

GLOBAL
NETWORK
INITIATIVE

Consolidating Norms into Regulation

GNI ANNUAL REPORT 2023





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OPENING LETTER

● ● ● The Global Network Initiative (GNI) is a unique and important organization, which we have had the privilege of Chairing and Vice Chairing. It is with a mix of gratitude and excitement that we decided not to seek renewal as the Board turned over in 2024. After an eventful four + years, which included conducting a top-to-bottom Strategic Review and implementing its many recommendations, it was the right time for us to step aside and allow new leadership to guide GNI into its next chapter. We wanted to take a moment to reflect on the extraordinary journey we have shared with this remarkable organization.



David Kaye

David Kaye

Independent Chair



Agustina Del Campo

Agustina Del Campo

Vice Chair

Our journey with GNI started when David joined as Independent Chair in 2020, succeeding Mark Stevens, CBE. David and the GNI's Board moved quickly to establish the new position of Vice Chair, which Agustina was elected to fill. Since then, we have had the honor of working alongside an incredibly talented and dedicated staff and a distinguished and diverse Board to advance GNI's mission of promoting freedom of expression and privacy in the digital age.

During this period, GNI faced some challenging and complex issues and extraordinary opportunities. Just a few months into David's term, the Covid-19 pandemic hit, and GNI transitioned temporarily to a completely virtual organization. In many ways, GNI was well prepared, with its members and staff already dispersed and used to interacting virtually. And this helped us see and respond to the challenges that the pandemic underscored, including the impacts of digital divides, and the wider use of tactics, technologies, and authorities to access user data and restrict Internet access. Despite these challenges, we witnessed GNI's resilience, adaptability, and unwavering commitment to protecting online freedoms, as the organization's work and membership grew steadily to meet the moment.

We also launched GNI's third strategic review, in order to help the organization understand and adapt to its growing membership and the changing digital regulatory environment. The review process turned out to be incredibly valuable not only for what it produced but, in our view, for how it helped us focus at a time when we could have drifted off into our pandemic isolation. At the same time, GNI conducted its fourth and largest assessment cycle for company members, which began in virtual mode and completed it in person, demonstrating GNI's commitment to accountability and transparency.

In 2022, GNI's Executive Director, Judith Lichtenberg, left the organization to take on an [important role](#) providing oversight to the Dutch intelligence community. Fortunately, GNI was able to recruit from within, promoting its Deputy Director, Jason Pielemeier, who together with the rest of the staff helped ensure a seamless transition. During this time, GNI also launched a remarkable array of policy and learning initiatives, exploiting the zoom-default for regular conversations that involved a wide swath of the membership. We are especially proud to have witnessed global membership expand in important and exciting ways. This growth reflects the importance and impact of GNI's multi-stakeholder convening function, where different stakeholders in the tech sector can engage, share information, and ask hard questions in an environment of shared norms. The 2022 [annual report](#) is a testament to all the amazing work this organization does.

We remain committed to GNI's mission and look forward to continuing our involvement as individual members. We are confident that GNI will continue to play a leading role in shaping the future of Internet governance and corporate accountability.

We look forward to witnessing GNI's continued growth and impact under the leadership of the incoming Independent Chair, Board and staff. The future is bright for GNI, and we are incredibly proud to have played a part in its journey.

We wish to thank everyone who has supported us during our time at GNI. We are grateful for your dedication and commitment to its mission.

We look forward to witnessing GNI's continued growth and impact under the leadership of the incoming Independent Chair, Board and staff. The future is bright for GNI, and we are incredibly proud to have played a part in its journey.



SPECIAL FEATURE: INTERVIEW WITH JASON PIELEMEIER

● ● ● Jason Pielemeier became Executive Director of GNI in May 2022, and under his leadership, the organization met several important milestones, including the completion of GNI's strategic review and fourth cycle of independent assessments. 2023 was also a crucial year for internet governance and tech accountability.

The following interview provides an overview of how he navigated the year and looks forward to continuing to strengthen GNI's mission to protect and advance privacy and freedom of expression in the tech sector.



Can you elaborate on GNI's most significant achievements in 2023? How do these accomplishments align with GNI's overall mission and goals?

Last year was my first full year as Executive Director and I am very proud of what we accomplished. With the logistical restrictions of the pandemic largely behind us, GNI and our members lost no time consolidating and implementing the recommendations from our strategic review, concluding the fourth GNI assessment cycle, and continuing to expand our membership, presence, and impact around the world.

This work tied together beautifully. As we navigated the course chartered by the Strategic Review, guided by our wonderful Chair and Vice Chair, David Kaye and Agustina Del Campo, we refined GNI's [mission and narrative](#) and began building a new website to better showcase our work. We also hired new staff to expand opportunities for shared learning and member engagement. Additional regional learning calls, global workshops, and expert panels featuring the diverse views and broad expertise of our members helped us identify and respond to evolving forms of censorship and surveillance, understand and guide the evolution of new technologies and use cases, and manage our organization's growth.

We also expanded our presence, including by holding our first two Board meetings ever outside the Global North - in Nairobi and San Jose - and participating in events across Brazil, India, Pakistan, South Korea, Japan, and Thailand, as well as in the US and Europe.

The fourth GNI [assessment cycle](#) reinforced the importance of GNI's commitment to protecting freedom of expression and privacy in the tech sector, revealing critical insights into the challenges and adaptations companies faced in a changing global environment. In 2023, we reflected on the lessons and learnings from this cycle, and considered how to further evolve and enhance the process in the next cycle.

As you anticipated last year, 2023 marked a pivotal shift from voluntary to mandatory transparency and accountability within the tech industry, thanks in no small part to the European Union. How did GNI and its members respond?

2023 was a landmark year for content regulation: we saw the EU pass the Digital Services Act (DSA), the UK pass the Online Safety Act (OSA), and numerous other tech-focused bills proposed around the world. At the same time, the EU and its member states took further steps to enact the first wave of serious mandatory human rights due diligence laws, including the EU Corporate Sustainability Due Diligence Directive (CSDDD), which require large companies, regardless of sector, to take affirmative steps to address human rights.

GNI has been engaged in these processes for years. I remember my first GNI Board meeting in the fall of 2017, where as a freshly minted Policy Director I facilitated a discussion with Prabhat Agarwal of the European Commission on the DSA and moderated an event with the UK government focused on the Online Harms “green paper,” which eventually became the OSA. Following those conversations, we developed a forward-looking policy brief on [Content Regulation & Human Rights](#), which has served as an evergreen advocacy resource that has allowed us to meaningfully shape these emerging regulations.

One of my favorite moments of 2023, was dining at the European Parliament building in Strasbourg with the five key committee rapporteurs working on the CSDDD. Together with other business and human rights experts, we engaged in deep and meaningful discussions about the best ways to build regulatory power that recognizes, incentivizes, and enforces responsible business conduct. Seven months later, we held our [Annual Learning Forum](#) and other [events](#) in Brussels, where we drew connections between the UN Guiding Principles on Business and Human Rights, the OECD Guidelines on Multinational Enterprises, and the GNI framework on one hand, and the AI Act, the CSDDD, the DSA, and the OSA on the other.

What impact do you believe these largely European initiatives will have on the rest of the world?

These regulations will echo globally. We are already seeing “online safety acts” being proposed in Sri Lanka and Singapore, and due diligence proposals emerging in Brazil and India. Some of these reflect Global North trends, but many include unique modifications and innovations. GNI has analyzed and commented on many of these initiatives, repeatedly calling for them to be consistent with and anchored in the time-tested, globally-applicable human rights framework.

We have sent the same message to and through multilateral initiatives that attempt to synchronize and share practices across jurisdictions. For instance, GNI attended and spoke at UNESCO’s Internet for Trust Conference in February and [repeatedly contributed](#) to the process that resulted in their “[Guidelines on the Governance of Digital Platforms](#).” In addition, we joined the OECD’s Network of Experts on AI and partnered with the UN Human Rights Office to develop important [guidance](#) on the development and use of generative artificial intelligence.

Divergence across jurisdictions and unintended consequences are expected. However, we believe coordination, information sharing, and collaboration among stakeholders can help improve regulatory design and implementation, including corporate compliance and government

enforcement, while safeguarding fundamental rights. Collaboration among actors with diverse regional and stakeholder backgrounds can help mitigate against misuse of regulatory powers and precedents, as well as fragmentation across jurisdictions.

What emerging trends or issues do you see as the most significant opportunities for GNI in the coming year?

In 2024, GNI will continue to help our members inform emerging regulations, while adapting our own assessment framework and holding the line against inappropriate government demands and restrictions. Stakeholder engagement, risk assessment/due diligence practices, and transparency are all practices whose roots are firmly planted in existing business and human rights frameworks, and are flowering repeatedly across emerging regulations and jurisdictions.

GNI has and will continue to emphasize the importance of stakeholder engagement in both regulatory design and as a critical element of corporate compliance. In addition, we will continue to draw lessons from our own deep experience working with our members to identify and facilitate good practices related to human rights risk assessment and mitigation. We will also continue to push governments and companies for more [meaningful transparency](#).

Finally, GNI will use the next year to continue to expand our staff and finalize a series of governance-related reforms that came out of our strategic review. We are excited to streamline our Board and welcome new Board members bringing fresh perspectives and leadership to our organization.

2023 IN NUMBERS

GOVERNANCE



22

BOARD MEMBERS



19

BOARD ALTERNATES



5

COMMITTEES



4

BOARD MEETINGS



1

GOVERNANCE REVIEW



1

STRATEGIC REVIEW

MEMBERSHIP

91 MEMBERS



41

CIVIL SOCIETY ORGANIZATIONS



25

ACADEMICS



15

COMPANY MEMBERS



10

INVESTORS

12 NEW MEMBERS



7

CIVIL SOCIETY MEMBERS



5

ACADEMIC MEMBERS



2

OBSERVER COMPANIES

COMMUNICATIONS



8

BLOG POSTS



3

MEDIA FEATURES



6

NEWSLETTERS

ACCOUNTABILITY



1

ASSESSMENT CYCLE COMPLETED '21/22



11

COMPANIES ASSESSED



2

FIRST-TIME COMPANIES ASSESSED



88

CASE STUDIES REVIEWED

POLICY

26 KEY EVENTS ATTENDED



4

TOOLS & RESOURCES



10

SUBMISSIONS TO GOVERNMENTS



9

POLICY STATEMENTS



12

POLICY CALLS

LEARNING



6

LEARNING CALLS



1

ANNUAL LEARNING FORUM



MEMBERSHIP ENGAGEMENT

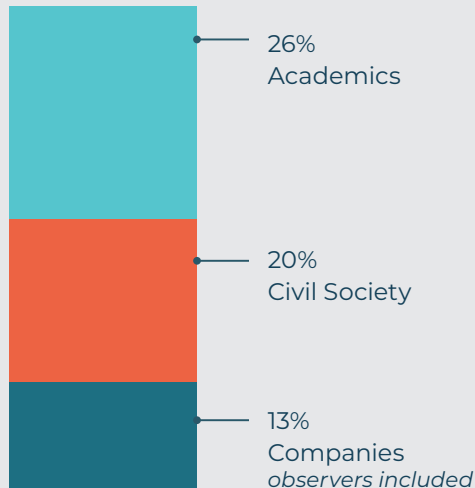
● ● ● In an interconnected world, an innovation, a development, or a regulatory change can have major effects on the technology sector and society writ large. 2023 was a year of several such big changes. Amid a flurry of new laws, innovation, and global challenges, GNI - by remaining true to its core focus yet adaptable to the needs of the times - has remained the leading multistakeholder forum in technology and human rights. By 2023, GNI convened an increasingly diverse membership in a trusted space to candidly engage, share learnings, and steer through new waters together. GNI also organized its first board meetings in Global Majority contexts – first in Nairobi, Kenya alongside GNI member Paradigm Initiative's [Digital Rights Inclusion Forum](#) (DRIF), and then in San Jose, Costa Rica on the margins of [RightsCon](#). GNI staff also attended several regional events, including the [Digital Rights in Asia-Pacific 2023](#) (DRAPAC) in Chiang Mai, Thailand, and GNI member CIPESA's [Forum on Internet Freedom in Africa](#) (FIFAfrica) in Dar es Salaam, Tanzania. These engagements have proved vital for contextual learning and building trust as our multistakeholder community expands and we continue navigating the highs and lows of collaborative consensus-building in complex situations.



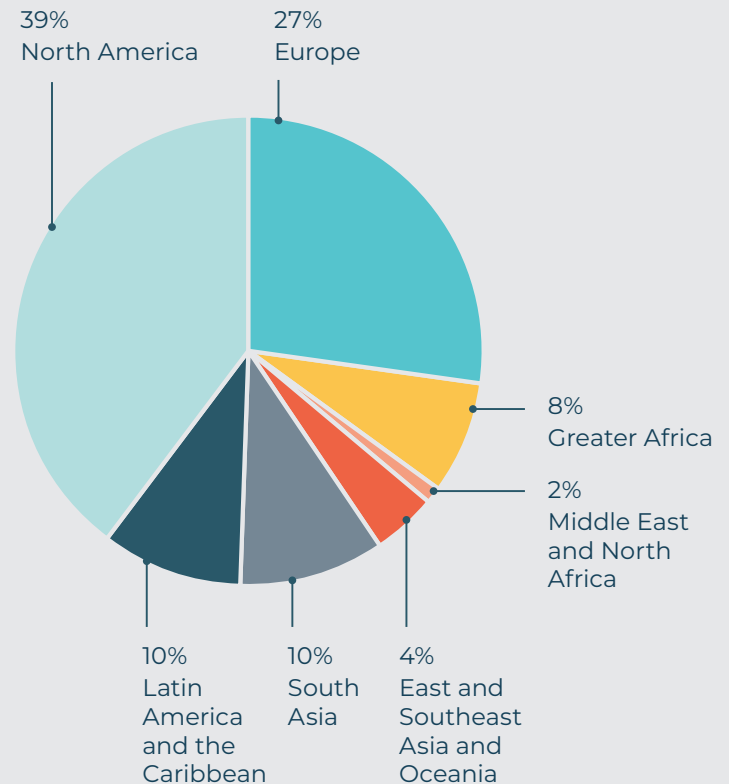
Executive Director Jason Pielemeier speaks during a GNI panel at DRIF, alongside other GNI members.

●●● GNI'S GROWTH BY CONSTITUENCY

includes Fellows & Observers



MEMBERS BY REGION



●●● SUMMARY OF NEW MEMBERS

JOINING THE ACADEMIC CONSTITUENCY

INSTITUTIONS



UC Berkeley Human Rights Center is a multidisciplinary research center established in 1994 that focuses on promoting human rights and international justice through innovative research, education, and advocacy.

INDIVIDUALS



Susan Morgan is an expert in technology and human rights and previously served as the Executive Director of GNI from 2010 to 2014.



Lennon Yao-Chung Chang is an Associate Professor of Cyber Risk and Policy at Deakin University, Australia.



Konstantinos Komaitis is an Internet policy expert and a Senior Resident Fellow at the Digital Forensic Lab (DFR Lab), Atlantic Council.



Muhammad Muzahidul Islam is a human rights lawyer with four law degrees, specializing in international law and human rights since 1998.

JOINING THE CIVIL SOCIETY CONSTITUENCY



KICTANET is a multistakeholder think tank based in Kenya focusing on ICT policy and regulation.



Search for Common Ground is the world's largest peacebuilding organization founded in 1982.



Digital Rights Foundation is a research based advocacy organization in Pakistan focusing on ICTs to support human rights, democracy and digital governance.



OpenNet is a non-governmental organization working for the freedom and openness of South Korea's internet.



European Center for
Not-for-Profit Law

European Center for Nonprofit Law (ECNL) is a non-governmental organization based in the Hague, Netherlands working on empowering civil society through creating enabling legal and policy frameworks.



Article 19 is an international non-profit organization that works to defend and promote freedom of expression and freedom of information worldwide. It was founded in 1987.



AfroLeadership is a pan-African organization headquartered in Cameroon that advocates for human rights, privacy, open data, and data ethics in Africa.

JOINING AS OBSERVER



Vodacom Group Limited is a South African mobile communications company, providing voice, messaging, data and converged services to over 130 million customers across Africa.

MEMBERSHIP PARTICIPATION

GNI supports members with structured ways to engage with one another on critical issues, such as through working groups and committees, including policy, learning, accountability, and constituency-specific committees, as well as on the sidelines of in-person events hosted or attended by GNI. These lead to real, and often tangible outcomes, whether in the form of joint statements, new relationships, practical resources, or enhanced clarity on technical functionality of technologies or operating environments. They also provide a forum to inform and consult members on important developments in the sector. For instance, GNI held two regional calls in July and August - the first to discuss notable **Content Regulation Developments in South Asia**, which helped organize **GNI's advocacy** on human rights and data protection in the region in a timely and effective manner; and another **Briefing on the European Union** to update members on the progress of key regulations, such as the Digital Services Act (DSA). Later in September, GNI facilitated an **open forum** for GNI participants with the **UN Under-Secretary General and Tech Envoy Amandeep Singh Gill** to discuss the UN Global Digital Compact and High-Level Advisory Body on AI, among other things. Our members also had the opportunity to engage in an urgent **Discussion on Internet Freedom in Hong Kong** in September, as a continuation of our digital rights advocacy in the region.



"The EOS team at Federated Hermes Limited has collaborated with GNI to demonstrate investor support for digital rights. We refer to the GNI best practices in our own principles and expectations on data privacy and freedom of expression, using them in our engagement with companies."

Nick Pelosi, Associate Director of Engagement,
EOS Federated Hermes Limited



COLLABORATIONS AND PARTNERSHIP

By collaborating with diverse partners, GNI creates safe spaces for learning and collective advocacy with governments, international organisations, and other key stakeholders to promote and protect freedom of expression and privacy. In January 2023, in partnership with **Business for Social Responsibility (BSR)**, GNI developed a resource entitled "**Across the Stack: Understanding Human Rights Due Diligence (HRDD) Under an Ecosystem Lens.**" This is a unique tool that maps the technology ecosystem and high level human rights issues to support companies and stakeholders in taking an ecosystem-wide view and approach to mandatory HRDD.

In May, GNI and the **Digital Trust and Safety Partnership (DTSP)**, supported by **Brainbox Institute**, organized a series of workshops to facilitate dialogue between academic experts, civil society and companies on **Implementing Risk Assessments under the European Union's Digital Services Act**. Later in August, GNI partnered with Advocacy Assembly to deliver a course on **Engaging with the Private Sector to End Internet Shutdowns**. Led by GNI Executive Director Jason Pielemeier, it informed how the private sector plays a part in shutdowns and shared strategies to build a strong collaboration with them in order to reduce and eventually end network disruptions and "blanket" shutdowns.

GNI also collaborated on two important events, organized alongside the Annual Learning Forum in Brussels in October, which includes the launch of the [Freedom of the Net 2023 Report](#) by Freedom House and a workshop on [AI, Human Rights, and the Evolving Regulatory Environment](#) with the UN Human Rights B-Tech Project. The workshop was the first in a three-part event for stakeholders to discuss the role that the [UN Guiding Principles](#) can play in shaping AI regulation to be rights-respecting and coherent.

Together with [Brainbox Institute](#), GNI managed the [Action Coalition on Meaningful Transparency](#) (ACT), launched under the auspices of the Danish Tech for Democracy Initiative. The project aimed to bring together a range of academics, civil society organizations, companies, governments, and international organizations to work collaboratively on digital transparency. The project was created by GNI with support from the Omidyar Network. Efforts included: clarifying relevant definitions and terminology; mapping existing efforts and identifying gaps through the development of a [Transparency Portal](#). Additional funding was provided by Google and Meta for meaningful transparency work at GNI.

GNI serves as a member of the Freedom Online Coalition Advisory Network (FOC-AN) and co-chairs the [FOC task force on Internet Shutdowns \(TFIS\)](#) alongside the United Kingdom's Office of Foreign, Commonwealth, and Development. GNI is also part of the [OECD.AI Network of Experts](#) workstream on AI risk. The network's goal is to help implement effective and accountable trustworthy AI systems by promoting global consistency. GNI also serves as a member of the [Christchurch Call Advisory Network](#).



“GNI is a very special organization with great people, who are all passionate for business human rights in the tech sector. We were fortunate to be selected years back as fellows for two years, during which we learned to know much about GNI, its members, its work, its commitment to transparency, accountability and participation, so as to be eager for AfroLeadership to join as member and contribute to the work in francophone Africa. We hope to give more light to GNI, and to keep refining our advocacy work for digital rights with all the products developed by GNI and its members.”

Charlie Martial NGOUNOU, President, AfroLeadership



Alongside Business for Social Responsibility (BSR), GNI presented the Across the Stack tool at FIFAfrica 2023 in Tanzania and were joined in the panel by Vodacom Tanzania.



DEVELOPMENT

● ● ● UNITED STATES BUREAU OF DEMOCRACY, HUMAN RIGHTS, AND LABOR

From August 2018 to May 2023, GNI implemented a project funded by the United States Bureau of Democracy, Human Rights, and Labor (DRL). This was done in two funding phases: “Enhancing Multistakeholder Collaboration for Internet Freedom” (EMCIF) and “Sustaining Multistakeholder Networks for Internet Freedom” (SuNI).

GNI worked to strengthen regional networks of private sector and local civil society organizations (CSOs), and geographically diversify its membership through the Emerging Voices Fellowship program, Regional Collaborative Coalitions (CPCs), and research grants.

NETHERLANDS MINISTRY OF FOREIGN AFFAIRS

The Multistakeholder Action for Rights in Cyberspace (MARC), supported by the Government of the Netherlands Ministry of Foreign Affairs, aimed to enhance global protections for freedom of expression and privacy in cyberspace. From November 2019 to October 2023, the project focused on engaging underrepresented voices from CSOs and the private sector in collaborative efforts. Through strategic outreach and engagement, the MARC project successfully mapped key stakeholders, developed tools such as the [Across the Stack Tool](#), translated outreach materials, and organized multistakeholder dialogue events across Latin America, Sub-Saharan Africa, South Asia, and Southeast Asia.

INTERNEWS CONSORTIUM

The [Greater Internet Freedom](#) (GIF) USAID-funded project, implemented by Internews under a consortium model including international non-governmental organizations, including GNI, local and regional partners, focuses on enhancing internet freedom through collaborative efforts. The project runs from 2020 - 2024, and GNI has been focusing on supporting local partners around multistakeholder practices and engaging with the private sector using various GNI tools and the GNI framework. This included delivering the workshop first developed for RightsCon on how companies respond to government demands at the South Eastern European Dialogue on Internet Governance.

FORD FOUNDATION

The [Ford Foundation](#) continues to provide organizational support to GNI to strengthen the Network, including through a number of our governance and membership activities.

OMIDYAR NETWORK

In addition to funding the Action Coalition on Meaningful Transparency, in 2023, GNI received funding from the Omidyar Network, which supports both organizational needs and enables GNI to contribute effectively to the internet freedom landscape through policy statements, research, and engagement with various stakeholders.



PROVIDING FRAMEWORK

● ● ● STRATEGIC REVIEW

In September 2022, GNI completed its third strategic review. This review, which commenced in 2021, was structured into three distinct phases: Scope, Membership, and Structure. The comprehensive process included surveys, focus groups, and deliberations with the Board and a wide cross-section of members. Subsequently, the Board approved nine recommendations from the first phase and ten from the second phase. Over the course of 2023, GNI implemented these recommendations, which ranged from the re-articulation of our organizational narrative to the development of a secure members' portal.

As part of the review and to allow further work related to GNI's structure, in 2023 the Board established two parallel but related workstreams. The first workstream, led by former GNI Board member Michael Samway, focused on governance reforms, membership engagement, working methods, and Diversity, Equity, and Inclusion (DEI). The second workstream, led by Article One Advisors, analyzed global legislative and regulatory frameworks related to mandatory due diligence requirements, identified potential overlaps and gaps with GNI's assessment process, and explored opportunities for aligning these assessments. This final phase of the strategic review concluded in late 2023 when the Board approved ten additional recommendations related to assessment, development, and governance.



GNI Operations and Programs Associate Montserrat Legorreta presenting GNI's tabletop exercise at the 8th Annual Meeting of the South Eastern European Dialogue on Internet Governance (SEEDIG) held in Zagreb, Croatia.



FOSTERING ACCOUNTABILITY

● ● ● OVERVIEW OF THE FOURTH ASSESSMENT CYCLE

GNI company members agree to have their implementation of the GNI [Principles](#) assessed independently every three years. The assessment enables GNI to determine whether each member company is making good-faith efforts to implement the GNI Principles with improvement over time, and to make recommendations for continuous improvement.

In 2022, GNI concluded the multistakeholder reviews of eleven companies participating in the fourth cycle of independent assessments, which covered the period from October 2019 to October 2021: BT Group, Ericsson, Google, Meta, Microsoft, Nokia, Orange, Telenor, Telia Company, Vodafone, and Yahoo. The independent assessments were conducted according to the GNI Assessment [Toolkit](#) by assessors accredited by the GNI Board as meeting GNI's [independence and competency criteria](#), who then participated in mandatory assessor training. In total, this assessment cycle included the examination of 88 cases in a variety of operating environments, including specific responses to government demands, as well as cases regarding the broader context of company operations.

The results of the fourth cycle independent assessment, which include each company's determinations and recommendations for improvement, were published in 2023 as part of GNI's [Public Assessment Report \(PAR\)](#). The PAR highlights critical insights into the challenges companies faced in a changing global environment. Despite the disruptions caused by the COVID-19 pandemic, the assessment process proved resilient, with much of the work successfully conducted remotely. The assessments highlighted the influence of regulatory changes, such as the EU's Digital Services Act, on aligning company practices with evolving legal frameworks. Conflict, particularly the Russian invasion of Ukraine, also had a significant impact on operations and human rights considerations.

As detailed in the PAR, assessors issued 66 recommendations which included strengthening risk management, enhancing company policies for freedom of expression and privacy, improving governance structures around the GNI Principles, and increasing transparency in communication and reporting. The Board also emphasized the need for adequate resources for company human rights teams, training, and multilingual implementation of company policies to ensure effective global operations.

Over the course of 2023, GNI conducted a review of the fourth cycle independent assessments, which was also informed by the broader Strategic Review (see section above). This review highlighted the need to understand and find synergies between new mandatory due diligence regulations and GNI's assessment process, to enhance participation and cadence of the assessments, to further tailor the assessment to each company member's services, and to capture trends in content governance, information integrity and human rights due diligence on rapidly developing AI services. In the second half of 2023, GNI commenced the planning and implementation of activities to effect these changes, with the aim of incorporating improvements ahead of the fifth cycle of assessments in 2024.



EMPOWERING POLICY

● ● ● In 2023, GNI's policy work prioritized understanding the evolving regulatory landscape shaping technology governance. Amidst rapidly evolving practices and tools for regulating the Internet and technology, GNI's policy priority issues - namely, [Network Disruptions](#), [Intermediary Liability and Content Regulation](#), [Privacy and Surveillance](#), and [Jurisdictional Assertions and Limits](#) - remain relevant and crucial in navigating the complex challenges posed by the evolving regulatory landscape.

Over the course of the year, GNI advocated for carefully-considered content regulation policies in relation to Australia's [Communications Legislation Amendment \(Combating Misinformation and Disinformation\) Bill 2023](#), Brazil's [Law on Freedom, Responsibility and Transparency \(PL 2630\)](#), India's [Information Technology Rules 2021](#) and [draft Telecommunications Bill 2022](#), Vietnam's [Decree 72](#), as well as against Turkey's [new laws targeting social media and private messaging services](#).

GNI acknowledges the important role that governments can have in regulating the tech sector to enhance due process, transparency, and accountability. However, without transparent and participatory legislative processes and narrowly-tailored requirements, regulation can lead - intentionally or unintentionally - to unwarranted restrictions on freedom of expression and privacy. Furthermore, GNI has been tracking and engaging on emerging online safety laws around the world as part of its focus on content regulations. In 2023, GNI commented on the online safety bills in [Sri Lanka](#) and the [United Kingdom](#) in their draft stages to inform human rights protections and intermediary liability provisions.

2023 was a crucial year for the European Union deliberating and negotiating landmark laws and directives, the 'Brussels effect' of which are likely to reverberate beyond its borders. GNI participated in several of these processes, including meeting with parliamentary rapporteurs working on and issuing [several statements](#) supporting the Corporate Sustainability Due Diligence Directive (CSDDD), as well as continuing to meet with the European Commission's



"ARTICLE 19 has benefited from our ongoing engagement with the GNI Policy Committee, and in particular through active participation in regional policy calls on Asia. Such engagement has supported our advocacy activities, such as through coordination on public GNI statements concerning policy issues in difficult jurisdictions across the region. We have also appreciated the opportunity to invite regional partners to highlight their own expertise and concerns through dedicated committee or working group meetings."

Michael Caster, Asia Digital Programme Manager,
ARTICLE 19



Directorate General for Communications Networks, Content and Technology and submitting a consultation response on the [Digital Services Act \(DSA\) Delegate Regulation on Independent Audits](#).

Personal data protection and privacy have also been high on GNI's list of priorities in 2023. GNI submitted a response to the call for a public consultation by the Government of India on the draft [Digital Personal Data Protection Bill 2022](#) to encourage secure collection, storage, and retention of personal data. In neighbouring Pakistan, GNI called on the government to reconsider troubling provisions in the draft [Personal Data Protection Bill 2023](#) and undertake open and transparent consultations to inform rights-respecting regulation. Recognizing the growing trend of "data protection" laws being exploited to justify policies that restrict data flows, enable surveillance, and enhance state control over tech companies, GNI established a Data Protection Working Group in 2023 and will convene the group in 2024.

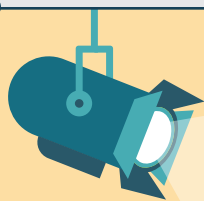
While governments around the world increasingly rely on content regulation and data legislations, network disruptions and shutdowns are still a looming threat in many countries. GNI continues to monitor cases of communications restrictions very closely, and in 2023, issued two statements: a condemnation of the [communications disruptions in Gaza](#), as well as a broader criticism of [government efforts to ban digital communications platforms globally](#).

PARTICIPATION IN KEY EVENTS

Throughout 2023, GNI engaged with members and stakeholders in twenty-six events to emphasize the importance of safeguarding and advancing privacy and freedom of expression in the tech sector. This includes our participation in the [Internet Governance Forum](#) held in Kyoto, as well as the [Paris Peace Forum](#), where GNI Executive Director Jason Pielemeier participated in the [5th Summit of the Christchurch Call](#) and the [Leaders' Summit](#) at the Élysée Palace hosted by French President Emmanuel Macron and former New Zealand Prime Minister Jacinda Ardern.



Executive Director Jason Pielemeier spoke at the Leaders' Summit hosted by French President Emmanuel Macron



IN SPOTLIGHT: GNI WITHIN INTERNATIONAL INTERNET GOVERNANCE PROCESSES

GNI had the opportunity to participate in several major international Internet governance processes in 2023. This includes its [submissions](#) on the three revised drafts (drafts 1.0, 2.0, 3.0) of [UNESCO's Guidelines for Regulating Digital Platforms: A Multistakeholder Approach](#). Broadly, GNI called for a detailed principles-based document that distinguishes between services' "visibility, influence over, and directionality of content" and is "future proof." GNI and several of its members attended and spoke at [UNESCO's Internet for Trust](#) conference in February 2023.

GNI also provided [input](#) on the targeted update of the [OECD Guidelines for Multinational Enterprises and Implementation Procedures](#), as well as engage in the intergovernmental process on the [UN Global Digital Compact](#) where GNI suggested [improvements](#) to the section on applying human rights online, avoiding internet fragmentation, promoting Artificial Intelligence (AI), and protecting data.





COMMUNICATIONS

- ● ● Over the course of 2023, GNI revised its communications strategy to focus on effective ways to share consistent and regular updates with its membership, expand reach, and increase awareness of its multistakeholder model of work and advocacy. As a result, GNI was able to expand awareness of its impact globally and its social media presence grew considerably.

GNI published six internal (members) and public newsletters recapping its quarterly activities, engagements, publications, and policy activities. In 2023, with financial support from Meta, GNI's communications team also took on the much-anticipated project of revamping its website and launching a new members' portal. GNI expects the portal to facilitate a more convenient way for members to keep up-to-date with GNI activities and engage with each other.

The impact of GNI's work has been far-reaching, with several of its public statements and advocacy efforts being quoted by international media outlets. For example, GNI's statement on Pakistan's Personal Data Protection Bill 2023 was referenced in two articles published by [Dawn](#) and [Global Voices](#), and was also highlighted in a live blog on Al Jazeera. Additionally, [Dawn](#) referenced GNI as evidence of widespread international condemnation of internet shutdowns in Pakistan.

GNI published [eight](#) insightful blog posts on Medium, which explored a range of critical issues, including the [implications](#) of Kazakhstan's publication of a foreign funding list on civic space. Through these posts, GNI provided a platform for diverse voices and perspectives on key human rights and technology issues.

GNI's Executive Director Jason Pielemeier co-authored an analysis on "[Unpacking 'Systemic Risk' Under the EU's Digital Service Act](#)," which examines the DSA's definition of systemic risk, risk mitigation obligations on platforms, and its implications for freedom of expression and democratic governance.



ENABLING LEARNING

● ● ● SHARED LEARNING

In 2023, GNI continued its mission of facilitating crucial shared learning sessions that promote open and transparent dialogues among its diverse stakeholders. These discussions, driven by members' interests, aim to enhance collective understanding of critical challenges to freedom of expression and privacy within the tech sector. For instance, GNI hosted a series of learning calls in collaboration with the International Committee of the Red Cross ([ICRC](#)) and the Stockholm International Peace Research Institute ([SIPRI](#)) exploring tech company responsibility in armed conflicts. Key takeaways from these calls can be found in a report [here](#).

In addition to these calls on armed conflict, GNI organized discussions on various topics such as:

- Implications for digital rights stemming from the U.S. Supreme Court's decision on abortion in *Dobbs v. Jackson Women's Health Organization*
- Brazilian Law on Freedom, Responsibility and Transparency on the Internet
- Telecom company responsibilities around elections



"Participants walked away from the Learning calls on ICT and Armed Conflicts with broadened perspectives on the challenges posed by doing business in conflict zones and other high-risk environments. They also were able to apply new frameworks and perspectives to the problems they face in this respect."

Arturo Carillo, Professor of Law and Director of the International Human Rights Clinic, George Washington University (SIPRI-ICRC series)





●●● ANNUAL LEARNING FORUM

The GNI [Annual Learning Forum](#) was held in Brussels on October 25, 2023 and focused on integrating emerging mandatory Human Rights Due Diligence (mHRDD) approaches with existing human rights and business frameworks. The forum featured experts from various sectors discussing the protection of user rights in the context of governmental demands, restrictions, and regulations in the tech sector. Having contributed to this trend over the last 15 years through its guidance and company assessments, the Forum allowed GNI to share insights into its approach to HRDD and tech company assessments. The discussions emphasized the transition from voluntary to mandatory HRDD, the impact of European regulations globally, and the challenges for tech companies in different contexts. The forum underscored the importance of multi-stakeholder collaboration and effective due diligence practices.

A full-length recording of the Annual Learning Forum can be found [here](#).

1. The forum focused on synchronizing new HRDD practices with established business and human rights frameworks, emphasizing continuous improvement and adaptation.
2. Discussions highlighted the implications of governmental pressures on tech companies, particularly regarding user freedom of expression and privacy.
3. Experts discussed the shift from voluntary to mandatory HRDD, noting how companies already complying with voluntary standards are better positioned for new legal requirements.
4. The forum explored how European legislation, such as the Digital Services Act (DSA), influences global practices, stressing the need for localized adaptations and avoiding a one-size-fits-all approach.
5. Effective HRDD requires collaboration among tech companies, civil society, and governments, with shared responsibility in protecting human rights and ensuring accountability.



GOVERNANCE

●●● THE GNI BOARD (AS OF 2023)

The following members currently serve on the GNI Board:



INDEPENDENT CHAIR

David Kaye



VICE CHAIR

Agustina Del
Campo, CELE

ACADEMICS AND ACADEMIC ORGANIZATIONS

Jessica Fjeld, Berkman Klein Center for
Internet and Society at Harvard University

Eduardo Bertoni, (Independent)

K.S. Park, Korea University Law School
(Independent)

CIVIL SOCIETY ORGANIZATIONS

Greg Nojeim, Center for Democracy &
Technology

Lillian Nalwoga, CIPESA

Lea Kaspar, Global Partners Digital

Melody Patry, Internews

Mishi Choudhary, Software Freedom Law
Center India

ICT COMPANIES

Miranda Sissons, Meta

Lewis Segall, Google

Steve Crown, Microsoft

Fiona Cura-Pitre, Nokia

Yves Nissim, Orange

Anita Househam, Telenor Group

Patrik Hiselius, Telia Company

Nicole Karlebach, Verizon

Logan Smith, Yahoo

Moira Thompson Oliver, Vodafone

INVESTORS

Adam Kanzer, BNP Paribas Asset
Management

Lauren Compere, Boston Common Asset
Management

●●● GNI BOARD ALTERNATES

The following members serve as alternate board members:

ACADEMICS AND ACADEMIC ORGANIZATIONS ALTERNATES

Jhalak Kakkar, Centre for Communications Governance at National Law University

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

Vivek Krishnamurthy, University of Ottawa (Independent)

CIVIL SOCIETY ORGANIZATIONS ALTERNATES

Usama Khilji, Bolo Bhi

Torsha Sarkar, Centre for Internet & Society

María Paz Canales, Derechos Digitales

Magnus Ag, International Media Support

ICT COMPANY ALTERNATES

Lydia Hopton, BT Group

Théo Jaekel Ericsson

Alex Warofka, Meta

Alexandria Walden, Google

Bernard Shen, Microsoft/LinkedIn

Sarah Altschuller, Verizon

Dorothe D'Herde, Vodafone

Rebecca MacKinnon, Wikimedia

●●● GNI STAFF

As our membership continues to grow under the leadership of Executive Director Jason Pielemeier, GNI expanded and empowered committees and working groups to create more spaces for engagement and interaction. To extend our presence and better service our members across a range of regions and timezones, GNI also grew its staff presence across Europe and Asia.

In 2023, GNI welcomed Setu Bandh Upadhyay, based in India, as a Membership and Learning Associate, who helped support GNI's network of members and advanced learning on pressing subjects. In October, Konstantinos Komaitis, an independent expert member based in Geneva, joined GNI as a part-time Senior Policy Advisor for six months, contributing his expertise on European tech policy and Internet governance. Samaya Anjum, a Policy and Communications Fellow based in Bangladesh, provided valuable support and research for GNI's policy and communications outputs.

In addition, GNI is grateful to its staff for their contributions across all workstreams, including GNI's Managing Director Elonnai Hickok for spearheading the organization's strategic development; Senior Policy and Communications Associate Ramsha Jahangir for leading GNI's policy and communications work across a globally expanding network; Senior Operations and Policy Associate Idan Ben Yakir for providing crucial support with GNI's operations and accountability work; and, last but not least, Operations and Program Associate Montserrat Legorreta for sustaining and advancing GNI's development and membership engagement.

Before our Annual Learning Forum and Board Meeting in Brussels, the GNI team gathered in the charming city of Bruges for our first staff retreat since before the pandemic. This in-person meeting fostered collaboration, helped us prepare for the upcoming events, and allowed our predominantly remotely-working staff to bond with each other. Our work together was interspersed with memorable activities like chocolate making and beer tasting.

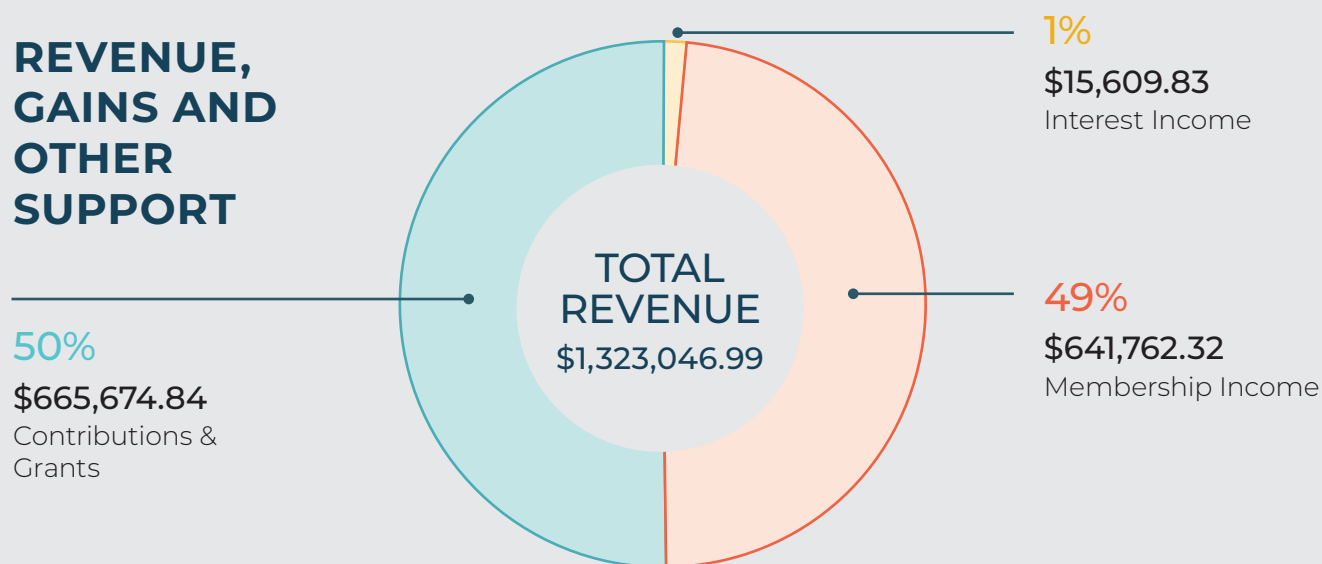
GNI also benefited from the support of three fellows from Georgetown's Masters in Science in Foreign Service (MSFS) program — Marcela Fuentes, Maria Paula Salmon, and Mariam Kvaratskhelia—and Georgetown Law Practicum student Lauren McNeal. Fellows have been integral to the team, contributing to GNI's policy work, development, and communications efforts with internal and external stakeholders. GNI is also grateful for the support of Chris Sheehy, who was Policy and Research Manager until August 2023. In this capacity, Chris 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.



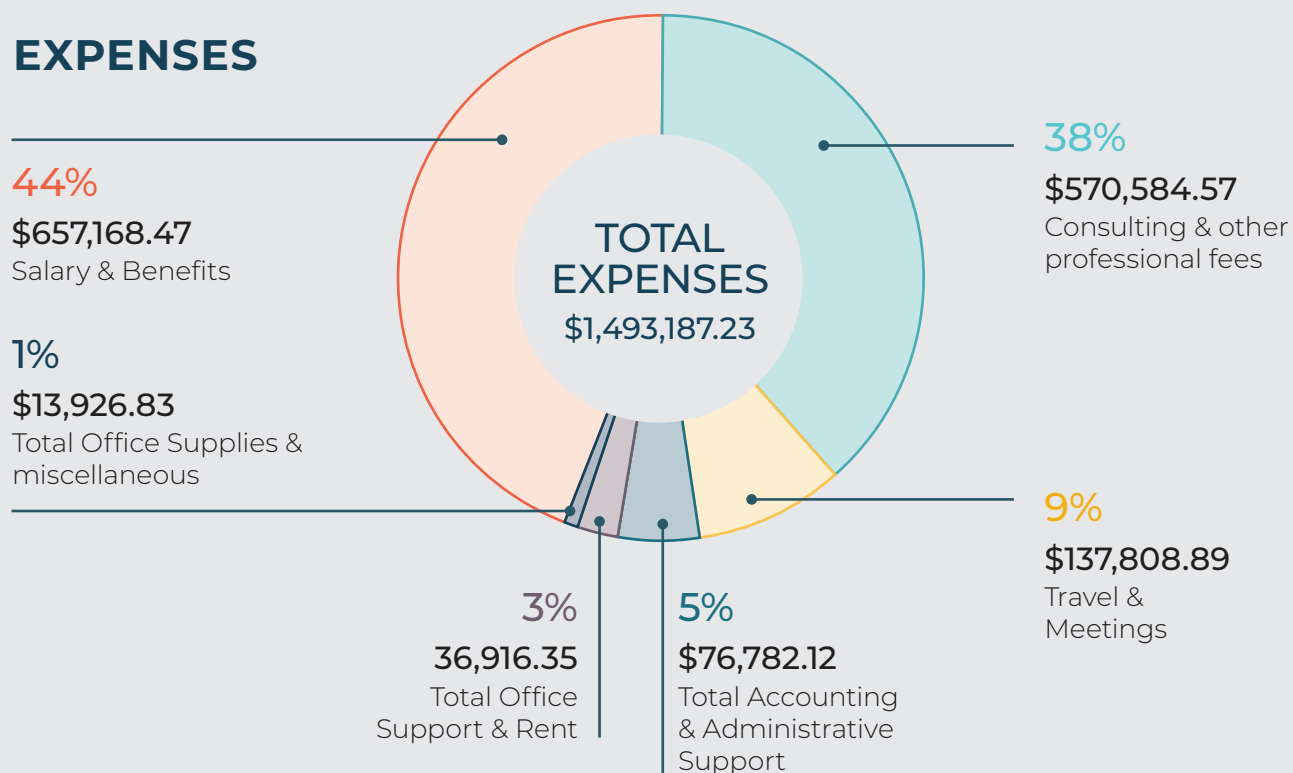
GNI Staff in Bruges, Belgium

2023 FINANCIALS

REVENUE, GAINS AND OTHER SUPPORT



EXPENSES



ASSETS

-\$170,140.24
EXCESS OF INCOME
OVER EXPENSES

\$1,688,902.06
NET ASSETS BEGINNING

\$1,518,761.82
NET ASSETS ENDING



ACKNOWLEDGMENTS

● ● ● 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 AND ADMINISTRATION

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

DESIGN

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

We also thank our Policy and Communications Intern Eric Le Houerou for his support on this report.