

ANNUAL REPORT 2018

LEARNING FROM THE PAST TO EMBRACE THE FUTURE



GLOBAL  
NETWORK  
INITIATIVE

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# WELCOME TO THE 2018 GNI ANNUAL REPORT

We are pleased to share with you the 2018 GNI Annual Report: “Learning from the Past to Embrace the Future.” This year marked our tenth anniversary of working to protect and promote freedom of expression and privacy in the information and communications technology (ICT) sector.

Our work over the course of this year both affirms our original mandate and demonstrates how much we have grown. The question raised in 2008 remains just as critical today: in the face of government demands to hand over user data or remove content, how can companies best respect the privacy and freedom of expression rights of their users in jurisdictions around the world? To address this issue, the organizations of GNI have created a model for multistakeholder collaboration. The foundation of that model is the [GNI Principles on Freedom of Expression and Privacy](#) (“GNI Principles”), which provide a framework for companies to responsibly address government demands for surveillance and censorship that are inconsistent with international human rights law.

GNI’s multistakeholder approach has proven to be strategic as the digital rights community seeks to respond to shifting trends and increasingly complex challenges in the ICT ecosystem. No single actor alone can successfully push back against surveillance overreach, government-ordered network disruptions, or sophisticated government censorship. GNI’s sustained engagement with decision makers at national, regional, and international levels is essential to securing lasting commitments to protect and respect digital rights.

In 2018, we provided inputs to governments and international organizations on a range of relevant topics and promoted rights-respecting approaches to tackling online extremism at high-level multinational convenings. GNI’s vital role was acknowledged in a seminal report from the UN Special Rapporteur on freedom of opinion and expression, noting that “The Guiding Principles on Business and Human Rights, along with industry-specific guidelines developed by civil society, intergovernmental bodies, the Global Network Initiative and others, provide baseline approaches that all Internet com-



MARK STEPHENS



JUDITH LICHTENBERG

panies should adopt.” We have also designed and implemented advocacy strategies focused on our core policy priorities: network disruptions, surveillance, intermediary liability and content regulation, and jurisdictional assertions and limitations. And through confidential conversations and public convenings, our learning agenda has identified new challenges as well as opportunities to advance digital rights.

Our membership has nearly tripled since 2008, and now includes world-leading Internet companies, telecommunications network operators, and equipment vendors, as well as some of the most influential academics and civil society organizations from Latin America, Asia, the Middle East, and Africa. Our expanded membership and geographic focus have enriched GNI in multiple ways. Our internal organizational structure has benefited from a diversity of experience, insights, and perspectives, and we are better positioned to interact with policymakers in the Global South.

To support this increased scope of work, in September, GNI Program and Policy Officer Nikki Bourassa joined us to manage two new projects in the Global South. These projects offer new opportunities for civil society participation in GNI, and for GNI to conduct regional advocacy in Latin America, South Asia, and sub-Saharan Africa. We also increased our capacity to reach external audiences and enhance meaningful participation for all GNI members, welcoming GNI Communications Manager Rocío Campos to the team in April, launching the first-ever [GNI Blog series](#) on Medium, creating a new [storytelling video](#), and opening up our quarterly newsletter for member contributions.

2018 also marked the beginning of the third biennial company assessment cycle, which is evidenced by important improvements to the process in order to focus on the most critical and meaningful points of evaluation and make it more efficient and transparent. This features the largest and most diverse group of companies being assessed (a total of 11), including the seven telecommunications operators and vendor company members that [joined GNI](#) in March 2017.

As we reflect on all that we have accomplished this year, and over the last decade, we constantly find new ways to continue to enhance our impact, grow our membership, and communicate our vision and experience to the world. We look forward to continuing to collaborate with members and key stakeholders to promote and protect freedom of expression and privacy rights.

We hope you enjoy this report of our progress.



Mark Stephens  
INDEPENDENT CHAIR



Judith Lichtenberg  
EXECUTIVE DIRECTOR



# 2018

## AT A GLANCE

### THIS YEAR GNI TOOK IMPORTANT STEPS

in each of its four strategic pillars to protect and advance freedom of expression and privacy in the information and communications technology sector, under the direction and operations of its governance structure.

### PROVIDE FRAMEWORK

59 MEMBERS  
22 CSOS  
17 ACADEMICS  
12 COMPANIES  
8 INVESTORS

4 NEWSLETTERS  
1 NEW BLOG SERIES  
1 ANNIVERSARY VIDEO

### GOVERNANCE

19 BOARD MEMBERS  
6 STAFF  
6 COMMITTEES  
2 WORKING GROUPS

### FOSTER ACCOUNTABILITY

11 COMPANIES FOR ASSESSMENT  
7 REACCREDITED ASSESSORS  
5 NEW ASSESSORS  
1 ASSESSMENT TOOLKIT  
1 ASSESSMENT TRAINING

### ENABLE LEARNING

8 LEARNING SESSIONS  
1 LEARNING FORUM

### EMPOWER POLICY

17 GNI SPEAKING ROLES  
5 HIGH-LEVEL SUBMISSIONS  
2 GNI-FACILITATED WORKSHOPS WITH POLICYMAKERS  
2 PROJECTS FOCUSED ON THE GLOBAL SOUTH

## KEY HIGHLIGHTS

### PROMOTING THE GNI FRAMEWORK

Setting a standard approach to the protection and advancement of freedom of expression and privacy for the ICT industry, GNI continued to expand and diversify its membership:

- ▶ GNI welcomed British Telecommunications PLC (BT) as a member after the company completed a year of observer participation. BT will participate in GNI's next independent assessment process on their actions to make and implement day-to-day business decisions that reflect the values and guidance of the GNI Principles on Freedom of Expression and Privacy. In addition, Ericsson and Wikimedia Foundation will engage in GNI policy and learning activities as observer members.
- ▶ GNI welcomed several civil society organizations working in the Global South: Collaboration on International ICT Policy for East and Southern Africa or CIPESA (Uganda), Digital Empowerment Foundation or DEF (India), NetBlocks Group (Turkey and United Kingdom), Software Freedom Law Centre or SFLC.in (India), and Internet Sans Frontières or ISF (France), active in countries like Brazil, Cameroon, and Togo. [Read more.](#)

“GNI commitments have become global norms that inform the policies and practices of companies everywhere.” — Leslie Harris, Georgetown University

### FOSTERING ACCOUNTABILITY

Through this pillar, GNI seeks to assess whether company participants are “making good faith efforts to implement the GNI Principles with improvement over time,” as required by the GNI Governance Charter and described in the GNI Accountability, Policy, and Learning Framework. To further communicate those efforts and generate trust among its members and with the public, GNI commissioned a review of its last assessment process by independent pro bono consultant Michael Samway and including input from participants past and present.

Informed by this review, in 2018, GNI continued to implement measures to help streamline the assessment process and ensure the resources of companies, assessors and GNI are focused on the most critical and meaningful points of evaluation. The GNI Board prioritized adopting the following recommendations:

- ▶ Developing an Assessment Toolkit that consolidates all the necessary information and guidance that assessors need to complete the assessment process applicable to companies undergoing assessment, followed by a training on how to use it.
- ▶ Adapting the methodology of the assessment to accommodate the increased number of companies being assessed, including allowing the board greater time to review the assessors' findings, reviewing companies on a rolling basis across the first three GNI Board meetings in 2019.

In addition, GNI added five new assessors to its pool of accredited assessors and reaccredited seven assessors. GNI's accreditation process verifies that individuals and organizations conducting GNI assessments are independent and have the expertise and experience needed to carry out this work. Accredited assessors must maintain this independence from the companies they assess and adhere to the highest professional standards. [Read more.](#)



“GNI’s unique accountability mechanism complements and feeds into its learning and policy work. GNI conducts regular and rigorous independent assessments of company members, to help inform responsible company decision making.”

— Meg Roggensack, Georgetown University

## ENABLING LEARNING

Shared learning is a core component of GNI. The collective experience and capability of GNI’s diverse membership offers unparalleled resources to tackle emerging challenges at the intersection of freedom expression, privacy, and the ICT sector.

The GNI learning program includes both candid, members-only conversations on timely and sometimes sensitive topics and sharing members’ insights with key stakeholders and the public. GNI members held eight learning discussions in 2018, often with subject matter experts under Chatham House rules.

Since 2012, GNI has helped engage the public and raise awareness on this shared learning program via the annual learning forum. In September, GNI co-hosted the 2018 forum, “New World Borders: How Jurisdiction Affects Human Rights Online,” with the American Society for International Law and the Open Technology Institute. [Read more.](#)

“As we enter a new era of transformation... [There is a] significant role [for] the GNI in identifying, exploring, and shaping how companies can uphold the corporate responsibility to respect in circumstances that are utterly different than anything we have experienced before. The GNI’s place is innovation.” — Dunstan Allison-Hope, Business for Social Responsibility

## EMPOWERING POLICY

Individually and collectively, GNI participants engage with governments and multilateral bodies to promote the rule of law and the reform of laws, policies and practices that infringe on users’ rights to freedom of expression and privacy. Policy engagement is led by the GNI Policy Committee and centers on four priority issue areas: network disruptions; intermediary liability and content regulation; jurisdictional assertions and limits; and surveillance.

This engagement includes building evidence to influence decision makers, promoting members’ consensus positions, and convening and engaging directly with key stakeholders on rights-respecting laws and policies. In 2018 alone, GNI staff presented or moderated 17 public sessions; issued the report, “Disconnected: A Human Rights-Based Approach to Network Disruptions,” which mapped 130 instances of network disruptions in 2017 and recommended a holistic, human rights-centered approach to advocacy; provided input to five public consultations by governments and international organizations; promoted rights-respecting approaches to tackling online extremism at sessions hosted by the UN and the Council of Europe; and engaged publicly and privately on a range of legislative initiatives, including a draft intermediary liability law in Argentina, the French fake news law, and the Digital Rights and Freedom bill in Nigeria. [Read more.](#)

“The importance of this alliance to our work trying to influence public policy to advance rights and minimize risks online, is invaluable and of significant impact.”

— Gbenga Sesan, Paradigm Initiative

## GLOBALIZING THE NETWORK

### DIVERSIFYING MEMBERSHIP IN 2018

This year GNI increased its membership to 59 after welcoming one company, five civil society organizations and two observer members. This continued expansion carries on GNI's growth trend outside the United States.

### 2018 NEW MEMBER SNAPSHOTS

#### CIVIL SOCIETY

##### Collaboration on International ICT Policy in East and Southern Africa

Kampala, Uganda



The Collaboration on International ICT Policy in East and Southern Africa (CIPESA) advances rights-respecting Internet policies in East and Southern Africa, with a recent focus on network disruptions and access to information. CIPESA builds the capacity of East and Southern African stakeholders to participate in national and international Internet policy conversations, including hosting the fifth Forum for Internet Freedom in Africa and producing research and briefing materials for policy makers and other stakeholders, including “The State of Internet Freedom in Africa 2018” and a policy brief on the economic impact of Internet disruptions in sub-Saharan Africa.

##### Digital Empowerment Foundation

New Delhi, India



The Digital Empowerment Foundation (DEF) aims to empower people at the edge of information through last mile connectivity, digital literacy and interventions. They work with individuals and communities to use technology for their own advantages and raise awareness of the usefulness of information and communication technology to increase opportunities and improve outcomes for all. DEF

has trained women to become computer teachers in local schools and launched the program DigiKharga that leverages information and communication technology to contribute to sustainable livelihood options for youth. DEF also holds workshops and public events on topics including Internet shutdowns, Industry 4.0 and cybersecurity.

##### Internet Sans Frontières

France



Internet Sans Frontières (ISF) is a French association founded in 2007 under the 1901 law, and an international network of non-governmental organizations dedicated to promoting the free flow of information and knowledge, and to defend digital rights and freedoms. ISF was created

by a group of civil society activists following the censorship of the Internet by the Burmese junta. They



have advocated against network disruptions in Cameroon, Chad, and the Democratic Republic of the Congo, and have organized international campaigns against Internet censorship to act against the blocking of social media and the high cost of Internet access in Central Africa.

#### Netblocks



NetBlocks is a recognized expert in tracking network disruptions and online censorship. They work at the intersection of cybersecurity, Internet governance, and digital rights to support and advocate for rights-based Internet regulation, access to information, and online safety for local communities, businesses, and nations. Netblocks have reported on digital rights violations around the world, including in Azerbaijan, Iran, Pakistan, Sri Lanka, Turkey and within Europe.

#### Turkey and the United Kingdom

#### Software Freedom Law Center, India



The Software Freedom Law Center (SFLC.in) brings together lawyers, policy analysts, technologists, and students to protect freedom in the digital world through education and free legal advice. SFLC.in promotes innovation and open access to knowledge by helping developers with Free and Open Source Software and supporting high-level decision makers with information on the use of technology. They have hosted workshops on countering misinformation, convened discussions on India's Draft Data Protection Bill, published counter-comments to India's Telecom Regulatory Authority consultation paper on creating a regulatory framework for over-the-top communications, and conducted digital security trainings around India. They have also maintained an India Internet shutdown tracker since 2012.

#### New Delhi, India

### COMPANY

#### British Telecommunications PLC



British Telecommunications PLC (BT) aims to use the power of communications to make a better world. It is one of the world's leading providers of communications services and solutions, serving customers in 180 countries. Its principal activities include the provision of networked IT services globally; local, national and international telecommunications services to its customers for use at home, at work and on the move; broadband, TV and internet products and services; and converged fixed-mobile products and services. BT consists of four customer-facing units: Consumer, Enterprise, Global Services, and Openreach. British Telecommunications PLC (BT) is a wholly-owned subsidiary of BT Group plc and encompasses virtually all businesses and assets of the BT Group. BT Group plc is listed on stock exchanges in London and New York.

#### United Kingdom

### OBSERVERS

#### Ericsson



Founded in 1876, Ericsson is a multinational networking and telecommunications company headquartered in Stockholm. The company provides communications services, software, and infrastructure in over 180 countries worldwide and employs around 95,000 people. As a market leader in the telecommunications equipment space, Ericsson helps service providers prosper in the digital economy. As networks become intelligent platforms for innovation, Ericsson's research areas for future technologies include 5G, the future of the internet of things, and cyber-physical systems, amongst others.

#### Sweden



The Wikimedia Foundation (WMF) is the nonprofit organization that hosts and supports Wikipedia and the Wikimedia free knowledge projects. WMF is a strong believer in multistakeholder collaboration to promote freedom of expression and privacy by working with global digital rights advocates. WMF supports hundreds of thousands of people around the world in creating the largest free knowledge projects in history. Volunteers help millions of people around the globe discover information, contribute knowledge, and share it with others, no matter their bandwidth. Wikimedia fights against censorship and promotes open licenses to ensure their materials can be used and revised globally.

## EXPANDING OUR WORK IN THE GLOBAL SOUTH

In August 2018, GNI began new projects aimed at enhancing participation in GNI and increasing our policy advocacy around the world.

The first project, “**Enhancing Multistakeholder Collaboration for Internet Freedom**” aims to:

*“GNI has an especially important role to renew the lesson that multi-stakeholder engagement is effective and in the interest of all.”*  
— Guy Berger, UNESCO

**Strengthen civil society engagement on the ground in Latin America, sub-Saharan Africa, and South Asia.** GNI, in coordination with Internews, is able to offer twelve fellowships over the next two years to enable organizations from Latin America, South Asia, and sub-Saharan Africa to participate in GNI, building on GNI’s existing fellowship program with Internews. This project also involves the creation of multi-stakeholder coordination bodies at the regional level, diversifying GNI’s policy and learning efforts and enhancing civil society partners capacity for their own regional work in support of laws and policies promoting freedom of expression and privacy.

**Expand the presence of GNI’s existing policy work in the Global South.**

This will involve adding more dedicated resources to GNI’s current policy activities to cover the target regions, in line with GNI’s stated policy priorities and activities and in collaboration with fellows and the proposed multistakeholder coordination bodies.

The second project, “**Business and Human Rights in the Tech Sector**,” in which GNI is in a supporting role, aims to address the intersection of the business and human rights and Internet freedom worlds. Working with a consortium, including GNI members Global Partners Digital, Internews, Open Technology Institute, and Ranking Digital Rights, the project will help ICT companies facilitate the adoption of the UN Guiding Principles on Business and Human Rights (UNGPs), with particular focus on smaller and medium-size enterprises.



## DEEPENING INTERNAL AND EXTERNAL ENGAGEMENT

To improve the level of engagement between GNI members, GNI staff conducted a series of surveys to identify additional opportunities for members to interact across constituencies and contribute to GNI’s spaces for sensitive discussions. The survey findings supplemented GNI’s work to review onboarding materials, increase access to information on GNI meetings, and enhance member collaboration and learning.

GNI explored further opportunities within existing programs for greater interaction between constituencies. For the first time, GNI’s 2018 annual meeting of members was a half-day meeting where participants discussed membership engagement and committee leadership. In response to members’ interest, the positions of



co-chairs and special representatives of membership and development committees were made open to all GNI members, as was already the case for the policy and learning committees. Subsequently, GNI encouraged all participants to consider putting themselves forward within their constituencies for these positions; over half of the committee leadership roles are now filled by non-US members. On 1 December, new co-chairs and special representatives, including four from Global South members, started their 18-month terms, adding diversity of experience, insights, and perspectives to the work of the committees.

GNI hosted a meeting in November with civil society and academic members from the Global South to identify broader challenges and opportunities for meaningful participation in GNI. Participants included representatives from Centro de Estudios en Libertad de Expresión y Acceso a la Información (Argentina), Fundación Karisma (Colombia), Internet Sans Frontières (France), Centre on Communications Governance (India), Digital Empowerment Foundation (India), National Law University Delhi (India), Software Freedom Law Centre (India), Paradigm Initiative (Nigeria), NetBlocks (Turkey) Center for Internet Policy in East and South Africa (Uganda), Global Digital Partners (U.K.), and Internews (U.S.).

GNI published four issues of its quarterly newsletter ([February](#), [May](#), [August](#), and [November](#)) last year. In addition to providing timely updates on GNI's work, the newsletters featured direct contributions from civil society and academic members for the first time. Contributors included 'Gbenga Sesan from Paradigm Initiative, Agustina del Campo from Centro de Estudios en Libertad de Expresión y Acceso a la Información, and Jessica Dheere from SMEX.

GNI also launched its [institutional blog](#) with the "Ten Years, Ten Insights" anniversary series. Members Meg Roggensack from Georgetown University, Patrik Hiselius from Telia Company, Elonnai Hickok from the Center for Internet and Society, and 'Gbenga Sesan from Paradigm Initiative wrote insightful pieces reflecting on GNI's efforts to promote freedom of expression and privacy online and were joined in the series by some of GNI's founding experts and long-time collaborators.

*“ I just want to say thank you so much for the space in the newsletter. [In response,] we've already gotten two offers for contributions to our [CYRILLA](#) database, one from Hong Kong and another from an independent practitioner in Oregon.”*  
— Jessica Dheere,  
SOCIAL MEDIA EXCHANGE



To celebrate GNI's 10<sup>th</sup> anniversary, in late fall we launched a [storytelling](#) video to make GNI's mission and accomplishments more accessible to both internal and external audiences, illustrating the history, relevance, and timeliness of our work. In only three months GNI's video reached hundreds of viewers and dozens of likes on YouTube. GNI continues to be very

active on social media with 4,000 followers on Twitter and a growing following on its new Medium page. GNI website traffic shows a steady 3,000 visits per month with rising interest from the Global South.

## IV

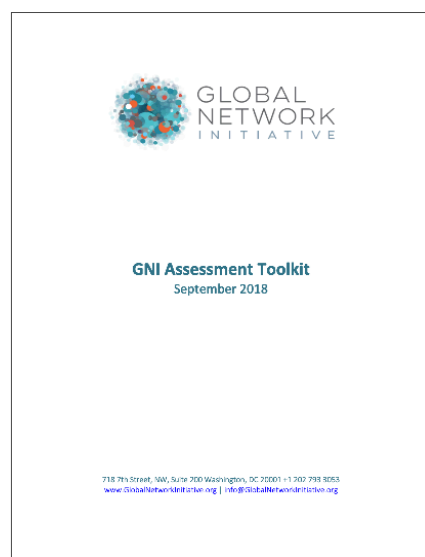
# FOSTERING ACCOUNTABILITY IN THE ICT SECTOR

## STREAMLINING THE ASSESSMENT PROCESS

The 2018/2019 independent company assessment cycle will include 11 companies — the largest number thus far — comprising for the first time the seven telecommunications operators and vendor company members that joined GNI in March 2017: Millicom, Nokia, Orange, Telefónica, Telenor Group, Telia Company and Vodafone Group. Facebook will be assessed for the second time and Google, Microsoft, and Verizon Media (formerly Yahoo/Oath) for the third time. In order to support the work of assessors and standardize accountability practices across these companies, in line with the recommendations of the 2016 assessment review, GNI implemented important improvements to the 2018/2019 assessment process.

## INTRODUCTION OF AN ASSESSMENT TOOLKIT

GNI revised the assessor guidance and produced an [Assessment Toolkit](#) that presents a common methodology to be used by all assessors to increase the consistency, efficiency, and comparability of assessments. The toolkit draws from the [Global Reporting Initiative \(GRI\)](#) and the [UN Guiding Principles Reporting Framework](#), and builds upon the experiences of previous GNI assessments. It provides all necessary information for assessors to do their job, including guidance on the process and scope of the assessment, and more granular templates with actionable questions and instructions for the Process Review ([Appendix I](#)) and Case Studies ([Appendix II](#)). The toolkit also clarifies the relationship between the high-level GNI Principles and the more granular Implementation Guidelines ([Appendix IV](#)).



## EFFICIENCY AND LEARNING

In view of the growing number and diversity of companies being assessed, the GNI Board implemented several measures to keep the process manageable for the board and staff, increase the review time of assessment reports for each company, and further facilitate learning.

The GNI 2018/2019 assessment process is underway. GNI's Board is reviewing assessment reports on a rolling basis across its first three meetings in 2019.

Every board member can submit questions to the companies in advance of the review meetings. These questions will be shared with all board members at the same time. The non-company board members will organize themselves in study groups — one group for each company assessment report. A GNI staff member will gather questions and comments from board members in advance of the review meeting and note common themes to discuss during the board meeting.

Finally, the GNI Learning Committee has revised the training for accredited assessors and created an ICT sector resource document for the board to provide background on the critical and current freedom of expression and privacy issues for each of the specific ICT sectors represented by GNI companies.

## SHARPENING ACCESSIBILITY AND BOOSTING CREDIBILITY OF THE ASSESSMENT PROCESS

In September, GNI delivered a training to all the accredited assessors to review the GNI Principles and Implementation Guidelines, discuss how GNI's assessment process relates to the assurance of sustainability reporting of some companies, and introduce the Assessment Toolkit — dedicating time to discuss the Process Review, Case Studies, and how to use the included templates.<sup>1</sup>

Over the course of the year, GNI welcomed five new assessor organizations who are eligible to conduct [assessments of member companies](#):

- ▶ Ernst & Young (EY) Oy (Finland member of EY Global)
- ▶ Ernst & Young, S.L. (Spain member of EY)
- ▶ iTrust Ethics (Ireland)
- ▶ KPMG Asesores S.L. (the Spanish member firm of KPMG's global network), and
- ▶ Osborne Clarke

In addition, the following companies were reaccruited as eligible assessors for the 2018/2019 assessment cycle:

- ▶ AJA Registrars Europe
- ▶ Deloitte Statsautoriseret Revisionspartnerselskab
- ▶ DNV GL
- ▶ Foley Hoag LLP
- ▶ KPMG AG (the Swiss member firm of KPMG's global network)
- ▶ Moores Rowland (MRI), and
- ▶ SSP Blue

GNI's accreditation process verifies that individuals and organizations conducting GNI assessments are independent and have the expertise and experience needed to carry out this work. Accredited assessors must maintain this independence from the companies they assess and adhere to the highest professional standards to conduct assessments. Independent assessors are therefore accredited by GNI following a thorough validation of their ability to assess member companies on their implementation of the GNI Principles of Freedom of Expression and Privacy. Assessors must demonstrate that they meet GNI's [independence and competency criteria](#), as initially reviewed by the GNI Executive Director, and with the GNI Board making final decisions on the accreditation of an organization.

<sup>1</sup> The Process Review examines a company's systems, policies, and procedures to implement the GNI Principles. The Case Studies assess a number of specific cases for each company in order to show whether and how the company implemented the GNI Principles in practice.



## LEARNING FROM THE PAST TO EMBRACE THE FUTURE

The 10th anniversary of GNI provided an opportunity to reflect on lessons learned from a decade of shared learning on freedom of expression and privacy in ICTs. The 2018 GNI learning agenda explored a variety of new and emerging censorship and surveillance challenges in 2018; the learning agenda included wide-ranging topics from refraction networking (a new censorship-circumvention technology) to the impact of the U.S. CLOUD Act on human rights in the Global South.

### INSIGHTS FROM FOUNDING GNI MEMBERS AND EXPERTS

In the “Ten years, Ten Insights” blog series, some of GNI’s founding members and expert collaborators reflected on ten years of hard-fought work building consensus and sharing insights between GNI members, and the significance of this experience for both the future of GNI and its place in the business and human rights movement. ‘Gbenga Sesan described GNI as “a unique platform for civil society to interface with ICT companies in a way which would not be possible without the GNI membership.” Leslie Harris recognized GNI members’ perseverance, as “commitment to privacy and freedom of expression in foundational human rights instruments became our lodestar” and praised how “GNI commitments have become global norms that inform the policies and practices of companies everywhere.” Meg Roggensack, an expert on multistakeholder initiatives, emphasized GNI’s “foundational impact on the business and rights movement.”

That is not to say ten years of shared learning and multistakeholder collaboration has not brought its own challenges — according to Patrik Hiselius, GNI must constantly grow and adapt: “the perception of GNI is how well we did today, and this week—not what we did a year ago, nor what we plan to do in a years’ time from now.” Michael Samway, a founding board member and current independent contributor to GNI’s work, tied these threads together in his blog post “GNI — A Journey of Trust and Making Common Cause”:





## **“GNI – A Journey of Trust and Making Common Cause”**

**BY MICHAEL SAMWAY**

Just over a dozen years ago, representatives from technology companies, civil society, socially responsible investors, and academia gathered—some reluctantly, most skeptically, all cautiously—to begin a collective discussion on how to address human rights risks created by global companies in the information and communications technology (ICT) sector. We began with a high level of distrust and misunderstanding, not only between companies and civil society but also among the companies themselves. Cutting sharply through the tension was a shared sense that the stakes were too high, the alternative too dark, for us not to work in good faith to build something impactful and durable, ambitious and realistic.

Widespread online censorship and surveillance, especially across markets with weak rule of law, regularly denies citizens their fundamental rights to freedom of expression and privacy—rights enshrined in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, regional treaties, and national constitutions. The points we negotiated as stakeholders were legal, policy, and technical ones. But, we all knew the issue of corporate complicity in a government’s violations of its own citizens’ rights was ultimately a human issue, with people’s security, safety, and even their lives at stake. So, we persisted.

After two-plus years of intensive negotiation on a complex global challenge—including unexpected pauses, U.S. Congressional and EU Parliamentary hearings and legislative proposals, participant withdrawals, and even a corporate acquisition bid between participants—the Global Network Initiative (GNI) launched in October of 2008. Ten years later we are still in the early chapters of the business and human rights story in the ICT sector. The pillars upon which GNI was built, however, remain just as essential today for any multistakeholder initiative on business and human rights: (i) standards grounded in international human rights laws and norms (as well as the UN Guiding Principles on Business and Human Rights, which were developed in parallel with the GNI Principles and have since been incorporated); (ii) practical guidance for companies on meeting the standards; (iii) a forum for continuous learning about responsible company decision making; (iv) a platform for collective advocacy to push for policy change; and (v) a rigorous accountability framework to evaluate companies against the standards.

**What has GNI accomplished beyond raising awareness about global freedom of expression and privacy?**

The intensive engagement and trust building that has occurred since our first multi-

takeholder meetings in late 2005 has created a safe setting that allows participants to share good practices and develop creative and practical approaches to complex puzzles at the intersection of technology, business, and human rights. GNI's company constituency has grown to more than a dozen members, and its non-company participants have grown in number, expertise, and geographic diversity, now totaling more than four dozen members. GNI's work has also led directly to tangible, if quiet, changes and improvements in company policies, practices, and outcomes on freedom of expression and privacy issues for users around the world. This includes the use of human rights impact assessments to evaluate and then mitigate risk, transparency reporting on content takedowns and government demands for user data, clear guidelines on information disclosure to law enforcement authorities, employee training on digital rights risks and responses, and push back through various channels on government overreach regarding freedom of expression and privacy. GNI has also helped promote and craft collective advocacy efforts on important issues ranging from advice on the Privacy and Civil Liberties Oversight Board in the United States to commissioning work regarding the reform of the mutual legal assistance treaty regime to calling out governments that use Internet shutdowns to suppress political dissent.

### What are GNI's principal challenges today?

GNI must continue to grow the variety, number, and geographic diversity of its company constituency members by adding more hardware manufacturers and vendors, Internet infrastructure companies, and sharing-economy companies. Companies across the ICT sector are struggling with the very same challenges as today's GNI members, and GNI must ensure that it remains open to engaging with them regardless of their size, business model, and structure. The nature of the organization creates an inherent and healthy tension where non-company actors push companies to be more transparent and to resist government practices inconsistent with human rights standards. While the resource commitment of participating in GNI is an understandable factor for start-up companies, too many medium-sized and large technology companies have been unwilling to join GNI because it requires that they undergo an independent assessment of their policies, process, and on-the-ground practices. That's disappointing, and users around the world pay the price. GNI has worked hard to make the assessment process more cost and time efficient while ensuring that its evaluation of company behavior against the GNI Principles remains rigorous and a cornerstone of the organization.

GNI faces a world where the threats to individual rights online have grown dramatically in number, variety, and severity. In addition, new risks have emerged where governments, as well as non-state actors, have used social media platforms and online tools to undermine the rule of law and democratic norms in countries across the world. GNI is fundamentally about improving company behavior. What are companies doing to live up to the high standards agreed across civil society, companies, socially responsible investors and academics? Questions surrounding fake news, Internet shutdowns, hate speech, and election interference—to name only a few of the most vexing online problems of the day—leave GNI members, like individuals and governments across the globe, grappling with the dangerous implications while searching for causes, methods used, and ultimately for lasting solutions. For GNI, the question is what does responsible company decision making look like in light of this dangerously shifting online landscape? GNI must also decide the role it will play regarding emerging technologies and applications—5G, artificial intelligence and machine learning, Internet of things, smart cities, digital health, etc.—and their intersection points with freedom of expression and privacy.

### How can companies most effectively meet the agreed standards in GNI?

Companies must build robust internal systems of responsible decision-making: (i) committing publicly and at an executive level to human rights; (ii) supporting a de-



dedicated and cross-functional human rights team; (iii) committing to high-level human rights principles and developing and detailed operational guidelines to support those principles; (iv) creating an ongoing internal inventory system to identify intersection points with human rights risks, then developing paths for issue escalation; (v) conducting human rights impact assessments; (vi) engaging regularly and meaningfully with internal and external stakeholders; and (vii) developing an accountability framework that involves internal and external assessment. This system architecture doesn't give an ICT company the answer to every content moderation question or every data transfer conundrum, but it gives a company a foundation and process to make repeatable, scalable, and responsible decisions.

The need for a global organization with GNI's unique multistakeholder structure focused on protecting and advancing freedom of expression and privacy online is at its greatest point in the history of the ICT sector. GNI's members have forged a remarkable degree of trust, earning it while traveling, for more than a decade, across the peaks and valleys of collective problem-solving in deeply challenging circumstances. Trust that must be demonstrated regularly in word and deed by companies and non-companies alike. GNI has become one of the leading multistakeholder initiatives in any industry, increasing awareness and taking a stance on critical issues and advancing meaningful improvements to companies' practices on human rights issues globally.



<https://medium.com/global-network-initiative-collection/>

## EXPERTS POINT TO GNI FRAMEWORK

The adoption or encouragement of the GNI Principles and Implementation Guidelines by multilateral bodies and other experts on sustainability or ICTs and human rights further solidifies GNI's place as a model for ICT companies.

In a well-regarded and influential June 2018 [report](#) to the UN Human Rights Council (UNHRC), the UN Special Rapporteur for freedom of opinion and expression, David Kaye, cited the GNI framework as guidance for companies in crafting "A Human Rights Approach to Content Moderation" — including in circumstances where local laws are not in compliance with international human rights frameworks. GNI [provided input](#) to this report, and ultimately, Professor Kaye recommended the GNI framework as a "baseline approach that all Internet companies should adopt."

In April, the Ranking Digital Rights Project (RDR) launched its third [Corporate Accountability Index](#) — ranking 22 of the world's largest Internet, mobile and telecommunications companies on their publicly-stated commitments to freedom of expression and privacy. The seven GNI company members evaluated in the index earned the top four scores for Internet companies and three of the top four scores for telecommunications companies. During the global launch, RDR Executive Director Rebecca MacKinnon highlighted that "we are seeing much more thorough governance structures and practices in place among Global Network Initiative companies than other companies."

Furthermore, GNI is regularly cited by researchers examining trends in technology and human rights. As one example, Professor Ron Deibert pointed directly to the GNI framework as guidance for ICT companies in a piece on the human rights ramifications of dual-use technologies for the [Journal of International Affairs](#).

## CONTINUING TO CRAFT NEW OPPORTUNITIES FOR GNI'S SHARED LEARNING PROGRAM

Each year, GNI's annual learning forum offers the public a window into its multistakeholder approach, as well as an opportunity for notable experts to join GNI debates on timely issues.

Although the transfer of data across jurisdictions is a fundamental byproduct of the global, interoperable Internet, it can also put pressures on legal systems designed for the pre-Internet age, sometimes imposing risks for human rights online. GNI explored these jurisdictional challenges in the 2018 GNI Annual Public Learning Forum, "[New World Borders](#)," held in partnership with the Open Technology Institute and the American Society of International Law. With extensive participation from both Washington, D.C.'s technology and human rights community and a diverse global audience via livestream, GNI convened experts and members to explore cross-border sharing of electronic evidence and the enforceability and rights risks of global content takedown orders.

In addition, GNI continued to facilitate members' input, sharing of current challenges, and timely research to craft internal learning sessions reflecting shared priorities or notable opportunities to form GNI positions on emerging issues. These sessions included:

- ▶ A GNI-members-only conversation on refraction networking: a network-level response to Internet censorship, as opposed to traditional anti-censorship techniques.
- ▶ An in-person overview of pressing topics for freedom of expression and privacy in India from GNI academic member Chinmayi Arun, informing GNI advocacy.
- ▶ One call and one in-person session on the rights risks, nature, and increasing adoption of laws and policies granting governments direct access to telecommunications networks.
- ▶ An in-person discussion of Global South perspectives on mutual legal assistance, informing GNI's work on rights-respecting approaches to sharing electronic evidence across borders.
- ▶ A session mapping GNI and independent experts' past work on remedy in the ICT sector, with the aim to develop a GNI approach to the topic.
- ▶ A public panel discussion at the 2018 Freedom Online Coalition conference exploring the increasing adoption of "5G" technology and the ramifications for human rights.

These discussions help GNI adapt to the changing freedom of expression and privacy landscape, particularly on emerging technologies. GNI Board member Leslie Harris noted in "The Global Network Initiative: Past, Present, and Future:" "as GNI enters its second decade, the future challenges to privacy and free expression in the ICT sector will surely be quite different than those envisioned at the Initiative's founding."

## PROMOTING RIGHTS-RESPECTING LAWS AND POLICIES WORLDWIDE

Members utilize GNI's unique, multistakeholder platform to collectively engage governments and international institutions on timely legal and policy challenges for freedom of expression and privacy in the ICT sector.

In 2018, GNI developed detailed strategy papers for each of the four policy priorities. The process, which involved extensive consultations through the GNI Policy Committee, was critical to build shared knowledge across the membership and produce a roadmap for core policy activities.

With the policy strategies as a foundation, GNI built on past years' progress promoting rights-respecting [responses to online extremism](#) and raising awareness on the harms of [network disruptions](#), engaged on a range of new legal and policy debates, and expanded policy engagement in the Global South through the "Enhancing Multistakeholder Collaboration for Internet Freedom" project.

*“The knowledge exchange and shared experiences at the GNI have provided insight into key global policy issues and have allowed us to contextualize such learnings into the Indian context.”*  
— Elonnai Hickok,  
CENTRE FOR INTERNET AND SOCIETY

### POLICY ADVOCACY HIGHLIGHTS IN 2018

- **Jurisdictional Assertions and Limits:** GNI helped ensure nascent approaches to sharing electronic evidence include adequate human rights protections. See comments on European e-Evidence Legislation; sessions at the U S Senate and at RightsCon.
- **Intermediary Liability and Content Regulation:** GNI pushed back on proposed regulatory responses to problematic content that risked censoring users' legitimate speech — and praised model intermediary protections. See the statement on Argentine Intermediary Liability Law; Op-Ed on Nigerian Digital Rights and Freedoms Bill; and engagement with UN officials on public-private initiatives for responding to online extremism.
- **Network and Service Disruptions:** GNI raised awareness on the human rights harms of network disruptions, including for policymakers and actors in non-ICT industries. See the report, "Disconnected; A Human Rights-based Approach to Network Disruptions;" GNI-UNESCO colloquium on elections and ICTs; sessions at IGF and RightsCon; and the convening on digital rights in Cameroon.
- **Surveillance:** GNI raised awareness on trends in surveillance that are disproportionate of international human rights laws. See the Submission to OHCHR on Privacy in the Digital Age.

### BUILDING EVIDENCE TO INFLUENCE DECISION MAKERS

GNI relies on members' deep expertise at the intersection of technology and human rights to inform our engagement with policymakers and build the evidence needed to shape rights-respecting legislation.

### NEW ARGUMENTS ON THE HARMS OF NETWORK DISRUPTIONS

In July, GNI launched "[Disconnected: A Human Rights-based Approach to Network Disruptions](#)," authored by former GNI Fellow Jan Rydzak and informed by consultations with members and other experts. In this report, viewed nearly six thousand times, Rydzak mapped the unexplored ramifications of network disruption.



tions on both civil and political rights, and economic, social, and cultural rights. Rydzak offered recommendations focused on engaging with non-traditional actors and working across disciplines to deter the rise of disruptions, enhancing GNI's own advocacy efforts.

## SUBMISSIONS TO KEY LEGISLATIVE CONSULTATIONS AROUND THE WORLD

When opportunities arise to shape legislation or international norms with ramifications for global freedom of expression and privacy, GNI regularly provides input to open legislative processes or expert consultations. These opportunities allow GNI to build consensus and articulate shared policy positions.

Since [2016](#), GNI has engaged with the European Commission in addressing challenges with sharing electronic evidence for law enforcement purposes across borders while ensuring respect for human rights. GNI made several recommendations in response to a 2018 European Commission proposal allowing for EU Member States to issue orders for electronic evidence directly to ICT companies and requiring that companies designate a representative to receive such orders: i) authorities should have human rights-related expertise; ii) orders should not impose potential legal liability on providers; and iii) orders should have sufficient information for providers to assess their legitimacy and human rights risks, in line with GNI standards. GNI members expressed similar concerns throughout 2018 in various fora, including the [Internet and Jurisdiction](#) project and the 2018 GNI [learning forum](#).

GNI shared additional input to governments and intergovernmental organizations in 2018. As noted previously, UN Special Rapporteur David Kaye cited GNI's [submission](#) in his report to the UN Human Rights Council (HRC). In response to a request for submissions by the Office of the UN High Commissioner for Human Rights (OHCHR) exploring "privacy in the digital age," GNI shared [specific guidance](#) from the GNI Principles that could inform "principles, standards and best practices" on privacy the OHCHR was exploring for a report to the UNHRC. GNI championed multistakeholder approaches to policymaking on ICTs in submissions to the UK Government and the UN Secretary General's High-Level Panel on Digital Cooperation.

## PUBLIC COMMENTARY

GNI also issues its own joint statements and public commentary articulating members' shared views or amplifying members' voices to help shape rights-respecting laws and policies worldwide.

GNI issued a statement, in both [English](#) and [Spanish](#), welcoming Argentina's draft law on the responsibility of Internet intermediaries. Members praised it as a potential model for global legislation, citing the potential legal clarity for online platforms and their users, the innovation and investment opportunities that could emerge, and the proposed protections for speech online. GNI received positive responses from key Argentine lawmakers and members expressed that the statement helped their own direct engagement with government officials.



In September, GNI Independent Board Chair Mark Stephens and ‘Gbenga Sesan of GNI-member Paradigm Initiative wrote a joint Op-Ed, [Shaping Nigeria’s Digital Future through Positive Legislation](#), praising the proposed Nigerian Digital Rights and Freedom Bill as a potential model for the both the region and the world. The piece was syndicated across multiple news outlets in Africa, helping raise awareness on digital rights efforts in the region. They praised the bill for its potential as a “a comprehensive legislative framework that describes and clarifies relevant obligations and responsibilities for human rights online.”

## ENGAGEMENT WITH POLICYMAKERS AND THE PUBLIC

GNI leveraged its research and members’ consensus positions in direct engagements with policymakers, including through meetings and roundtables, participation in international fora, and facilitating and amplifying members’ own advocacy.

### DIRECT ENGAGEMENT WITH POLICYMAKERS

Since the start of a [policy dialogue](#) in 2015, GNI has met with governments, companies, civil society, and other actors working to curb extremists’ use of the Internet and ensure that freedom of expression and privacy are incorporated into their approaches. Leveraging GNI’s multistakeholder experience and joint policy recommendations from our [2016 brief](#), GNI added expertise to a series of workshops on public-private collaboration in this arena organized by the UN Counter Terrorism Executive Committee and the UN Office of Drugs and Crimes. These included sessions in New York and Toronto in collaboration with the Tech Against Terrorism project, which focuses on small and medium-sized companies, and sessions in Bangkok and Malaysia attended by regional policymakers.

In addition, GNI participated in closed-door roundtables and direct meetings with the Council of Europe, the European Commission, various UN agencies, and the governments of France, Germany, the U.S., and other countries on related policy issues.

### FACILITATING HIGH-LEVEL CONVERSATIONS

GNI convened high-level sessions on both network disruptions, and intermediary liability and content regulation in 2018.

In February, GNI partnered with UNESCO to organize a full-day colloquium in Paris covering the threats to human rights emerging from online abuses around elections. The event featured representatives from UN member states; experts and practitioners from academia, intergovernmental organizations, civil society, Internet and telecommunications companies, and national communications regulators; as well as election lawyers and observers. Meeting participants emerged with two [key takeaways](#) on the interface between election integrity and online expression: i) the Internet needs to remain accessible, and digital infrastructure needs to be kept secure; and ii) the quality of online information needs to be enhanced, and users should be empowered to critically and constructively engage with it.

Informed by this model, GNI partnered with company and non-company members to support Internet Sans Frontières in convening a session on the digital rights concerns related to Cameroonian elections in the fall. Over two days of discussion, representatives from local Internet service providers, civil society organizations, international Internet platforms, and the Cameroonian government hashed out responses to increasing disinformation and hate speech online, with a particular emphasis on alternatives to network disruptions.

Participants highlighted the costs of extensive government-ordered disruptions in Cameroon.

## GNI PARTICIPATION IN INTERNATIONAL FORA ON DIGITAL RIGHTS

GNI presented or moderated 17 discussions during convenings on ICT policy and business and human rights around the world. Participation in global fora helps ensure GNI's policy positions reach key actors and allows for engagement with new audiences.

### POLICY ENGAGEMENTS IN 2018

#### Network Disruptions

- ▶ "PARALYSIS THROUGH DISRUPTION: UNDERSTANDING THE FULL HUMAN IMPACT OF NETWORK DISRUPTIONS" — RightsCon (Toronto)
- ▶ "DATA-DRIVEN ADVOCACY ON NETWORK DISRUPTIONS" — Forum on Internet Freedom in Africa (Accra)
- ▶ "WHAT NEXT FOR ADVOCACY AGAINST NETWORK DISRUPTIONS?" — Internet Governance Forum (Paris)

#### Intermediary Liability and Content Regulation

- ▶ "FAKE NEWS, FREE SPEECH, AND FOREIGN INFLUENCE: THE SMART WAY THE UNITED STATES CAN COMBAT DISINFORMATION" — Human Rights First Event (Washington)
- ▶ "SHOOTING THE MESSENGER: THE RISE OF INTERMEDIARY LIABILITY AROUND THE WORLD"; & "Respecting Human Rights in Tackling Terrorist Exploitation of the Internet" — RightsCon 2018 (Toronto)
- ▶ "THE REGULATION OF TECH COMPANIES: A KEY TEST FOR COMBATING HATE SPEECH, VIOLENT EXTREMISM, AND 'FAKE NEWS'" — Centre for European Policy Studies (Berlin)

#### Privacy and Surveillance

- ▶ "5G AND HUMAN RIGHTS" — Freedom Online Coalition Conference (Berlin)
- ▶ "THEMATIC SESSION ON TERRORISM AND THE INTERNET" — 2nd Plenary Meeting of Council of Europe Counter-Terrorism Committee CDCT (Strasbourg)

#### Jurisdictional Assertions and Limits

- ▶ "NEW WORLD BORDERS: HOW GOVERNMENTS ASSERT AUTHORITY ACROSS BORDERS IN THE INTERNET AGE" — GNI Annual Public Learning Forum (Washington)
- ▶ "LAWBITRAGE: DEVELOPMENTS IN CROSS-BORDER SEARCH ENGINE REGULATION" — RightsCon (Toronto)
- ▶ "FORECASTING THE IMPLICATIONS OF THE U.S. CLOUD ACT AROUND THE WORLD" — GNI Session at U.S. Senate (Washington)

#### Other Discussions

- ▶ "HUMAN RIGHTS DUE DILIGENCE IN PRACTICE IN THE ICT SECTOR" — UN Forum on Business and Human Rights (Geneva)
- ▶ "WORKSHOP ON ARTIFICIAL INTELLIGENCE AND HUMAN RIGHTS" — Data and Society (New York)
- ▶ "GOVERNANCE INNOVATION FOR A CONNECTED WORLD, PROTECTING FREEDOM OF EXPRESSION, DIVERSITY & CIVIC ENGAGEMENT IN THE GLOBAL DIGITAL ECOSYSTEM" — Stanford Global Policy Incubator Event (Palo Alto)
- ▶ "THE ROLE OF BUSINESS IN THE PROTECTION OF CIVIC SPACE, FUNDAMENTAL FREEDOMS, AND HUMAN RIGHTS DEFENDERS WORLDWIDE" — Business and Human Rights Resource Centre / U.S. Government Roundtable (Washington)

"Forecasting the Implications of the U.S. CLOUD Act Around the World," held at the U.S. Senate offices, was an example of GNI bringing its international expertise directly to policymakers. GNI members from India,



South Korea, Sweden, and the United Kingdom discussed the global implications of the law that outlines the U.S. government's approach to cross-border evidence sharing. Panelists discussed how potential partner countries measure up to the U.S. CLOUD Act criteria for bilateral agreements, how Congress can help ensure the agreements protect human rights, and how the law may impact Internet governance globally.

GNI brought together diverse stakeholders throughout the year to identify new approaches for advocacy on network disruptions. At the 2018 Internet Governance Forum in Paris, [What Next for Advocacy Against Network Disruptions?](#), reflections from advocates in Cameroon, Pakistan, and Uganda, affirmed the need to reach the media, labor unions, and non-ICT companies. At the RightsCon session [“Paralysis through disruption: underscoring the full impact of network disruptions in order to activate non-ICT organizations.”](#) representatives from the private sector and the digital rights world alike emphasized the need to better bridge local and international advocacy, and considered new partners like international financial institutions.



## VII GOVERNANCE

The GNI Board of Directors is responsible for the strategic direction and fiduciary operations of GNI and is led by an independent board chair.

The current GNI Board started in March 2017 and will serve a three-year term through 2020. As of March 2017, the GNI Board was composed of the independent chair and representatives of GNI's four constituencies, including ten company representatives, five civil society organizations representatives, three academic representatives and two investor representatives.

Board alternates are also selected among nominated candidates from each constituency.

### Independent Chair

MARK STEPHENS, CBE.

### Company Representatives

ANDREW O'CONNELL [Facebook](#)

LEWIS SEGALL [Google](#)

STEVE CROWN [Microsoft/LinkedIn](#)

OEZLEM DECKER [Nokia](#)<sup>2</sup>

YVES NISSIM [Orange](#)

SIDSELA NYEBAK [Telenor Group](#)

PATRIK HISELIUS [Telia Company](#)

NICOLE KARLEBACH [Verizon Media](#)

LAURA OKKONEN [Vodafone Group](#)<sup>3</sup>

### Civil Society Organization Representatives

GREG NOJEIM [Center for Democracy & Technology](#)

ROB MAHONEY [Committee to Protect Journalists](#)

CYNTHIA WONG [Human Rights Watch](#)

JODIE GINSBERG [Index on Censorship](#)

KAT DUFFY [Internews](#)

### Academic Representatives

JESSICA FJELD

[Berkman Klein Center for Internet & Society, Harvard University](#)<sup>4</sup>

MEG ROGGENSACK [Georgetown University \(Independent\)](#)

K.S. PARK [Korea University Law School \(Independent\)](#)

### Investor Representatives

ADAM KANZER [Domini Impact Investments LLC](#)<sup>5</sup>

BENNETT FREEMAN (GNI Board Secretary) [EIRIS Conflict Risk Network](#)

### Board Alternate Representatives in 2018

USAMA KHILJI [Bolo Bhi](#)<sup>6</sup>

EMMA LLANSÓ [Center for Democracy & Technology](#)

ELONNAI HICKOK [Centre for Internet and Society](#)

SARA NORDBRAND [Church of Sweden](#)

ALEX WAROFKA [Facebook](#)

ALEXANDRIA WALDEN [Google](#)

ARTURO CARRILLO [The George Washington University Law School](#)

ARVIND GANESAN [Human Rights Watch](#)

ANDREAS REVENTLOW [International Media Support](#)

BERNARD SHEN [Microsoft / LinkedIn](#)

SILVIA GARRIGO [Millicom](#)

CHRISTOPH STECK [Telefónica](#)

MAI OLGARD [Telenor Group](#)

PHILLIP MALLOCH [Telia Company](#)

MOLLY LAND [UConn Human Rights Institute](#)

KATIE SHAY [Verizon Media](#)<sup>7</sup>

JUSTINE HARRIS [Vodafone Group](#)<sup>8</sup>

<sup>2</sup> Laura Okkonen previously represented Nokia through September 2018.

<sup>3</sup> Annette Fergusson previously represented Vodafone Group through July 2018.

<sup>4</sup> Vivek Krishnamurthy previously represented the Berkman Klein Center through September 2018.

<sup>5</sup> Adam Kanzer ended his board representation on behalf of Domini in August 2018. He rejoined the board as a representative of BNP Paribas Asset Management in 2019.

<sup>6</sup> Farieha Aziz previously represented Bolo Bhi through March 2018.

<sup>7</sup> Katie Shay ended her board representation in September 2018.

<sup>8</sup> Matthew Peacock previously represented Vodafone as a Board alternate through July 2018.

## GNI COMMITTEES

GNI operates through committees and working groups that report to the board and the membership. The committees include executive & management, accountability, policy, learning, membership, and development. All except executive & management (which draws only from GNI Board members) are open to every GNI member. All have two co-chairs, one from a company member and one from a non-company constituency member, except for executive & management, which is chaired by the independent board chair together with the board secretary. Special representatives from the constituencies not represented by the co-chairs are also appointed.

### GNI COMMITTEES' CO-CHAIRS AND SPECIAL REPRESENTATIVES

COMMITTEE	COMPANY CO-CHAIR	NON-COMPANY CO-CHAIR	SPECIAL REPRESENTATIVES
ACCOUNTABILITY	Steve Crown Microsoft	Arturo Carrillo George Washington University, Academic	Adam Kanzer Domini Impact Investments, Investor Cynthia Wong/Arvind Ganesan Human Rights Watch, NGO
MEMBERSHIP	Patrik Hiselius Telia Company	Andreas Reventlow International Media Support, NGO	Sara Nordbrand Church of Sweden, Investor
DEVELOPMENT	Steve Crown Microsoft	Bennett Freeman EIRIS Conflict Risk Network, Investor	Arturo Carrillo George Washington University, Academic
POLICY	Bernard Shen Microsoft	Emma Llansó Center for Democracy and Technology, NGO	Jonas Kron Trillium Asset Management, Investor Vivek Krishnamurthy Berkman Klein Center for Internet & Society, Harvard University Academic
LEARNING	Nicole Karlebach Verizon Media	Meg Roggensack Georgetown University, Academic	Greg Nojeim Center for Democracy and Technology, NGO

NOTE: The representatives listed here concluded their 18-month terms on 1 December 2018. On 1 December, new co-chairs and special representatives, including four from Global South members, started their 18-month terms, adding diversity of experience, insights, and perspectives to the work of the committees.

## GNI WORKING GROUPS

The China and other Difficult Jurisdictions Working Group (CWG) is tasked with discussing the application of the GNI Principles in difficult jurisdictions, with a focus on China.

The Company Membership Expansion Working Group is tasked with developing strategies to explore how GNI can attract and accommodate smaller/regional new members to GNI companies.





Judith Lichtenberg



David Sullivan



Jason Pielemeier



Rocío Campos



Chris Sheehy



Nikki Bourassa

## STAFF

The GNI secretariat is based in the United States and the Netherlands. It supports the GNI committees and working groups, develops and hosts closed-session and public events, prepares for GNI participation in conferences and meetings, drafts submissions, reports, and media releases, and facilitates the collaboration of GNI's diverse participants.

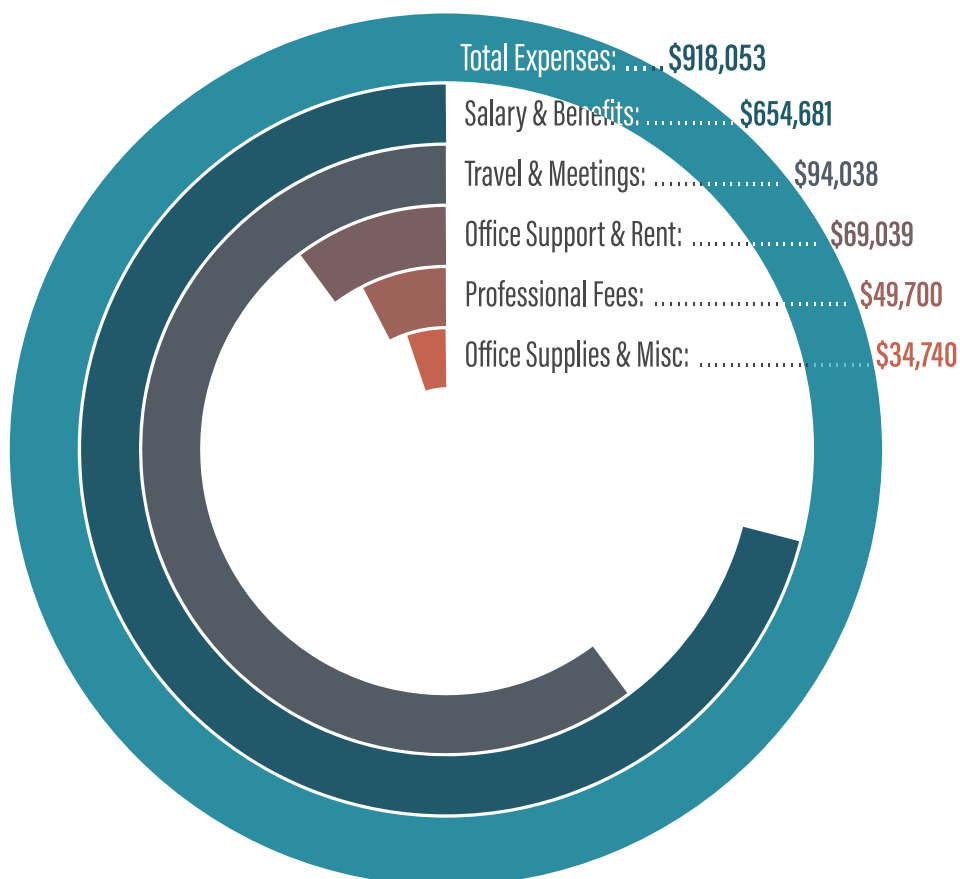
GNI Executive Director Judith Lichtenberg, based in Amsterdam, oversees GNI's accountability and advocacy goals, the expansion of membership and funding, and building consensus for the advancement of freedom of expression and privacy across the four constituencies. GNI Director of Learning and Development David Sullivan, based in Boulder, Colorado, works to devise and execute a shared learning agenda for participating members, strengthens membership integration, and works to recruit new members and secure diverse funding sources. Based in Washington, D.C., GNI Policy Director Jason Pielemeier works with GNI's diverse members to develop and articulate GNI's policy positions and engage with policymakers and other stakeholders to enhance protections for freedom of expression and privacy at global and regional levels. GNI Communications Manager Rocío Campos joined in April to develop and implement internal and external communications programs that effectively describe GNI's mission and multistakeholder model and promote meaningful participation by all GNI members. GNI Policy and Program Officer Nikki Bourassa joined in September to manage GNI's grant portfolio and global programs. GNI Program and Communications Officer Chris Sheehy supports day-to-day operations and administration and contributes to policy and communications.

GNI is also grateful for the support of Barbara Dourley, research associate and former Georgetown University Master of Science in Foreign Service fellow, who assisted with research, events and project coordination, part time through April 2018; Georgetown University Master of Science in Foreign Service Fellow Elyse Lee who also assisted with research, events and project coordination through May 2018; and Google Policy Fellow Emma Friedheim who conducted research and provided logistical support during our annual forum.

## VIII FINANCIALS

Net Assets Beginning:	\$642,657
Net Assets Ending:	\$552,365
Excess of Income over Expenses:	\$(90,292)

Total Public Support & Revenue:		\$827,761
Membership Income:		\$753,666
	Contributions & Grants:	\$72,860
Interest Income:	\$1,235	Gain on Disposition of Fixed Assets: \$0





## ACKNOWLEDGEMENTS

### *Legal*

GNI is very grateful for legal advice and support it receives from White & Case LLP, especially Charles Moore, Gabrielle Hodgson, Noah Brumfield, Earle Miller, and Bijal Vakil.

### *Accounting and Administration*

We would like to acknowledge the assistance of staff from Glass Jacobson Financial Group, especially Andrea Montali and Marc Friedman, and also that of the staff at Howard Kennedy LLP, especially Eleanor Barker.

### *Design*

J. Gregory Barton of DC-based design and technology firm Britt Barton produced this report.

### *Members and Supporters*

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

We would also like to thank the students of the Harvard Law School Cyberlaw Clinic at the Berkman Klein Center for their research support on “Internet Referral Units” this past year.

### *Photos Credits*

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