

Making sense of integrity:
Civil society's influence on international
operating firms in collective action against
corruption

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Master Thesis

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Preface

This master's thesis represents the conclusion of my studies in Organizational Design and Development at Radboud University Nijmegen. The academic journey has been intellectually enriching. Throughout this year, I developed a deep interest in the dynamics of global supply chains and the complex interplay among their actors. While global supply chains have garnered increasing attention in recent years, this attention is not always positive; issues such as corruption and unethical practices persist.

From the perspective of organizational development, I became particularly intrigued by how organizations can evolve to mitigate these challenges and contribute to more sustainable and ethical global systems.

I am grateful to Dr. Stefan Schembera for his expert supervision and invaluable insights, which significantly shaped the direction and depth of this research. Completing this thesis represents a significant milestone in my academic path, and I look forward to applying my knowledge to the advancement of global organizational practices.

Abstract

This study investigates the influence of civil society actors on international operating firms in making sense and responding to collective anti-corruption initiatives within global supply chains. By employing a longitudinal qualitative case study of the International Collective Action Conference (ICAC), the research utilizes a sensemaking lens along with the Gioia methodology to capture the evolution over time in the context of global supply chains. The study identifies three core sensemaking mechanisms: framing integrity, institutional anchoring, and ethical norm-setting. Through these mechanisms, civil society actors shape corporate compliance behaviour, reframe integrity as a shared social responsibility, and bridge the gap between soft and hard law. The findings show civil society's role has evolved from advocacy to co-regulation, co-creating institutional pathways that embed collective action in global supply chains. This research contributes to governance, institutional, and sensemaking theory by demonstrating this role in the global anti-corruption landscape.

Content

Introduction	4
Literature review	8
<i>Sensemaking lens</i>	8
<i>Collective action against corruption</i>	9
<i>The influence of civil society on IOFs' anti-corruption behavior</i>	10
Methodology	12
<i>Research design</i>	12
<i>Data collection</i>	13
<i>Data analysis</i>	13
<i>Ethical considerations</i>	15
Findings	18
<i>Civil society's influence on corporate perception</i>	18
<i>Institutionalization and scaling of collective action</i>	21
<i>Multi-stakeholder collaboration and implementation</i>	23
<i>State and policy influence on corporate integrity</i>	25
<i>Navigating the diffusion and internationalization of integrity norms under civil society</i>	27
Discussion	31
<i>Theoretical implications</i>	32
<i>Practical implications</i>	34
<i>Conclusion</i>	35
<i>Limitations</i>	36
<i>Future research</i>	37
References.....	38
Appendix 1: Document overview.....	46
Appendix 2: Codebook.....	47

Introduction

In recent decades, globalization has transformed the architecture of the networks in the global supply chains, specifically global production and distribution. Globalization has thoroughly reshaped the architecture of economic activity, which has enabled the expansion of multinational corporations (MNCs) and the integration of small- and medium-sized enterprises (SMEs) into complex global supply chains. While this interconnectedness has facilitated economic growth and international trade, it has also intensified social and environmental challenges, including labour exploitation, deforestation, bribery, organizational misconduct and corruption (Cleveland et al., 2009; Palmer, 2013; Stiglitz, 2006). Firms operate across diverse jurisdictions, encounter legal systems, regulatory standards, and cultural expectations, complicating efforts to ensure ethical, sustainable business practices (Ashwin et al., 2020; Peterson & Anand, 2004).

At the same time, globalization accelerates the diffusion of norms across borders, creating tensions in corporate accountability due to divergent societal expectations (Boersma, 2018; Gelfand et al., 2024). These tensions are particularly pronounced in MNCs, where independent decision-making structures increase the complexity of collective behaviour (Batzke & Ernst, 2024). Moreover, globalization has empowered transnational social movements and civil society actors, which increasingly influence policy reforms and corporate accountability (Bauhr, 2017; Smith et al., 2021). As a result, stakeholders now expect corporations to take responsibility for their actions and comply with ethical business practices (Hartmann & Moeller, 2014; Matos et al., 2020).

Despite the introduction of sustainability standards and corporate regulations (Vogel, 2010), many firms continue to engage in corrupt practices. Research shows that corruption often arises when sustainability practices are implemented symbolically rather than substantively (Matos et al., 2020; Silvestre et al., 2020). This phenomenon is grounded in institutional theory, highlighting the gap between formal adoption and symbolic implementation. Applying uniform standards in varied political and cultural contexts can unintentionally enable corruption, as companies exploit regulatory inconsistencies and enforcement gaps (Ostrom, 2000).

MNCs, some of which now operate with more economic and social influence than national governments (Beck & Cammiller, 1999), across multiple jurisdictions with various levels of legal enforcement. In this fragmented regulatory landscape, formal state-led mechanisms are often proven insufficient (Connor & Haines, 2013). Consequently, private regulation and civil society initiatives have emerged as alternative governance mechanisms

(Vogel, 2010).

Civil society organizations (CSOs), such as NGOs, trade unions, consumer groups, and activist networks, hold corporations accountable (Grimes, 2013). These CSOs hold corporations accountable through voluntary initiatives, industry codes of conduct, and sustainability certifications (Vogel, 2010). These actors create market-driven incentives that push firms beyond legal compliance, embedding responsible business practices into their operations. This shift toward hybrid governance is reinforced by evolving social norms, which influence corporate behaviour through societal pressure (Batzke & Ernst, 2024).

Over time, civil society actors shape corporate sensemaking by reframing compliance as a proactive ethical commitment rather than a legal obligation (Barley & Tolbert, 1997). Sensemaking mechanisms, defined as communicative and cognitive processes through which organizations construct meaning in complex environments (Bunge, 1997; Schembera et al., 2023; Weick, 1995), are central to understanding how firms interpret and respond to corruption challenges.

MNCs and SMEs, in this study referred to collectively as international operating firms (IOFs), are embedded in global supply chains and often cooperate closely. When MNCs gain legitimacy, they can drive social change and promote corporate responsibility (Boersma, 2018; Suchman, 1995). However, they also face the, so called, self-promoting paradox, where excessive focus on image management can lead to scepticism (Richter, 2011).

In this context, collective action can emerge as a critical mechanism to combat corruption. These collective action mechanisms refer to coordinated efforts by multiple stakeholders to address shared problems that cannot be solved one-sided (Ostrom, 2009; World Bank Institute Working Group, 2010). Collective action occurs at various levels, from local initiatives to international frameworks, and is increasingly institutionalized through platforms, for example, the International Collective Action Conference (ICAC). These initiatives are particularly important in situations where legal enforcement is weak or fragmented, and where voluntary cooperation can complement governance mechanisms (Aiolfi, 2018; Pieth, 2012)

However, the success of collective action depends not only on institutional design but also on the interpretive processes through which actors construct shared meaning. In multi-stakeholder environments, sensemaking enables actors to align their interpretations, justify their actions, and coordinate responses to complex challenges (Maitlis, 2005; Van Der Giessen et al., 2022; Whittle et al., 2023). Norms, culture, and ideology shape the conditions under which collective action emerges (DeMarrais & Earle, 2017), and civil society plays a

role in guiding these processes.

Despite growing recognition of civil society's role in corporate governance, existing research has not sufficiently examined how civil society actors shape the sensemaking mechanisms that substantiate collective action against corruption. Prior studies have focused on psychological drivers of collective action (e.g., group efficiency) or the structural features of anti-corruption initiatives (Ashwin et al., 2020; Vogel, 2010). Others have critiqued mechanism-based theorizing for its static view of institutional processes, calling for more dynamic, interpretive approaches (Schembera et al., 2023). Moreover, the interaction between soft law (e.g., voluntary standards, discourse) and hard law (e.g., formal regulations) in shaping corporate behaviour remains underexplored (Abbott & Snidal, 2000).

This study addresses these gaps by investigating how civil society actors influence the sensemaking of IOFs in the context of collective action against corruption. It builds on the sensemaking theory (Weick, 1995; Whittle et al., 2023) to explore how shared meanings are constructed, contested, and institutionalized across diverse stakeholders. The research provides a more nuanced understanding of how ethical norms are internalized within organizations and how civil society contributes to the evolution of governance frameworks in global supply chains.

From a scientific perspective, this research contributes to the literature on institutional theory, sensemaking, and anti-corruption governance by offering a dynamic account of how civil society actors shape corporate interpretations and responses. It extends existing models by identifying specific sensemaking mechanisms, such as framing integrity, institutional anchoring, and ethical norm-setting, that mediate the transition from symbolic to substantive compliance.

Practically, the study offers insights for policymakers, CSOs, and corporate leaders seeking to enhance ethical governance in global supply chains. Illuminating the interpretive processes that underpin collective action informs the design of more effective anti-corruption strategies and supports the development of inclusive, multi-stakeholder governance frameworks.

This study examines how civil society actors influence the sensemaking mechanisms of IOFs in the context of collective action against corruption. Therefore, the central research question is: How do civil society actors influence internationally operating firms (IOF) in making sense of collective action against corruption?

To address this research question, a sensemaking lens is applied to explore how IOFs interpret anti-corruption challenges through their engagement with civil society. A

longitudinal qualitative case study of the ICAC analyses 15 transcribed sessions from 2022 and 2024. Inductive content analysis and the Gioia methodology effectively answer the research question.

First, the literature review presents the concepts of sensemaking, civil society, and collective action against corruption (Chapter 2). Then, the research design, case study, data collection, and analytical approach are outlined. (Chapter 3). The empirical findings are then articulated (Chapter 4). Following this, the study concludes with a discussion of both the theoretical and practical implications. A conclusion is then provided, offering answers to the research question. Ultimately, the limitations of this study and suggestions for future research are examined (Chapter 5).

Literature review

Sensemaking lens

Sensemaking is a social iterative process through which individuals and groups interpret and construct their reality, often in complex and ambiguous situations. Sensemaking is essential in corporations for creating a shared understanding of issues, and it is the key to enabling collective action (Maitlis, 2005; Whittle et al., 2023). Structuration theory, which is discussed in the context of sensemaking, emphasizes the dynamic interplay between structure (rules, norms, institutions) and agency (individual action). It suggests that sensemaking is not just an individual cognitive process but is embedded in social structures and interactions (Jones & Karsten, 2008). In addition, the role of language and discourse in sensemaking is often essential in shaping meaning construction and reinforcing the structuring process of sensemaking (Whittle et al., 2023).

In this study, sensemaking mechanisms refer to the structured, interpretational processes through which individuals and organizations create shared meaning to respond to complex or ambiguous situations. These mechanisms encompass cognitive, emotional, and discursive elements that guide how actors interpret and respond to issues related to corruption in global supply chains (Van Der Giessen et al., 2022). Sensemaking mechanisms significantly influence collective action in multi-stakeholder environments, as actors engage in collective sensemaking to navigate and respond to uncertain or complex situations. (Schildt et al., 2020; Weick, 1995). In this process, narratives are constructed to justify the actions of stakeholders (Brown et al., 2015; Schildt et al., 2020). Similarly, managers within organizations are increasingly confronted with complex and ambiguous decisions which impact multiple stakeholder groups. In the field of management, the integration of sensemaking with rational decision-making is pivotal in addressing situations by establishing a shared understanding prior to applying rational analysis (Awati & Nikolova, 2022). This process underscores the significance of collective sensemaking in shaping coordinated actions among diverse stakeholders.

The interaction between legal mechanisms and information governance is crucial in shaping corporations' behaviour. Hard law, such as formal regulations and enforcement mechanisms, provides a structural foundation for compliance. In contrast, soft law, including voluntary standards, norms, and discursive practices, guides behaviour through collective sensemaking and social expectations (Abbott & Snidal, 2000). Corporations adapt to environmental changes, such as anti-corruption measures in global supply chains. Sensemaking mechanisms facilitate this alignment to the environmental changes regarding

legal requirements with corporate norms and practices, which provide a systemic view of change (Jones & Karsten, 2008).

In movements like Transparency International, collective sensemaking involves creating shared narratives that help guide actions and strategies (Transparency International, 2022). Through sensemaking, local crisis actors develop a collective narrative to address challenges (Van Der Giessen et al., 2022). Furthermore, the role of language between actors and discourse in shaping organizational sensemaking supports the development of coherent strategies in anti-corruption efforts (Whittle et al., 2023).

Collective action against corruption

The origins of collective action in the context of anti-corruption stem from the fight against corruption and money laundering. The Wolfsberg Banking Group was one of the early initiatives of collective action against corruption. They marked significant progress in compliance systems among corporations (Pieth, 2012). The development of collective action involves the evolution of normative constraints, emphasizing the role of civil society and the pressure to create democratic societies and control corruption. Civil society influences governance by shaping corporate legitimacy through normative sensemaking mechanisms and constraints (Mungiu-Pippidi, 2013). According to Brennan and Hamlin (2009), normative constraints are more effective than legal constraints in shaping corporate legitimacy. Corporations gain social acceptance by aligning their actions with ethical and social expectations. This concept aligns with the broader interplay between positive and normative political evaluation, where normative principles inform political behaviour while being constrained by the empirical realities outlined (Boersma, 2018; Suchman, 1995). CSOs play a crucial role by initiating, facilitating, and monitoring collective action, raising awareness, and ensuring accountability in anti-corruption efforts. Nevertheless, the effectiveness of such initiatives varies across contexts, as cultural values influence public support for policy change (Alló & Loureiro, 2014). The World Bank Institute's classification of anti-corruption initiatives, such as principle-based initiatives and integrity pacts, highlights the diversity and effectiveness of regulatory mechanisms available (Pieth, 2012).

Collective action has emerged as a framework in anti-corruption efforts, operating through top-down regulatory enforcement and bottom-up initiatives. Rooted in Principle-Agent Theory (PAT), corruption arises when agents act in self-interest rather than aligning with the principal's objectives, highlighting enforcement challenges within governance structures (Marquette & Peiffer, 2018). Despite existing anti-corruption policies, enforcement

gaps persist, allowing corruption to thrive. Collective action initiatives (CAIs) mitigate these issues by fostering transparency, stakeholder collaboration, and civil society engagement (Aiolfi, 2018; Ostrom, 1990). Integrating collective action with PAT provides a more comprehensive approach to strengthening institutional accountability and addressing systematic corruption (Marquette & Peiffer, 2018; Rothstein, 2018).

The role of law and regulation in corporate behaviour is closely linked to collective action. Compliance-based anti-corruption governance relies on legal enforcement, while collective action fosters voluntary cooperation through social pressure (Cleveland et al., 2009; Gutterman, 2019). These approaches are complementary, whereas compliance ensures legal accountability and collective action strengthens ethical norms and stakeholder engagement (Ostrom, 1990). Legal frameworks such as the Foreign Corrupt Practices Act and the UK Bribery Act play a role in corporate behaviour by enforcing transparency and discouraging corruption (Cleveland et al., 2009; Karpacheva & Hock, 2024). Such frameworks emphasize the role of international legal frameworks and corporate self-regulation in behaviour (Manacorda et al., 2014). However, challenges like enforcement gaps limit the effectiveness (Vorster & Nwosu, 2024). The tendency of corporations to free-ride on collective benefits complicates governance efforts (Ostrom, 2000). Civil society actors, including NGOs such as Transparency International, are crucial in strengthening anti-corruption efforts. These mechanisms are whistleblowing, advocacy, and litigation. These mechanisms help hold corporations accountable and push for compliance beyond regulatory mandates (Arbatskaya & Mialon, 2020).

The influence of civil society on IOFs' anti-corruption behavior

Civil society actors play a crucial role in driving institutional change, particularly in the context of corrupt governance. Civil society actors are widely recognized as key in promoting transparency, accountability, and good governance. However, their effectiveness depends on political competition and government transparency (Grimes, 2013; Themudo, 2013). For instance, in Central and Eastern Europe, the influence of civil society is significantly shaped by the institutional context and the stage of EU accession. This highlights the importance of domestic and international institutional actors (Meyer et al., 2020). Furthermore, civil society's ability to contest and represent public interests influences governance and reduces corruption. This underscores the central role of civil society in shaping institutional accountability and curbing corruption, particularly in governance systems vulnerable to abuse of power (Grimes, 2013).

Civil society engages in corporate sensemaking through different mechanisms, such as lobbying and market-based regulation. These activities can shift the focus of corporate actors from a compliance-based approach to a progressive understanding of governance as an achievement (Schembera et al., 2023). The influence of these activities is often amplified by public pressure (Themudo, 2013). In the context of governance, civil society actors enhance political legitimacy by performing functions such as problem identification, agenda setting, and monitoring, thereby influencing both corporate and governmental decision-making processes (Erman, 2018). Additionally, the presence of international CSOs plays a role in promoting effective anti-corruption strategies in IOFs (Graham & Kocadal, 2023).

Furthermore, MNCs have the power to promote effective anti-corruption due to people's trust in the company and the extent of their global reach. Therefore, MNCs can shape and impact their industry environment when they achieve certain legitimacy. However, a challenge they face is the self-promoting paradox, where excessive promotion of their image may lead to public suspicion. Legitimacy can shape corporations to engage in a better future and be part of social change (Boersma, 2018; Suchman, 1995). The dominant role of MNCs in global supply chains affects SMEs by establishing compliance expectations and diffusing governance tools and standards. This dynamic between corporate power and institutional regulation shapes the creation of anti-corruption practices within global networks (Petkoski et al., 2009).

Thus, civil society actors' influence on IOFs in anti-corruption sensemaking processes remains understudied. Ashwin et al. (2020) stress the importance of research on the role of CSOs in corporate anti-corruption strategies. Additionally, Schembera et al. (2023) emphasize the need to move beyond static representations of institutional processes to capture their evolving nature over time. Similarly, Boersma (2018) emphasizes the need to understand how corporate self-regulation interacts with external pressures from civil society.

Therefore, this study addresses these gaps by examining how civil society actors influence IOFs' sensemaking in collective action against corruption in global supply chains.

Methodology

Research design

The research question answered during this study is: How do civil society actors influence internationally operating firms (IOF) in making sense of collective action against corruption? This study adopts a qualitative inductive approach in the form of a longitudinal embedded single case study. This design is appropriate because it enables an in-depth examination of how sensemaking mechanisms around collective action against corruption evolve over time and across multiple actors' perspectives (Gioia et al., 2013).

This study investigates how sensemaking around collective anti-corruption efforts unfolds within global supply chains. The International Collective Action Conference (ICAC), by the Basel Institute on Governance, serves as the case under investigation. The state is recognized internationally for its commitment to identifying the root causes of corruption, developing innovative preventive mechanisms, and supporting the implementation of effective anti-corruption strategies (Basel Institute on Governance, 2024). This conference, accessible through public online sources, brings together civil society actors, MNCs, SMEs, public and private businesses, NGOs, Banks, and other stakeholders, offering a rich setting to observe interactions and meaning making in real time.

This study is grounded in the interpretive approach, emphasizing how individuals and corporations construct meaning through social interaction and experience (Gioia & Chittipeddi, 1991). This approach aligns with the focus on sensemaking and its emphasis on socially constructed reality, which supports understanding how institutional and perceptual shifts unfold in practice.

The empirical material consists of 15 transcribed conference sessions, including seven from the 4th ICAC held in 2022 and eight from the 5th ICAC conducted in 2024 (Appendix 1). These two iterations were purposefully selected to facilitate a longitudinal analysis of evolving discourses and stakeholder engagement in collective action. The 4th ICAC was thematically oriented around mainstreaming collective action to foster a clean, equitable, and sustainable business environment. In contrast, the 5th ICAC emphasized integrating business integrity into the global agenda, signalling a shift toward institutionalizing and internationalizing anti-corruption initiatives. The conference's open-access format and recurring nature make it an ideal longitudinal inquiry case.

Initially, the study was designed with MNCs as the primary unit of analysis. However, as data collection and analysis progressed, it became evident that the empirical material included a broader spectrum of organizational actors, including SMEs and other globally

active firms. Accordingly, the research question was refined to more accurately reflect the expanded scope and analytical relevance of the data.

Data collection

The primary empirical foundation of this study is the ICAC, which provides a rich and dynamic setting wherein a diverse set of stakeholders engage in discourse surrounding collective action against corruption. The data collection process was executed with a qualitative content analysis approach, which is particularly well-suited for examining textual and audiovisual materials without interfering with or altering the original content. This non-reactive nature of content analysis enhances the methodological rigor and appropriateness of the approach for this study (Vourvachis & Woodward, 2015).

To capture developments over time, this study adopted a longitudinal focus by analysing the 2022 and 2024 conferences. These editions were purposefully selected based on their thematic relevance, temporal proximity, and comprehensive and diverse content availability. The dataset consists of 15 conference sessions, seven from the 2022 edition and eight from the 2024 edition, each selected for its relevance to the research focus on the interaction between civil society actors and IOFs.

The data collection included official conference materials such as session descriptions, transcripts, and video recordings of keynote speeches, panel discussions, and stakeholder contributions. All selected video materials were transcribed entirely for analysis. The aim is to examine the influence of civil society on sensemaking, discourse, stakeholder positioning, and interpretations of collective action against corruption efforts over time. This approach supports a deeper understanding of the evolving role of civil society in shaping anti-corruption narrative and institutional responses over time.

Data analysis

This study utilized a qualitative, inductive content analysis to examine how civil society actors influence the sensemaking of IOFs regarding collective action against corruption. The analysis focused on latent content to uncover implicit meanings, interpretive shifts, and evolving patterns of stakeholder discourse across the two conference editions of the ICAC (Vourvachis & Woodward, 2015).

Several sensitizing concepts drawn from the literature, such as collective sensemaking, normative pressure, legitimacy, and discourse construction, served as interpretive lenses throughout the analytical process. These did not impose deductive

categories but instead provided theoretical sensitivity that enriched the inductive analysis by directing attention to subtle patterns and framing within the data.

Consistent with the Gioia methodology (Gioia et al., 2013), the data analysis followed a structured, iterative process that progressed from detailed illustrative codes to first-order codes. These were then abstracted into second-order themes and subsequently consolidated into aggregate dimensions. This multi-stage procedure ensured analytical transparency and rigor while allowing space for theoretical insight to emerge inductively from the empirical material (Clarke & Braun, 2017).

Initially, the coding process yielded 441 illustrative codes, which captured particular and context-bound expressions across the transcribed conference sessions. These were not applicable as analytic units independently and were therefore systematically evaluated for relevance and potential for abstraction. Codes that lacked direct relevance to the study, such as internal organizational sensemaking mechanisms that could not be attributed to civil society influence, were excluded. This refinement process reduced the number of first-order codes to 32, which were then clustered into 12 second-order themes, ultimately leading to five aggregate dimensions.

To manage the complexity of the original codebook, shown in Appendix 2, the initial six aggregate dimensions were reassessed for thematic overlap. Two dimensions were merged, 'internal organization compliance culture and ethical norms adaptation and learning', and 'tensions, challenges, and limitations'. This decision reflected both empirical and theoretical considerations. While one dimension emphasized the diffusion and internationalization of integrity norms, the other focused on barriers and institutional constraints. Their synthesis enabled a more nuanced exploration of how normative processes and structural frictions co-evolve under civil society influence.

Axial coding was executed during the phase to identify relationships among codes and themes, allowing the data to be categorised into distinct yet interrelated dimensions. The final data structure (Figure 1), emerging through this iterative engagement process, consists of five aggregate dimensions, underpinned by 12 second-order themes and 32 first-order codes. These dimensions form the conceptual framework of the findings chapter.

The data structure development was conducted inductively and evolved alongside the data analysis. This ensured alignment with the changing understanding of how civil society actors shape corporate perceptions and practices. As such, the analytic strategy enabled both within-case and cross-temporal comparisons, capturing how civil society influence on sensemaking evolved between 2022 and 2024.

The study maintains a transparent chain of evidence and analytic transparency by tracing how illustrative statements were abstracted into theoretically meaningful categories. This rigorous approach supports the validity of the study's findings. It allows for credible and transferable insights into the role of civil society in shaping collective action frameworks within global anti-corruption governance.

Ethical considerations

This study relies exclusively on publicly available data from the ICAC and, therefore, does not involve direct engagement with human participants. Nevertheless, ethical research practices were maintained throughout the study. This includes ensuring the accurate representation of conference content, maintaining contextual integrity of transcribed data, and avoiding any form of misinterpretation. All materials used were appropriately cited by academic integrity standards, and codes were used in the described way.

Although the data are publicly accessible, this does not absolve the researcher of ethical responsibility. The conference content may touch upon politically or professionally sensitive topics, such as corporate governance and anti-corruption strategies. As such, special care was taken to preserve the intended meaning of speakers' contributions and to ensure that their words are not taken out of context or reframed misleadingly. Where necessary, direct quotes were used, prioritizing the clarity of analytical claims while maintaining respect for the original communicative intent. Additionally, the citations used in this study were anonymized.

Furthermore, this research enhances research integrity by adhering to the researcher's professional standards of responsible and moral behaviour, intending to reinforce the validity and reliability of the insights in this research. To ensure validity, the coding process was grounded in the aggregated dimensions, according to the Gioia method (Gioia et al., 2013), informed by relevant literature. The reliability of this research was ensured through a consistent and transparent analytical process, with each step of the coding procedure documented.

Lastly, this study embraces a reflexive approach to ethical inquiry, recognizing that interpretive analysis research is inherently shaped by the researcher's positionality and interpretive framing. As such, flexibility and critical self-reflection were essential to maintaining rigor throughout the analytical process. The research engaged with the concept of ethics in practice, emphasizing ongoing, situated ethical awareness as a core element of

credible and morally responsible scholarship (Guillemin & Gillam, 2004).



Figure 1, Data structure

Findings

This study's findings emerge from the structured coding process enabled by the Gioia method. The findings are consistent with several aggregate dimensions and illustrate how civil society actors influence the sensemaking of IOFs. These dimensions are visualized in the data structure (Figure 1). This chapter is structured around the identified aggregate dimensions. Each section explores one of these dimensions, further elaborated upon using themes, codes, and citations from the ICAC data. Consequently, this approach offers a clear analytical framework to address the central research question.

Civil society's influence on corporate perception

The data includes multiple references to the influence of civil society. However, many of these insights were not explicitly mentioned during the conference proceedings. Instead, the analysis relies on contextual interpretation to determine how civil society influences corporate perceptions of collective action against corruption. This influence can be understood in two primary ways. First, through shaping a collective understanding of integrity, and second, constructing meaning through language and discourse. These mechanisms illustrate how civil society affects corporate perceptions of collective action. At the 2022 conference, which focused on mainstreaming collective action, civil society organizations were highlighted as moral compasses in facilitating such efforts. This influences both the ethical framework and the perceived legitimacy of these initiatives. The Ethics Institute stated, "The role of civil society as a convenor and mediator between public and private sectors, leveraging its perceived neutrality to bridge conflicting" (ICAC, 2022).

At the conference held in 2024, greater attention was devoted to the influence of civil society. A dedicated lightning talk discussed the role of civil society in collective action, aiming to clarify its contribution more explicitly. The emergence of this definition in 2024 is notable, especially when compared to the 2022 conference. In that conference, collective action against corruption was often described as an emerging topic on the stakeholder agenda. By 2024, however, there appeared to be increased confidence among participants regarding the relevance of collective action for stakeholder groups. This shift facilitated the expression of more substantial insights, significance, and relevance regarding collective action as a mechanism to combat corruption. Thereby strengthening their role in promoting business integrity on the global agenda.

Civil society plays a crucial role in shaping the ethical framing of anti-corruption efforts by acting as a moral broker between sectors. It reinforces integrity norms as collective

obligations and rearranges corruption as a shared societal harm, thereby mobilizing broader societal engagement. Trust in government and institutions emerges as a critical dimension in this context, as fragmented cooperation and public distrust hinder the development of sustainable, cross-sectoral solutions.

Civil society influences public understanding and organizational sensemaking through storytelling, public framing, and discourse. These narrative strategies communicate public values and foster trust and accountability by promoting transparency and shared ethical expectations. As Crowell & Moring International mentioned, corporations face common challenges in global operationalization, making trust essential for ensuring a level playing field and cultivating a culture of integrity (ICAC, 2022).

Furthermore, civil society contributes to developing shared frameworks that enable cross-sector alignment, often overcoming linguistic and conceptual barriers to facilitate collective action. At the 2024 conference, a head of compliance emphasized the value of compliance strategy, advocating for a shift from control-based regulation to collaborative innovation. This perspective redefines the relationship between regulators and companies, positioning compliance not as a constraint but as a driver of long-term value creation.

Moreover, the ability to shape public narrative, referred to as narrative power, is linked to the ability to cultivate and sustain trust across diverse stakeholder groups. Trust is a foundational asset for civil society actors, enabling them to function as credible intermediaries in collective action initiatives. Their perceived neutrality, access to transnational networks, and normative authority position them to influence both public discourse and institutional behaviour (ICAC, 2024).

This role is significant in regions such as Latin America, where low levels of interpersonal and institutional trust create significant barriers to practical anti-corruption efforts. Civil society supports the long-term implementation of compliance programs that go beyond legal conformity by contributing to organizational sensemaking. This is to enhance internal governance, client relations, and corporate reputation (ICAC, 2024).

The evolving perception of the private sector further illustrates the shift from control-based regulation to collaborative innovation. While companies were initially viewed with suspicion in global anti-bribery efforts, governments began to recognize them as potential partners. This transformation was stated at the 2022 conference, which emphasized mainstreaming collective action as a normative approach embedded by governments, businesses, and civil society (ICAC, 2022). Nevertheless, by 2024, civil society had increasingly influenced governmental approaches to corruption, advocating for responses that

reflect its global nature. During the conference of 2024, Transparency International noted that “addressing the global nature of corruption requires a unified, globally connected civil society to overcome the fragmentation of political responses” (Transparency International, ICAC, 2024). Thereby, the strategic importance of civil society in fostering coherence and alignment across sectors and borders was highlighted.

Furthermore, civil society’s influence mechanisms are shaped through language, which is often institutionalized within formal frameworks. Government-led recognition initiatives, such as the Pro-Ethics Program, contribute to this dynamic by incentivizing continuous improvement in corporate compliance through benchmarking and the acknowledgement of evolving best practices. Additional mechanisms for fostering shared language, transparency, and trust include the involvement of civil society or other public institutions in the auditing of compliance programs. Therefore, the UN Working Group on Business and Human Rights implemented and stated that, “we have corruption frameworks [...] for governments, for companies, and for civil society, it has created a common language” (ICAC, 2022). IOFs may obtain these frameworks and certifications that are applicable across the jurisdictions in which they operate, as stated by a Chief Risk and Compliance Officer in 2024.

Transparency and trust-building are reinforced through proactive disclosure practices, such as publicly reporting incidents of corruption. During the 2022 conference, the Ethics Institute highlighted that transparency, particularly concerning access to data through reporting, constitutes a fundamental prerequisite for effective engagement with government. It was asserted that the accessibility of relevant data at all levels of government establishes the empirical foundation for meaningful monitoring and accountability systems (ICAC, 2022). Beyond facilitating government oversight, transparency also shapes organizational behaviour and civil society engagement. As the International Anti-corruption Academy stated during the conference, “we need to operate in a transparent way, and because our customers request it, and also because we think it is the right thing to do” (ICAC, 2022). This illustrates how transparency discourse responds to external expectations and reinforces internal ethical commitments. The Basel Institute on Governance emphasized in 2024, “Re-establishing integrity and trust in institutions as a key path to fighting corruption seems critically important to most of us.” In this manner, civil society and the private sector co-produce integrity norms, thereby contributing to a more extensive culture of accountability.

Building upon this understanding of accountability, the Board of Directors of *Empresarios por la Integridad* (Entrepreneurs for Integrity) emphasized the necessity of re-

establishing public service as the principal mission of municipal governance. This actor argued that local governments must transition from functioning solely as revenue-generating entities to prioritizing the interests of the citizens they are obligated to serve. Furthermore, he stressed the significance of education and long-term cultural transformation. This is particularly focused on among younger generations, as it is essential to addressing entrenched patterns of corruption (ICAC, 2024).

Moreover, firms increasingly experience pressure from multiple directions, from civil society, which expects transparency as a normative standard, governments requiring disclosure as part of regulatory compliance, and international institutions. Corporations are beginning to recognize that engaging in collective action against corruption and adopting transparent practices is ethically sound and strategically beneficial. As stated by the Head of anti-corruption and integrity of the Asian Development Bank, transparency is becoming a form of “good business practice all around, and that it is good for their economic performance” (ICAC, 2024). This shift reflects a growing recognition that ethical conduct and economic competitiveness are not mutually exclusive, but increasingly interdependent in the global business environment (ICAC, 2024).

Institutionalization and scaling of collective action

The institutionalization and expansion of collective action signal an increasing commitment to embedding anti-corruption practices within formal governance structures while simultaneously enhancing their legitimacy and cross-sectoral impact. This progression is evidenced by integrating collective action into compliance mechanisms, corporate governance frameworks, and international policy instruments. The Head of Corporate Responsibility Management emphasized in 2022 the importance of embedding these practices within institutional structure, “because if you are not embedding these processes in the governance of a firm, you are not going to get very far” (ICAC, 2022). This statement underscores the necessity of moving beyond surface-level commitments toward structural integration. Moreover, the transition from voluntary, ad hoc initiatives to systematized and scalable practices reflects growing alignment with broader agendas related to sustainability and long-term development.

Several countries, such as France, are implementing anti-corruption laws and regulations at the national level. The French Anti-Corruption Agency (AFA) plays a central role in this effort. Their core mandate is to support public and private organizations in the prevention and detection of corruption in a broad sense. The AFA provides guidance to

companies, offers technical support, and conducts audits to assess the effectiveness of corporate compliance programs (ICAC, 2022).

As part of its approach, the agency actively engages stakeholders to incorporate diverse perspectives, thereby ensuring that the resulting guidelines are both realistic and contextually appropriate. As the AFA stated that they “engage with the private sector for developing our official guidelines” (ICAC, 2022). This reflects a broader regulatory philosophy, which is also mentioned by the United Nations Office on Drugs and Crime, “to come down with regulations that have a clear relevance to the private sector” (ICAC, 2022).

Additionally, it was noted by the AFA that public consultation contributes to more comprehensive and grounded guidance to “enrich the guidelines, to make them more complete, because we had other perspectives, to make them more grounded in reality” (ICAC, 2022). This method also allows other actors to “build collective action based on this partnership approach” (Independent Commission Against Corruption, ICAC, 2022). This inclusive engagement allows civil society to contribute to the development of formal anti-corruption standards and guidance. Moreover, the AFA holds the authority to impose sanctions on companies that fail to meet compliance obligations, reinforcing the seriousness of these standards.

A significant development is the institutional growth of collective action, mainly driven by the shift from voluntary initiatives to more systematic practices. This progression is underpinned by the increasing recognition of collective action as a mutually beneficial approach, generating both social value and business advantage. As noted by the Basel Institute of Governance during the 2022 ICAC conference, “companies feel that this needs to be integrated into their systems [...] to drive and mainstream collective action.” (ICAC, 2022). Civil society actors are actively advocating for the broader application of collective action principles, including in areas such as sustainability. By 2024, compliance practices had expanded across a wider range of sectors, which was a positive development. This broader adoption raised expectations across markets and contributed to the establishment of higher standards. When all actors within a sector participate, collective action is increasingly viewed as a best practice that can be shared, adapted, and scaled across industries (ICAC, 2024). Moreover, collective action is increasingly positioned as a strategic tool to combat corruption and promote sustainable development outcomes.

Multi-stakeholder collaboration and implementation

Multi-stakeholder collaboration is a central theme in the data, with various actors, including MNCs, SMEs, CSOs, and government agencies, actively engaged in anti-corruption initiatives. The conference demonstrates broad participation and the formation of inclusive governance networks that enable cross-sector collaboration. Panel participants, particularly compliance officers, emphasized the importance of public-private partnerships in advancing collective action. The UN Working Group noted that “it’s industry-based trade associations working together to solve problems or to help SMEs” (ICAC, 2022).

Organizational mindset emerged as a critical factor in the effectiveness of private sector engagement. The data suggest that meaningful participation in collective action requires a shift beyond profit maximization toward ethical responsibility and social accountability. This ethical orientation is internalized, and corporate contributions become more impactful. This is reinforced by the call by The Ethics Institute for positive reinforcement mechanisms, which stated, “if companies do the right thing, there should be some form of recognition, some form of incentive coming from the government to recognize changed behaviour” (ICAC, 2022). The Basel Institute on Governance reinforced this perspective, noting that they “want those companies to be really in the game, to show respect for partners” (ICAC, 2022).

Furthermore, transparency is a foundational element of successful collective action, particularly concerning access to comprehensive data across institutional boundaries. The findings indicate a shift from fragmented compliance functions toward integrated, cross-departmental risk management systems. This evolution enables sharing risk-related information across domains such as labor rights and anti-bribery compliance, thereby enhancing holistic supplier risk assessments. In contrast, fragmented approaches hinder the identification of high-risk suppliers and increase exposure to corruption risk.

To address these challenges, the implementation of structured escalation procedures that consolidate multiple risk indicators is recommended. According to the UN Working Group on Business and Human Rights, such mechanisms support more informed, ethical decisions in supplier engagement and due diligence processes (ICAC, 2022). Effective multi-stakeholder collaboration also requires the inclusion of both MNCs and SMEs, recognizing SMEs' critical role in global supply chains. As noted in 2024, stakeholder inclusion mechanisms have become more practical and experience-based. Transparency International emphasized the need to “reach out to the small and medium enterprises, [...] through unions,

industry associations. They are more difficult to reach out to; they are less equipped than the others and we need to reach out to them also through the supply chain of the big companies” (ICAC, 2024).

Civil society plays a key role in this outreach, helping to raise awareness and engage individuals at all levels of corporate structures. As one participant noted, “within the corporations, we need to reach out to all the people. [...] with the help of civil society, to the people in the field.” (ICAC, 2024). The 2022 conference underscored the significance of stakeholder engagement and establishing trust through transparency. By 2024, the dialogue had advanced towards more focused partnerships and strategies for internal influence, particularly emphasizing engagement with civil society.

Furthermore, multi-stakeholder collaboration fosters the formation of strategic partnerships predominantly facilitated by formalized platforms such as the ICAC, UK Bribery Act framework, the AFA, the Ghana Integrity Initiative, the Thai Collective Action Against Corruption, and Transparency International. These institutionalized platforms play a critical role in cultivating intersectoral trust, which is a fundamental condition for effective collective action. These institutes also “host a practical hands-on workshop designed to facilitate learning and enhancing the development of collective action models” (ICAC, 2024).

Trust is further reinforced through an emphasis on demonstrable impact, often operationalized via the pursuit of early, tangible successes or ‘quick wins.’ Ministries, departments, and agencies accomplish this, together with the Multi-stakeholder Group, which noted that “them uploading information on our portal [...]. It gives confidence and trust to the business community” (ICAC, 2024). There exists an increasing recognition within the field that the presentation of visible and measurable outcomes is essential for restoring and maintaining public trust in anti-corruption initiatives. While macroeconomic indicators may reflect positive national trends, they frequently fail to capture the lived realities of citizens, many of whom continue to face persistent unmet basic needs. Consequently, collective action initiatives have progressively prioritized the implementation of concrete interventions that yield immediate benefits. Thereby, enhancing their legitimacy and fostering deeper societal engagement (ICAC, 2024).

The operation of integrity through partnerships is significantly driven by civil society’s role in addressing the legal and ethical voids within governance frameworks. Civil society actors exert significant influence by shaping the conceptualization and normative understanding of compliance and integrity in various domains where formal legislation is absent, ambiguous, or outdated. This influence is exemplified through giving, for example,

feedback on guidelines.

Finally, the 2022 conference illustrated how civil society responded to enforcement shortcomings exposed during the COVID-19 pandemic, particularly regarding corruption in public procurement. Through collaborative norm-building strategies, these actors contributed to redefining standards of procurement integrity in the post-crisis context. By 2024, this dynamic had evolved considerably. Civil society's engagement extended beyond advocacy for legal reform to actively reshaping corporate expectations in areas such as human rights, where international legal standards have traditionally remained soft and non-binding. This process reflects an ethical norm-setting function that increasingly transitions into the regulatory requirements. Furthermore, existing legal instruments are being reinterpreted through an ethical lens, conferring enhanced moral legitimacy and juridical authority to integrity programs. The Secretary for Private Sector Integrity noted that "within the sanctioning procedure itself, we start realizing that companies who had compliance programs in place should be treated differently [...] with diminished sanctions or non-trial resolution agreements" (ICAC, 2024). The data shows that through these mechanisms, civil society effectively shifts the focus from punitive enforcement toward fostering ethical reform and proactive corporate accountability.

State and policy influence on corporate integrity

The state and policy significantly influence corporate integrity. Civil society actively engages in government support, thereby positioning the government as a facilitator and partner, fostering public-private partnerships that are based on collective action. The Ethics Institute stated that for collective action to be effective, businesses must adopt a socially responsible mindset and use their influence to push governments toward integrity and reform (ICAC, 2022). Additionally, civil society is activating government support through a document called the High Level Principles on fostering integrity in the private sector, which lays out a series of steps that governments must take to encourage the private sector to adopt integrated systems (ICAC, 2024). The CSOs influence the government. This is accomplished by effectively expanding collective action within the anti-corruption agenda, necessitating the strategic engagement of a diverse coalition of stakeholders, including youth, academia, and the business sector, supported by dedicated financial resources and governance integration. According to the Multi-stakeholder Group (ICAC, 2024), sustaining momentum requires not

only ideological commitment but also the practical institutionalization of collective action through targeted funding and persuasive advocacy to secure broad-based buy-in.

Public and private partnerships are rooted in collective action, and they increasingly realize that they need each other for collective action against corruption. According to the Cooperation and Institutional Affairs (ICAC, 2022), this could be done by providing feedback because “they have been involved in the consultation process, they have given feedback on the guidelines”. Nonetheless, in 2024, collective action has effectively united various stakeholders, encompassing companies of all sizes, to enhance anti-corruption initiatives and realize substantial outcomes (ICAC, 2024).

The findings indicate that achieving meaningful state and policy influence on corporate integrity is challenged by both institutional gaps and the need for regulatory momentum. As noted during the 2022 conference by Cooperation and Institutional Affairs, many collective action alliances remain voluntary, “that’s where political will is, of course, then again important, because we don’t have a law or a framework that says, okay, you need to do this.” Institutional gaps refer to weaknesses in governance structures that hinder effective enforcement of anti-corruption measures and compliance standards.

Collective action and anti-corruption efforts are dynamic processes that evolve. As the International Anti-corruption Academy (ICAC, 2022) mentioned, “it might be that as things go on and progress, you need to come up with new indicators and think about also potentially redesigning [...] collective action is the sort of life cycle of a collective action initiative.” These statements reflect a shift from rigid compliance models toward more adaptive, context-sensitive approaches. Additionally the Basel Institute on Governance noticed that “collective action has shifted the balance from often quite mechanical compliance practice to how we open a space for agreements [...] It anchors ethical behavior and compliance with norms in specific contexts” (ICAC, 2024).

A regulatory push is emerging, driven by civil society and other stakeholders, calling for stronger legal frameworks, accountability mechanisms, and enforcement tools. These efforts aim to close institutional gaps and ensure that anti-corruption initiatives are not merely symbolic but substantively implemented.

In 2022, CSOs were involved in compliance discussions with institutions such as the AFA and OECD, but their role was largely advisory. By 2024, however, their influence had become more formalized. CSOs co-developed standards embedded in frameworks such as the OECD guidelines, marking a shift from consultation to codification.

Navigating the diffusion and internationalization of integrity norms under civil society

Within global supply chains, the actors situated furthest from public scrutiny, particularly SMEs and subcontracted workers linked to MNCs, often remain distant in anti-corruption efforts. However, this dynamic is shifting, as larger companies increasingly require their suppliers to meet due diligence and compliance standards. The OECD stated that “big companies had to comply with this obligation, but it also has competences to smaller companies, because some smaller companies now have to develop some anti-corruption program, because if they want to conduct business with bigger companies, which have an obligation of diligence, now smaller companies also have to implement such compliance programs” (ICAC,2024).

Insights shared during the conference emphasized that SMEs with more mature ethics and compliance systems outperformed their less developed counterparts during periods of crisis, such as the COVID-19 pandemic. This evidence challenges the longstanding notion that SMEs should be exempt from integrity requirements. Nevertheless, adopting compliance standards contributes to growth, competitiveness, and access to international markets (Crowell & Moring International, ICAC, 2022).

Complementing this development, the 2021 OECD Anti-Bribery Recommendation formally integrates collective action as a strategic mechanism, encouraging governments and companies to actively collaborate with civil society to resist foreign bribery and solicitation. In line with these institutional advancements, the Banknote Ethics Initiative has developed audit standards, grounded in a code of ethical business practice, that are operationalized through a comprehensive audit manual to promote adherence and ensure compliance (ICAC, 2024).

The United Nations Global Compact (UNGC) stated in 2024 that, as a development finance actor, it is increasingly focused on expanding compliance capacities at the SMEs and early-stage enterprise level using multilayered training strategies. These efforts include direct engagement with the boards and senior leadership of portfolio companies, the dissemination of virtual training modules across supply chains, and strategic partnerships, such as with the Basel Institute, to develop localized ‘train-the-trainer’ programs in regions with limited institutional capacity. In a panel, Norges Investment Bank, emphasized their role in this ecosystem, noting that they are “trying to contribute and help improve shared learning,

collective action, and improve practices [...]we have ethical guideline for the fund, which is part of that integrated chain of tools that we think of, that we use to address ownership in our investments” (ICAC, 2024). Such initiatives contribute to the development of integrity cultures within IOFs. A crucial pathway in this process involves the internalization of civil society pressures and standards, which may encompass legal obligations and normative ethical expectations. To facilitate this transition, collective action is operationalized through concrete mechanisms, including audits, training programs, reporting systems, and peer-learning initiatives (ICAC, 2024).

During the 2022 conference, an audience member raised concerns regarding the perceived ownership of collective action initiatives. Some participants expressed restraint in supporting such efforts, viewing them as overly corporate-driven. Particularly, associating them with Siemens, one of the earliest companies to engage in collective action, and a financial partner. As a result, specific stakeholders questioned the neutrality of such initiatives, stating they were unwilling to support what they perceived as corporate-branded programs financially.

However, by 2024, a more inclusive vision of collective action had emerged. The conference emphasized that collective action should be understood as a dynamic and forward-looking mechanism through which CSOs can reactivate long-standing but under-implemented norms and values. By embedding ethical principles within actionable and collaborative frameworks by a panellist from the Basel Institute of Governance, collective action is increasingly seen as a procedural compliance tool and a participatory process rooted in democratic accountability, stakeholder agency, and the revitalization of the global rules-based order.

Furthermore, as organizations are ultimately comprised of individuals, attention must be paid to personal agency in ethical decision-making. The concept of wilful blindness was introduced during a lightning talk, where individuals are aware of unethical behaviour but choose to ignore it (ICAC, 2022). Wilful blindness thrives in steep hierarchies, centralized power, and high-pressure competition. In such contexts, sensemaking becomes essential to enable early recognition and collective resistance to unethical practices.

These findings reflect the aggregate dimensions identified during the analysis (Figure 1). They reveal distinct mechanisms through which civil society influences the sensemaking processes of IOFs. Specifically, the data demonstrate how soft and hard law pathways interact in shaping internal compliance cultures. The emergence of these mechanisms is grounded in both empirical data and the statements made during the conferences. The

mechanisms are categorized into two domains: soft law and hard law. Civil society actions, such as framing voluntary compliance through discourse, align with soft law approaches, while hard law mechanisms, such as co-developing formal guidelines, were prominently discussed in 2024. This shift is evident in the increasing involvement of civil society in the co-creation of regulatory frameworks, enabling IOFs to engage more actively in anti-corruption efforts. Moreover, civil society's role in monitoring compliance within collective action frameworks has become increasingly present. To illustrate these developments, the model presented in Figure 2 is provided.

The analysis identifies three distinct sensemaking mechanisms, each reflecting how civil society shapes firms' interpretive and strategic orientations in anti-corruption initiatives.

The first mechanism is framing integrity and institutionalizing collective action for public trust-building. This mechanism illustrates how civil society constructs integrity as a shared social responsibility. By framing corruption as a legal infraction and a societal harm, civil society encourages firms to move beyond minimal compliance toward proactive ethical engagement. Over time, this reframing has been institutionalized through formal governance structures and collaborative platforms, reinforcing the need for cross-sectoral anti-corruption strategies and building public trust through inclusive action.

The second mechanism is institutional anchoring, which reflects how civil society extends its influence beyond advocacy by co-creating legal and regulatory frameworks. This includes contributing to the development of formal standards, embedding collective action into compliance mechanisms, and engaging in benchmarking and monitoring processes. In doing so, civil society assumes a semi-regulatory role, anchoring anti-corruption norms within the institutional architecture that governs corporate behaviour.

The third mechanism is ethical norm-setting and reflective learning. This mechanism captures the role of civil society in fostering internal reflection within organizations. Rather than treating compliance as a performative requirement, civil society promotes ethical learning, challenges symbolic gestures, and encourages firms to embed integrity into their organizational culture. This supports a shift toward viewing anti-corruption as integral to long-term identity and legitimacy.

These findings suggest that addressing the identified sensemaking mechanisms requires a dual approach grounded in soft law and hard law. The interplay between these approaches reinforces ethical awareness and institutional accountability and creates the conditions for durable behavioural change.

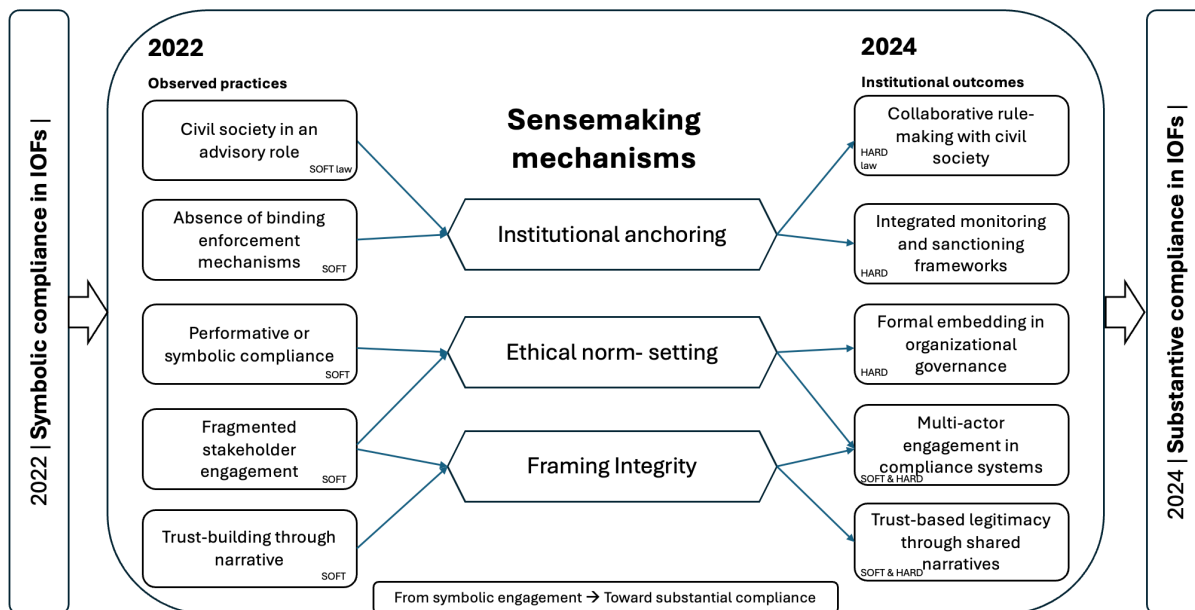


Figure 2, Sensemaking mechanisms of civil society on IOFs

Figure 2 summarizes the core findings of this study. It visualizes how civil society actors influenced IOFs through three sensemaking mechanisms. The model illustrates the evolution from symbolic compliance in 2022 to substantive compliance in 2024, highlighting how initial soft-law practices progressed into more institutionalized, co-regulatory arrangements. Each mechanism mediates specific shifts in engagement, accountability, and legitimacy within the global anti-corruption field.

Discussion

This study builds on prior research that identifies corruption and collective action as critical challenges for global economic development (Cleveland et al., 2009). While earlier studies have explored these phenomena, this research focuses on how civil society actors influence the sensemaking mechanisms of IOFs in anti-corruption efforts within global supply chains. Addressing gaps in the literature, it states civil society's evolving role in shaping corporate governance, progressing from self-regulation to more effective compliance in collective action (Boersma, 2018).

The findings discuss existing literature and theoretical frameworks. The central research question was examined through a qualitative case study of the ICAC in 2022 and 2024, identifying three sensemaking mechanisms: framing integrity and institutionalizing collective action, institutional anchoring, and ethical norm-setting with reflective learning. These mechanisms illustrate how civil society shapes corporate interpretations and responses to anti-corruption challenges in the global supply chain (ICAC, 2022; ICAC, 2024).

The findings reveal two influence pathways, soft law (norms, discourse, voluntary standards) and hard law (formal regulations, sanctions). Sensemaking mechanisms shape these pathways (Abbott & Snidal, 2000). Data indicated that various actors are influenced differently, with some being voluntary and personal, while others are more formal and institutionalized. Over time, collective action evolved from voluntary initiative to a systematic and regulated compliance form. This transformation was driven by civil society's impact on how IOFs perceive collective action against corruption (Schembera et al., 2023; ICAC, 2024). This aligns with the literature, which notes a shift among corporate actors from compliance to substantive compliance.

These mechanisms institutionalized collective action across sectors, leading to laws and governance structures (ICAC, 2022). Nevertheless, these frameworks shift ethical culture within firms. Schembera et al. (2023) and Palmer (2013) assert that ethical culture significantly shapes organizational sensemaking and decision-making processes.

Civil society actors influence corporate behaviour by shaping firms' responses to regulatory and normative pressures, driven by market expectations, investor demands, and advocacy (Boersma, 2018; Whittle et al., 2023). This study constructed and analyzed the sensemaking mechanisms that evolved over time.

Theoretical implications

This study extends sensemaking theory (Maitlis, 2005; Ostrom, 2000; Weick, 1995; Whittle et al., 2023) by demonstrating how civil society actors co-construct meaning in ambiguous and contested governance environments. In this study, civil society actors emerge as narrative framers who shape how IOFs interpret concepts such as corruption, integrity, and compliance. Through mechanisms like storytelling, public framing facilitated the transition from symbolic compliance to proactive substantive compliance (ICAC, 2022; ICAC, 2024). This contributes to a more dynamic understanding of sensemaking through which normative pressures are internalized and institutionalized within corporate governance structures.

The first sensemaking mechanism identified in this study, framing integrity and institutionalizing collective action for public trust-building, demonstrates how civil society actors reframe corruption as a legal infraction and a shared societal harm, encouraging IOFs to move beyond symbolic compliance toward proactive ethical engagement. This reframing process is facilitated through narrative strategies such as storytelling, public framing, and discourse construction, which collectively shape public understanding and organizational sensemaking (ICAC, 2022; ICAC, 2024). The findings reveal that civil society actors function as moral brokers, leveraging their perceived neutrality to mediate between public and private sectors and to reinforce integrity norms as collective obligations (ICAC, 2022). This aligns with the literature emphasizing the role of discourse in shaping shared meaning (Whittle et al., 2023) and the importance of normative constraints in establishing corporate legitimacy, which are more effective than legal constraints in shaping corporate legitimacy (Brennan & Hamlin, 2009). Furthermore, the institutionalization of these narratives through formal governance structures and collaborative platforms, such as the ICAC, indicates a transition from voluntary, ad hoc initiatives to systematized practices that are embedded in corporate governance (ICAC, 2022; ICAC, 2024). However, the findings also highlight critical limitations, including the risk of symbolic compliance (Matos et al., 2020), perceptions of branding or window-dressing, and limited actor diversity, which may hinder the scalability and legitimacy of collective efforts. These concerns reflect critiques in the literature about adopting ethical standards without deep institutional anchoring (Boersma, 2018; Schembera et al., 2023). Thus, while the framing of integrity by civil society contributes significantly to public trust-building and ethical norm diffusion, this effectiveness is contingent upon inclusive participation, sustained engagement, and the avoidance of performative practices.

The second sensemaking mechanism identified in this study is institutional anchoring, which captures the evolving role of civil society actors as they transition from advocacy to active participation in regulatory processes. This mechanism reflects how civil society co-develops formal standards, contributes to compliance frameworks, and engages in benchmarking and monitoring practices, thereby embedding anti-corruption norms within institutional structures. These findings align with structuration theory (Jones & Karsten, 2008). This theory emphasizes the recursive relationship between agency and structure, wherein civil society actors respond to institutional norms and actively shape them. Empirical evidence from the ICAC conferences illustrates this shift as civil society organizations were involved in the co-creation of OECD guidelines (ICAC, 2024). Collaborated with national agencies such as the AFA in developing context-sensitive compliance standards and participated in auditing and certification processes to institutionalize integrity norms (ICAC, 2022; ICAC, 2024). These developments support the literature on soft and hard law interplay (Abbott & Snidal, 2000) and limited actor diversity (ICAC, 2024), demonstrating how voluntary norms and formal regulations converge through civil society engagement.

However, the findings also reveal critical limitations. Concerns about symbolic compliance (Matos et al., 2020), perceptions of corporate branding (ICAC, 2022), and limited actor diversity (ICAC, 2024) suggest institutional anchoring may risk symbolic adoption if not inclusively and transparently implemented. These critiques show broader concerns in the literature about the performative nature of corporate ethical initiatives (Boersma, 2018) and the need for dynamic, participatory governance models (Schembera et al., 2023). Thus, while institutional anchoring enhances the legitimacy and durability of anti-corruption efforts, its effectiveness depends on sustained, multi-stakeholder engagement and the avoidance of symbolic practices.

The third, and last, sensemaking mechanisms identified in this study are ethical norm-setting and reflective learning, which demonstrate how civil society actors foster internal organizational change by promoting the integration of integrity into corporate identity. Rather than encouraging compliance as a performative or symbolic act, civil society challenges facilitate ethical learning through mechanisms such as audits, training programs, and peer-learning initiatives (ICAC, 2024). This process supports institutional theory by illustrating how normative pressure, initially external, becomes embedded in organizational practices over time (Schembera et al., 2023). The findings reveal that civil society actors are critical in redefining corporate expectations, particularly when legal standards remain soft or underdeveloped, such as human rights and procurement integrity. For instance, civil society's

influence has led to the reinterpretation of legal instruments through an ethical lens, contributing to differentiated sanctioning procedures for firms with robust compliance programs (ICAC, 2024). However, the findings show significant limitations. During the 2022 ICAC conference, concerns were raised about the perceived corporate ownership of collective action initiatives, particularly those associated with early adopters like Siemens. This led to scepticism regarding the neutrality and legitimacy of such efforts. This perception of branding or ‘window-dressing’ underscores the risk that ethical norm-setting may be implemented for reputational gain rather than genuine reform (ICAC, 2022; ICAC, 2024).

Furthermore, limited actor diversity and persistent enforcement gaps may hinder the scalability and inclusivity of these initiatives. Despite these challenges, ethical norm-setting offers a pathway for embedding integrity into organizational culture. It is supported by sustained civil society engagement, inclusive participation, and a balance between normative influence and regulatory accountability (ICAC, 2022).

Practical implications

The findings suggest IOFs should move beyond performative compliance and engage in proactive ethical governance. Civil society actors provide external pressure and strategic value by enhancing legitimacy, trust, and stakeholder engagement. Embedding integrity into corporate culture through reflexive learning can strengthen the firm's long-term resilience and reputation (ICAC, 2022; ICAC, 2024).

Additionally, the findings suggest implications for civil society actors. The data shows that civil society actors are effective moral brokers and co-regulators. To maintain legitimacy, they must balance advocacy with inclusivity and transparency. Avoiding perceptions of branding or authority is essential for sustaining trust and broad-based engagement of stakeholders. Their role in shaping discourse, facilitating trust, and co-developing standards is critical for institutional change (ICAC, 2022; ICAC, 2024).

Furthermore, the data has implications for policymakers and regulators. Policymakers should recognize the value of hybrid governance models that integrate civil society into formal regulatory processes. Platforms like ICAC demonstrate the potential of multi-stakeholder collaboration in addressing enforcement gaps and promoting ethical reform. Governments can enhance compliance by supporting civil society initiatives and institutionalizing collective action frameworks.

The findings highlight the importance of compliance diffusion for SMEs and supply chain actors. SMEs benefit from adopting MNC-derived compliance tools and engaging in

peer learning. This supports Boersma (2018) and Suchman's (1995) view that MNCs shape industry norms. Civil society facilitates this by offering training and ethical standards. By creating market-driven incentives, civil regulation pushes firms beyond legal compliance, embedding responsible practices into operations (Vogel, 2010).

Nevertheless, the effectiveness of anti-corruption efforts varies across contexts, as cultural values significantly influence public support for policy change. This was reflected in the findings during ICAC conferences (ICAC, 2022; ICAC, 2024). Latin American participants mentioned the challenges associated with initiating collective action against corruption within a context characterized by deeply entrenched corrupt practices. This situation results in diminished trust among individuals and towards governmental institutions. (ICAC, 2024).

Finally, the findings align with Meyer et al. (2020) those who emphasize the importance of both domestic and internal institutional actors. The influence of civil society is shaped by institutional context, as evidenced by the emergence of the ICAC as a platform. The participation of diverse global actors in ICAC illustrates growing interest in compliance and collective action as essential components of global supply chain governance (ICAC, 2022).

Conclusion

This study examined the central research question: How do civil society actors influence internationally operating firms (IOF) in making sense of collective action against corruption? Drawing on a qualitative analysis of the ICAC, the findings reveal that civil society actors have played a significant role in shaping corporate perceptions, practices, and institutional commitments to anti-corruption.

Additionally, civil society actors have redefined integrity as a shared social responsibility through normative framing and narrative legitimation. This has enabled corporations to advance engagement beyond legal compliance to ethical governance. Discursive strategies, trust-building, and the development of shared language frameworks that promoted cross-sector alignment facilitated this shift. This facilitates a collaborative innovation, thereby enabling the creation of long-term value within the global supply chain to promote collective action against corruption.

Furthermore, civil society's sensemaking mechanisms evolved from moral advocacy to co-creation. By developing regulatory standards and frameworks, civil society actors institutionalized and created a more substantive compliance for collective action. Their

influence spanned soft law through discourse and trust, and hard law via governance structures and regulatory engagement.

Moreover, civil society facilitated inclusive multi-stakeholder collaboration, ensuring that SMEs and local actors were integrated into global anti-corruption efforts. Their role in monitoring, accountability, and capacity-building further reinforced the legitimacy and sustainability of these initiatives in the global supply chain. Civil society also reinforces collective action by engaging in preventive education and training various actors in diverse sectors to prevent corruption. This collaboration with multiple stakeholders contributes to the creation of long-term sustainable value.

In conclusion, civil society actors have shaped and operationalized the narrative of collective action through institutional pathways. This research emphasizes the critical roles of both influence sensemaking and system builders in the dynamic landscape of global corporate governance within the global supply chain, thereby facilitating collective action against corruption.

Limitations

This study has several limitations. Firstly, a risk of researcher bias in qualitative content analysis exists, even though utilizing the Gioia methodology may have influenced data interpretation. Gioia et al. (2013) noted that overemphasizing construct development could obscure deeper conceptual understanding. To address this, the study employed a transparent and systematic coding process, grounded in literature and carefully documented throughout the analysis.

Secondly, the ICAC's public nature may have led participants to present a more positive image of their anti-corruption efforts, possibly underreporting challenges. This could result in an inaccurate portrayal of how these actors engage with collective action against corruption.

Additionally, the reliance on publicly available data from ICAC limits the capture of internal corporate sensemaking mechanisms or informal interactions. While the interpretive analysis introduces subjectivity, this was mitigated through reflexivity and methodological rigor.

Furthermore, the findings are context-specific and may not be generalizable across all sectors, regions, and firms in the scope of this study. The focus on discourse and sensemaking may overlook material constraints or power asymmetries within global supply chains.

Future research

Given the limitations of this study, further research could examine how individual cognition interacts with organizational and institutional sensemaking. While the study integrates sensemaking and institutional theory, it does not address psychological or behavioural aspects of decision-making. This future research could explore comparative case studies or mixed methods approaches to expand insights into constraints and power asymmetries within global supply chains. Finally, future research could study the influence of digital and media on the sensemaking of MNCs and SMEs in the global supply chain regarding anti-corruption. This research could analyse how digital platforms, for example, social media and online campaigns, shape public and corporate sensemaking around corruption. This study could examine the role of transparency portals, open data, and digital whistleblowing tools in reinforcing civil society influence.

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Appendix 1: Document overview

Number	Name	Type	Quotations	Panel	Creator
1	20220630_Session 1 Government engagement and support for CA .docx	Text	36	Basel Institute on Governance, Comptroller General of the Republic of Chile, Director General, Independent Commission Against Corruption of Mauritius, International Affairs Officer, French Anti-Corruption Agency	Anne P
2	Session 2 Showcasing the variety of anti-corruption Collective Action.docx	Text	38	United Nations Office on Drugs and Crime, Crowell & Moring International, Grundfos, International Anti-corruption Academy, Basel Institute on Governance	Anne P
3	Keynote speech by Margaret Heffernan A place for truth-telling ICAC2022.docx	Text	29	Basel Institute on Governance, Legal and Compliance Siemens, Basel Institute on Governance, University of Bath School of Management	Anne P
4	European investment bank and anti-corruption collective action.docx _ Lightning Talk, g	Text	10	European Investment Bank, Basel Institute on Governance	Anne P
5	20220701_Joining forces to mainstream Collective Action.docx	Text	53	Basel Institute on Governance, Maritime Anti-Corruption Network (MACN), Office of the Comptroller General of the Republic of Chile, The Ethics Institute	Anne P
6	20220701_setting standards on AC CA Mark Pieth Drago Kos.docx	Text	28	OECD, Basel Institute on Governance, Managing director	Anne P
7	20220630_Business, human rights and anti-corruption connecting the dots.docx	Text	30	Novartis, UBS, Basel Institutional on Governance	Anne P
8	20240624_Keynote address_Peter Maurer on the mobilising power of anti-corruption Collective Action.docx	Text	19	Basel Institute on Governance	Anne P
9	20240624_Lightning talk Valérian of TI on the role of civil society in Collective Action.docx	Text	15	Transparency International	Anne P
10	20240624_Lightning talk, Fromholz, OECD, on how anti-corruption CA is becoming a norm.docx	Text	7	OECD	Anne P
11	20240624_Session 1 A new era of CA.docx	Text	45	OECD, AFA, Ghana Revenue Authority, USAID, General of Brazil	Anne P
12	20240624_Session 2 The evolution and variety of Collective Action initiatives.docx	Text	30	Basel Institute on Governance, Maritime Anti-corruption Network, Tenova, World Bank Group, Banknote Ethics Initiative	Anne P
13	20240624"Session 3 Making it count: Assessing the effectiveness of compliance efforts"	Text	39	Basel Institute on Governance, OEC, Oando Plc, Joint Foreign Chambers of Thailand, METRO AG	Anne P
14	20240625_Session 4 Building a community of practice for CA.docx	Text	36	Basel Institute on Governance, Canadian Centre of Anti-corruption, CoST infrastructure transparency Malawi, FAFPI	Anne P
15	20240625_Session 5 Incentives for business integrity.docx	Text	26	United Nations Global compact, Norges Bank Investment Management, EBRD, Asian Development Bank, British International Investment	Anne P

Appendix 2: Codebook

Aggregate dimension	Second-order themes	First-order codes	Example Quote	Document
Civil society's influence on corporate perception	Shaping collective understanding of integrity	Framing integrity as a shared social responsibility	We're talking about mainstreaming collective action and developing it into a norm, having it taken up by governments, the private sector and promoted by civil society.	20220630_Session 1 Government engagement and support for CA .docx
		Civil society's role as moral compass	We've already seen that the predominant role of civil society is to convene, to be an intermediary. Often there are conflicting views, conflicting interests between the public sector and the private sector. They can play that role as the intermediary. And the reason why they can do it is because they come from a bit more of a neutral place into these collective action initiatives.	20220701_Joining forces to mainstream Collective Action.docx
	Framing anti-corruption as a shared value	Storytelling, public framing and discourse	When language fails, we can have no shared reality, corruption not only damages institutions but also destroys trust in language, making promises meaningless and undermining shared understanding in	Keynote speech by Margaret Heffernan A place for truth-telling ICAC2022.docx
		Trust-building as narrative power (action)	Building trust is a very important aspect of the transparency and accountability agenda.	20240625_Session 4 Building a community of practice for CA.docx
	Constructing meaning through language and discourse	Collective action depends on language	compliance and integrity and it also values the opinion of the employees. So not just role compliance and integrity from a corporate dog in the organization but also good opportunity for the employees to give feedback and also there are questions not just about the I think that is very important that the compliance function is not always seen as someone that is doing good business, but also to make sure that compliance is a benefit for the business in performance and innovation.	20240624_Session 3 effectiveness of compliance efforts, cleaned transcript.docx
		Language between actors shapes organizational sensemaking	If we align our values, how are we communicating these out to our networks? Monitoring changes to the environment, serving as early warning detection platforms, and then ultimately, and very importantly, including the patient voice within this process altogether.	Session 2 Showcasing the variety of anti-corruption Collective Action.docx 2022
	Transparency a trustbuilding strategy	so I feel like finding creative ways to manage and to engage within trust will lead us to better results and ultimately fighting corruption, good governance and enhancing democracy, true-based engagement fosters anti-corruption and good governance.	20220701_Joining forces to mainstream Collective Action.docx	
Institutionalization and scaling collective action	Embedding meaning through language and discourse	Civil society contributions to formal standards and guidance	We thought recommendation is fine, it's politically binding, it's much more subtle, quicker, easier. But then quite a few countries said no, for criminal law you need a convention, you need binding law.	20220701_setting standards on AC CA Mark Pieth Drago Kos.docx
		Embedding collective action in compliance and settlement	Integrate ESG issues into our investment decisions, and I'll come back to that later. But that really means that we think about also anti-corruption issues when we assess the risks and opportunities related to our investments.	20240625_Session 5 Incentives for business integrity.docx
	Expanding scope and legitimacy	Collective action supports anti-corruption as pathway to sustainable development	having this dialogue with the private sector, while shaping standards, is crucial to facilitate ownership of these standards afterwards, engaging in dialogue with the private sector while shaping standards is crucial to ensuring their later acceptance and ownership	20220630_Session 1 Government engagement and support for CA .docx
		From voluntary initiatives to systemized practice	It's in the SME's benefit and interest to start adopting and incorporating best practices. They will perform better. They will become larger companies. They will grow. They will be able to access new markets. They will be able to integrate into the different values that exist across countries, which we're starting to see align in terms of norms. I can't believe, Liz, there was actually a push.	Session 2 Showcasing the variety of anti-corruption Collective Action.docx
	Institutional growth of collective action over time	internal collective action development going on.] And we see that the collective action we started is not the collective action we will see next year. Because we change, the society changes, the challenges somewhat change — I mean, they are also somewhat the same. We are moving into a new strategy period, and one of the things that we experience is that we need to keep focus. What I have experienced, and made me sometimes a little bit frustrated, was that a lot of people here in — I see that the people that are represented here are people that want to do good.	20240625_Session 4 Building a community of practice for CA.docx	
Multi-stakeholder engagement	Multi-stakeholder engagement	Inclusive networks linking SMEs, MNCs, CSOs, governments	I think it starts with a robust risk assessment of where your corruption risks are, and then being able to make sure you have mitigating factors, whether you're an SME or a large company like ours. But then also the brilliant thing about doing an ESG strategy or viewing your ESG strategy is that you have a materiality assessment where you reach out to your key stakeholders	20240624_Session 3 effectiveness of compliance efforts, cleaned transcript.docx
		Shared roles in collective action	So maybe there is more here on the external engagement side that goes hand in hand with this internal integration. Internal coordination across risk areas should be implemented by proactive engagement with external stakeholders	20220630_Business, human rights and anti-corruption connecting the dots.docx
	Multi-stakeholder collaboration and implementation	Operationalizing integrity through partnership	Civil society filling the legal ethical gap	we developed an audit standard. So the foundational basis is a code of ethical business practice. That is the standard. But in order to ensure that people abide by the standard, we developed this audit standard plus an audit manual in order to ensure that there is compliance with the standard.
Enabling trust between sectors			We're finding that, as many of you might expect, ethics is the foundation to so much more. If you have ethical conduct and you have trust, maybe these stakeholders can work together to do other very important things, like find new cures faster that can serve patient needs better. ethical conduct and trust are essential for stakeholders to collaborate effectively and achieve broader goals	Session 2 Showcasing the variety of anti-corruption Collective Action.docx 2022
	Formalized platforms	ICAC has three main functions. It investigates and prosecutes corruption and money laundering offences. And then, it carries out a lot of educational activities, sensitization and awareness campaign. And thirdly, it does a lot of prevention work. Prevention, in this particular context, it means simply systems enhancement. In other words, building up your system.	20220630_Session 1 Government engagement and support for CA .docx	
State and policy influence on corporate integrity	Government as facilitator and partnership	Civil society is activating government support	Government is not unapproachable and they will be willing to get help because they also have to show that they are meeting certain standards, whether it's from a point of view of meeting the climate change commitments, meeting their uncapped commitments.	20240624_Session 3 Making it count: Assessing the effectiveness of compliance efforts*
		Public-private partnerships rooted in collective action	provide a platform for companies of all sizes and for stakeholders from various sectors to get together and try to promote these anti-corruption efforts. And so now all of these thoughts and aspirations have been realized to a great extent in my view.	20240624_Session 2 The evolution and variety of Collective Action initiatives.docx
	Institutional gaps and regulatory push	Building compliance programs to engage and support SMEs	assist SMEs within the country to pass the message across, engage their stakeholders and have the confidence to come to us. So with the launch I was very happy that all the SME associations were represented at that launch and gave their full commitment to engaging their stakeholders. They have been part of the consultation process, they have given feedback on the guidelines, the feedback was quite positive, and some of the issues they had, they had been incorporated. But they're very excited and they're looking forward	20240624_Session 3 Making it count: Assessing the effectiveness of compliance efforts*
		Civil responses to limited push	so that left me in the feeling of being quite alone, because I could not figure out what to do about this problem, you know, as a company. I was helpless and I also was very frustrated because I wanted to live up to the law and also get rid of these facilitation payments. So that actually marked the birth of FAFPI at that time, because I contacted the Danish government and I contacted the Danish Confederation of Industries and I asked them, you know, what can we do about this	20240625_Session 4 Building a community of practice for CA.docx

Internal organizational compliance culture and ethical norms adaptation and learning	Diffusion of compliance standards	Legal frameworks integrity into internal policy form	this is an obligation that all big companies have to implement. And the law has also created an agency to ensure that big companies are respecting this Anti-Corruption Agency, AFA, Agence Française Anti-Corruption,	20240624_Session 1 A new era of CA.docx
		SMEs adoption MNC derived integrity tools and guidance	It's in the SME's benefit and interest to start adopting and incorporating best practices. They will perform better. They will become larger companies. They will grow. They will be able to access new markets. They will be able to integrate into the different values that exist across countries, which we're starting to see align in terms of norms.	Session 2 Showcasing the variety of anti-corruption Collective Action.docx 2022
	Developing integrity cultures into internal policy reform	Internationalization of civil society pressure and standards	wanted to also bring as a nuance here is that it's often assumed that, you know, the big companies, when you get into collective action and when you talked about the SMEs, that you needed to sort of co-opt them also into this space. It's often forgotten, and this is arising from our empirical experience, that the big companies at the global level, while they may subscribe to this as a proposition. But the trickle-down effect at the local level, at the regional level, I'm sorry to say that there's a yawning gap. The local regional heads are simply unaware of what's happening on the ground level. so while somebody might become a member of any of these initiatives, collective action initiatives, at the end of the day it does not drill down at the field level, at the operational level so even in a big company the impact	20240624_Session 2 The evolution and variety of Collective Action initiatives.docx
		Shift from performative to genuine integrity practices	u the portal — IPPI.mw — where you can access most of the infrastructure projects happening in my country, uploaded willingly by MDAs, courtesy of the Collective Action Project. We have managed to bring information closer to the citizens through that portal. I guess, by any standard, that is an achievement.	20240625_Session 4 Building a community of practice for CA.docx
		Tools and process supporting compliance	This workshop offered a great opportunity to discuss how to adapt the anti-corruption measures of the supplementary law to the specific and highly regulated context in which these companies operate. This kind of platform is mutually beneficial. And if I want really to highlight this term, it's mutually beneficial to have collective action.	20220630_Session 1 Government engagement and support for CA .docx
Tensions, challenges and limitations	Governance constraints	Enforcement gaps and symbolic compliance risks	for your compliance and risk management teams, certainly in certain complex markets with high risk of corruption, if that risk is there, then you may need to think about certain kinds of due diligence,	20220630_Business, human rights and anti-corruption connecting the dots.docx
		Limitations of government's role beyond guidance in collective action	annex to the Good Practice Guidance is basically the toolbox for companies to do their compliance systems, to do many other things. Although it's never said it's mandatory, this is the standard according to which we will be assessing the countries—and indirectly the companies too. The same goes for collective action.	20220701_setting standards on AC CA Mark Pieth Drago Kos.docx
		Regulation limited by national boundaries	We'll talk about global-level action. Country-level efforts are absolutely necessary, but they're not sufficient, particularly as we face contemporary forms of corruption that transcend borders and involve sophisticated, powerful, and complex networks.	20240624_Session 1 A new era of CA.docx
	Legitimacy and representation	Challenges of civil society speaking for all stakeholders	we are going beyond the public consultation, and for our most recent guides, like the one on anti-corruption in the construction industry, we have set up working groups with business federations in order to jointly discuss the good practices and challenges faced by companies.	20220630_Session 1 Government engagement and support for CA .docx
		Legitimacy concerns in self-regulatory initiatives	Well, just to add something is, focus on impact. As Ken was saying, prioritize, try to get some quick wins you know, people have been waiting for the basic services, and they hear about the economy growing, the big numbers playing well, but they don't feel it, they don't see it. So I think that we need to bring solutions, concrete solutions to our people, and with that, we start building that trust.	20240625_Session 4 Building a community of practice for CA.docx
		Limited actor diversity restricts initiative	private sector, you have governments, you have international organizations, CSOs, NGOs, academia. And they're all working together to push to reduce the risk of fraud and corruption in our global business operations and government operations. And before, you often saw the focus on these collective action initiatives being with large companies. And increasingly, we are seeing the collective action initiatives bringing on board SMEs and including SMEs in these activities. And to me, that is a critical development because SMEs are disproportionately affected by corruption.	20240624_Session 2 The evolution and variety of Collective Action initiatives.docx
		Perception of branding or window-dressing in collective action	How do companies encourage — whether it is the CSR manager that has a thousand other things or the compliance officer that also has GDPR and misconduct and sanctions — how do you squeeze in collective action in that? [00:09:05] - And I think that empowering also the professions who work in companies today is important.	20220701_Joining forces to mainstream Collective Action.docx