



GLOBAL  
NETWORK  
INITIATIVE

2015 ANNUAL REPORT

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# GLOBAL NETWORK INITIATIVE ANNUAL REPORT 2015

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## MESSAGE FROM THE INDEPENDENT CHAIR & EXECUTIVE DIRECTOR

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### **2015 WAS AN EXCITING YEAR OF TRANSITION AND GROWTH FOR THE GLOBAL NETWORK INITIATIVE.**

We ushered in new leadership; we laid the foundation to grow our network of participants by more than any other single year since our founding in 2008; we launched our second cycle of independent company assessments; and we extended our influence in support of free expression and privacy around the world.

From the role of governments and technology companies in responding to violent extremism online, to the debates over cross-border data flows and encryption, the past year saw an escalation in the global conversation around human rights and information and communications technologies. GNI's unique multi-stakeholder model of direct, high-level engagement, policy development, and accountability is more relevant than ever.

Our three-year collaboration with the Telecommunications Industry Dialogue (ID) culminated in our announcement in February 2016 that seven new companies now hold official observer status in GNI, and are on the path to membership. Millicom, Nokia, Orange, Telefónica, Telenor Group, Telia Company and Vodafone serve hundreds of millions of users in over 100 countries. We welcome this important opportunity to advance human rights by bringing global internet and telecommunications services companies together within our multi-stakeholder, human rights initiative that spans the breadth of the ICT sector.

These companies join Change.org, which received observer status in September 2015, and new academic participants: K.S. Park from Korea University Law School, the University of Connecticut Human Rights Institute, and the Center for Communications Governance at National Law University, Delhi. Procera Networks discontinued their participation in GNI as of December 31, after they were acquired by Francisco partners and went back into private ownership.

Together with our increasingly diverse membership, we have taken steps to expand our profile and policy impact, and to build our capacity and resources. In 2015, GNI organized and engaged in policy discussions and events in Amsterdam, Boston, Brussels, Geneva, João Pessoa, London, Madrid, Manila, New York, Palo Alto, Stockholm, The Hague, Ulanbaatar, and Washington, DC. In October, we held our first board meeting outside the United States, in London.



JUDITH LICHTENBERG



MARK STEPHENS

We hosted our first of several roundtable discussions with government, company and civil society stakeholders on responses to extremist content online, and met on several occasions with senior government officials to argue against key provisions of the United Kingdom's proposed Investigatory Powers Bill.

Our second cycle of independent assessments of member companies started in July. This included the second independent assessments for founding companies Google, Microsoft, and Yahoo, and the first for Facebook and LinkedIn. Assessments require a significant commitment of time and resources from GNI's company representatives, who in turn draw on the detailed input and expertise from colleagues across all parts of their respective organizations. It is clear that GNI Principles and Guidelines are being embraced by senior leadership and throughout company operations. The valuable learning derived from the assessment process is being shared within GNI's diverse stakeholders and will ground our ongoing discussions and policy advocacy. The Public Report on this second cycle of assessments was released in July 2016.

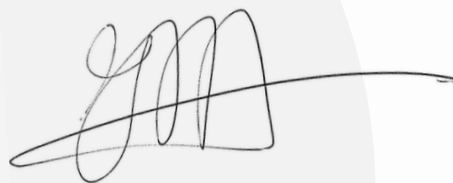
One of our priorities in 2015 and 2016 is to provide greater visibility into the assessment process for our stakeholders and the wider public. As part of a series of measures aimed at increasing the understanding of how we hold companies accountable to the GNI Principles, in 2016, our member companies will for the first time communicate themselves on the outcome of the assessment process.

Looking ahead to 2016, we see huge opportunities for GNI. For the first time we have an Executive Director based in Europe, and the support of two full-time staff in Washington, DC. We have plans to further expand and diversify our participants across our constituencies. The coming year will see a program of learning and policy events aimed at driving the global conversation on privacy and free expression. We will also focus on a program of learning opportunities where our telecommunications observer companies will engage directly with GNI's company, civil society, academic and investor constituencies.

None of our achievements would have been possible without the deep and sustained commitment of all our members and staff throughout 2015. We extend our appreciation to them, and to all our stakeholders and funders who continue to work with us to develop a constructive and informed global dialogue on the complex threats to free expression and privacy rights around the world.



**Mark Stephens**  
INDEPENDENT CHAIR



**Judith Lichtenberg**  
EXECUTIVE DIRECTOR

## KEY RESULTS

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- **Launch of GNI's second ever cycle of independent company assessments.** The assessment process covered a detailed review of the systems, procedures and policies in place to protect free expression and privacy for our five member companies, as well as 59 separate case studies from around the world relating to government requests to access or take down user data. The Public Report on the 2015/16 GNI Independent Company Assessments and supporting documents can be found on our website.
- **Launch of GNI's global dialogue on extremist content.** Anchored by a series of closed and public roundtable and panel discussions, beginning with sessions in London and Silicon Valley, the dialogue spans internal GNI learning and policy development, advocacy and engagement with the EU and national governments, and GNI outreach to international organizations. We expect to release a set of recommendations endorsed by our multi-stakeholder membership in the 4th quarter of 2016.
- **Research, engagement and policy advocacy on mutual legal assistance.** In January 2015 we released our report: [\*Data Beyond Borders: Mutual Legal Assistance in the Internet Age\*](#). The report drew attention to the acute stress the mutual legal assistance regime is under. Governments around the world are increasingly resorting to extra-territorial laws, data localization, surveillance and the weakening of encryption to get data required for law enforcement investigations. The report was the basis of extensive advocacy throughout the year directed at governments, international organizations, civil society stakeholders and the public. It called for the streamlining and reform of the existing MLA system, and highlighted the need to build towards a new international cross-border data-sharing framework with robust protection for user rights.
- **Advocacy around the UK Investigatory Powers Bill.** Mindful of the potential of these laws to be influential in Europe and around the world, GNI conducted a targeted series of meetings and events focused on UK and EU policy makers, law enforcement officials and other stakeholders. GNI representatives met with the UK Home, Cabinet and Foreign Offices to give input on key provisions of the Bill affecting free expression, privacy, transparency, oversight and the exercise of extra-territorial jurisdiction. GNI submitted formal written evidence to the UK Parliament's Joint Select Committee scrutinizing the Bill. This advocacy will continue throughout 2016 as the Bill goes through its review process.
- **GNI member and public learning events.** GNI convened a number of internal and public learning and stakeholder events and briefings in 2015. These included government and company responses to extremist and alleged terrorist content online, mutual legal assistance and cross-border data reform, the implications of the EU Safe Harbor decision, encryption, domain localization, online incitement directed at women, the development of company human rights impact assessments for market entry and exit, and engaging company responses to the 2015 Ranking Digital Rights Corporate Accountability Index. Our annual Public Learning Day was held at the Stanford University Law School with a record number of attendees.

## OVERVIEW OF 2015

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### **2015 was a year of growth and outreach for the Global Network Initiative.**

Against the backdrop of an elevated global debate on surveillance laws, encryption, online extremism, and the urgency of reform of cross-border data and mutual legal assistance regimes, GNI deployed its unique multi-stakeholder model of international engagement and standard-setting. We expanded our work with national governments, law enforcement and international institutions; we set the foundation for unprecedented growth in our diverse membership; and we leveraged our collective voice in policy debates and campaigns around the world.

### **PROVIDING A FRAMEWORK FOR RESPONSIBLE COMPANY DECISION-MAKING**

**Anchored in international human rights laws and standards, and informed by the UN Guiding Principles on Business and Human Rights, the GNI Principles and Implementation Guidelines provide a framework for companies to respect freedom of expression and privacy rights in their operations. The goal is that these principles support responsible decision-making by companies and take root as a global standard for human rights in the ICT sector.**

During 2015, international experts pointed to GNI as a key resource and emerging source of best practices for ICT companies.

The GNI Principles and Implementation Guidelines were endorsed by David Kaye, UN Special Rapporteur on the right to freedom of expression and opinion, in his report [to the UN Human Rights Council on encryption and free expression rights in May 2015](#). GNI provided multi-stakeholder input into the report. SR David Kaye said:

*“At a minimum, corporations should apply principles such as those laid out in the Guiding Principles on Business and Human Rights, the Global Network Initiative’s Principles on Freedom of Expression and Privacy, the European Commission’s ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights and the Telecommunications Industry Dialogue Guiding Principles, which encourage corporations to commit to protect human rights, undertake due diligence to ensure the positive human rights impact of their work and remediate adverse impacts of their work on human rights.”*

GNI’s position as a standard bearer for human rights in technology was endorsed by the authoritative “Privacy Bridges” report to the [2015 Amsterdam Privacy Conference](#), written by EU and US privacy experts. The conference identified the GNI Principles as a best practice for international companies. It recommended a ten-part privacy agenda for the US and Europe, including the use of the GNI Principles by companies on both sides of the Atlantic to develop a framework for assessing and responding to government surveillance and other requests.

In September, United States Ambassador to the United Nations Samantha Power [called on companies](#), especially those in the technology sector, to join the Global Network Initiative to help keep the Internet open and free.



In 2015, the GNI Board established a working group to review and develop proposed revisions to the GNI Principles and Implementation Guidelines. This is in line with the GNI commitment to periodically review and assess the effectiveness of its core documents. As experience with the operation of the Principles and Implementation Guidelines grows, we want to ensure they meet the changing global policy and technology landscape and continue to align with the UN Guiding Principles on Business and Human Rights, as adopted in 2011.



ANDREW WOODS,  
JUDITH LICHTENBERG,  
AND MARK STEPHENS  
VISIT NUMBER 10  
DOWNING STREET,  
LONDON, OCTOBER 2015

#### LOOKING AHEAD:

In 2016 and 2017 GNI will continue to promote our framework through communications, public events, and outreach. Of particular importance, GNI will be completing its review of the GNI Implementation Guidelines, the first review since their issue in 2008. This involves considering the development of guidelines that may be tailored to specific ICT sectors. GNI will explore opportunities to develop further guidance for companies, for example, by developing resources for companies to conduct human rights impact assessments, a key component of the Implementation Guidelines.

#### FOSTERING ACCOUNTABILITY TO GENERATE TRUST AND CREDIBILITY

**When they join GNI, member companies commit to an independent assessment process to evaluate their implementation of the GNI Principles. Our accountability process—the only mechanism of its kind in the Information & Communications Technology sector—is designed to generate trust among stakeholders and build public credibility. The ultimate goal is the demonstrable protection and advancement of user rights. Findings from this biannual assessment process inform the shared learning and policy advocacy we conduct on behalf of our multi-stakeholder membership.**

#### LAUNCHING OUR SECOND CYCLE OF GNI COMPANY ASSESSMENTS.

In 2015, we launched the second cycle of independent company assessments. This cycle included the second assessments of founding GNI member companies Google, Microsoft and Yahoo, and the first assessments of Facebook and LinkedIn. GNI's [Public Report](#) on the 2015-16 Independent Company Assessments and accompanying documents are available on the [GNI website](#).

Following the completion of GNI's first cycle of assessments, carried out in three phases from 2010-2014, the GNI Board voted in June 2014 to consolidate future assessment cycles into a bi-annual, two-stage process made up of:

1. A one-time self-reporting from the companies to GNI on their internal company policies and processes to support free expression and privacy after one year of membership, and;
2. A biannual Independent Company Assessment of each member. This includes

both a process review of the internal company policies and procedures for implementing the GNI Principles, and a specific case study review.

During the assessment process, member companies each work closely with an independent assessor who must be accredited by, and consult with, the GNI Board. In addition to our existing roster of accredited assessors, GNI accredited four new firms in 2015: AJA Registrars Europe, Ernst & Young LLP (US member Firm of Ernst & Young global), DNV-GL, and Moores Rowland (MRI). The full list of [currently accredited assessors](#) can be found on the GNI website.

GNI hosted an assessor orientation featuring representatives from all of GNI's constituencies in May 2015. After the assessors were appointed, a set of case studies for each company was selected by the relevant assessor in consultation with the company and based on the specific case recommendations of GNI's non-company membership. Cases included in the review covered examples of government and law enforcement requests that impact the privacy and free expression of users in a range of countries where member companies operate.

After each assessor submitted a detailed report on the company process review and case study review, the GNI Board reviewed the report for each company, asked questions of the company representatives and assessors, and determined compliance.

The GNI Board meetings determining compliance for this assessment cycle were held in Washington, DC, on March 10, and on May 23, 2016.

[\*A Step-By-Step Guide to the GNI Independent Company Assessments is on the GNI Website.\*](#)

ENHANCING THE TRANSPARENCY OF THE ASSESSMENT PROCESS.

The GNI Independent Company Assessment process is designed to be confidential. GNI Board Members read the individual company assessment reports and question the companies on the report findings and recommendations. Confidentiality ensures that members can engage candidly and collaboratively on the most sensitive cases, and allows the companies to provide confidential information to the assessors, and ultimately, to the GNI Board. GNI has long recognized the importance of increasing transparency around the assessment process, and at the same time, ensuring that disclosed information about individual cases is not counterproductive to the ability of companies to foster human rights and uphold the GNI Principles and Implementation Guidelines.

As part of the second assessment cycle, the GNI Board agreed in October 2015 to a set of measures to enhance the transparency of the process for our internal and external stakeholders and the wider public. In addition to GNI's Public Report on the assessments, member companies Google, Microsoft, Yahoo, Facebook and LinkedIn will communicate publicly about the outcome of their assessments, within six months of the end of the assessment process. In 2016, GNI will publish the GNI Assessment Guidance and the GNI Assessment Reporting Framework for the first time. These supporting documents accompany the Public Report on the 2015/16 Independent Company Assessments as [published on our website.](#)



AMOS TOH, FROM THE OFFICE OF UN SPECIAL RAPPORTEUR DAVID KAYE, AND REBECCA MACKINNON, DIRECTOR OF RANKING DIGITAL RIGHTS SPEAK AT GNI'S PUBLIC LEARNING DAY AT STANFORD LAW SCHOOL.



## LOOKING AHEAD:

Following the GNI Board review of the assessment findings and the publication of the Public Report on assessment, the GNI Board will undertake a formal review of the assessment process. GNI is committed to finding new opportunities to engage with human rights stakeholders, other companies, and the wider public on the importance of our assessment process, and how it fosters responsible company decision making, standards building, and shared learning on how best to sustain and build on protections for privacy and free expression in the ICT sector.



U.S. AMBASSADOR TO  
THE UNITED NATIONS,  
SAMANTHA POWER,  
SPEAKING AT THE  
STATE DEPARTMENT'S  
INTERNET FREEDOM  
TECHNOLOGY SHOWCASE  
EVENT IN NEW YORK,  
SEPTEMBER 2015

## POLICY AND LEARNING ENGAGEMENT

**The GNI provides a uniquely authoritative platform for companies, academics, civil society and socially responsible investors to collectively engage governments and international institutions. Our forum also provides a confidential space for members to participate in shared learning to evolve and improve company systems and policies that protect user rights.**

In 2015, GNI increased its visibility and presence at international forums on technology and human rights, and stepped up its advocacy amidst escalating global policy discussions addressing extremism and radicalization online, cross-border data reform, and encryption. We see the nexus between development and the rights of privacy and freedom of expression as a growing issue, and we will be seeking more opportunities to engage with international development agencies and governments on user rights and government development.

- At [RightsCon Southeast Asia](#), GNI held a well-attended panel discussion moderated by Michael Samway, founder of the Yahoo Business and Human Rights Program, to promote the GNI Principles and the multi-stakeholder model of shared learning and collective policy advocacy.
- GNI attended the fifth meeting of the Freedom Online Coalition in Ulaanbaatar, Mongolia, where GNI Executive Director Judith Lichtenberg spoke at a session organized by the Telecommunications Industry Dialogue on [Good Policy Practices in Online Freedom](#).
- GNI's multi-stakeholder approach received renewed attention at the inaugural Politico [Cybersecurity Summit](#) in Brussels in June 2015.
- Judith Lichtenberg argued for the critical importance of multi-stakeholder initiatives in the ICT sector at the annual Annenberg-Oxford Media Policy Summer Institute.
- Judith Lichtenberg participated in an Institute for Human Rights and Business workshop in July Hosted by the UK National Contact Point (NCP) which shared experiences and ideas about the role of 'Human Rights within the ICT sector and its relevance to the OECD Guidelines on MNEs'.
- At the [Stockholm Internet Forum](#) in October 2015, GNI and the Telecommunications Industry Dialogue hosted an "unconference" session on Making Freedom of Expression and Privacy a Key part of Development. Judith Lichtenberg also

spoke on a plenary session entitled ‘All of the Internet for All of the People.’ Both panels underlined that privacy and free expression rights, and ICT companies, will be increasingly important for the global development agenda around education, health, and civic participation.

- Judith Lichtenberg attended the Internet Governance Forum in Brazil in November where she spoke at a workshop on [dangerous speech online](#) and at the UNESCO panel: [“Mitigate Online Hate speech and Youth Radicalization”](#).
- GNI organized a panel discussion together with Privacy International entitled: “Balancing Rights and State Demands: Taking Stock of the Challenges and Exploring Opportunities to Secure Rights Online,” at the 4<sup>th</sup> UN Forum on Business and Human Rights, in Geneva on 16-18 November.

*“We need more businesses – and in particular tech companies – to embrace the UN Guiding Principles on Business and Human Rights, to join the Global Network Initiative, and to help use their creativity and private sector savvy to help figure out how to keep this space free and open.”*

US AMBASSADOR TO  
THE UNITED NATIONS,  
SAMANTHA POWER

A special focus for GNI and our members in 2015 was the sustained engagement with United Nations Special Rapporteur for Freedom of Expression and Opinion, Professor David Kaye, as his office embarked on the first stage of consultations to map the role of the private sector in global free expression.

GNI submitted [comments](#) to UN Special Rapporteur David Kaye on the legal frameworks governing the relationship between freedom of expression and the use of encryption and other technologies to transact and communicate securely online. GNI staff and members also met with the newly appointed UN Special Rapporteur for Privacy, Professor Joe Cannataci, on government requests and surveillance.

## RESPONSES TO EXTREMISM AND RADICALIZATION ONLINE

The conflict in Syria and the terror attacks in cities around the world in 2014 and 2015 prompted an acceleration in the number of requests by governments for companies to remove or restrict alleged terrorist content from their platforms.

GNI put a special priority on engagement with the UN Security Council Counter-Terrorism Executive Directorate (CTED) during 2015 to advance our policy objectives on extremist content and mutual legal assistance reform. In April, David Sullivan participated in a [workshop](#) organized by CTED and NYU that also featured GNI members from CDT, GW Law, and Google. Following the workshop, in July, the UN Counter-Terrorism Committee held a special meeting in Madrid featuring Judith Lichtenberg and Mark Stephens as [speakers](#) on extremist content and MLA reform.

In September, Judith Lichtenberg spoke about extremist content at a United Nations meeting held to mark the 10<sup>th</sup> anniversary of Security Council Resolution 1624. In December, she was invited back to address the UN to address a [special meeting](#) of the Counter-Terrorism Committee on preventing and combating abuse of ICT for terrorist purposes at the UN Headquarters.

In November, GNI sent a letter to members of the European Parliament regarding the “Report on the Prevention of Radicalization and Recruitment of European Citizens by Terrorist Organizations,” to highlight the problematic aspects of this non-binding—but highly influential—policy statement on combatting extremism online. The European Parliament subsequently adopted the report, underscoring the serious challenges in Europe as more intrusive measures are considered for dealing with terrorism online. GNI will continue to prioritize advocacy with European authorities on this issue,

leveraging the presence of GNI's Executive Director and Independent Board Chair in the Netherlands and London, respectively.

This heightened debate over the role of ICT companies in addressing extremist content and radicalization online saw GNI launch a [global dialogue](#) on ICT companies and extremist content in July. The dialogue aims to raise the level of informed debate on take down and other requests associated with alleged terrorism, and to encourage governments and inter-governmental organizations to consult broadly with affected stakeholders, experts, and the public on the impacts government pressure—both legal and extra-legal—can have on free expression and privacy.



This dialogue is anchored by a series of roundtable stakeholder sessions. The first, co-hosted in London on [October 15](#) with the Center for Democracy and Technology, brought together European law enforcement representatives, UN officials, human rights and press freedom groups, Internet and telecommunications companies, academics, and investors for a conversation held under the Chatham House Rule. Participants explored whether restricting content for countering extremism and incitement to violence online was proportionate and effective, and identified possible measures that could be used to mitigate the harm to privacy and free expression. These roundtable stakeholder sessions will continue in 2016.

MARK STEPHENS DISCUSSES **REFORMING MUTUAL LEGAL ASSISTANCE**  
UK SURVEILLANCE LAWS AT  
RIGHTSCON SAN FRANCISCO,  
WITH ESTELLE MASSÉ FROM  
ACCESS NOW AND DANNY  
O'BRIEN FROM EFF.

The second policy focus for GNI in 2015 was reform of the mutual legal assistance system. In January, GNI made a key intervention in this global discussion, publishing the report “Data Beyond Borders: Mutual Legal Assistance in the Internet Era,” authored by Andrew K. Woods. The report was launched at an [event](#) hosted by the Center for Strategic and International Studies (CSIS) in Washington, DC. James A. Lewis from CSIS moderated the discussion, which featured speakers from UK law enforcement, as well as GNI company and civil society members.

The report was mentioned in a blog post on [Lawfare](#), and was cited in academic reports and proposals by [Peter Swire and Justin Hemmings](#), Gail Kent, Kate Westmoreland, and [Viet D. Dinh and Jeffrey M. Harris](#). The Congressional Internet Caucus Advisory Committee referenced the report in a [briefing on MLA reform](#) on July 24.

The report focused on practical recommendations to streamline and update MLATs for the digital era, so that law enforcement around the world can get the evidence they need to prosecute crime. It also demonstrated the urgent need for stakeholders to work towards a new international framework for law enforcement requests—one which builds in robust protections for human rights. On November 23, GNI held a learning call for GNI participants—featuring Assistant Professor Andrew Woods, Greg Nojeim from CDT, and Matt Perault from Facebook—to discuss strategies for reform. In December, the GNI Board voted and affirmed their in-principle support for such a framework.

On April 23, GNI joined a coalition of NGOs and trade associations writing to Congressional appropriators urging increased funding for MLA reform. On June 16, the Senate

Appropriations Committee included language in their committee report expressing support for MLAT reform at the Department of Justice.

In June, GNI staff and members participated in a Microsoft and MacArthur Foundation-funded session on MLA reform, which was hosted by GNI member, The Harvard Berkman Center.

From the end of 2015, GNI staff have participated in the DC-based Cross-Border Data Working Group, a multi-stakeholder collaboration focused on the US law reform and international human rights standards needed to underpin the development of an internationally credible alternative to the current MLAT system. This work is ongoing.



JUDITH LICHTENBERG  
SPEAKS AT RIGHTSCON,  
SAN FRANCISCO,  
MARCH 2016.

#### A VICTORY FOR INTERMEDIARY LIABILITY REFORM IN INDIA

In India, GNI and its members worked at the national level to inform the debate on freedom of expression and intermediary liability. GNI's report, [Closing the Gap: Indian Online Intermediaries and a Liability System Not Yet Fit for Purpose](#), was [cited in oral arguments](#) before the Indian Supreme Court. The report, prepared by the consultancy firm Copenhagen Economics, found that Internet intermediaries could add billions to India's GDP if the intermediary liability regime is reformed.

On March 24, the Supreme Court of India issued a [landmark ruling](#) in support of freedom of expression. The Court struck down as unconstitutional Section 66a of the IT Act, which provided the power to arrest individuals for posting allegedly "offensive" content, and which had been used to arrest individuals for posting on Facebook and other social networks. The Court also strengthened the safe harbor provisions for Internet intermediaries in section 79 of the IT Act, requiring a court or government order for takedowns under this provision.

#### THE UK INVESTIGATORY POWERS BILL

The UK Investigatory Powers Bill introduced in 2015 presented acute problems for privacy and freedom of expression. GNI representatives – including Executive Director Judith Lichtenberg, Board Chair Mark Stephens and Associate Professor Andrew K. Woods had a series of meetings with representatives from the UK Foreign and Commonwealth Office, the Home Office, and the Cabinet Office to discuss the impact of the Investigatory Powers Bill (IPB). Of particular concern is the extra-territorial reach of the proposed provisions, and the model it presents for authoritarian governments, who may use these powers as a model and justification for their own laws. In the meetings, GNI also stressed the need for governments to reform and invest in the antiquated mutual legal assistance (MLA) system to allow efficient and transparent law enforcement requests for cross-border data. GNI met with the Number 10 Downing Street policy unit and later submitted [written evidence](#) to the Parliamentary committee scrutinizing the Bill. In November, GNI Board Chair Mark Stephens and Yahoo Europe Director of Public Policy Emma Ascroft met with Labour MP and former Director of Public Prosecutions Keir Starmer on the IPB and MLAT reform. Engagement with the UK authorities will continue into 2016 as the Bill goes through the Parliamentary scrutiny process.



GNI played a contributing role in the surveillance reform debate in the United States in 2015, working with the coalition of civil society organizations and companies advocating for [passage of the USA FREEDOM Act](#). GNI also joined the [coalition of organizations](#) pressing the US government to commit their support for strong encryption, and urged Kazakhstan and other countries to respect the security of digital communications. The pressure on companies worldwide to undermine their security standards or provide data from encrypted services is a key emerging issue that GNI will continue to monitor.

#### LOOKING AHEAD: CYBERCRIME, NETWORK SHUTDOWNS AND MORE.

[A GNI statement](#) recommending that Pakistan review its prevention of electronic crime bill was used to by advocacy organizations on the ground to help secure a parliamentary review process that is currently underway. Working closely with our member group from Pakistan, Bolo Bhi, our advocacy in Pakistan will continue into 2016 as the Cybercrime Bill is reviewed and amended by the parliament, and we will monitor the proliferation of “cybercrime” laws in other jurisdictions.

In late 2015 and early 2016, GNI issued statements expressing concern over the blocking of social media and other communications platforms in Uganda and Turkey, and the blocking of the WhatsApp messaging service in Brazil. We anticipate increased policy engagement on the human rights harms caused by network shutdowns in 2016, and we will be working on this issue in conjunction with the Telecommunications Industry Dialogue companies.

In addition to cybercrime laws and network shutdowns, in 2016 we will continue our focus on the broad range of issues confronting freedom of expression and privacy, including how governments and companies address extremist content and incitement to violence online, reform of mutual legal assistance, and the implementation by governments of directives based on the European Union’s “Right to be Forgotten”.

#### GNI ANNUAL PUBLIC LEARNING DAY

The Global Network Initiative and the Stanford Center for Internet and Society co-hosted a Public Learning Day at Stanford Law School on December 2nd. Over a hundred people joined our interactive sessions, which addressed government and company responses to online extremism, the striking down of the EU Safe Harbor arrangements, and the reform of cross-border data for law enforcement investigations. Amos Toh, representing the UN Special Rapporteur for Freedom Expression David Kaye, also gave a briefing on the SR’s new mapping report on the role of companies in global freedom of speech.

Representatives of Microsoft, Yahoo, Google and Orange came together to assess the implications of the results of the Ranking Digital Rights Corporate Accountability Index in a panel with RDR Director, Rebecca MacKinnon and BSR’s Dustan Allison-Hope. Launched in November 2015, GNI companies performed strongly in the Index, and the panellists took questions and discussed company responses to the growing number of requests from governments around the world to monitor and restrict content.



NICOLE KARLEBACH FROM YAHOO! AT THE GNI ANNUAL PUBLIC LEARNING DAY. DUNSTAN ALLISON-HOPE FROM BSR (LEFT) AND STEVE CROWN FROM MICROSOFT WERE ALSO ON THE PANEL.



## OUR MISSION

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FOSTER  
ACCOUNTABILITY  
*Generate Trust*

EMPOWER  
POLICY  
*Promote Human Rights*

PROVIDE  
FRAMEWORK  
*Improve Responsible  
Decision making*

ENABLE  
LEARNING  
*Shape Best Practices*

BUILD CAPACITY  
*Be a Leading Multi-Stakeholder Voice*

THE MISSION OF THE GLOBAL NETWORK INITIATIVE IS TO ADVANCE HUMAN RIGHTS BY CREATING A GLOBAL STANDARD FOR COMPANIES THAT SUPPORTS RESPONSIBLE DECISION-MAKING, AND BY BEING A LEADING VOICE FOR FREEDOM OF EXPRESSION AND PRIVACY RIGHTS.

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Since its formation in 2008, GNI has worked to build a critical mass of participating companies who commit to the GNI Principles, and who participate in a sustained dialogue within our multi-stakeholder framework.

Informed by United Nations human rights standards, including the International Covenant on Civil and Political Rights and the UN Guiding Principles on Business and Human Rights, our member companies agree to be held accountable through a rigorous independent assessment process. An equally important part of GNI's work is providing a unique, high-level forum for real-time policy engagement and shared learning. Our forum builds the collective voice of our companies, civil society, investors and academics to influence governments and international institutions.

This platform for global policy advocacy is critical where government laws and practices pose a barrier to companies respecting user rights to privacy and freedom of expression.

Membership in the GNI provides unique value for all constituencies—companies, academics, civil society organizations and investors.

Companies can demonstrate their public commitment to the freedom of expression and privacy rights of their customers and users. By committing to work with a diverse coalition of global experts, companies benefit from valuable multi-stakeholder collaboration, and gain a framework for accountability on how to responsibly address government requests that affect the freedom of expression and privacy of users. Companies are empowered to improve decision-making, manage risk, and build on the efficiency and effectiveness of internal company policies and processes to support and promote user rights.

GNI membership enables civil society organizations, investors and academics to gain valuable insights into the policies and processes companies use to support and advance the rights of their users. They can advise on, and be directly involved in, the development and improvement of internal company standard-setting mechanisms, policies and processes that address the protection of free expression and privacy.

For more information about membership of the Global Network Initiative and our member constituencies, please contact Executive Director Judith Lichtenberg or visit the [GNI website](#).

## GNI BY THE NUMBERS

**OUR GROWING NETWORK** of **46** participants based in **15** countries fall within **4** constituencies: ICT companies, academics and academic institutions, civil society organizations – including human rights and press freedom groups and socially responsible investors.

**ACADEMICS** **12** academics and academic organizations from Argentina, India, Italy, South Korea, Switzerland and the United States.

**CIVIL SOCIETY ORGANIZATIONS** **12** civil society organizations, from human rights and press freedom groups with global reach, to advocacy groups with in-depth local expertise in Azerbaijan, China, India, Pakistan and the United States.

**INVESTORS** **9** socially responsible investors from the United States, United Kingdom and Sweden with over **\$61 billion dollars** under active management.

**MEMBER COMPANIES** **5** global companies: Facebook, Google, LinkedIn, Microsoft and Yahoo!, with billions of users around the world.

### **Observer Companies** **1**

Change.org, the world's largest online empowerment platform, joined GNI as an Observer in September 2015.

### **GNI SECRETARIAT**

**4** staff, based in Washington DC and Amsterdam.

**1** Independent Board Chair based in London.

**9** accredited Assessors.

**\$653K** annual budget.

*\*figures are for 2015.*

# GOVERNANCE

## THE GNI BOARD

The Board of Directors is responsible for the strategic direction and fiduciary operations of GNI. It is made up of one Independent Chair, five company representatives (there are currently three additional company seats available that have not yet been filled), four civil society organization representatives, two academic representatives and two investor representatives. Each Board member may also designate an alternate member from within its organization or constituency.

### INDEPENDENT CHAIR

**MARK STEPHENS, CBE.**

### COMPANIES

**PABLO CHAVEZ**  
*LinkedIn*

**STEVE CROWN**  
*Microsoft*

**TEKEDRA MAWAKANA**  
*Yahoo!*

**MATT PERAULT**  
*Facebook*

**LEWIS SEGALL**  
*Google*

### CIVIL SOCIETY ORGANIZATIONS

**ARVIND GANESAN**  
*Human Rights Watch*

**JODIE GINSBERG**  
*Index on Censorship \**

**ROB MAHONEY**  
*Committee to Protect Journalists*

**GREG NOJEIM**  
*Center for Democracy & Technology\*\**

### INVESTORS

**BENNETT FREEMAN**  
*(GNI Board Secretary)*  
*Calvert Group*

**SARA NORDBRAND**  
*Church of Sweden*

### ACADEMICS & ACADEMIC ORGANIZATIONS

**EDUARDO BERTONI**  
*University of Palermo*

**DALIA TOPELSON RITVO**  
*Berkman Center for Internet & Society,  
Harvard University*

### BOARD ALTERNATES IN 2015

**FARIEHA AZIZ**  
*(Bolo Bhi)*

**MARK BENCH**  
*(World Press Freedom Committee, until October 2015)*

**ARTURO CARRILLO**  
*(The George Washington University Law School)*

**LAUREN COMPERE**  
*(Boston Common Asset Management)*

**SARA HARRINGTON**  
*(LinkedIn)*

**ADAM KANZER**  
*(Domini Social Investments LLC)*

**NICOLE KARLEBACH**  
*(Yahoo!)*

**DEIRDRE MULLIGAN**  
*(U.C. Berkeley School of Information)*

**ANDREW O'CONNELL**  
*(Facebook)*

**KATHLEEN REEN**  
*(Internews)*

**BERNARD SHEN**  
*(Microsoft)*

**ALEXANDRIA WALDEN**  
*(Google)*

**CYNTHIA WONG**  
*(Human Rights Watch)*

\* From October 2015, Ms Ginsberg filled the open civil society seat on the Board.

\*\* From January 2015 Mr Nojeim replaced Ms Nuala O'Connor (Center for Democracy and Technology).

## GNI COMMITTEES

GNI operates through board committees. The Executive and Management Committee is responsible for fiduciary operations and internal policies, including budget, staffing and the conflict of interest policy. The other committees are Governance and Accountability, Policy and Learning, and Outreach and Communications. With the exception of the Executive and Management committee, which is composed of GNI board members with balanced representation from each constituency, GNI's committees are open to all GNI participants.

## GNI STAFF

Since it was founded in 2008, GNI has worked with a very small secretariat of no more than two people, with additional support from fellows and interns. In 2015, after the appointment of a new Executive Director, Judith Lichtenberg, the decision was made to build out a new staffing structure with two full time positions supporting her. Kath Cummins was hired in September as Director of Communications and Outreach to focus on improving GNI's internal engagement, developing transparency around assessment, and building outreach to policy makers, funders, stakeholders and the media. Additionally, the decision was made to leverage the policy experience of Lisl Brunner, who since 2013 has served as facilitator of the Telecommunications Industry Dialogue, to assist the GNI on policy one day per week from August 2015. Lisl was brought on full-time as Director of Policy and Learning as of January 2016. Her focus is on developing GNI's policy agenda, supporting GNI-Industry Dialogue shared learning initiatives, and overseeing GNI's policy and learning events. GNI also hired a part-time Administrative and Research Associate, Chris Sheehy. David Sullivan, who served as Policy and Communications Director until July 2015, has continued to work for GNI as an occasional project consultant.

### JUDITH LICHTENBERG

*Executive Director*  
(from April 2015)



### DAVID SULLIVAN

*Director of Policy and Communications*  
(through June 2015)

### CHRIS SHEEHY

*Administrative & Research Support*  
(from September 2015)

### KATH CUMMINS

*Director of Communications & Outreach*  
(from September 2015)

### SIMON HARARI

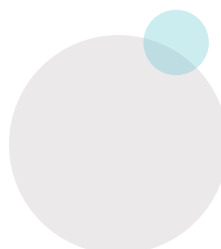
*2014-15 Georgetown MSFS Intern*

### LISL BRUNNER

*Facilitator, Telecommunications Industry Dialogue*

### TATEVIK SARGSYAN

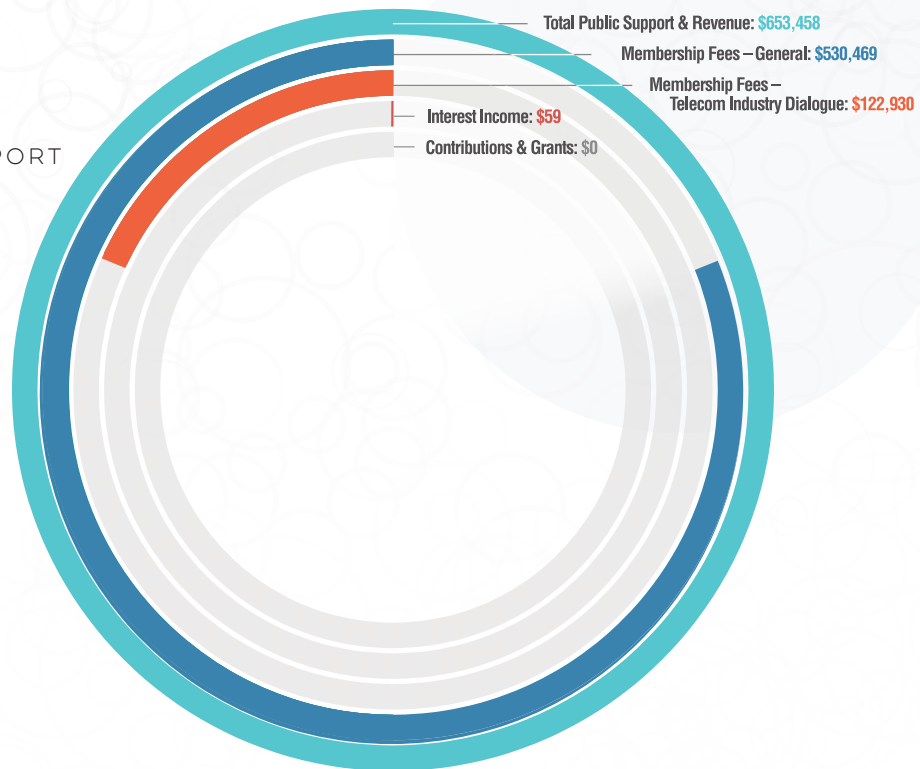
*2015 Google Policy Fellow*



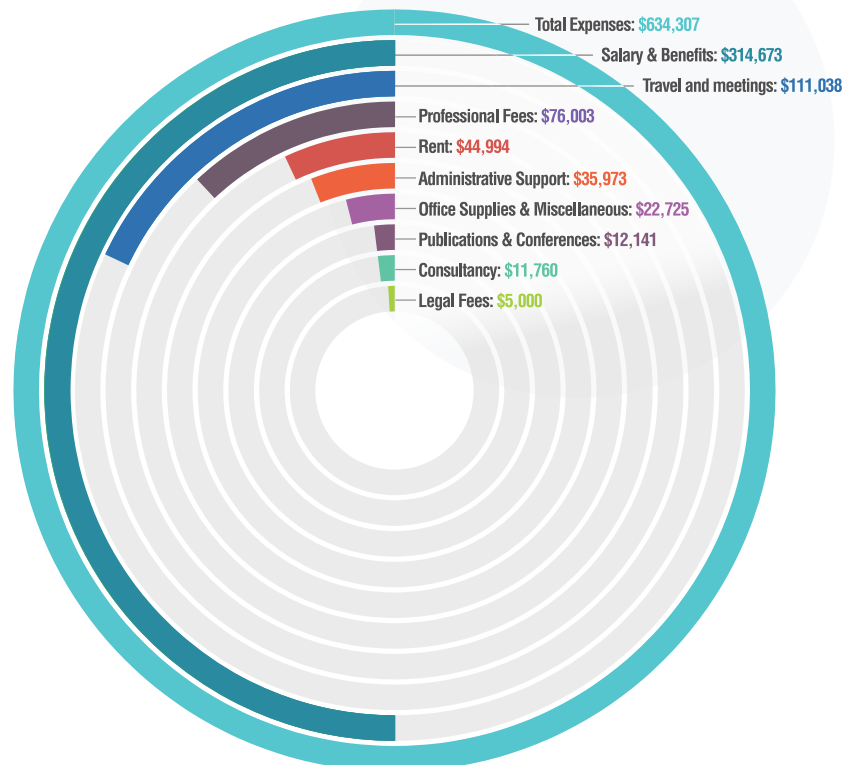


## 2015 FINANCIALS

### PUBLIC SUPPORT & REVENUE:



### EXPENSES:



# ACKNOWLEDGEMENTS

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LEGAL

GNI appreciates the legal advice and support it receives from [White & Case LLP](#), especially Richard Lee and Charles Moore.

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IT AND ADMINISTRATION

We would like to acknowledge the assistance of staff from the DC-based [Center for Democracy & Technology](#) including Michael Grimes, Portia Wenz-Danley and John Crawford; and also that of the staff at [Howard Kennedy LLP](#), especially Eleanor Barker.

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DESIGN

j. Gregory Barton of DC-based design and technology firm [BRITT BARTON](#) produced this report.

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OUR MEMBERS

The Board Chair, Executive Director and staff of GNI would also like to extend their deep appreciation to GNI members around the world, who give enormous amounts of their time and resources to provide us with counsel and support for our mission.

