

The fight against corruption and inequality has been strengthened

Final project report

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Money Trail was a collaborative project between highly regarded journalism and training organizations: Finance Uncovered, Free Press Unlimited, Journalismfund.eu and Oxfam Novib.

This final report showcases the ground-breaking stories, achievements, and activities of the project for the entire duration from April 2018 – September 2021.

Money Trail was supported by the Dutch Postcode Lottery.

Learn more at money-trail.org
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1. ACKNOWLEDGEMENTS

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We are grateful for the support and cooperation of media organizations and civil society organizations, whose participation lent greater credibility and broadened the scope of what the project could achieve.

We would also like to thank the Dutch Postcode Lottery for its contributions and look forward to future partnerships to eradicate corruption, injustice and inequality all over the world.

2. ACRONYMS

CGT Capital Gains Tax

CSO Civil Society Organisation

DJBC Direktorat Jenderal Bea dan Cukai

DJP Direktorat Jenderal Pajak EAC Eastern African Region

EALA The East African Legislative Assembly

EU European Union

EUTF The Emergency Trust Fund for Africa

FPU Free Press Unlimited FU Finance Uncovered

GASK Gaming Awareness Society Kenya GDPR General Data Protection Regulation

GIJN The Global Investigative Journalism Network

ICIJ The International Consortium of Investigative Journalists

IFFs Illicit Financial Flows
JF Journalismfund.eu

MEP Members of the European Parliament

MNC Multinational corporation

MT Money Trail

NPL Dutch Postcode Lottery

ONL Oxfam Novib

PPMN Indonesian Association for Media Development
PTCIJ Premium Times Center for Investigative Journalism

SEATINI Southern and Eastern Africa Trade Information and Negotiations Institute

VPN Virtual Private Network

VVOJ Dutch-Flemish Association for Investigative Journalism

3. FOREWORD



In early September 2021, after nine intense months of rigorous research investigating a complex web of offshore entities linked to the sitting president of my own country, it suddenly hit me: It was time to send him the questions.

A few weeks later, our Pandora Papers investigation – jointly done between us at Finance Uncovered, Africa Uncensored and the International Consortium of Investigative Journalists -- would be published for Kenyans and the world to see.

But at that crucial moment, I had some time to reflect. It felt like I had been swimming in a river, trying to keep at the top of the water. Now, at this point, my mind wandered back two years – to the Money Trail training in Abuja in 2019.

At that training, Finance Uncovered had introduced to us all the concepts of offshore structures and how they can be misused for tax avoidance and other forms of illicit finance. Without that training, understanding the implications of the structures used by our president's ruling family would have been far more challenging. The Pandora Papers story brought that training into being.

First, I was thinking, Wow! We now have an opportunity to help Kenyans understand this secretive offshore world that is only open for the wealthy to use to their advantage: And secondly, I thought, we must get these questions right!

I first heard of "Money Trail" in 2019. Back then, I was barely a year into my career as a data journalist at the leading Kenyan investigative collective, Africa Uncensored.

I had just written my second article ever, following another project-based workshop with Finance Uncovered. The project was based on a leak of over 25,000 transactions from Kenya's government procurement records of eight ministries.

Afterward, I applied as a trainee for the five-day Money Trail training in Abuja, which intensified my understanding of not just general corporate structures, but also how offshore entities are commonly used to evade or avoid tax through aggressive tax planning and secrecy. I learned how to spot stories from company financial reports and even from mining concessions.

Importantly, we also received vital digital security training from the brilliant trainers at Free Press Unlimited.

But more than just the training itself, the event was a golden opportunity to meet and build strong relationships with many immensely experienced investigative journalists as well as anti-corruption activists. To date, many collaborative projects have been actualized.

I formed formidable relationships with veteran investigative journalists such as Ruth Hopkins from South Africa, passionate and always helpful Naipanoi Lepapa who enlightened me about the Kenyan media industry and encouraged me to write

I also met Leslie Olonyi, an environmental lawyer and we got to work on the illegal wildlife trade of Pangolins.

I know that all these journalists – and many more from sessions in London and Jakarta – have also benefited from the training. Dozens were also grateful to Journalismfund.eu for the Money Trail story grants.

My career took another turn after the Abuja training: I worked on several other stories while at Africa Uncensored before Finance Uncovered appointed me as their first Fellow. And that's how I came to be reflecting in silence in September, when possibly the most significant story to work on in my life was about to be published.

We are grateful to all the Money Trail partners. So, thank you. The fight against corruption and inequality has been strengthened.

Purity Mukami

Finance Uncovered Fellow and Data Journalist Nairobi, November 2021

4. MONEY TRAIL: EXPOSING ILLICIT FINANCE

4.1 Draining resources from development

Even before the COVID-19 crisis, countries faced widespread corruption, tax evasion and other harmful tax practices. Illicit finance thwarts their efforts to recover earnings and diminishes national revenues. These abuses erode countries' ability to provide access to health, education and economic opportunities to their citizens. This drain on resources does more than financial loss. It enhances inequalities within and between nations, undermines their capacity to respect, protect and fulfil human rights, and promotes injustices.

The COVID-19 crisis has sharpened the challenges to address financial accountability, integrity and transparency. The unprecedented circumstances and the response to the virus combined with pre-existing governance weaknesses have increased the risks of acts of grand corruption, financial crimes and tax abuses.

4.2 How are we going to change this?

The issues at hand are global. They require global cooperation and engagement by all stakeholders including the media, civil society organisations (CSOs) as well as governments. Investigative Journalism is key to combating this situation. Thus, the Money Trail (MT) project aimed to persuade power holders to take effective measures to combat tax abuse and grand corruption, ensuring government officials are held accountable and companies pay their fair share in taxes, pressured by journalists and activists, the media and CSOs.

MT delivered trainings, financial grants, technical and mentoring support to independent journalists and activists to investigative tax abuse, money laundering and corruption in Asia, Africa and Europe. It improved their capacity and network to investigate and publish stories exposing corruption, tax abuse, illicit financial flows (IFFs) etc.
Supported by the MT project, CSOs harnessed the evidence uncovered in these stories and engaged in advocacy campaigns to demand changes, resulting in increased citizens' awareness. Powerholders were forced to take appropriate measures including discussions in parliaments, back-pedalled laws, policy/practice changes, tax penalties, formal inquiries, and the formation of investigative committees.

The project contributed to establishing cross border and cross continental collaborations between journalists and activists.

4.3 Advancing the 2030 Agenda for Sustainable Development



Peace, Justice and Strong Institutions

Goal 16 of the 2030 Agenda for Sustainable Development made peace, governance and anti-corruption central to advancing international development. MT contributes directly to the international community's effort to meet this goal by reducing IFFs, corruption and bribery in all their forms.



Reduced Inequalities

MT also addresses Goal 10, to reduce inequalities by exposing corruption, tax fraud and money laundering through the global financial systems that further widen the gap within and among countries.

5. MONEY TRAIL IN NUMBERS'

156	People trained in financial investigations and digital security ²	10+	Policy and Practice change signals identified ⁴
66	People trained in financial research, media work and campaign tactics	6	Trainings organised on digital security
65	People trained in doing research and advocacy on tax and IFFs	5	Trainings organised on financial investigative journalism
137	Investigative stories		Awards and Nominations
340	Publications	25	Journalists and CSO activists attended or presented cases at international conferences or institutions
8	CSO projects funded³		



6. STORIES THAT MATTERED: INVESTIGATIONS AND IMPACT

Money Trail supported the publication of over a hundred investigative stories. Five of some of the most impactful stories are highlighted here.

6.1 Speaking truth to power: Kenyan president family's secret fortune revealed

Authors: Purity Mukami and Simon Bowers (FU) Read the full story **here** on FU.

President Uhuru Kenyatta's family, the political dynasty that has dominated Kenyan politics since independence, for many years secretly owned a web of offshore companies, our investigation showed.

Driven by Purity Mukami, FU fellow and former MT trainee, this story revealed the secret offshore world of Kenya´s first family. Though no reliable estimates of their net worth have been published, the Kenyattas are regarded as one of the country's

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While we in Europe are all too aware of the legal risks our investigative journalism entails - and meticulous fact checking is a fundamental part of our processes - it is vital to appreciate one other dimension for journalists working in more difficult media landscapes: Safety. Digital safety from harassment and physical safety itself - and also the perception of danger on both fronts. This alone can have a hugely chilling effect on freedom of expression. So embarking on and then publishing and broadcasting an important public interest story about the family of your own president takes a special kind of courage. Ted Jeory (Finance Uncovered co-director)

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richest families with assets spanning banking, insurance, media and vast swathes of agricultural land.

Previously secret assets were discovered among almost 12 million documents known as the **Pandora Papers**, a significant investigation organized by ICIJ into how world leaders and public officials use offshore tax havens to hide assets worth hundreds of millions of dollars. More than 600 journalists including reporters at FU have sifted through the files as part of a massive global investigation. This investigation pulled in information from other sources beyond the Pandora Papers data leak.

Key findings include

- Seven members of Kenyatta's family are connected to 11 offshore entities. For example, Uhuru Kenyatta's younger brother Muhoho owned an offshore company with a portfolio of cash, stocks and bonds worth \$31.6m in 2016.
- Family members used offshore companies to own three properties in the United Kingdom. One, a flat near Westminster in London, now worth an estimated £1m
- These assets were shielded from public scrutiny through foundations and companies in tax havens in Panama and the British Virgin Islands.

Impact

On October 4, a day after our investigation was published, President Kenyatta issued a statement to say: "My attention has been drawn to comments surrounding the Pandora Papers. Whilst I will respond comprehensively on my return from my State Visit to the Americas, let me say this:

"That these reports will go a long way in enhancing the financial transparency and openness that we require in Kenya and around the globe. The movement of illicit funds proceeds of crime and corruption thrive in an environment of secrecy and darkness.

"The Pandora Papers and subsequent follow up audits will lift that veil of secrecy and darkness for those who cannot explain their assets or wealth. Thank you."

6.2 Big Oil in the Dock: Oil major agrees to pay millions in taxes to Vietnamese government

Author: George Turner (FU)
Read the full story **here** on The Guardian

Effectively and fairly collecting taxes is essential for all states, and especially for developing countries. Not least because tax revenues offer a way to provide quality public services for all. However, in Vietnam, big oil corporations challenged the government which tried to impose taxes on their massive profits.

In August 2018, an FU investigation revealed that in a little known but powerful international court of arbitration, a new case had been filed that pitched two mighty western oil majors against one of the world's last Communist-run countries. Hardly anyone had heard of this battle between ConocoPhillips and Perenco vs the Vietnamese government.

Key findings include:

- In 2012, two Vietnamese oil fields were sold by two UK subsidiaries of ConocoPhillips to a UK company owned oil firm Perenco. ConocoPhillips sold the companies for US\$1.29 billion, making a profit of US\$896 million. But the US\$896 million capital gain was avoided.
- Vietnam had signalled its intention to tax the transaction. To prevent Vietnam from collecting the capital gains tax (CGT), and instead put some extra money into their pockets, ConocoPhillips and Perenco tried to jointly sue the Vietnamese government. The case was filed in 2017 based on the UK-Vietnam bilateral investment treaty.
- Vietnam believed that it had the right to the untaxed gain, as it was generated by exploiting the country's oil resources.

Impact

ConocoPhillips finally paid tax to Vietnam on its \$896m gain from the sale of two oil fields, after a period in which the government had asked Oxfam in Vietnam for advice in its arbitration court dispute. The company confirmed a settlement had been reached but declined to disclose the amount paid. It is understood the settlement was less than \$179m. Conoco's retreat appears to have come about partly because it wanted to avoid further negative publicity. The result marked a significant shift in the way multinationals attempt to avoid paying taxes to developing countries. This was revealed by Nick Mathiason and George Turner in an article published on FU here. The MT project had funded the Oxfam in Vietnam office to do further research and campaigning on the case.



Oxfam has a strong record and expertise in global tax systems, having done research of similar cases of tax avoidance in other countries. We as Oxfam in Vietnam shared this information with the Government of Vietnam for their reference, so that they are aware of related cases in other countries. Secondly, the fact that Finance Uncover made an investigation about the case and published in the media, and Oxfam's connection and synergies with journalists from Finance Uncovered through the Money Trail project helped to exchange important information between Finance Uncovered, Oxfam and General Tax Department. I think all of this combined with the public pressure and a strong position of Vietnam government ensured a favourable settlement of the dispute. Huong Nguyen, Sr Programme Manager,



FU had uncovered more stories involving companies avoiding billions of dollars in CGT in countries where the profitable businesses were located. Oxfam and FU deemed CGT avoidance an important, yet relatively unexplored area. Analysis of further cases and potential policy responses resulted in the report Capital Gains Taxes and Offshore Indirect Transfers by Oxfam and FU. Its purpose is to generate appreciation for and understanding of CGT avoidance in the global tax justice policy debate. The report is also a tool for civil society activists and investigative journalists to analyse and expose this form of tax avoidance.

On 23rd July 2020, Oxfam was invited at an IMF webinar of the Platform for the Collaboration on Tax to present the report. The need was explained to have provisions in domestic law to enable taxation of such transfers where countries wish to exercise those taxing rights foreseen in their bilateral tax treaties. Issues in enforcement and collection of such taxes were discussed at the highest global policy level. Oxfam was able to provide its perspective that taxes should be paid where profits are made which is inherently linked to the specific location in a specific jurisdiction.

6.3 Creating real, concrete change: Cape Verde passes law closing "offshore" banks

Authors: Margot Gibbs with additional reporting by Margarida Fontes; Editing by Ted Jeory and Nick Mathiason (FU)

Read the full story here on FU

Isabel dos Santos, the billionaire daughter of the former president of Angola, claimed to be a self-made businesswoman. But a cache of documents known as the **Luanda Leaks** appeared to tell a different story.

In collaboration with ICIJ and Margarida Fontes, FU exposed the Cape Verde offshore banking sector as part of the Luanda Leaks. Documents detailing the finances of Ms dos Santos raised serious questions about the role played by Cape Verde, as she built her controversial business empire across the world. Ms dos Santos used her own bank, Banco Bic Cabo Verde, in Cape Verde to route millions of dollars in payments from Chinese and European contractors working on construction projects in her father's country.

Key findings include

- In 2013, Cape Verde's National Assembly introduced tax incentives to make the islands attractive to offshore banks.
- The same year, Ms dos Santos bought into Banco Bic Cabo Verde. This would be a "sister" to her Angolan and Portuguese banks, which were owned by the same investor consortium.
- Two years later, as she became the majority shareholder, the bank ramped up its dealings with these "sisters", a move that increased its profits to a high of €12.9m by 2017.
- Ms dos Santos was a Politically Exposed Person⁵ and the Cape Verde bank also became a significant part of her own payments system as concern grew about her elsewhere in the international financial environment.
- Between 2016 and 2017 her companies used accounts at the bank to invoice for more than \$35m that were owed for contracts in Angola.
- Cape Verde's own rules were bypassed when Banco Bic Cabo Verde was granted its license to operate.

Impact

Just days after the story was published in January 2020, Cape Verde's Deputy PM and Finance Minister Oliveira Correira ordered an investigation into how a bank owned by Isabel dos Santos was granted a licence to operate in his island nation. He instructed the country's officials to launch a probe after he was shown details of FU's investigation into Ms dos Santos's business in Cape Verde. He also asked officials to examine a series of questionable payments that companies controlled by Ms dos Santos routed through her offshore bank, Banco Bic Cape Verde.

On February 21, Cape Verde's parliament unanimously agreed to close so-called "offshore" banks that provide services to customers who do not live in the country. The law applied to four banks, including Banco Bic Cabo Verde. Deputy PM Correria attributed the investigation to helping build support for passing this measure. He told ICIJ that the "Luanda Leaks made the measure more understandable, broadened the consensus in society and facilitated the approval process unanimously and without any social noise."

6.4 Supporting and challenging EU decision-makers: Unravelling EU's migration spending and policies in Africa

Authors: Maite Vermeulen, Ajibola Amzat and Giacomo Zandonini

Read the full series **here** on The Correspondent

Three journalists from the Netherlands, Italy and Nigeria worked together for six months to investigate the effects of Europe's migration money and policies in Africa. They produced a series comprising 11 stories investigating the EU's migration millions. From explaining the EU's migration policy, to figuring out where the money actually goes, to breaking down €1.5bn migration spending in Nigeria and revealing a 'migration cartel', the team uncovered the European migration spaghetti.

Key findings include:

- There are a staggering number of ministries, funds and departments involved in European migration spending.
- In Nigeria, 50 migration projects are being funded by 11 different European countries, as well as 32 migration projects that rely on EU funding. Together, they amount to more than €770m in funding.
- Most of the money from the EU is spent on improving Nigerian border control: more than €378m. The funding provided by individual countries largely goes to projects aimed at creating employment opportunities in Nigeria: at least €92m.
- EUTF, the EU's largest funding mechanism for development, stability and migration in Africa has over the past three years spent €4.6bn in 26 African countries. This money, however, has not been spent following the proper public procurement laws of the EU.
- The reason the EU can bypass its own public procurement laws is that there is a hidden clause in the legal documents of the EUTF, in which the EU declares a state of crisis in all countries covered by the EUTF for the duration of the fund.
- No grounds are given to prove that there is a crisis in and throughout all these 26 African countries.
 And the general nature of the exception makes the provision evidently overbroad.
- Consequently, it is practically impossible for African organisations to get projects funded by the EUTF.

At least 75 per cent of the Fund is spent through EU- or UN-organisations. Experts have called this the formation of a 'migration cartel.'

Impact

After these revelations, Members of European Parliament (MEPs) Tineke Strik and Erik Marquardt hosted a talk on: "Tracking EU migration funding in Africa, where does it go, with what impact and who decides?" at the European parliament on 29th January 2020. The journalistic team behind this investigation were invited to give a presentation on tracking the EU's migration millions in Africa. They also participated in a panel debate on the effects of the EU's external migration policy in Africa.



Giacomo Zandonini participated in another **public event** in Italy on European development cooperation and migration which was attended by MPs and government officials.



6.5 Shaking up sports betting in Africa

Sports Betting has exploded across Africa. But are the betting companies playing it straight?

Through the following investigative stories, Money Trail helped to expose the consequences of global companies targeting some of the poorest and most vulnerable people on the continent.

Gamblers Like Me: The Dark Side of Sports BettingBy: BBC Africa Eye with support from FU See the documentary **here**

This documentary follows one young football fan on a journey across Uganda, discovering an industry that could have a devastating impact on the lives of young Africans, and an epidemic of compulsive gambling that makes him question his own betting habits. FU significantly supported this 51-minute documentary by hosting two Ugandan journalists for a week each. It helped to frame the financial aspect of the investigation, mapping company structures and contributing financial analysis. FU also double-checked Uganda Revenue Authority data and had oversight on the finished script.

Impact

The film was Nominated, *Best Television/Digital Documentary, British Sports Journalism Awards.*Oxford University's Media Society organized a screening of the documentary and a panel discussion.

A Betting Nation

Authors: Lionel Faull and Paul Wafula (MT trainee) (FU and Daily Nation)

Read **here** complete overview of this MT granted project on JF website

The three legs of this investigation revealed:

- Kenya's enormous betting addiction.
- At the same time the Kenyan government removed a tax for betting companies, a cousin of Kenya's president accumulated a financial stake in betting giant SportPesa. Read the story on FU here.
- SportPesa has been sucking profits out of its lucrative Kenyan business by paying millions of pounds to a software company it owns in the UK. Read the story on FU here.

Impact

As a result, the Kenyan government back-pedalled on a controversial betting tax cut, less than 48 hours after the President signed it into law. The National Treasury and Planning promised to reintroduce the tax via a "proposal" to Parliament in 6 months' time. On 29th June 2021, the President signed a bill introducing 7.5% tax on gambling stakes.

6.6 Money Trail Trainees break stories, shine a light and hold powerholders to account

The following stories have been authored by journalists who participated in one of the Money Trail trainings on financial investigations and digital security.

Heineken NV Holding gets 6 million dollar in dividend, despite drop in profits Nigerian breweries

Author: Idriss Linen (MT trainee)
Read the full story **here** on Agence Ecofin Finance.

While the Nigerian economy faced challenges, the majority shareholders of Nigerian Breweries had clearly defended their interests first against the development of communities that host them, this story revealed.

Camel Trafficking from Syria

Authors: Daham Alasaad and Mohammad Bassiki (MT Trainee)

Read the full story here on The National

Over thousands of camel shepherds have fled Syria to the EU, crossing the sea and mountains to seek refuge following the tragic ongoing war that has changed their lifestyle with loss of camels to illegal trafficking.

The Military Economic Republic of Egypt

Author: Mahmoud Elsobky (MT Trainee) Read the full story **here** on Daraj

This in-depth cross-border independent investigation looks at the monopoly of both the Egyptian Armed Forces, and the General Intelligence Directorate on state projects and public contracting works, often charging higher prices than private companies, and profiting in ways that some experts consider illegal.

Saving Aru: The epic battle to save the islands that inspired the theory of evolution

Authors: Philip Jacobson (MT Trainee) and Tom Johnson

Read the full story here on Mongabay

In 2013, thousands of people in a remote Indonesian archipelago, Aru, rose up against a plan - concocted by a corrupt politician - to convert their land into a giant sugar plantation. This investigation tells the inside story behind the grassroots campaign for the first time.

Threat of 'blood diamonds' returns as exports flow from Central African Republic

Authors: Christian Locka (MT trainee) Read the full story **here** on The Museba Project

After international arbiters partially lifted a ban on selling diamonds amid a period of increased stability, miners in the Central African Republic revel in the prospect of renewed prosperity. However, fighting in the country's south and east is stoking fears that mines once again will fall into the hands of militias who will use "blood diamonds" to fund conflict.

The corporate lobby for climate skepticism in the Netherlands in the 1990s

Authors: Bas van Beek (MT Trainee), Alexander Beunder, Merel de Buck and Jilles Mast Read the full story **here** on De Volkskrant (in Dutch)

An archive left behind by global warming sceptic Frits Böttcher shows that dozens of Dutch multinational corporations supported his Global Institute for the Study of Natural Resources. Between 1990 and 1998, 24 companies sponsored his CO2 project, including Shell, Hoogovens, DSM, Gasunie, the NAM, Texaco, KLM, Schiphol airport, ING, Bovag and the ANWB. This financial support, adding up to about 1 million guilders, allowed Böttcher to spread his story about the greenhouse effect being a myth widely. Böttcher's lobbying, according to experts, has contributed to the difficult start of Dutch climate regulation.

7. HOW WE DID IT

7.1 Trainings for journalists and activists

As part of the MT project, FU and FPU provided trainings focused on how to investigate tax abuse, money laundering, corruption and ensure digital safety.

FU's training on investigating tax abuse, corruption and IFFs focused on the following topics: an understanding of the history, size and scale of the offshore world; an understanding of the relevant policy contexts; an understanding of various forms of taxation; a working knowledge of basic accountancy and financial statement interpretation; a knowledge of how and where to find relevant documents; the cross-border dimension to finance; methodologies to piece together complex financial investigations.

Beyond imparting knowledge, FU used the trainings to develop ideas from journalists and worked with some to produce stories and access Money Trail grants from JF. This proved how the partners worked effectively to maximise output. FU ended up mentoring a number of JF grantees which produced a good number of impactful stories that were published or broadcast in mainstream media.'

The digital security training with FPU aimed to make journalists aware of the threats, risks and dangers they might encounter during their work while at the same time giving them insight into possible measures to protect themselves. The training not only aimed at increasing knowledge on digital security (e.g., how to create secure passwords), but also skills (e.g., how to carry out a risk assessment). Through knowledge and skills, FPU empowered trainees to implement new, safer ways of carrying out their investigation. Participating journalists and CSO activists learned to keep their data at rest and in transit safe, to know their adversaries (what to protect from whom), and how they could keep him/ herself and their sources safe in communicating and sharing information with them.

Face-to-face trainings were conducted in London, Jakarta and Abuja. In Jakarta and Abuja, MT partnered with local organizations PPMN and PTCIJ respectively.



Appreciation for the training sessions was rated very high by the participants (rated 4.4 out of 5, or higher).



Approximately 71-76% participants later reported that their online behaviour changed, adopting more secure privacy tools and practices in their work.⁶

Due to COVID-19, a fully planned second training in Jakarta and a training in Nairobi were cancelled. These trainings were conducted online and both FU and FPU successfully adapted their classroom training methodology and curriculum to a virtual blended learning environment that combined self-paced courses with Q&A hands-on sessions with trainers (live webinars). These interactive sessions provided a crash course overview on digital security, building on the knowledge participants had gathered through the self-study. They also took part in a risk assessment exercise which was an opportunity to test knowledge and ask questions to ensure that knowledge would be converted into changed digital practices.



FPU's pre-existing online learning platform called Totem⁷ proved ideal for virtual training as it already contained multiple self-paced free courses on digital security. Further, to meet the specific needs of MT participants, FPU created two new Totem courses: Secure your devices and How to protect your identity online.

In addition, the following Totem courses were also selected to form a comprehensive curriculum, enabling participants to effectively protect themselves against online threats.

- How the Internet Works
- Secure Passwords
- Secure Messaging Apps
- Phishing Attacks



If it wasn't for the pandemic, we wouldn't have forced Totem in the curriculum, and I am happy that we did. I now realize that it would have been a great help if we had done it from the start. I will continue with this approach.

Digital Security Trainer





An evaluation on the Totem project showed that the learning curve was most significant for those that combined the self-paced Totem courses with the live interaction with trainers. The repetition of explaining rather difficult concepts and tools helped the trainees to convert new knowledge into changed behaviour and safer practices. In future, FPU will continue to offer this blended learning approach when training journalists and activists on digital security. Program Coordinator Gender, Safety and Accountability, FPU



To increase global accessibility, the newly developed MT courses on Totem were made available in Arabic. Moreover, the 'Secure your devices' course was selected by eQualit.ie and is being localized and translated into Russian.

7.2 Grants for journalists

For journalists, the MT project provided grant opportunities to conduct often long-term and costly investigations especially at a time when media houses do not want to invest or do not have sufficient resources. Often, foundations giving grants to journalists are focused on other issues such as climate change, and illicit financial flows are less popular among funders.

JF offered working grants for (mixed teams of) African, Asian and European journalists to investigate cross-border IFFs, tax abuse and corruption in Africa, Asia and Europe. Grants were awarded to journalists solely by JF, with no input or oversight at any stage from the consortium. The primary goal has been to expose illicit finance, tax abuse, corruption and money laundering. The stories covered a range of topics such as fraud, migration, illegal funding, arms trade, cross-border smuggling, mining, arms trafficking, agriculture, education, security, environment, and mafia. An overview of all the investigative stories that have been supported by the MT grants program is here.

Awards and Nominations

Three granted MT investigations were chosen as GIJN's best 2020 investigative stories.

Tracking South Africa's Mining Millions and How Multinational Tech Companies Exploit Tax Laws and Shift Profit were selected by GIJN's regional editors as the year's best investigative reporting in sub-Saharan Africa. Highway 10 - How West-Africa Pays for Europe's Cocaine Addiction was chosen as one of the best in the Editor's Pick in French.

The MT granted investigation **Dutch Flower Farms Avoid Paying Tax in Kenya** was *nominated for a Loep award from VVOJ.*

Swedish Journalist Carolina Jemsby was shortlisted for the 'Golden Shovel' (Guldspaden) award in Sweden, for her story Climate Change Adaptation Aid Never Reached Kenya's Farmers. This investigation was conducted in Kenya's Turkana region by Jemsby and her colleagues Carolyn Thomson and Juliet Atellah.

The Consultant: Why did a palm oil conglomerate pay \$22m to an unnamed 'expert' in Papua? was a finalist in two categories of the Online Journalism Awards 2021: the Knight Award for Public Service and Excellence in Collaboration and Partnerships.



7.3 Grants for CSOs

CSOs and activists played a valuable role in amplifying MT investigations, using evidence found by journalists to help shape policy demands and to promote change.

ONL supported eight civil society organizations in Africa and Asia with grants to follow up on MT investigations with policy and advocacy initiatives and/or campaign 'spikes' in their respective countries.

Research Legal Tax Framework | Vietnam

Following up on the **ConocoPhillips story**, Oxfam in Vietnam and the Vietnam Tax Justice Alliance reviewed practices of multinational corporations (MNCs) in Vietnam, similar cases across the globe and the relevant legal regulations to advocate for an improvement of the Vietnamese legal tax framework, to ensure a fair share of tax payments by ConocoPhillips and other MNCs in the future.

The story combined with Oxfam's support to the Government of Vietnam led to the oil major settling the huge CGT bill to Vietnam.

Beware of Dangers of Gambling (Tahadhari Na Athari Za Kamari) | Kenya

Following up on the stories highlighting the online gambling craze in Kenya, GASK launched a project to ban gambling in secondary schools and 10 universities through a public awareness campaign involving talk shows and social media strategies, installing blocking software in university computers (provided by Gamban UK) and referral to Gamhelp Kenya of addiction cases. Outcomes and impact include –

- Campaign forced the government to backpedal on signing a bill to reduce betting taxes.
- Increased awareness of gambling related harm among many young people including girls.
- GASK policy submissions on strict regulations of the gambling industry to the mental health taskforce featured in its report to the President.
- GASK's sparked a nationwide debate on the dangers of gambling in society.
- Stricter regulation of gambling promotions.

See **here** GASK on Kenya's national TV news presenting a segment on gambling and what the effects are on the mental health of dozens of citizens.

Advocacy campaign on IFF | Indonesia

Perkumpulan Prakarsa published a **report**highlighting IFFs of Indonesia's top six export
commodities. The report gained attention of the
media and the government. Prakarsa was invited
by the authorities to talk about the findings of
the report. This project is expected to improve
the capacity of the Indonesian Tax Justice forum,
thus enhancing its policy advocacy work to
strengthen the tax system and eliminate IFFs,
based on the evidence generated by the report.
The advocacy initiative targets the new cabinet of
the government including the Ministries of Finance,
Trade, Energy, Mineral Resources and Members of
Parliament.

Further, FU reviewed the Macau Money Machine project **report** which gained the attention of the Indonesian government. The report provided the Government of Indonesia and other stakeholders with a detailed analysis of profit shifting practices in the nation's pulp industry. The Directorate General of Taxes (DJP) and Directorate General of Customs and Excise (DJBC) wanted to discuss future steps regarding the issue, and work with the Tax Justice Forum to further investigate the case.

Strengthening barriers against IFFs in the Eastern African Region | Uganda and Kenya

IFFs in Uganda and the EAC region are part of a broader political economy dynamic that hampers continued economic growth and development. A Money Trail story revealed how IFFs in the form of smuggling have eroded the tax base in Uganda and Kenya. The investigation disclosed how cross border beer smuggling is hurting revenue collections in Kenya and Uganda.

In response to this challenge, SEATINI has undertaken a project aimed at "Minimizing IFFs across the Kenya-Uganda border in order to enhance Revenue Mobilisation in Kenya and Uganda". The project scaled up efforts to have a harmonized tax regime by strengthening engagements with policy makers including revenue authorities, relevant ministries and advocacy CSOs in Uganda and Kenya. The project also raised awareness among key stakeholders including EALA and traders along the border on the negative impact of IFFs on revenue mobilization and service delivery.

7.4. Mattermost: Online MT Community

A secure and accessible space was created for MT's network of investigative journalists and CSO activists to communicate remotely, exchange ideas, share files and seek collaboration. Mattermost addresses the most challenging private messaging security needs by offering strong encryption protocols. It is GDPR compliant and by selecting Greenhost (who is committed to a free and open internet and the security of its users) for webhosting, the Third-party access to data is also safe. The Public channels are open to consortium members, trainers, trainees and grantees (joining the channels is by invitation only). The 'Private channels' and the 'Direct messages' enable crossborders investigations and allow members to exchange information in smaller groups.

7.5 Technical Support Desk and Safety

It is important to keep sources and information during an investigation safe and secure. It is a basic precondition for anyone involved in investigative journalism. Digital records, databases, documents and communication streams are all likely targets. A variety of support mechanisms were made available to journalists and activists.

A **repository** of digital security resources was created for journalists and CSOs in case they faced an emergency or wanted to get back to information they learned during the training. FPU established a Technical Support Desk that participants could reach out to for digital security-related advice and support. FPU's digital security trainer developed several practical 'How to' videos which were shared with the Money Trail participants via the MT YouTube **channel**. One-on-one advice related to security was provided throughout.

FPU deployed 44 VPN accounts to former trainees and provided an additional 6 VPN subscriptions. Yubikeys⁸ were shared with trainees in Abuja and London 2019 training rounds. Moreover, 17 Yubikeys were sent to interested participants from Asia and Africa.

5 anonymous SIM-cards were distributed to those who needed help in protecting their identity.

A journalist in distress was directly supported through MT funding ensuring his release from jail. Subsequent extensive fundraising efforts by consortium partners avoided renewed imprisonment. When a former MT trainee from Bangladesh was arrested, FU released a public statement calling for immediate release. FPU handled the case diplomatically with a statement and call-to-action that was sent to:

- Special Rapporteur on the Promotion and Protection of Opinion and Expression.
- Head of Delegation of the European Union to Bangladesh.
- Deputy Head of Mission of the Embassy of the Kingdom of the Netherlands in Bangladesh.

When security cases come in, FPU collaborates directly with the people involved and coordinates with partners in Journalist in Distress-network to assist the case. FPU's involvement could range from public statements, advocacy to local embassies and EU Delegations, provision of a support letter for asylum, legal aid to financial support from FPU's Legal Defense Fund or emergency support from the Reporters Respond Fund.



The Money Trail project is an excellent example of intercontinental collaboration between journalists, which is a weapon for standing up against corrupt governments and fraudulent companies when journalists expose abuses. Money Trail has proven that independent cross-border cooperation leads to better public awareness of corruption, money laundering, fraud, and other financial crimes. Informing the public is the first step to change. That is why the Money Trail project is of vital importance in today's world.

Ides Debruyne, Co-founder and Managing Director of Journalismfund.eu



ANNEX A

Policy/Practice Changes or Other Impact

Impact Story	How/What/Where	Policy/Practice change signals identified or other impact
Dubai Leaks: Was Nigeria's OPL245 oil cash laundered in secretive Emirate?	The Money Trail story in the Nigerian Premium Times was part of a bigger set of stories, the #DubaiLeaks stories, exposing the corruption taking place between then oil minister Etete and oil companies Shell and Eni. The stories substantiated the earlier Finance Uncovered story that led to Shell admitting that senior figures knew that some funds from the deal would be paid to companies controlled by former Nigerian oil minister Dan Etete.	Officials from Shell & Eni and former Minister Etete, stand trial on various corruption charges relating to OPL245 in Italy
Story above amplified	To follow up on the Dubai leaks, a CSO grant was given to CODE Nigeria	Due to the intense advocacy and citizens led campaigns: (1) The Federal Audit Service Commission Bill was revived and reintroduced for first reading at the floor of the National Assembly for enactment. (2) The Nigerian National Petroleum Corporation (NNPC), for the first time since its establishment (43 years), published its annual financial statements. (3) A national galvanization of citizens against corruption, public audit and finance leakages as seen in the Malabu "OPL 245" scandal and the recent NDDC scandal and public hearings. (4)The Senate Constitution Review Committee called for the submission of Memoranda on the alteration of provisions of the Constitution and Point 9 of the Call acknowledged and provided for the "Strengthening of Independence and Oversight of an Office created by the Constitution". Pursuant to that Call, Connected Development submitted a comprehensive Memorandum to the Committee on altering/ repealing sections of the Constitution which inhibit the independence and oversight of the Auditor-General for the Federation. See Memorandum here
Paladin Energy dodges €14mIn in tax via Mauritius construction: Namibian government to investigate	Paladin Energy selling shares in the Langer Heinrich uranium mine led to the Namibian government becoming aware of the capital gain taxes Namibia missed out on, due to the OIT structure used by Paladin.	A day after publication, the Namibian treasury released a statement confirming it was trying to claw back the tax it says it is owed.
The money trail of the Japanese Imperial brothel system by Griselda Molemans & Hee Seok Park	Published in Korean and Malaysian newspapers at the end of 2019, is now also published as a chapter in Molemans' book 'Levenslang oorlog' (Quasar Books, 2020) and got press coverage in The Netherlands in February 2020.	Debate about this issue generated in the Netherlands
Big tobacco's behaviour is legal but shows system failure: tax shortcuts	Cigarette companies Philip Morris, British American Tobacco, Japan Tobacco and Imperial Brands are all letting (parts of) their billion dollar profits run through the Netherlands - once again put the spotlight on the world of shadowy tax structures.	Immediately after publication the Dutch Parliament came together in an emergency session to discuss this issue as it negatively protraits the image of the Netherlands as a tax haven.

Impact Story	How/What/Where	Policy/Practice change signals identified or other impact
Revealed: UK's overseas aid fund is major investor in company linked to media crackdown in Myanmar	Working with the Myanmar civil society, FU revealed a company owned by CDC Group, a controversial Department for International Development investment fund, is "complicit" in closing down independent media in Myanmar.	CDC launches "urgent" probe. Labour's shadow DflD minister forces UK government Dfid secretary of state to make statement about issue. The UK foreign minister was also asked questions in parliament on our story.
Nepali migrants in Finnish restaurants	Issue of modern slavery exposed in Nepalese restaurants in Finland by a MT trainee.	In March 2019, Finnish newspaper Helsingin Sanomat published an investigation into the deplorable working conditions in Nepali restaurants. The Finnish National Bureau of Investigation, said that the low number of reports doesn't indicate a lack of abuse. Instead, it's a sign of how dependent the workers are on their employers. The problem doesn't have to do with just Nepalis but generally South Asian and Chinese restaurants, too.
Dutch flower growers in Kenya avoid corporate taxation	Dutch flower growers in Kenya avoid corporate taxation (on income, dividends and capital gains), using transfer pricing between the Kenyan subsidiary and a parent company in (mostly) the Netherlands and offshore constructions in i.a. The Bahamas, the British Virgin Islands and Jersey.	This story was published on the front page of Trouw daily and various other media outlets (Groene Amsterdammer, Investico,etc).
Low tax guaranteed: how a Russian mining giant has saved \$16.5m in Burkina Faso - one of the world's poorest countries	An investigation by The Economist and Finance Uncovered revealed how the Norgold company is still profiting from a stabilization clause from 1995, costing the government around \$16,5 million in missed taxes. The story made the national news.	The government of Burkina Faso examined all its fiscal stability clauses.
Dubai real estate links point fresh footprints to hidden Abacha loot	Till date, 20 years after the controversial demise of one of Nigeria's last military leaders, Sani Abacha, one sore thumb still aching local and international financial crime investigators is the full extent of his legacy of corruption.	Multiple renounced individuals reacted to the leak exposed in the story, including Auwal Rafsanjani, Director, Civil Society Legislative Advocacy Centre (CISLAC); the Executive Director of the Africa Network for Environment and Economic Justice (ANEEJ), David Ugolor and Olarenwaju Suraju, Chairman, HEDA Resource Centre.
		Olarenwaju Suraju, Chairman, HEDA Resource Centre, reacting to this new discovery, urged the Nigerian government to quickly engage the UAE authorities using the bilateral agreement between both countries to freeze the assets and move for prosecution and final forfeiture. He expects that the Nigerian government will pursue return of the assets as fast as other properties were pursued. He went on further to say "government must make moves to ensure forfeiture of assets acquired using proceeds of crime by past and present public office holders".
Inside Zim's illicit gold mine trade	Journalists Stephen Tsoroti and Ankita Anand investigated how an estimate of 50% of artisanal and small-scale mined gold in Zimbabwe was lost to smuggling, causing bloody turf wars that have claimed hundreds of lives.	In September 2020 environment groups in Zimbabwe made presentations to the Zimbabwean Cabinet, also using the report from the above investigation. As a result, the Cabinet has ordered banning of riverbed and alluvial mining, and directed holders of mining titles to obtain environmental clearance.

MONEY TRAIL
The fight against
corruption and inequality
has been strengthened

ANNEX B

Theory of Change

1

SHORT TERM

- Trained independent journalists expose cases of tax abuse and grand corruption in Africa, Asia and Europe
- Journalists and civil society effectively cooperate to increase citizens' awareness on tax abuse and corruption
- Civil Society Organizations (CSOs) equipped to include cases on tax abuse and corruption into their campaign narratives and actions

2

INTERMEDIATE

- Power holders aware of the cases exposed and inclined to engage with citizens and CSO activists
- Citizens aware and mobilized to demand an end to tax abuse and grand corruption
- · CSOs harness the evidence uncovered by journalists for policy demands/practices

3

VISION

- Power holders to take effective measures to combat tax abuse and grand corruption ensuring government officials are held accountable and companies pay their fair share in taxes, pressured by journalists, media and CSO activists.
- End illicit financial flows to ensure more equitable and inclusive societies that boost citizens' access to health, education and economic opportunity

MONEY TRAIL
The fight against
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NOTES

- 1 Approximately 40% of people who participated in trainings or conferences are female journalists and activists.
- 2 An additional 27 people were trained in digital security only.
- 3 Initially, the objective was to support 10 projects. However, during implementation, CSO projects were supported with higher amounts than planned. Quality of CSO grants was prioritised over quantity.
- 4 See Annex A for a list of key policy/practice change signals identified.
- 5 A politically exposed person (PEP) is defined by the Financial Action Task Force (FATF) as an individual who is or has been entrusted with a prominent public function.
- 6 The participants who took part in the training rounds in London, Jakarta and Abuja were approached to fill a survey to determine the learning curve and how digital security training affected their use of technology. 24 participants replied and scored their own learning curve on a scale of 1-5.
- 7 https://totem-project.org/
- 8 The YubiKey is a hardware authentication device manufactured by Yubico that supports one-time passwords, public-key cryptography and authentication, and the Universal 2nd Factor (U2F) and FIDO2 protocols. It allows users to securely log into their accounts by emitting one-time passwords or using a FIDO-based public/private key pair generated by the device.

money trail