebook, WhatsApp and Twitter Employees**," *Wall Street Journal* by Jeff Horwitz and Newley Purnell, March 5, 2021

> "**The Cost of an Internet Shutdown**," *Center for International Governance Innovation* by Maria Lamensch, March 9, 2021

> "**Global Network Initiative Criticises India's IT Rules 2021: 'Overbroad, Goes Beyond Scope, Chills Free Speech'**," *Medianama* by Trisha Jalan, March 21, 2021

> "**Acting on the plan**," *Dawn* by Usama Khili, March 30, 2021

> "**Across Africa, internet blackouts loom over elections**," *Coda Story* by Erica Hellerstein, April 9, 2021

> "**With Myanmar**," *Dawn* by Usama Khili, April 26, 2021

> "**Four ways governments disrupt internet access**," *Rest of World* by Vittoria Elliot, May 3, 2021

> "**New laws requiring social media platforms to hire local staff could endanger employees**," *Rest of World* by Vittoria Elliot, May 14, 2021

> "**Myanmar junta plans restricted 'intranet' to silence opposition**," *Nikkei Asia* by Gwen Robinson and Rory Wallace, May 18, 2021

> "**India Demands Social Media Firms Help It Track Misinformation Online**," *National Public Radio* by Shannon Bond, June 8, 2021

> "**Indian Government in Standoff with Twitter Over Online Speech**," *Voice of America* by Bilal Hussain, June 15, 2021

> "**The Future of the Internet Is Under Greater Threat Than Ever Before—and Activists Say the U.S. Needs to Step In**," *TIME Magazine* by Billy Perrigo, June 16, 2021

> "**Internet Freedom and Digital Rights with Jason Pielemeier**," *Priv8 Podcast* by Derek Silva, June 23, 2021

> "**'It's unworkable': Canada's plans for fighting 'online harms' draw international condemnation**," *The Logic* by Chris Reevely, October 13, 2021

> "**To protect our privacy and free speech, Canada needs to overhaul its approach to regulation**," *The Conversation* by Yuan Stevens, October 20, 2021

POLICY ADVOCACY TO ADVANCE HUMAN RIGHTS IN THE ICT SECTOR

As the world continued to grapple with an ongoing pandemic, and global political events increasingly touched on digital rights questions, a growing number of governments implemented new laws and regulations that could challenge ICT companies' ability to respect the freedom of expression and privacy rights of their users. GNI and its members continued to navigate these challenges, conducting research on the impacts of proposed legislation, advocating for rights-respecting laws and regulations, and utilizing an increasingly visible international presence. GNI's policy work remained centered on its four key policy priorities: **network disruptions**, **privacy and surveillance**, **intermediary liability and content regulation**, and **jurisdictional assertions and limits.**

TAKING STOCK OF GNI POLICY PRIORITIES

In light of our growing membership, as well as the rapidly changing nature of the digital space, GNI initiated a review of its policy priorities. These priorities have served as the focus of GNI's policy strategy, outputs, and advocacy since they were identified during a previous policy review exercise in 2017. The review process seeks to identify the issues that present significant challenges to GNI members, enabling GNI to focus its resources and better support members' work going forward. Over the course of the year, GNI conducted surveys and interviews, gathering feedback from a range of members from all four constituencies to learn more about issues of interest and how members interact with the Policy Committee.

Members noted the relevance of GNI's policy efforts to the work of their respective organizations and emphasized the value of GNI policy briefs and commissioned research, outreach and advocacy, and event summaries.

The policy strategy review underscored that GNI's existing issue areas remain important priorities for members, helping ground GNI's focus, collaboration, and place in the digital rights sphere. The review also identified additional topics of interest for GNI, to be further informed by the broader strategic review that GNI started this year.

> "
> Policy Committee calls and regular emails from the GNI staff have allowed me to gain useful insights into the most recent legislative and policy developments and related debates from around the world. These have enhanced my work as a human rights academic, consultant, and teacher.
>
> **SEJAL PARMAR, SCHOOL OF LAW, UNIVERSITY OF SHEFFIELD**
> "

DEFINING DIRECT ACCESS

In recent years, governments have continued to expand the tactics and capabilities that they use to access data. A particularly prevalent trend involves the use of legal and technical arrangements that allow government authorities to access data streams directly – that is, without having to request access from, or even notify, the service providers that collect and/or transmit the data as part of their service. GNI has monitored these "direct access" arrangements and hosted panel discussions, while researching the implications for **privacy and surveillance.** By allowing governments to access data streams directly, without the service providers' involvement or even knowledge, direct access arrangements remove an important source of potential scrutiny, transparency, and accountability for demands for user data, increasing the likelihood of unlawful or arbitrary interference with the right to privacy.

After months of discussion and the efforts of a dedicated working group on direct access, GNI published a **one-pager** bringing together its research on this concerning trend and rolling out a new **webpage** outlining how direct access arrangements work in practice, the risks they pose for human rights, and the safeguards that can help avoid or mitigate these risks should governments choose to implement or broaden these arrangements despite the risks.

PRIVACY AND DATA BROKERS

In the face of concerning accounts about U.S. law enforcement and government agencies acquiring sensitive data from third-party brokers, GNI encouraged lawmakers to further examine this practice, noting the value of legislative efforts, such as the *Fourth Amendment is Not For Sale Act*, and other actions that would close these potential legal loopholes for access to user data.

# RESPONDING TO NETWORK DISRUPTIONS: MYANMAR, SUDAN, AND UGANDA

Throughout 2021, governments around the world ordered disruptions of Internet access, often alongside moments of crisis, conflict, or protest. The consequences of disruptions include restricting internationally recognized rights to freedom of expression, preventing access to vital emergency, payment and health services, and disrupting contact with family members and friends. In some cases, these mandates create additional human rights harms when they restrict the free flow of information in the lead up to elections or are used to target particular regions, districts, or ethnic groups. GNI and its members were able to quickly mobilize during moments of crisis to issue statements condemning disruptions and calling on governments to reinstate access in Myanmar, Sudan, and Uganda, as follows:

> Following the military *coup* and crisis in Myanmar in early 2021, GNI issued a **statement** critiquing the sustained network disruptions and restrictions on freedom of expression. After nearly two months of no network access, GNI played a leading role in organizing an even broader coalition to call for action. Together with the **Myanmar Centre For Responsible Business**, GNI issued a **joint statement** in February to mark nearly two months of mobile-Internet disruptions and restrictions. The statement was signed by civil society organizations, companies, and investors from around the world, including GNI members Ericsson, Bolo Bhi, Facebook, Wikimedia Foundation, and Women of Uganda Network. GNI's statement

LIFE INTERRUPTED REPORT

In the GNI report, "**Life Interrupted**," Tomiwa Ilori, an LLD candidate at the Centre of Human Rights at the University of Pretoria, investigated the social impacts of network disruptions across 11 countries in sub-Saharan Africa during 1,144 days between 2011 and 2020 of regular incidents. Ilori surveyed experts from academia, civil society, government, and international organizations and the report featured both first-hand accounts of individuals' experiences and analysis of the community-wide impacts of disruption. The report highlighted that the impact of network disruptions is felt by communities both with and without Internet access and the impacts can be debilitating and far reaching but can also vary widely across communities. Importantly, the report also presents potential advocacy strategies to prevent network disruptions. The report was also featured by the publication *Coda* in the article **Across Africa, internet blackouts loom over elections**.
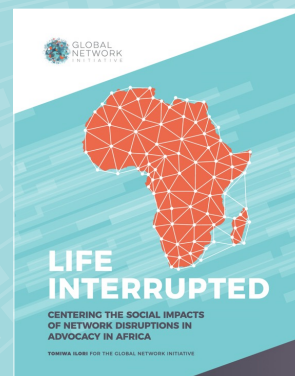
was covered in a *Nikkei Asia* **article** about significant Internet restrictions in the country.

> After the Internet was shut down hours before the Uganda general elections in January, GNI issued a **statement** calling for the government to restore access immediately. At a politically sensitive moment when many were relying on digital services due to the COVID-19 pandemic, these disruptions had particularly serious implications for Ugandan voters' freedom of expression, access to information, and political engagement. GNI members CIPESA, Paradigm Initiative, and new member Unwanted Witness contributed to this statement.

> Following the military *coup* in Sudan in late October, there were ongoing Internet and telecommunications shutdowns. GNI issued a **statement** expressing alarm about the ongoing shutdown and the human rights consequences of the *coup* more broadly. GNI called for Sudanese authorities to respect freedom of expression and media freedom by restoring network connectivity.

Global Network Initiative @theGNI
Today marks two months since mobile Internet was shut down in **#Myanmar**. As restrictions continue, **@info_mcrb** and GNI again call for equal and unrestricted access to information across all telecommunications networks. **#KeepItOn #StopInternetShutdown** https://globalnetworkinitiative.org/mcrb-return-mobile-internet-myanmar/ … pic.twitter.com/eoDEmfK8pD

"

Network disruptions are a cudgel whose damage often silently ricochets across communities. This report weaves together compelling first-hand accounts and a panoramic analysis of instruments that different actors can use to push back under the African human rights system. It is a clarion call for a multistakeholder community to take coordinated steps to prevent shattered and disrupted digital spaces from becoming the new normal.

JAN RYDZAK, RANKING DIGITAL RIGHTS IN DISCONNECTED: A HUMAN RIGHTS-BASED APPROACH TO NETWORK DISRUPTIONS

"

ANALYZING AND INFLUENCING CONTENT REGULATION EFFORTS AROUND THE WORLD

GNI published its **Content Regulation and Human Rights Policy Brief** in October 2020, analyzing over 20 regulations from around the world through a human rights lens. GNI has since utilized the recommendations in this Policy Brief, which was informed by consultations with local multistakeholder experts around the world, to call for laws and regulations that maximize protections for digital rights as they seek to address concerns about digital content and conduct. As new forms of content regulation continued to emerge in 2021, GNI's convening power was on display across diverse countries as it engaged with policymakers in support of more rights-respecting approaches.

AUSTRALIA

GNI sent a **letter** to the Australian Minister of Communications in response to the draft text of the "Online Safety Bill 2021." The bill sought to update the country's legal framework for online content and conduct with the stated goal of better protecting its citizens online. While GNI welcomed amendments to the bill that would have improved transparency and citizens' rights to effective remedy, GNI detailed various provisions that could have limited freedom of expression and privacy in an analysis amended to the letter. These include application to an overly broad set of companies; extensive discretionary powers afforded to the eSafety Commissioner; limited exemptions for content in the public interest; an inflexible emphasis on a 24-hr takedown window; and lack of definitional clarity around thresholds for certain categories of content. It encouraged the government to model good practice for global content regulation efforts through proposed amendments in our analysis. Subsequently, in November, GNI signed onto a joint organization **letter** authored by DIGI and submitted to Australian officials in response to Australia's proposed Basic Online Safety Expectations (BOSE) Determination.

BRAZIL

In early August, GNI joined **Coalizão Direitos na Rede** in issuing a **statement** expressing deep concern about a proposed draft Presidential Decree on freedom of expression and the Internet in Brazil. The proposal would have prohibited intermediaries from taking action on content or accounts that violate their policies without a court order, limiting their ability to address legitimate concerns about harmful online content, and undermining the safe harbors in the landmark Civil Rights Framework for the Internet in Brazil, otherwise known as "Marco Civil." Given the significant constitutional, due process, human rights, and jurisdictional concerns that it generated, the statement collectively called for the Decree to be formally withdrawn.

CANADA

GNI **responded** to the open submission period on the Government of Canada's Proposed Approach to Addressing Harmful Content Online. GNI emphasized the concerning implications of Canada, a country which had played a leading role in establishing an open,

free, and accessible Internet, proposing such a regulatory model and enabling less rights-respecting countries to follow suit. GNI expressed particular concerns about the broad and vaguely defined set of companies and content that could be subject to the regulation, paired with strict timelines for content takedowns and significant new enforcement authorities, as well as newfound legal authorities that could contribute to excessive access to user data held by companies. GNI's commentary on the Canadian proposal received coverage in both *The Logic* and *The Conversation*.

CHILE

In September, a **Bill** to Regulate Digital Platforms was introduced in the Chilean Senate. GNI expressed its concerns over the new bill via a **letter and analysis** shared with representatives of the Chilean Senate Commission on Challenges for the Future, Science, Technology and Innovation in late October. While the bill stated its commitment to freedom of expression and transparency, it contained vaguely worded obligations for prohibited content and impermissible

Vivek Krishnamurthy
@vivekdotca

Replying to @ystvns @mgeist and @theGNI

This is a remarkable statement by the @theGNI given the multi-stakeholder nature of the organization, which includes members ranging from @CenDemTech to @hrw to @Microsoft and @nokia.

7:47 AM · Sep 29, 2021 · Twitter Web App

4 Retweets   6 Likes

Daphne Keller
@daphnehk · Oct 28

What is going on in Chile? They have a TERRIBLE Internet law in the making, despite being the home of the much-respected judicial notice model. I don't see any news coverage, but here is a letter from @theGNI opposing it.
globalnetworkinitiative.org/chile-digital-…

7   151   207

View Tweet

content moderation and significant penalties for noncompliance, while also including limitations on companies' ability to moderate certain forms of otherwise legal speech. Furthermore, it paired these competing obligations with significant penalties for noncompliance, adding to the potential chilling effects for speakers and ambiguity for companies tasked with enforcement. The effects of the bill, specifically the newfound liability risks and competing pressures for digital platforms, would pose risks to freedom of expression and privacy in Chile. GNI also noted that the bill appeared to be introduced via a rushed process that failed to consult with Chilean and international experts or other Senate commissions with related expertise.

COLOMBIA

In August, GNI shared a **letter** with the Colombian government on its draft "Childhood Protection Law." GNI acknowledged the admirable aims from the government in protecting the rights of children. Unfortunately, it was unclear how the draft law, as originally constructed, would protect these rights, posing significant risks to freedom of expression and privacy. GNI expressed concerns about the lack of public consultations ahead of the bill's announcement, the obligations the bill would place on a broad range of intermediaries, and the possibility for significant sanction for intermediaries that failed to adhere to the bill's requirements. GNI urged the Chamber of Representatives and Senate to withdraw the current draft and engage in further open consultations.
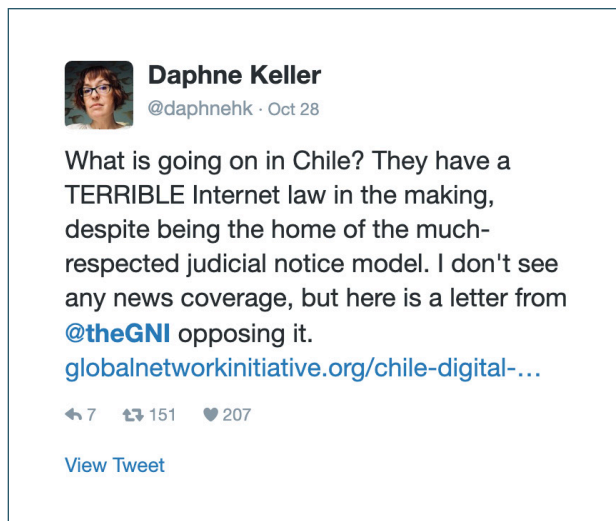
EUROPEAN UNION

In March, GNI shared a **submission** with the European Commission, responding to the open feedback period on the Commission's Draft for the Digital Services Act (DSA). GNI welcomed the EU's efforts to develop the Act and commended many of the DSA's provisions, but expressed concerns about some. These included Article 21, which could require platforms to turn over user information upon mere suspicion of criminal offense, Articles 26 and 26, that might incentivize aggressive content moderation, and the lack of checks and balances in the proposed governance structure.

> " The bigger challenge is how do we encourage and facilitate the companies that are trying to do better at addressing this content, without pushing them so far in the direction of responsibility and liability that they effectively take over state functions in terms of detecting and determining when content becomes illegal and needs to be actioned? "
>
> JASON PIELEMEIER, GNI

INDIA

In March, GNI sent a **letter** to India's Ministry of Electronics and Information Technology about proposed Indian Information Technology Rules. GNI's concerns included the rules' broad scope, unclear definitions, onerous due diligence requirements, and the potential to facilitate disproportionate access to user data, in particular risks to encryption. GNI called for the Ministry to consider revising the rules, noting India's role as the world's most populous democracy and a global leader in technology innovation. The letter was referenced in *Voice of America* and was **covered** in depth by *MediaNama*, a leading Indian publication focused on technology policy.

INDONESIA

GNI **urged** the Indonesian government to suspend implementation of a regulation proposed by the Indonesian Ministry of Communication and Information Technology. Issued in November 2020 without adequate public consultation, the regulation presented problems regarding government access to data and disproportionate enforcement mechanisms. The regulation lacked definitional clarity about what defines prohibited content or what constitutes an "electronic service organization", potentially bringing in digital platforms and services that are ill-equipped to address content concerns and contributing to chilling effects. It also had a problematic localization component that would have required a local point of contact who would be responsible for government demands, without clarifying any potential liability protections.

MYANMAR

In February, GNI issued a statement in response to the Myanmar military's **proposed cybersecurity law**. Given the severe social, economic, and human rights consequences that the draft law was likely to have on both users and companies inside the country, GNI called on the Myanmar military to withdraw and reconsider the cybersecurity law. The draft law surfaced during the state of emergency following the *coup*, was not shared publicly, and its timeline for implementation was unclear. It also provided the military with newfound authorities to access ICT company data and

restrict content, and threatened access cutoff if services failed to comply. This statement was highlighted in the article: "**Cybersecurity bill to plunge Myanmar into darkness**," published in the *Asia Times*.

NEW ZEALAND

As an original and ongoing member of the Christchurch Call Advisory Network, GNI continued to engage on the issue of extremist content in the ICT sector, providing input to the government of New Zealand about the Film, Videos, and Publications Classifications Amendment Bill. **GNI's submission** in March urged the government to reconsider the provisions around content filtering and the creation of an inspector of publications potentially vulnerable to inappropriate political influence.

PAKISTAN

In January, GNI expressed deep concern about **Pakistan's Removal and Blocking of Unlawful Online Content Rules**. Officially notified in November 2020, the Rules followed a previous edition that GNI also raised concerns about. The government continued a pattern of opaque legislative processes and insufficient consideration of input from civil society and human rights experts regarding these Rules. Of particular concern were broad authorities granted to the government to pressure companies to restrict access to content and facilitate exceptional access to user data, paired with a number of vaguely worded provisions and significant penalties for noncompliance. GNI encouraged Pakistan's government to rescind the Rules and undertake open, transparent, and multistakeholder deliberations to inform effective, fit-for-purpose, and rights-enhancing regulation.

GNI'S GLOBAL REACH: POLICY STATEMENTS IN 2021
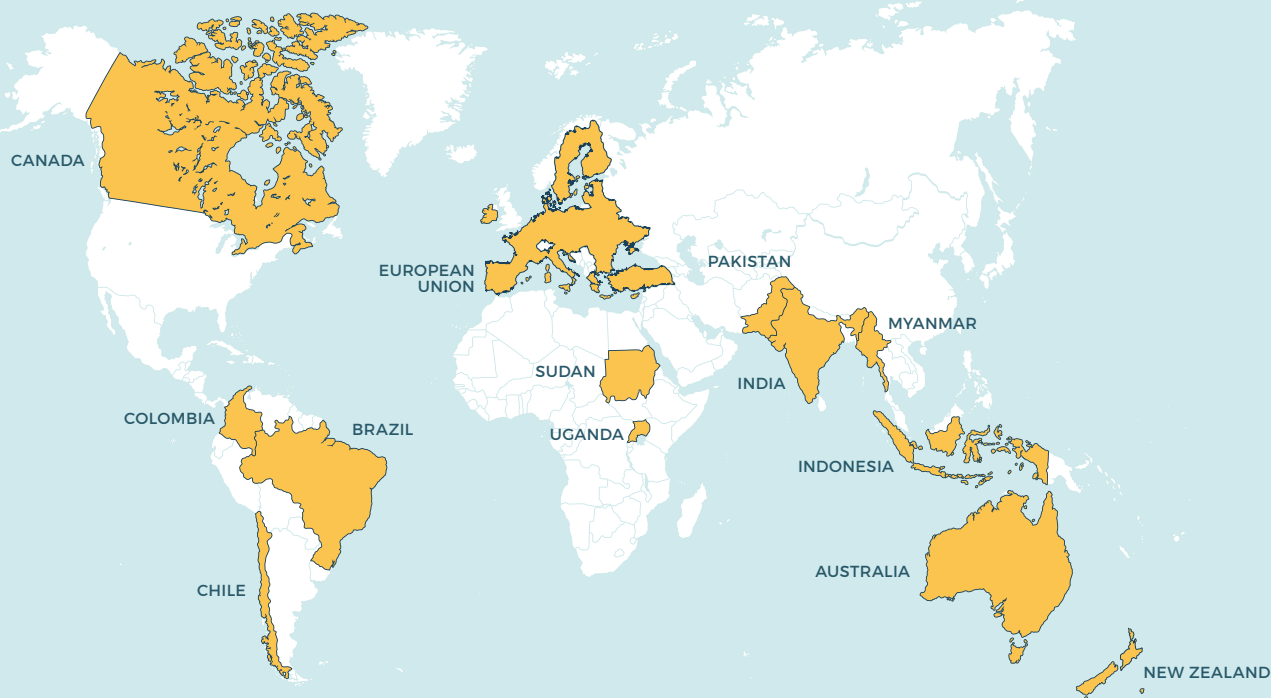
GNI'S VOICE AT MULTILATERAL AND MULTISTAKEHOLDER SPACES

In addition to sharing input and analysis with national-level policy makers, GNI also engaged with international multilateral institutions shaping the global agenda for digital rights. Some highlights in 2021 include:

> In March, GNI submitted a **recommendation** during the European Commission's open feedback period on the Commission's Draft for the forthcoming Digital Services Act (DSA). GNI raised concerns about the deputization of service providers to perform law enforcement functions and the creation of personal liability for local staff of covered service providers. In July, GNI hosted an **invite-only roundtable** and **high-level public panel** focused on the human rights risk assessment and auditing elements of the DSA, paying particular attention to alignment with existing frameworks under the UNGPs and GNI Principles.

> In May, GNI provided **input** to the United Nations (UN) ahead of an upcoming UN report focused on the linkages between artificial intelligence (AI) and the right to privacy. GNI's submission not only noted the risks and opportunities created by AI technology, but the ways in which the GNI Principles can offer a framework to help companies and governments use AI in a way that respects human rights. GNI also detailed important safeguards around AI-enabled surveillance activities as governments continue to expand tools and tactics for accessing user data.

> In June, GNI Executive Director Judith Lichtenberg spoke at the high-level United Nations' Conference on "Countering and Preventing Terrorism in the Age of Transformative Technologies: Addressing the Challenges of the New Decade." Judith was the only non-governmental speaker at the opening session of the event, which was organized by the UN Office on Counter-Terrorism. In her **remarks**, she highlighted how GNI's experience in multistakeholder engagement and collaboration could serve as a model for organizations working to address concerns around terrorism and new technologies, and emphasized GNI's experience fostering dialogue with both government and nongovernmental stakeholders on critical questions around responding to alleged online extremism while respecting human rights.

> In September, GNI expressed its support following the creation of the **U.S. EU Trade and Technology Council** (TTC) via a statement that highlighted the opportunities created by the Council. GNI noted its optimism that the TTC can create spaces to more effectively address the complex issues in the technology sphere and that it looks forward to engaging with these governments and other stakeholders through relevant TTC working groups.

DISCUSSING CURRENT DIGITAL RIGHTS TRENDS IN INTERNATIONAL FORA

GNI had a large presence at international events that brought together hundreds of speakers to discuss issues at the intersection of information and communications technology law and policy, business and human rights, and corporate responsibility. GNI staff participated in 12 panels across various events, presenting opportunities to bring attention to the GNI Principles and framework for multistakeholder collaboration.

In June, GNI staff participated at RightsCon with other leading digital rights actors and GNI members to discuss direct access and Internet shutdowns. GNI also joined a panel on "Digital Technologies, Human Rights Due Diligence, and the State Business Nexus" with the UN Human Rights B-Tech Project, and a panel on "Building the Business Case for Digital Rights: Leveraging Local Private Sector Involvement in Advancing Internet Freedom."

In November, GNI co-hosted three different sessions at the **Freedom Online Coalition (FOC) Conference.** The panels focused on "Data and Human Rights: Striving for Meaningful Transparency and a Fair Data Economy" and "Regulating (Dis)Content: How Human Rights Can Help Shape Government Content Regulation Efforts." Deputy Director Jason Pielemeier also moderated the opening plenary session: "Beyond Pegasus: Improving Transparency, Rights Protection, and Accountability in the Surveillance Tech Space." GNI members participated in additional panels and discussions during the conference. Recordings of the sessions can be seen **here**.

In December, during the **Internet Governance Forum** (IGF), GNI hosted a session on **Stakeholder Roles for Human Rights Due Diligence** with GNI members Bolo Bhi and the Center for Studies on Freedom of Expression and Access to Information (CELE), along with the Danish Institute for Human Rights. GNI members participated in **additional sessions** during the course of the conference, discussing content moderation, data justice, and human rights due diligence.

In December, GNI participated in the **Summit for Democracy**, an event hosted by the U.S. Department of State. This event brought together leaders from government, civil society, and the private sector in a shared effort to set forth an affirmative agenda for democratic renewal and to tackle the threats faced by democracies through collective action. GNI Deputy Director Jason Pielemeier spoke at an official Summit for Democracy session titled: "Models for Online Platform Data Access for Researchers."

GNI also organizes and participates in off-the-records conversations with government officials, where GNI members are able to share feedback on proposed initiatives. One example of such an engagement was a December 2021 briefing on the crisis in Ethiopia, which was attended by over 40 participants and 13 government officials.

CONCERNS ABOUT "HOSTAGE PROVISIONS"

Data localization mandates, which seek to limit companies' ability to transfer data freely across borders, have the potential to impact a broad range of human rights and even undermine the open Internet.

> As part of its work on **jurisdictional assertions and limits** GNI hosted a **workshop** with Freedom House on "Data Localization and Human Rights." 65 diverse organizations, consisting of GNI members and members of the Freedom on the Net community, participated in a discussion of the realities and risks of data localization and how companies can best respond to these requirements. 'Personnel localization' — whereby companies are required to employ representatives on the ground who are responsible for engagement with government officials and regulatory compliance — emerged as a tactic increasingly correlated with data localization measures. Depending on a country's commitment to respecting the rule of law and the broader environment in which ICTs operate, these approaches can constitute significant risks for company personnel and could be used to force companies to restrict users' speech or share access to data. GNI Deputy Director Jason Pielemeier was quoted extensively in a _**Rest of World article**_ about this trend, highlighting many of the concerns raised during this workshop.
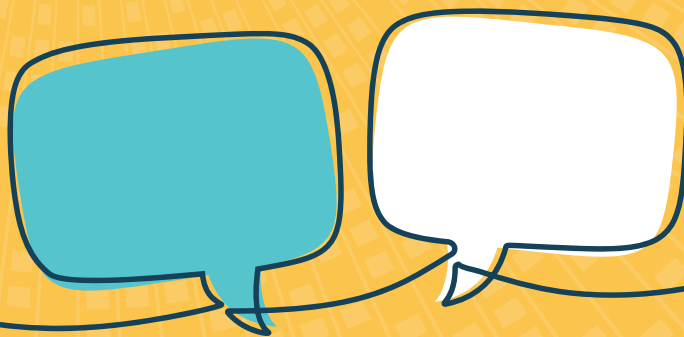
GNI'S LEARNING PROGRAM: EXCHANGING INSIGHTS ACROSS DIVERSE CONSTITUENCIES, REGIONS, AND PERSPECTIVES

GNI's learning agenda is driven by members' interests and seeks to deepen our collective understanding of the most pressing challenges for freedom of expression and privacy rights in the ICT sector. The trusted space built for our multistakeholder members to share firsthand experiences and insights allows for discussions of sensitive issues as they emerge. This year's program included a variety of learning calls and events, some of which were open to external participants. With discussions grounded in the GNI Framework, the 2021 learning agenda covered topical issues such as content moderation challenges regarding state actors, privacy implications of technological responses to COVID-19, and deep dives into members' research on digital rights issues. Nearly 60% of participants in learning calls represented academic, civil society, and investor members and 25% were based in Africa, Asia, and Latin America. Almost 60% of participants in learning calls were women.

GNI also offered tailored onboarding opportunities for new and more experienced members to learn from each other and engage in interactive small group discussions, achieving greater interaction across constituencies and regions.

GNI ANNUAL LEARNING FORUM ON CONTENT REGULATION & HUMAN RIGHTS

In January, GNI hosted its Annual Learning Forum titled **What does the Global Wave of Content Regulation mean for Human Rights?**. This virtual event was moderated by GNI's Independent Board Chair David Kaye, with participation from Tom Malinowski (U.S. Congressman, Democrat, New Jersey), Shazia Marri (Member of the National Assembly, Pakistan People's Party Parliamentarians, Pakistan), Alexandra Geese (Member of the European Parliament, Group of the Greens/European Free Alliance, Germany), and Agustina Del Campo (Director of the Center for Studies on Freedom of Expression and Access to Information at Palermo University, Argentina).

The event built on GNI's policy brief on **Content Regulation and Human Rights**, which was published in 2020 and offered recommendations for how to put human rights at the center of any legal and regulatory efforts to address concerns about digital harms.

Throughout the discussion, panelists:

> Shared insights about how efforts to regulate content in different jurisdictions affect freedom of expression. Topics included the proposed **U.S. Protecting Americans from Dangerous Algorithms Act**, Pakistan's **Prevention of Electronic Crimes Act**, the EU's draft **Digital Services Act** (DSA), and trends in content regulation across Latin America;

> Acknowledged the need for greater transparency around algorithms used for content distribution to inform effective content regulation; and

> Reiterated the importance of understanding local context and avoiding one-size-fits-all solutions.
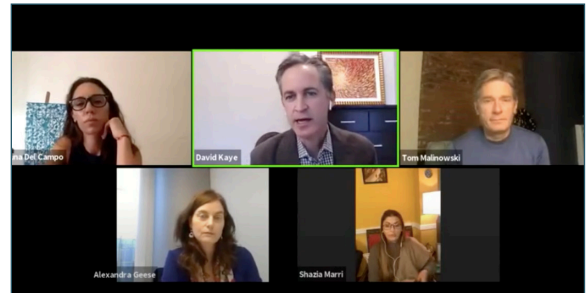
A full-length recording of the Annual Learning Forum can be viewed **here**.

GNI members also participated in other calls throughout the year to discuss new resources and areas of interest:

> In February, GNI members received an overview of the Ranking Digital Rights Corporate Accountability Index.

> In March, GNI hosted a discussion on 5G and human rights.

> In May, members had a call on the GNI Principles and Managed Services about the restrictions on what information can be shared by companies when entering into managed services agreements, with the goal of avoiding adverse human rights impacts.

UNDERSTANDING THE IMPLICATIONS OF CONTENT MODERATION DECISIONS

Throughout the year, GNI held learning discussions covering challenges in content moderation and pressures from state actors to restrict access to content. Following the January 6 insurrection at the U.S. Capitol, GNI members discussed company content moderation decisions around state actors (and others) calls for further violence and unrest, as well as the spreading of election-related misinformation. Members looked further at comparative global examples, including government-ordered network disruptions and restrictions on access to social media services in **Uganda** following company decisions to limit state actors' accounts. They also considered the ramifications of a law in Poland that could penalize companies for making content-based decisions on otherwise legal speech. In an additional call, members explored concerns about digital rights implications of content moderation decisions in Palestine, including the role of government pressure and the Israel Cyber Unit flagging content for removal on the basis of companies' own terms, as opposed to via legal demands. These calls provided an opportunity for foremost human rights experts to share their input and perspective on these challenging decisions and to consider the application of the GNI framework in practice.

PARTICIPATION IN LEARNING CALL

CONSTITUENCY	
Academic	4
Civil society	21
Company	17
Investor	3
TOTAL	**45**

REGION	
Africa	1
Asia	4
Europe	7
LAC	7
North America	26
TOTAL	**45**

THE USE OF TECHNOLOGY IN THE RESPONSE TO COVID-19

In November, GNI members Jess Pacis from the Foundation for Media Alternatives (FMA) in the Philippines, one of GNI's 2021 Emerging Voices Fellows; Laura Nathalie Hernández Rivera from Derechos Digitales Latinoamérica in El Salvador; and Thobekile Matembi from Paradigm Initiative in Nigeria discussed their research about the privacy implications from the (mis)use of technology by government authorities in Africa, Latin America, and the Philippines in the context of the COVID-19 pandemic. GNI members discussed recommendations, lessons, and trends from members' research, for example:

> FMA's report recommends strategic alignment between government offices to ensure a coordinated strategy and more accessible communication in response to public health crises. It notes the need for better regulation and oversight in delivering and implementing policies.

> Derechos Digitales' report highlights some of the privacy flaws in COVID-tracking apps used in Argentina, Bolivia, Brazil, Colombia, Ecuador, and El Salvador. It examines the social and legal context of pandemic response, including existing or newfound emergency authorities.

> Paradigm Initiative's research looks at the consequences of failing to ensure transparency in the handling of user data, including the limited use of contact tracing and unclear data collection practices, looking at specific examples in Africa.

In the report, "**Technologies Used in the Fight Against the Pandemic: Personal Data in Latin America,**" Laura Hernández from **Derechos Digitales**, with support from GNI, looked at the development of technologies to fight the pandemic under different legal frameworks. She analyzed the impacts of governments' responses on users' privacy rights and made recommendations to ensure that the design, development, and implementation of these technologies complies with human rights standards. The report is available in **English** and **Spanish**.

PARTICIPATION IN LEARNING CALL

CONSTITUENCY	
Academic	1
Civil society	11
Company	5
Investor	1
TOTAL	**18**

REGION	
Africa	3
Asia	2
Europe	5
LAC	4
North America	4
TOTAL	**18**

REGIONAL DISCUSSIONS WITH THE 2021 GNI EMERGING VOICES FELLOWS

In conjunction with the June GNI Board meeting, GNI facilitated meetings between the 2021 GNI Emerging Voices Fellows and GNI members on regional developments in Africa, Asia, and Latin America. Fellows shared their initial ideas for research projects on digital rights topics, a component of the fellowship, and received feedback from members. At a subsequent board meeting, fellows led breakout group sessions and updated the GNI Board on their progress, discussing disinformation during elections, the role of social media in democratic processes, and the concept of "disruptive technologies," as follows:

> **Eliana Quiroz** from Internet Bolivia offered an overview of the political context in Bolivia that has framed her research on disinformation during elections, particularly the disinformation targeted against the nation's electoral authority. She shared her analysis of various actors' roles in spreading disinformation.

> **Lisa Garcia** from Foundation for Media Alternatives in the Philippines is focused on social media in the democratic process, given the 2022 election cycle. She hopes to better understand whether companies' policies and standards promote citizens' rights, increase political engagement, and counter disinformation and hate speech.

> **Hamadou Tidiane Sy** from EJICOM in Senegal talked about his analysis of how "disruptive technologies" are impacting journalists in Senegal. The discussion revolved around the positive and negative impacts of disruptive technologies.

On World Press Freedom Day GNI published the blog post "**Reflections on Press Freedom from Bolivia, the Philippines, and Senegal**," where fellows offered insights on press freedom and the implications for digital rights work, reflecting on the importance of protecting openness and transparency to enjoy their fundamental rights.

PARTICIPATION IN ALL 2021 CALLS

CONSTITUENCY		REGION	
Academic	11	Africa	9
Civil society	62	Asia	13
Company	59	Europe	35
Fellow	1	LAC	15
Investor	10	North America	71
TOTAL	**143**	**TOTAL**	**143**

OPPORTUNITIES FOR CROSS-CONSTITUENCY LEARNING: THE GNI ONBOARDING MODULE

In addition to organizing welcome calls for new members and new representatives of existing members, GNI revamped its onboarding module to help keep everyone up to speed on GNI's mission and history, day-to-day operations, modes of engagement, and governance structure. The module was delivered in January and November. The interactive format allowed members to propose topics for discussion, clarify issues, and learn from one another. Participants, including observers, members, and fellows, followed a self-guided presentation and completed a survey that informed the topics covered in the webinar portion of the module. The goal was to facilitate shared learning in an interactive manner, tailored to the interests of GNI members, while addressing members' information needs and promoting meaningful engagement.

> Bringing together different stakeholders and their respective expertise is a critical component in a holistic, multi-perspective approach to tackling the challenging issues that technology companies face around the world. GNI provides both the forum and the conceptual framework for companies and other actors to examine their approaches and ensure they are acting as effectively as possible to uphold the values of freedom of expression and privacy.

JOSH KALLMER, ZOOM

Both modules were well attended by a diverse representation of members from all four constituencies and different geographic regions (4 from Africa, 1 from Asia, 4 from Europe, 3 from Latin America, and 17 from the U.S.) with equal representation from company and non-company representatives, including new and experienced members. During the modules, participants had the opportunity to engage in interactive small-group discussions on topics of their choice, as follows:

> How companies and other stakeholders can collaborate

> The application of the GNI Principles in different contexts

> How members leverage GNI statements & membership

> How to strengthen and make use of transparency reports

> The relevance of the assessment process for companies and investors

COUNTRY LEGAL FRAMEWORK RESOURCE

clfr: Country Legal Frameworks Resource

Egypt ▼

UPDATED: May 2017 | SOURCE: Vodafone Group with support from Hogan Lovells

Provision of Real-time Lawful Interception Assistance

Disclosure of Communications Data

National Security and Emergency Powers

Oversight of the Use of Powers

Censorship-related Powers

Oversight of the Use of Powers (Censorship-related)

Encryption and Law Enforcement Assistance

Provision of Real-time Lawful Interception Assistance

NOTE: The pertinent legal frameworks have undergone some changes since this report was last updated, including with adoption of the "Anti-Cyber and Information Technology Crimes" law in August 2018.

CONSTITUTION OF EGYPT

Articles 57 and 58 of the Constitution of Egypt explicitly protect the privacy of communications, prohibiting their surveillance except with a reasoned court order for a specific time, in accordance with the law.

THE EGYPTIAN CRIMINAL CODE AND THE CRIMINAL PROCEDURES CODE

According to the Egyptian Criminal Code (Law 58 of 1937) and the Criminal Procedures Code (Law 150 of 1950), a prosecutor or investigative judge may issue a warrant authorizing the interception and recording of individual communications when investigating a possible crime.

Under Article 95 of the Criminal Procedures Code, reasoned warrants from a prosecutor or investigative judge can be issued where they assist in the investigation of any felony or misdemeanor attracting a sentence of over three months, for no more than 30 days and can be renewed once; or by a direct order from an authorized member of the armed forces or security agencies. There are no explicit regulations regarding the latter.

THE COMMUNICATIONS LAW (LAW 10 OF 2003)

The Communications Law (Law 10 of 2003) regulates the communications industry, including law enforcement agencies access to communications and communication infrastructure. It is generally illegal under criminal law to intercept or record private communications except pursuant to a judicial warrant, but the Communications Law allows broad latitude to the armed forces and security agencies to obtain information pursuant to national security concerns, which are not defined.

The **Country Legal Frameworks Resource (CLFR)** is a set of reports examining the legal authorities for governments to access or restrict communications content in 57 countries. The CLFR helps ICT companies understand the legal realities they may face in their countries of operation, including in cases where legal frameworks might authorize disproportionate restrictions or lack uniform interpretation. They also provide an evidence base for digital rights advocates and researchers to raise awareness about the legal threats to human rights online and to push for rights-respecting legislation. The CLFR reports are hosted on a **GNI web platform**, launched in 2019, which allows users to navigate, compare, and search across the reports.

In 2021, GNI continued its progress of updating countries in the resource, working with GNI's academic and civil society members and other local experts. This included new country reports for **Ethiopia** and **Nigeria**, and researching relevant legal powers to update over 10 existing country reports in Africa, Latin America, and South Asia. We thank the Cyberlaw Clinic at Harvard Law School, the Civil and Human Rights Clinic at GW Law, and the Samuelson-Glushko Canadian Internet Policy and Public Interest Clinic at the University of Ottawa (CIPPIC —as represented by GNI individual academic member Vivek Krishnamurthy) for continuing to lead this work, and various members and local contributors for their support. We are grateful for the contributions from, among other members, CELE, CIPPIC, CCG at National Law University, Delhi, Derechos Digitales, Fundación Karisma, Internet Freedom Foundation, IPANDETEC, Paradigm Initiative, and TEDIC, as well as outside contributors Yohannes Eneyew Ayalew of Monash Law School and Tomiwa Ilori of the University of Pretoria.

GOVERNANCE

THE GNI BOARD

Independent Board Chair

David Kaye

Vice Board Chair

Agustina Del Campo, Centro de Estudios en Libertad de Expresión

> "We are thrilled to have Agustina in this new vice-chair role. Not only is she familiar with GNI's work and operations, having contributed to our strategic thinking and meaningful engagement practices, but she will also bring to GNI's leadership her well-rounded expertise in international law and human rights and familiarity with various regional perspectives."
>
> JUDITH LICHTENBERG, GNI

The GNI Board (continued)

ICT COMPANIES

Miranda Sissons, Meta (formerly Facebook)

Lewis Segall, Google

Steve Crown, Microsoft

Fiona Cura-Pitre, Nokia

Yves Nissim, Orange

Anita Househam, Telenor Group

Patrik Hiselius, Telia Company

Moira Thompson Oliver, Vodafone Group [1]

April Boyd, Yahoo [2]

CIVIL SOCIETY ORGANIZATIONS

Greg Nojeim, Center for Democracy & Technology

Lillian Nalwoga, CIPESA

Richard Wingfield, Global Partners Digital [3]

Kate Duffy, Internews

Mishi Choudhary, Software Freedom Law Centre, India

ACADEMICS AND ACADEMIC ORGANIZATIONS

Jessica Fjeld, Berkman Klein Center for Internet and Society

K.S. Park, independent academic member

Chinmayi Arun, independent academic member [4]

INVESTORS

Lauren Compere, Boston Common Asset Management

Adam Kanzer, BNP Paribas Asset Management

Board Alternates

ICT COMPANIES

Alex Warofka, Meta (formerly Facebook)

Alex Walden, Google

Bernard Shen, Microsoft

Christopher Steck, Telefónica

Lauren Kahn, BT

Théo Jaekel, Ericsson

Dorothee D'Herde, Vodafone Group

Logan Smith, Yahoo

CIVIL SOCIETY ORGANIZATIONS

Usama Khilji, Bolo Bhi

Gurshabad Grover, Centre for Internet and Society

Maria Paz Canales, Derechos Digitales

Deborah Brown, Human Rights Watch

Andreas Reventlow, International Media Support

ACADEMICS AND ACADEMIC ORGANIZATIONS

Meg Rogensack, Georgetown University Law Center (Independent)

Caroline Kaeb, Zicklin Center for Business Ethics Research at The Wharton School (Independent)

INVESTORS

Emilie Westholm, Folksam

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1 Moira Thompson Oliver from Vodafone Group replaced Dorothee D'Herde as company board member in May.

2 April Boyd from Yahoo (formerly Verizon Media) replaced Nicole Karlebach from Verizon Media as company board member in September.

3 Richard Wingfield from Global Partners Digital replaced Charles Bradley as civil society board member in June.

4 Chinmayi Arun is now an academic board member and Meg Roggensack became an academic alternate board member, swapping seats with Arun as of October.

COMMITTEES AND WORKING GROUPS

Committees and working groups that report to GNI's Board and membership are core to the organization's function. The Executive Committee draws only from GNI Board members and is chaired by the independent board chair. Each of GNI's five other committees — Accountability, Development, Learning, Membership, and Policy — has two co-chairs, one representative from the company constituency and one from a non-company constituency, and is open to all GNI members. Special representatives from the constituencies not represented by the co-chairs are also appointed.

Working groups are formed on an ad-hoc basis to address specific issue areas. In 2021, the following working groups were active:

CHINA AND OTHER DIFFICULT JURISDICTIONS WORKING GROUP

Discusses the application of the GNI Principles in difficult jurisdictions, with a particular emphasis on China.

CASE SELECTION GUIDANCE WORKING GROUP

Prepares the General Part of the Case Selection Guidance document to aid in the selection of case studies used by assessors and companies during the assessment process, and identifies cases for consideration by the assessors to be included in the assessment.

HUMAN RIGHTS DUE DILIGENCE WORKING GROUP

Formed to examine questions around and develop tools and guidance on HRDD for companies and other stakeholders working to identify and address risks in the ICT sector.

GNI STAFF

In recognition of his policy engagement leadership, Jason Pielemeier was promoted to Deputy Director in October. Jason is responsible for helping shape GNI's strategic direction, working with GNI's diverse members to develop and articulate GNI's policy positions, and engaging with policy makers and other stakeholders to enhance protections for free expression and privacy globally.

GNI is grateful for the work and dedication of David Sullivan, who was GNI Program Director until August 2021. In this capacity, David designed and implemented a range of collaborative projects in support of freedom of expression and privacy in the ICT sector. He managed GNI's shared learning agenda, expanded GNI's collaboration between companies and human rights groups around the world, and supported GNI's assessment process. From 2011 to 2015, David was GNI's first Policy and Communications Director. GNI also thanks Membership Associate Annie Lehman-Ludwig, who supported GNI's internal and external communications and efforts to embed diversity, equity, and inclusion across our organization until June 2021.

GNI welcomed three Master of Science and Foreign Service (MSFS) Fellows for the academic year 2021-2022: Ariana Nikmanesh, Kaia Haney, and Montserrat Legorreta; and Nicholas Savas, who joined as part of the Georgetown Law School BHR Practicum for one semester. Fellows have been an integral part of the team, contributing to GNI's statements and submissions, conducting research on GNI's policy priority areas, and supporting our communications efforts and engagement with internal and external stakeholders.

Judith Lichtenberg
Executive Director

Jason Pielemeier
Deputy Director

Rocío Campos
Communications Manager

Chris Sheehy
Policy Officer

Sarina Phu
Research & Programs Associate

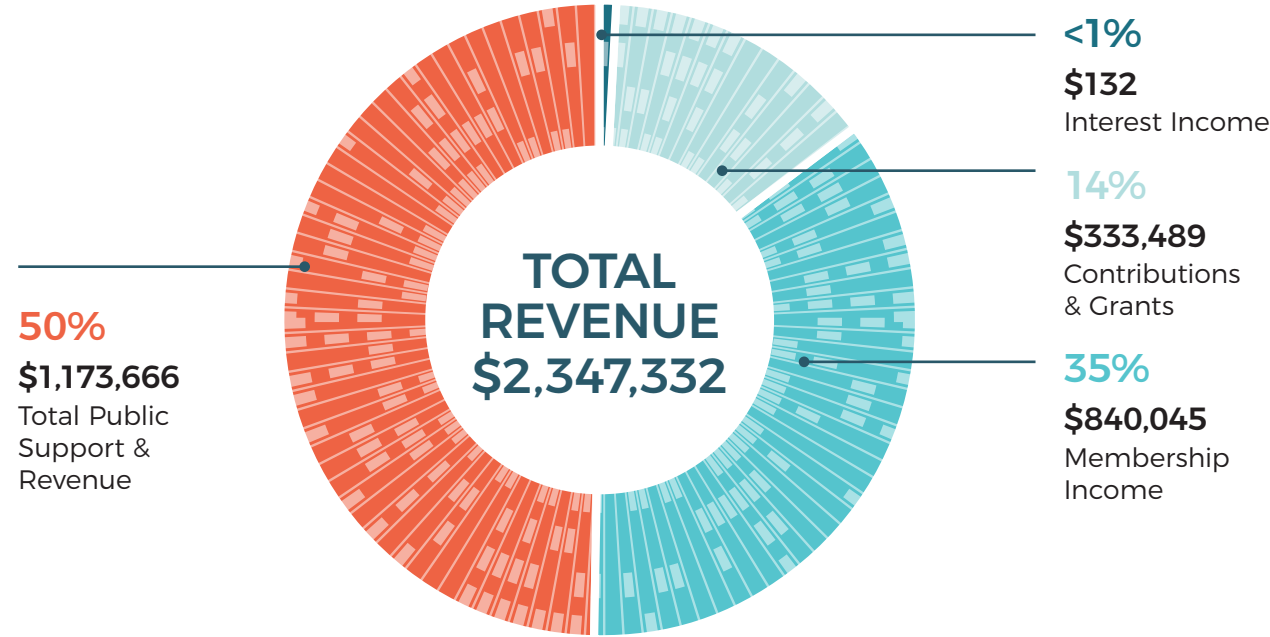**Idan Ben Yakir**
Operations Associate

2021 FINANCIALS

GNI received support from the U.S. State Department's Bureau of Democracy, Human Rights, and Labor, which represents the main of several grants, as well as from the Government of the Netherlands Ministry of Foreign Affairs. GNI also received private donor funding from the Ford Foundation. This diversified funding portfolio supports our work to engage underrepresented voices from civil society and the private sector in collaborative processes to protect and respect freedom of expression and privacy throughout cyberspace.
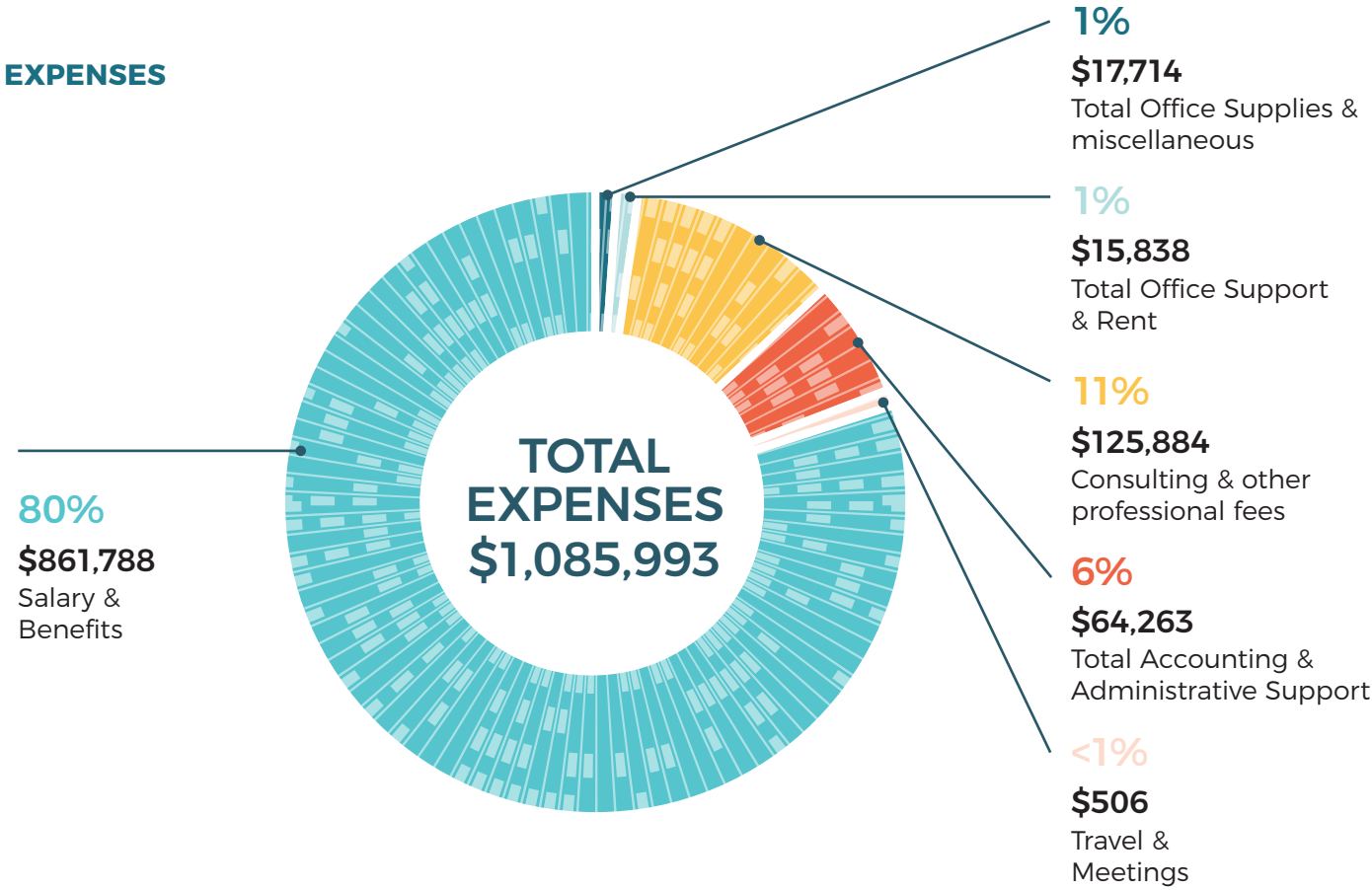
$87,673
EXCESS OF INCOME OVER EXPENSES

$1,265,046
NET ASSETS BEGINNING

$1,352,719
NET ASSETS ENDING

REVENUE, GAINS AND OTHER SUPPORT

TOTAL REVENUE $2,347,332

50%
$1,173,666
Total Public Support & Revenue

<1%
$132
Interest Income

14%
$333,489
Contributions & Grants

35%
$840,045
Membership Income

EXPENSES

TOTAL EXPENSES $1,085,993

80%
$861,788
Salary & Benefits

1%
$17,714
Total Office Supplies & miscellaneous

1%
$15,838
Total Office Support & Rent

11%
$125,884
Consulting & other professional fees

6%
$64,263
Total Accounting & Administrative Support

<1%
$506
Travel & Meetings

ACKNOWLEDGEMENTS

LEGAL

GNI is grateful for the legal advice and support it receives from White & Case LLP, especially Charles Moore, Clare Connellan, John Hannon, Gabrielle Hodgson, Emily Holland, Daniel Levin, Earle Miller, and Mariana Seixas.

ACCOUNTING

We would like to acknowledge the assistance of staff from Glass Jacobson Financial Group, especially Andrea Montali and Marc Friedman.

DESIGN

The female-lead firm Christy Batta Design produced this report.

MEMBERS & SUPPORTERS

The board chair, executive director, and staff of GNI would like to thank GNI members and supporters around the world who help make our work possible.