ANNUAL REPORT 2019

Enhancing Diversity and Participation

GLOBAL NETWORK INITIATIVE

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OPENING LETTER

Welcome to the 2019 GNI Annual Report: Enhancing Diversity and Participation. This year was marked by important achievements from which we are distilling lessons to face new challenges, as we see governments approaching technology companies worldwide with demands to use their data to combat COVID-19.

These lessons and the diversity of our membership – both in terms of geography and the plurality of perspectives within its constituencies – will impact our ability to protect and advance freedom of expression and privacy rights in the information communications and technology (ICT) sector. GNI's civil society constituency, for instance, includes research, advocacy, and network-based organizations that work at the local, national, and regional levels. Likewise, the company members of GNI include Internet platforms, telecommunication operators, and vendor equipment companies representing different roles in the ICT ecosystem.

Judith Lichtenberg

Mark Stephens

The diversity amongst and within constituencies is essential to foster meaningful multi-stakeholder engagement to address the challenges facing freedom of expression and privacy rights of ICT users. Together GNI members have increased first-hand access to information and more policy entry points to respond to government actions.

GNI increases the possibilities to, for example:

- Track and respond to governments' acts of censorship and surveillance in a manner consistent with internationally recognized laws and standards, underscoring human rights' implications and the perspectives of different actors;
- Promote engagement by currently underrepresented stakeholders in advocacy against network disruptions; and
- Counteract government efforts to pressure companies to monitor, filter, take down, or block access to online content.

Ultimately, the active participation of the growing and diverse GNI membership inside and outside GNI increases our ability to uphold the GNI Principles on Freedom of Expression and Privacy (the "GNI Principles") through policy advocacy activities at global, regional, and local levels; promote continued shared learning; and enhance GNI's independent assessment process of company members. In 2019, the addition of five new members and one company observer from Africa, Asia, Europe, and Latin America will bring valuable expertise to our activities.

We proactively worked to promote multistakeholder collaboration inside and outside GNI. For instance, we led regional consultations in Africa, Latin America, and South Asia to explore opportunities for cross-collaboration between civil society and companies on issues related to our policy priorities. We also welcomed the formation of a women's group to advocate for the importance of diversity within GNI, including but not limited to gender.

Highlights from our 2019 policy efforts included advocacy with policymakers in Australia, the European Union, India, and the United Kingdom, as well as wider activities and events held on five continents. GNI engaged in discussions, prepared statements, and participated in a variety of events engaging with policymakers and other key actors to draw attention to problematic trends for freedom of expression and privacy rights, and identify good laws and best practices.

GNI members also collaborated to improve existing policy learning resources and better understand the legal environments in which ICT companies operate. With the support of the former Telecommunications Industry Dialogue, we updated and provided added functionality to our Country Legal Framework Resource, which offers over 50 country-specific reports on laws relevant to censorship and surveillance. GNI's Annual Learning Forum on human rights due diligence (HRDD) brought together members and outside experts to discuss the first decade of HRDD in the technology sector. Participants shared insights on how companies can work with other actors to make sure their risk management processes anticipate and respond to constantly changing pressures on digital rights.

We also completed the third cycle of independent company assessments, which was the largest and most diverse cycle to date, including Internet companies, telecommunications network operators, and an equipment vendor – Facebook, Google, Microsoft, Millicom, Nokia, Orange, Telefónica, Telenor Group, Telia Company, Verizon Media, and Vodafone Group. It was the first time that vendor and telecommunications companies participated, demonstrating that companies from different segments of the ICT sector can apply the GNI Principles. The assessments offer important lessons on how companies can navigate new pressures from governments.

These accomplishments would not be possible without the support of our members and funding partners. In addition to ongoing projects supported by the U.S. State Department Bureau of Democracy, Human Rights, and Labor, GNI received support from the Government of the Netherlands Ministry of Foreign Affairs to engage underrepresented voices from civil society and the private sector in collaborative processes to protect and respect freedom of expression and privacy throughout cyberspace.

Going forward, we will build on this year's learnings and achievements to deepen the collaboration between GNI members and between GNI and external stakeholders to bring diverse perspectives to the dilemmas around data collection and surveillance posed by the present pandemic. More than ever, multistakeholder collaboration is essential to protect freedom of expression and privacy rights.

Mark Stephens
Independent Chair

Judith Lichtenberg
Executive Director

2019 AT A GLANCE

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

MEMBERSHIP

65 MEMBERS:
- **18** ACADEMIC MEMBERS
- **25** CIVIL SOCIETY MEMBERS
- **13** COMPANY MEMBERS
- **9** INVESTOR MEMBERS

6 NEW MEMBERS:
- **3** CIVIL SOCIETY MEMBERS
- **1** COMPANY OBSERVER
- **1** INVESTOR MEMBER

GOVERNANCE

20 BOARD MEMBERS

LEARNING

7 LEARNING SESSIONS:
- **3** IN PERSON
- **4** VIRTUAL

1 PUBLIC ANNUAL LEARNING FORUM:
- **80** IN PERSON PARTICIPANTS
- **20** REMOTE PARTICIPANTS
- **10** SPEAKERS

54 COUNTRY LEGAL FRAMEWORK (CLFR) REPORTS

2 NEW COUNTRIES: BRAZIL AND THE UNITED STATES

ACCOUNTABILITY

11 ASSESSED COMPANIES

4 ASSESSMENT REVIEW MEETINGS

86 CASE STUDIES

125 INDEPENDENT ASSESSOR INTERVIEWS

POLICY

9 FORMAL SUBMISSIONS TO POLICY MAKING PROCESSES

31 POLICY EVENTS:
- **19** PRIVATE
- **12** PUBLIC

FOR MORE DETAIL, GO TO:
ZOOMING IN ON DIVERSITY AND MEMBERSHIP ENGAGEMENT

DEEPENING DIVERSITY, MEANINGFUL PARTICIPATION, AND COLLABORATION

NEW MEMBERS AND OBSERVERS

In 2019 we continued to attract new entities interested in membership and welcomed five new members to three of our four constituencies, as well as one company observer. GNI's global multistakeholder organization fosters a unique environment to better understand, assess, and mitigate risks arising from government initiatives in the ICT sector, more specifically:

- GNI's shared learning activities enable members to discuss sensitive matters and on-the-ground challenges within a confidential and trusted space, for instance, on how to manage risk exposure and improving decision making when implementing the GNI Principles and Implementation Guidelines;
- GNI's policy advocacy engagements support the work of members to advance rights-respecting policies with governments around the world, from fighting network disruptions to responding to extremist content without harming human rights; *and*
- GNI's independent company assessment process ensures that member companies' policies and procedures are reviewed by independent assessors, promoting accountability and continuous improvement.

JOINING THE CIVIL SOCIETY CONSTITUENCY

Global Forum for Media Development

GLOBAL FORUM FOR MEDIA DEVELOPMENT

The Global Forum for Media Development (GFMD) is an international network of over 200 members working across 70 countries. It provides an international platform to support journalists and media development practitioners and advocates for media development as a primary pillar for social, economic, and political progress. GFMD has experience in multistakeholder spaces, including the United for News Coalition and the Journalism Trust Initiative.

Red en Defensa de los Derechos Digitales

Based in Mexico City, Red en Defensa de los Derechos Digitales (R3D) is focused on defending human rights in the digital realm through applied research, advocacy, and strategic litigation on themes related to privacy, surveillance, freedom of expression, access to the Internet, and access to knowledge. R3D has extensive experience on privacy and surveillance.

Women of Uganda Network

Women of Uganda Network (WOUGNET) is a member-based organization that works throughout Uganda to promote and support the use of ICTs by women to tackle sustainable development issues. WOUGNET is the first organization focused on the intersection of gender and technology that joins GNI.

JOINING THE ICT COMPANY CONSTITUENCY

Ericsson

Ericsson, a global leader in communications technology providing services in over 180 countries worldwide, became a GNI member after completing an observer period. The company has valuable expertise on vendor-specific challenges for privacy and freedom of expression to GNI.

LINE Corporation (company observer)

LINE Corporation is a mobile messaging platform provider based in Japan. It was conceived after the massive earthquake that devastated Japan on 11 March 2011 to strengthen communications and founded on 1 April 2013. This is the first company headquartered outside of Europe and the United States to start a one-year observer membership.

JOINING THE INVESTOR CONSTITUENCY

BNP Paribas Asset Management

BNP AM is the investment management arm of BNP Paribas, one of the world's major financial institutions. BNP AM has been a key player in sustainable investment since 2002, managing over 40 billion USD of assets in socially responsible investment strategies.

ZOOMING IN ON DIVERSITY AND MEMBERSHIP ENGAGEMENT

NORTH AMERICA
29 members
8 policy events
16 women's group participants

EUROPE AND CENTRAL ASIA
21 members
8 policy events
2 formal submissions to policy making processes
9 women's group participants

EAST ASIA
1 member

GLOBAL
1 formal submission to policy making processes

SOUTH ASIA
2 fellows
6 members

MIDDLE EAST
1 member

PACIFIC
1 policy event
2 formal submissions to policy making processes

LATIN AMERICA
2 fellows
4 members
2 policy events
4 women's group participants

AFRICA
2 fellows
3 members
9 policy events
2 formal submissions to policy making processes
5 women's group participants

10 SPEAKERS AT THE ANNUAL LEARNING FORUM:
2 academics
4 civil society
3 companies
1 investor

24 ASSESSORS:
13 female
11 male

11 COMPANY ASSESSMENTS:
1 equipment vendor company
4 Internet service companies
6 telecommunications companies

20 BOARD MEMBERS:
9 female
11 male

18 BOARD ALTERNATE MEMBERS:
11 female
8 male

15 GNI COMMITTEE LEADS:
9 female
4 male

PROMOTING ENGAGEMENT AND COLLABORATION

GNI-INTERNEWS FELLOWSHIP PROGRAM

Six civil society organizations from Latin America, South Asia, and Africa participated in the 2019 GNI-Internews Fellowship Program. The program, led by GNI in collaboration with Internews, provides support for organizations with exceptional policy advocacy experience to participate in activities reserved for GNI members.

Each organization received support to participate in GNI meetings and learning and policy activities. Examples include attending GNI Board meetings in London and Washington, D.C., meeting with GNI company members alongside RightsCon in Tunis, presenting their work at the Oxford Internet Institute, and sharing their policy perspectives with American and British government representatives. Fellows met with members of the United Kingdom's Department of Culture, Media, and Sport to discuss the potential global precedents set by this country's approaches to regulating online speech, as outlined in the Online Harms White Paper. Later in the fall, fellows convened in Washington, D.C., alongside GNI's Annual Meeting of Members and Public Learning Forum. (Enhancing Learning: From Artificial Intelligence to Human Rights Due Diligence)

AfroLeadership, Cameroon – AfroLeadership promotes digital rights, human rights, freedom of expression, and democracy and governance, including via coalition building. Among other activities, they led a campaign to raise awareness of digital rights and freedom of expression issues in response to the prolonged 2016 Internet shutdown in the English-speaking part of Cameroon.

Collaboration on International ICT Policy in East and Southern Africa (CIPESA), Uganda – CIPESA advances rights-respecting Internet policies in East and Southern Africa through research and advocacy. Notable contributions to Internet freedom advocacy and analysis include yearly reports mapping the state of Internet freedom on the continent, numerous country-level in-depth legal analyses, and the convening of the Forum on Internet Freedom in Africa.

Derechos Digitales, Chile – Derechos Digitales analyzes digital rights impacts of legal and regulatory frameworks throughout Latin America through publications including their annual "Latin America in a Glimpse" report. In addition, Derechos Digitales regularly contributes to expert sessions at international and regional convenings of diverse stakeholders.

El Instituto Panameño de Derecho y Nuevas Tecnologías (IPANDETEC), Panama – IPANDETEC has become a leading voice on digital rights in Central America. They co-convened the fourth Forum on Privacy and Data Protection in Central America, and are key contributors to the Latin America & the Caribbean Internet Governance Forum and the Panama Internet Governance Forum.

Digital Empowerment Foundation (DEF), India – DEF seeks to empower marginalized communities to access, consume, and produce quality information online, and they regularly undertake policy advocacy and research in support of digital rights. They have hosted local workshops on Internet shutdowns and led conversations that explore the intersection of law, gender, and digital rights.

Software Freedom Law Centre (SFLC.In), India – SFLC.in brings lawyers, policy analysts, technologists, and students together to protect freedom in the digital world by sharing free legal advice and engaging with policymakers. They published concerns on draft amendments to guidelines for online intermediaries in India, and have tracked Internet shutdowns in the country since 2012.

A new cohort of six fellows will join GNI in 2020 for a second iteration of this fellowship program.

Connecting Civil Society and Small and Medium-Sized Enterprises

Alongside GNI members Global Partners Digital (GPD) and R3D as well as the Bloggers Association of Kenya, GNI staff supported training workshops in Kenya and Mexico on business and human rights for CSOs and small and medium-sized ICT enterprises (SMEs). GNI staff contributed to these workshops by outlining the obligations of all businesses to respect human rights. Using the GNI Principles and Implementation Guidelines, we shared examples of ways to put these responsibilities into practice to promote collaboration between CSOs and SMEs. (Enhancing Learning: From Artificial Intelligence to Human Rights Due Diligence)

> "My GNI fellowship experience was immeasurably rewarding – intellectually, professionally, and personally. My time here was an intellectual feast rich in conversations, provocations, and new ways of thinking about critical topics at the intersection of business, technology, and human rights. Participating in board meetings and regular GNI calls was incredibly stimulating as the collegial atmosphere and quality of discussion can't be beaten.
> The fellowship is an amazing opportunity to meet experts from great companies shaping the world with their technologically innovative genius, human rights activists questioning ethical impacts of technology on human beings, and scholars building theoretical material for tomorrow's world."
>
> **CHARLIE MARTIAL NGOUNOU,**
> AFROLEADERSHIP

Formulating Regional Policy Strategies

GNI convened diverse stakeholders from the ICT sector to discuss pressing policy issues that affect the rights to privacy and freedom of expression in Africa, Latin America, and South Asia. These regional consultations facilitated cross-stakeholder knowledge sharing on issues like surveillance, network disruptions, and data retention. They also provided a platform to explore possibilities for multi-stakeholder collaboration in pursuit of rights-respecting policies and government practices.

As a result of these consultations and many discussions with members, GNI moved closer toward establishing region-focused policy strategies for each aforementioned region. Once established, these plans will facilitate GNI's deeper multistakeholder policy engagement across these regions. (Promoting Rights-Respecting ICT Sector Regulations Worldwide)

Introducing the GNI Women's Group

Female GNI Board representatives took the intiative to form a group open to GNI participants who identify as women, which convened around the GNI Annual Public Learning Forum in October. The goal of this initiative is to advocate for the importance of diversity within GNI (including but not limited to gender); cultivate mentorship opportunities and increase visibility for tech policy career paths; and coordinate panels, presentations, and workshops to deepen women's roles in the digital rights space.

GNI FRAMEWORK AT WORK

2018/2019 GNI ASSESSMENT CYCLE OVERVIEW

When companies join GNI, they agree to have their implementation of the GNI Principles assessed independently by participating in GNI's assessment process. The assessment enables the GNI Board to determine whether each member company is making good-faith efforts to implement the GNI Principles with improvement over time. It also gives GNI's civil society, academic, and investor board members (collectively, GNI's non-company board members) insight into how companies go about implementing the GNI Principles.

Throughout the year, the GNI Board conducted the review of each one of the 11 company assessments that would constitute the third assessment cycle of GNI. This represents twice as many assessments than in any previous assessment cycle. Given the large number of companies being assessed, the GNI Board dedicated three full-day meetings alongside its quarterly board meetings in March, June, and October, plus an additional meeting in November to review each one of the company assessments for Facebook, Google, Microsoft, Millicom, Nokia, Orange, Telefónica, Telenor Group, Telia Company, Verizon Media, and Vodafone Group.

The GNI Board aimed to ensure that the review process was as participatory as possible. For each assessment review, assessor and company presentations to the GNI Board were followed by a session of questions and answers moderated by the independent board chair for at least an hour. This was followed by an additional questions and answers segment between the GNI Board and each company.

The active involvement of non-company constituencies of the GNI Board was critical to the assessment process. They provided guidance for the assessors on case selection and identified specific cases for consideration by the assessors for inclusion in the assessments. Non-company board members also formed study groups to examine the assessment reports for each company. The study groups identified and prepared questions and discussion points for the company assessment reviews directed to each company, assessor, and the rest of the GNI Board.

At the end of each review meeting, the board determination took place subject to a super-majority vote, which is defined as two-thirds of the full board and at least 50 percent of each constituency group. As few as two negative votes in the investor or academic constituency, or three negative votes of the NGO constituency results in a finding of non-compliance. This did not occur during this assessment cycle.

Once the assessment reviews were completed, GNI started preparations to publish the 2018/2019 public assessment report, which was released on April 22, 2020.

A MORE TRANSPARENT ASSESSMENT PROCESS

The 2018/2019 independent company assessments were conducted according to the revised methodology contained in the GNI Assessment Toolkit by assessors accredited by the GNI Board as meeting the independence and competency criteria established by GNI.

To complete their assessment, assessors received adequate access to privileged company information, reviewing documents in secure settings. They also had access to key company personnel, from frontline teams to senior management, and conducted a total of 125 interviews. Assessments also included an examination of a total of 86 case studies, which looked at how the companies deal with government requests and demands in practice in different countries around the world.

The assessment process is confidential by design. This allows companies to open their internal policies and processes on how they respond to government requests and demands to external oversight. Notwithstanding this and mindful of providing greater access to information, GNI published a comprehensive list of questions and answers on its website to clarify important aspects of the process and prepared for publication:

- More than 20 case studies showing how companies are implementing the GNI Principles in practice, the majority of which are non-anonymized,
- Examples of non-anonymized recommendations made by the assessors to specific companies, and
- Anonymized and aggregated recommendations from all companies.

Throughout the assessment process, GNI documented lessons to continue improving the process, promote shared learning, and identify best practices to implement the GNI Principles.

EXPERTS RECOGNIZE THE GNI FRAMEWORK AS A GOOD PRACTICE

The GNI Principles and corresponding Implementation Guidelines represent GNI's framework for responsible company decision making and reflect the commitments of all GNI members. The GNI framework goes hand in hand with multistakeholder collaboration to set a global standard to promote freedom of expression and privacy in the ICT sector.

International experts and prominent stakeholders from international multilateral organizations and leading platforms and organizations working on technology policy, corporate responsibility, and business and human rights continue to refer to the GNI framework and the GNI independent assessment of company members as a model.

> "The Global Network Initiative was an early and innovative multistakeholder response to the challenge posed to ICT companies by government demands to surveil and censor. It was the first effort to hold ICT sector companies accountable, through regular review of company implementation of GNI Principles and Guidelines. Today, GNI's DNA forms an important part of the global ecosystem of regulation, from global standards, to transparency reporting, to cross-sector collaboration, e.g., in response to Internet shutdowns. GNI's assessment process has helped its members to better understand both the challenges companies face, and how, in the context of specific cases, companies are responding to the continuing challenges to Internet freedom."
>
> **MEG ROGGENSACK,**
> GEORGETOWN UNIVERSITY LAW CENTER

In a 2019 report to the UN Human Rights Council, Clement Voule, the UN Special Rapporteur on freedom of association, stated that *"... effective implementation of the UN Guiding Principles on Business and Human Rights should be a priority for [digital technology companies]. Models that include an independent impact assessment oversight, such as the ones promoted by the Global Network Initiative, should be scaled up."*

The Investor Alliance for Human Rights, a collective action platform for responsible investment grounded in respect for people's fundamental rights, cited GNI as a resource for engagement with ICT companies on freedom of expression and privacy. GNI hopes to continue building its engagement with and guidance for responsible investors in 2020. These examples add to GNI's input on

international initiatives (Enhancing Learning: From Artificial Intelligence to Human Rights Due Diligence and Promoting Rights-Respecting ICT Sector Regulations Worldwide) and citations in relevant research.

The Ranking Digital Rights Index, which evaluates ICT companies for their disclosure of commitments, policies, and practices affecting freedom of expression and privacy, continues to serve as an important benchmark of how companies communicate publicly about practices outlined in the GNI framework. While not all GNI members participated in the study and therefore were not ranked, the top scores on indicators related to disclosure of companies' governance practices on human rights — including on topics like company training, board oversight, stakeholder engagement, human rights impact assessments, and more — all went to companies that are members of GNI. The four GNI telecom company members that were included received the highest scores on disclosures around network disruptions. Read more in the GNI blog.

These validations of GNI's work are important incentives to continue offering a trusting space for shared learning between different stakeholders, and to provide a forum for collective advocacy in support of laws and policies that promote and protect freedom of expression and privacy rights.

THE OPERATION OF THE GNI PRINCIPLES WHEN LOCAL LAW CONFLICTS WITH INTERNATIONALLY RECOGNIZED HUMAN RIGHTS

Consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines on Multinational Enterprises, the GNI Principles recognize that companies "should comply with all applicable laws and respect internationally recognized human rights, wherever they operate. However, challenging digital rights environments pose difficulties including overbroad obligations on intermediaries to monitor users, the criminalization of many categories of speech, broad censorship powers, non-proportionate mass-surveillance, and government-ordered network disruptions.

Through a dedicated working group, GNI members participated in discussions over the course of several months to develop a public statement addressing questions about the applicability of the GNI Principles and Implementation Guidelines in the most challenging environments for human rights. What is expected of GNI companies? What does this mean for member companies' independent decisions to enter or exit a jurisdiction? And, how do we know if companies are acting consistent with their commitments?

As a result of these discussions, GNI issued a statement addressing these topics and concluded that: ***"Taken together, implementation of the GNI Principles, independent assessment, and multistakeholder collaboration provide users with a degree of confidence that GNI member companies are constantly evaluating — both internally and with external stakeholders — how to respect their rights."***

Balancing the laws binding ICT companies with their responsibilities under international law is a challenging endeavor. This is made more difficult when laws are vague, unclear, difficult to access, or not subject to uniform interpretation. The statement also highlighted members' efforts to disclose how they respect human rights in their respective markets, including through our collective work to shed light on governments' legal authorities to restrict communications or access user data via the Country Legal Frameworks Resource (see: Relaunching the GNI Country Legal Frameworks Resource).

PROMOTING RIGHTS-RESPECTING ICT SECTOR REGULATIONS WORLDWIDE

GNI utilized its 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, focusing on its policy priority areas: privacy and surveillance; intermediary liability and content regulation; human rights implications of questions around jurisdiction online; and government-ordered network and service disruptions. Fortified by GNI's increasingly global membership (see: Deepening Diversity, Meaningful Participation, and Collaboration) and the GNI-Internews Fellowship Program, GNI increased its regional, on-the-ground engagement in Africa, Latin America, and South Asia.

TAKING GNI'S MULTISTAKEHOLDER CONVENINGS AROUND THE GLOBE

CONTRIBUTING TO HIGH-LEVEL INTERNATIONAL EXCHANGES

GNI brought members' shared perspectives and commitments to freedom of expression and privacy to various expert conversations and projects developing new governance models and guidance for the global ICT sector.

The Christchurch Call

The role of ICT companies in responding to alleged terrorist or extremist content has become one of the most challenging issues for freedom of expression and privacy in the digital sphere, as evidenced in part by the horrific murders in Christchurch, New Zealand. In response, the governments of France and New Zealand led the formation of the Christchurch Call to Eliminate Terrorist and Violent Extremist Content Online, which featured newly forged commitments by governments and tech companies to address terrorist and violent extremist content online. GNI wrote a letter to the founding governments calling for inclusive consultations with a diverse array of actors to ensure the commitments are framed by international human rights language. GNI was selected and will continue to engage as a participant in the Christchurch Call advisory network.

The Internet & Jurisdiction Policy Network

In recent years, regulators and courts in several countries have attempted to compel Internet companies to limit the availability of content on their platforms to users in other countries or regions, with these assertions of jurisdiction beyond national borders posing possible risks for freedom of expression and international comity. Throughout the year, GNI continued to participate in

the Internet and Jurisdiction Project, a global initiative bringing together experts from governments, industry, academia, and international organizations alike, grappling with these and other tensions between national laws and the cross-border nature of the Internet. GNI led a working group to identify global norms for "geographically proportional action," which met during the Third Internet and Jurisdictional Conference in Berlin, and contributed to a brief on the topic. GNI will continue to engage with this project.

Freedom Online Coalition

GNI served on the Advisory Network of the Freedom Online Coalition (FOC), a group of likeminded governments who have pledged to work together to protect and promote Internet freedom. The Advisory Network, which is composed of representatives from technology companies, civil society, and academia, advises the FOC on a variety of matters including its planning, statements, and coordination related to multilateral engagement. GNI will continue its participation for a second term.

PARTICIPATION IN PROMINENT DIGITAL RIGHTS AND TECHNOLOGY POLICY EVENTS

GNI actively engaged in regional and international level discussions relevant to its policy priorities. These engagements presented important opportunities to connect with existing and potential members, government officials, and business and human rights experts; and consider the impacts of emerging issues and technologies.

Government-Ordered Network Disruptions

In Addis Ababa, Ethiopia, GNI held a session at the Forum on Internet Freedom in Africa, titled ***"Disrupting Development: How Internet Shutdowns Impede the Sustainable Development Goals."*** Amid rising partial and complete network disruptions in Africa and around the world, this session discussed the negative impacts of disruptions on the attainment of the 2030 Agenda for Sustainable Development Goals, including impediments to investment and business opportunities, increases in civil uncertainty and violence, and impediments to humanitarian efforts, among other limits. In Geneva, GNI participated in the 2019 UN Forum on Business and Human Rights, with the session ***"Combatting Internet Shutdowns, Social Media Taxes, and Censorship,"*** looking at ways in which governments are using Internet shutdowns, taxes on social media, and censorship laws to attack freedom of expression, and how telecommunication and social media industries are often caught in the middle of potential widespread violations of freedom of expression.

> "The GNI multistakeholder model provides a unique platform for civil society, academia, companies, and investors to come together and weigh out their respective priorities toward a consensus. This process is full of critical learning for all stakeholders; something that the world can do with more of! Ultimately, none of the stakeholders have their agenda agreed upon completely, but there is a lot more understanding, empathy, and impact on future course of policy for all."
>
> **USAMA KHILJI,** BOLO BHI

GNI's panel ***"Understanding Electoral Information Flows: Mapping the Impact of Digital Technology from Network Disruptions to Disinformation"*** at UNESCO's World Press Freedom Day built on a previous colloquium organized with UNESCO covering ICTs and the integrity of elections. Panelists mapped the different ways in which digital technology impacts election-relevant information flows, including different forms of information interference, as well as the inter-relationships between these impacts. Read more in the reflections from GNI Policy Director Jason Pielemeier .

Intermediary Liability and Content Regulation

As governments and other actors around the world work to respond to legitimate concerns over misuse of ICTs to promote and distribute problematic content (see: Ensuring Regulations on Problematic Content Online Respect ICT Users' Rights), GNI continued to promote responses that incorporate sufficient protections for human rights. At the workshop ***"Intermediary Liability in the India Context,"*** organized by the Centre for Internet and Society, a GNI member, GNI shared international perspectives on intermediary liability and content regulation, including human rights concerns over proposed approaches in India.

GNI Policy and Program Officer Nikki Bourassa published a related article on the discussion in the Indian news website Scroll.in.

During the **Global Internet Forum to Counter Terrorism (GIFCT) Annual Summit** in San Francisco, a group of ICT companies committed to working together to "prevent terrorists and violent extremists from exploiting digital platforms." GNI joined representatives from governments, regional bodies, and the UN, and continues to engage with the GIFCT to help keep freedom of expression and privacy at the forefront of efforts in response to online extremism.

New Policy Challenges and Emerging Technologies

GNI led, moderated, and joined discussions to maximize the potential societal benefits from emerging technologies while mitigating their risks, including artificial intelligence (AI) and the adoption of 5G technologies. In Helsinki, Finland, GNI participated in a conference chaired by the Council of Europe ***"Governing the Game Changer – Impacts of Artificial Intelligence Development on Human rights, Democracy and the Rule of Law,"*** alongside high-level experts from governments and international organizations. GNI also participated in an all-day workshop titled ***"The Future of Human-Centered AI,"*** hosted by the Global Digital Policy Incubator at Stanford University and led by GNI academic member Eileen Donohoe. At that event, GNI moderated the session "Human Rights by Design: Private Sector Responsibilities" with representatives from Article One Advisors, Facebook, Google, Microsoft, and Salesforce. Experts like Microsoft President Brad Smith pointed to the GNI framework as a model for the sector.

At RightsCon 2019, GNI's session ***"Demystifying Direct Access: Demands, Definitions, Data,"*** promoted a common understanding and multistakeholder community of practice around the challenges faced by telecommunications companies when governments seek direct, unmediated access to user data, such that they don't need to make requests to companies operating communications networks.

GNI was also part of the consultations around the OECD's work on ICT-sector specific applications of the OECD Multinational Guidelines for Responsible Business Conduct. During a workshop led by **OECD Working Party on Responsible Business Conduct** held in Paris, GNI walked through current challenges for freedom of expression and privacy in the ICT sector and shared GNI's model for multistakeholder collaboration to address these challenges.

BRINGING TOGETHER LOCAL CORPORATE AND CIVIL SOCIETY ACTORS

GNI connected diverse groups of local stakeholders to foster long-term multistakeholder collaboration in support of laws and policies that protect and promote freedom of expression and privacy rights.

During the Digital Rights and Inclusion Forum in 2019, hosted by GNI member Paradigm Initiative in Lagos, Nigeria, GNI facilitated a policy advocacy consultation with local stakeholders to connect companies and civil society groups to identify pressing freedom of expression and privacy issues in the region.

Alongside the Forum on Internet Freedom in Africa, in Addis Ababa, Ethiopia, GNI led a roundtable discussion, ***"Cross-Sector Collaboration for Digital Rights in Africa,"*** where participants shared updates and insights into pressing policy issues and advocacy strategies on surveillance and network disruptions. Participants walked through tangible, collaborative steps ICT company and civil society actors can take to achieve shared policy goals in these areas.

At RightsCon, GNI held a consultation with stakeholders from Africa, including academics, civil society, ICT companies, and intergovernmental organizations, where participants shared additional insight into Internet freedom-related policy priorities and strategies in the region.

In La Paz, Bolivia, GNI gathered representatives from ICT companies, academia, and civil society organizations in Latin America on occasion of the Latin America and the Caribbean Internet Governance Forum (LACIGF) to discuss digital rights-related policy issues including surveillance, data retention, and the criminalization of speech, and identify possible collaboration between local civil society and company actors on these issues.

GNI co-hosted with 2019 GNI-Internews Fellow Software Freedom Law Centre India, a policy partnership roundtable convening for local Internet platforms, telecommunications companies, civil society groups, and academics, among others to discuss

the landscape of **data protection, intermediary liability, and network disruptions in India**, and considered strategies for continued collaboration, contributing learnings and insights from ten years of multistakeholder engagement in India.

In Washington, D.C., GNI organized a consultation, attended by several GNI's non-company membership and other partners, with the Independent National Security Legislation Monitor (INSLM) of the Australian government to review the **Telecommunication and Other Legislation Amendment (Assistance and Access) (TOLA) Act in 2018**. GNI issued a follow-up letter to the INLSM, expressing gratitude for the opportunity to provide input, while encouraging further consultations and innovative, fit for purpose, human rights-oriented oversight mechanisms that ensure maximum transparency and accountability.

CALLING ATTENTION TO GOVERNMENT PRESSURES AND RESTRICTIONS ON ICT USERS' FREEDOM OF EXPRESSION AND PRIVACY

POLICY ADVOCACY EFFORTS IN THE GLOBAL SOUTH

Informed by consultations on the ground and collaboration with the GNI-Internews Fellows, GNI started to identify regional policy plans that reflect instances where GNI's issue areas could benefit most from coordinated multistakeholder advocacy in Africa, Latin America, and South Asia. Looking ahead to 2020, GNI hopes to utilize the trust built between local companies and civil society organizations and increase understanding of region-specific challenges in order to implement more tailored research and advocacy activities.

Some examples of GNI's policy advocacy efforts in Africa, Latin America, and South Asia include:

- A statement reflecting concerns about draft intermediary guidelines in India, which could place significant pressure on a wide range of ICT companies to monitor Indian users' activities, remove content, and hand over data in ways that could unnecessarily and inappropriately impact users' freedom of expression and privacy (see in: Ensuring Regulations on Problematic Content Online Respect ICT Users' Rights).
- A statement expressing deep alarm about the Internet shutdown in Sudan, amplifying what a number of members had said publicly about the serious human rights consequences of actions by the Sudanese Transitional Military Council (TMC) — including violations of freedom of expression, and calling for the authorities to restore network connectivity throughout the country.
- A letter to the Honorable Minister Federal Ministry of Communications and Digital Economy Dr. Isa Ali Pantami in Nigeria; recognizing the country's vision for a digital economy while calling on the minister to support advocacy toward passing the long-delayed Digital Rights and Freedom Bill. As Paradigm Initiative Executive Director 'Gbenga Sesan and GNI Independent Board Chair Mark Stephens, CBE wrote in a 2018 op-ed, the bill offers an opportunity for the country to take a leadership role in rights-respecting digital development in the region.
- A statement on ongoing network disruptions across India, including in New Delhi, amid mass protests. GNI urged the government to consider its international commitments to freedom of expression and privacy, and the risks disruptions pose for public safety, health and emergency services, the economy, and the news media. The ongoing restrictions in the Jammu and Kashmir region are some of the longest-running service disruptions ever recorded.
- GNI continued to point to the potential consequences of government-ordered network disruptions, as outlined in our one-page guide for policymakers that is available in 12 languages. In addition to the statements above, GNI called attention to network disruptions in Ecuador, Ethiopia, Iran, Myanmar, and Venezuela, and continued to engage with other digital rights advocates on these harms:

  TWITTER: From violating ***#humanrights*** to harming tourism, while hurting local businesses, the impacts of ***#Shutdowns*** are wide and alarming. Find out more about what the consequences of ***#ShutdownZimbabwe*** could be via ***@theGNI: https://globalnetworkinitiative.org/wp-content/uploads/2018/04/Impacts-Disruptions-EN.pdf…#KeepItOn***

ENSURING REGULATIONS ON PROBLEMATIC CONTENT ONLINE RESPECT ICT USERS' RIGHTS

Numerous government initiatives emerged looking to regulate online speech, and in some cases, placing penalties on ICT companies for hosting or transmitting certain types of speech. While GNI acknowledges the legitimate concerns over the proliferation of problematic content like hate speech, extremist content, or disinformation, some elements of these proposals pose risks for digital rights. To this end, GNI made public comment on or engaged directly with policymakers on laws or proposals in Australia, the European Union, India, and the United Kingdom.

While not uniformly reflected in each proposal, some of the freedom of expression and privacy challenges identified included:

- Broad and vague definitions of forms of content that are eligible for removal orders;
- Requiring intermediaries, rather than judicial bodies, to determine the legality of content, sometimes under rapid or arbitrary timelines and with threats of significant legal penalties for noncompliance;
- Holding online intermediaries legally liable for content that is not prohibited by domestic law;
- Mandating automated filtering and/or other forms of proactive monitoring of content; and
- In some cases, rushed or atypical processes for enacting content regulation, leading to GNI calls for further public consultation or input. GNI Learning and Policy Director David Sullivan flagged some of the challenges in rushed proposals for legislation in response to terrorist aPacks in an article for Just Security.

Examples of GNI policy activities on these regulatory proposals include:

- Meetings with the offices of Members of the European Parliament regarding the negotiations of the proposed regulation for preventing the dissemination of terrorist content online in Europe;
- Meetings between the GNI-Internews Fellows and the U.K. Department of Culture, Media, and Sport on the global implications of the regulatory approach outlined in the U.K. Online Harms White Paper; as well as a subsequent confidential roundtable on the White Paper with industry, government, and local experts in London co-organized with the Oxford Internet Institute; and
- Research highlighting the human rights risks — including for due process, transparency, and remedy — of using formalized structures to administer government referrals of alleged extremist content for removal, rather than legal orders. This work examined so-called "Internet referral units" in Europe and considered provisions on referrals in the draft EU regulation on terrorist content online.

Keeping GNI's policy positions at the forefront of these regulatory debates is critical for improving protections for freedom of expression and privacy. In India, the GNI submission on draft amendments to the intermediary guidelines was referenced in an article published in India's MediaNama, pointing to concerns about vague definitions, both of the authorities able to administer removal orders and requests for user data and the forms of content covered under the regulation. GNI's concerns about the risks of mandated automated content filtering in the proposal were highlighted in an article by the Indian Tech Newsite Techcircle.

In April, amendments made by the European Parliament Committee on Civil Liberties, Justice and Home Affairs (LIBE) in its report on the proposed EU terrorist content regulation improved upon a number of issues GNI and others had highlighted as problematic. First, the draft removed provisions encouraging vaguely described "competent authorities" from member states to issue referrals for content removal under companies' terms and conditions and clarified that removal orders from member states come from a single, judicial or functionally independent administrative or law enforcement authority. In addition, the draft removed a number of requirements for companies to undertake so-called "proactive measures" with the possibility of penalty for non-compliance, which could have contributed to over-removal of legitimate, lawful content. Taken as a whole, the draft amendments would provide greater definitional specificity, improve due process-related provisions, and enhance transparency, among other improvements for ICT users' rights. GNI will continue to engage with the EU on responding to online extremism and intermediary liability and content regulation more broadly.

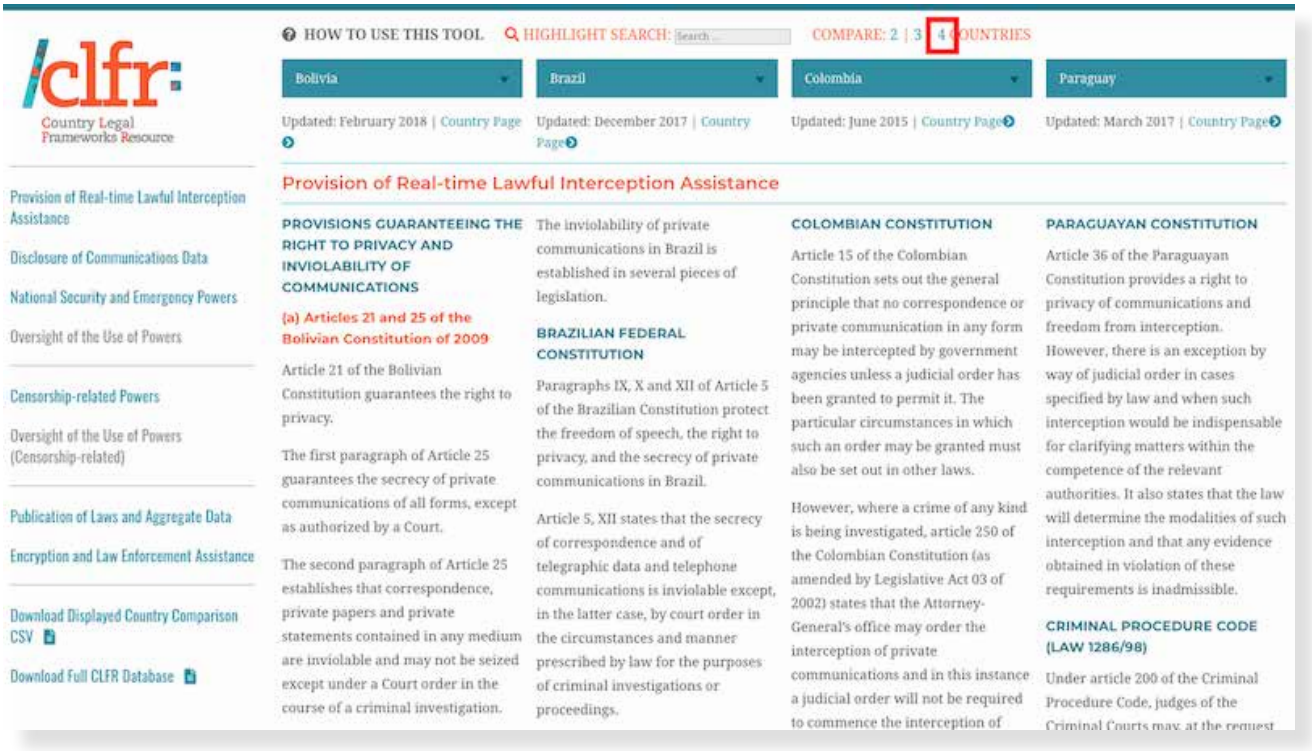
RELAUNCHING THE GNI COUNTRY LEGAL FRAMEWORKS RESOURCE

A TOOL FOR TRANSPARENCY ON GOVERNMENTS' AUTHORITIES TO RESTRICT ICT USERS' COMMUNICATIONS OR ACCESS USERS' DATA

In September, GNI relaunched an enhanced Country Legal Frameworks Resource (CLFR), an online interactive tool that centralizes and facilitates search and comparison across a repository of more than 50 reports on the legal environments in markets where GNI company members have a presence. The new features allow users to compare legal frameworks in two to four countries simultaneously, download the entire database or a comparison of countries, and search within the entire set of reports or a specific comparison.

The CLFR reports incorporate a framework for documenting governments' authorities to restrict ICT users' communications or access user data, organized around a common (although not uniform) set of categories of legal powers:

- Provision of real-time lawful interception assistance,
- Disclosure of communications data,
- National security and emergency powers,
- Censorship-related powers,
- Oversight of access-related powers, and
- Oversight of censorship-related powers.



A COLLABORATIVE INITIATIVE FOR DIGITAL RIGHTS

The CLFR can help digital rights researchers and advocates and ICT companies' users better understand the legal realities companies face in local jurisdictions and elucidate problematic legal and regulatory trends. In 2019, information in the reports supported internal GNI learning and policy conversations, and the CLFR was cited by Access Now as a resource for advocates considering litigation on network disruptions.

> "Tools like the CLFR have been critical as they offer insights into the legal frame_ works, governance principles and operating policies and procedures associated with respond- ing to lawful demands for assistance from law enforcement authorities. Having this information available helps us work with companies and advocates alike to drive further transparency, which is why we are excited to support the next evolution of the CLFR by the GNI."
>
> **LAURA OKKONEN,** VODAFONE GROUP

With global scrutiny on the laws that impact freedom of expression and privacy escalating, revamping the tool also enhances GNI's capacity to contribute to and complement other initiatives. This includes the CYRILLA collaborative, which gathers the work of various partners documenting digital rights-related legal information, organizing and making accessible laws, cases, and analyses from more than 140 countries. In a post for the GNI blog, Nerissa Naidoo of Social Media Exchange (SMEX), a GNI member administering CYRILLA, an open database of digital rights law from around the world, identified the urgent need for collaboration to raise policymaker and public awareness on digital rights-related legal trends. Furthermore, Naidoo pointed to the integration of the CLFR analyses with existing laws, cases, and legislation on the CYRILLA database as a valuable step in the right direction.

The blue areas represent the 54 countries included in the CLFR

ENHANCING LEARNING: FROM ARTIFICIAL INTELLIGENCE TO HUMAN RIGHTS DUE DILIGENCE

The collective experience and capability of its diverse, multistakeholder membership helps GNI respond to emerging issues and exchange best practices on preserving freedom of expression and privacy in the ICT sector. GNI engages in public and private shared learning discussions, often including both member and non-member subject matter experts, covering topics such as the implications of certain emerging technologies or new or particularly rights-risking forms of government pressures. These learning events also enhance members' collaboration on policy advocacy, assessment, and promoting and advancing the GNI framework.

ANNUAL LEARNING FORUM: THE STATE OF DIGITAL RIGHTS DUE DILIGENCE

Each year, GNI hosts an annual learning forum, offering the public and interested stakeholders a window into our shared learning program and an opportunity to interact with members. On 24 October at the Human Rights Campaign Equality Center in Washington, D.C., GNI organized the forum "The State of Digital Rights Due Diligence," reflecting on the first decade of human rights due diligence in the ICT sector. HRDD and human rights impact assessments (HRIAs) were focus areas for the GNI learning agenda throughout the year.

GNI Board Independent Chair Mark Stephens, CBE introduced GNI and the concept of HRDD as part of the corporate responsibility to respect human rights outlined in the UNGPs. The GNI Principles and accompanying Implementation Guidelines provide further guidance on HRDD as applied to freedom of expression and privacy rights in the ICT sector.

Panelists included a diverse and representative set of experts, with multistakeholder perspectives from Colombia, India, Nigeria, Sweden, the U.K., and the U.S., sharing insights on how companies can work with other actors to make sure they effectively anticipate and respond to diverse and constantly changing pressures on digital rights:

- Independent expert Bennett Freeman opened the discussion with a brief history of corporate HRDD and HRIAs, pointing to GNI's foundational conversations that occurred alongside parallel discussions culminating in the UNGPs.

- Michael Samway of Georgetown walked through his experience with the first-ever HRIA in the ICT industry, which led Yahoo to tailor its service offerings in Vietnam.
- Nicole Karlebach of Verizon Media demonstrated how the Business and Human Rights Program at Verizon embeds HRDD into broader company practices, including by establishing partnerships with personnel in key executive functions.
- Carolina Botero of Fundación Karisma emphasized how implementing the Who Has Your Back project, ranking Internet service providers in Colombia annually on their human rights commitments, helped build bridges for engagement and collective advocacy down the line.
- Laura Okkonen of Vodafone Group highlighted how sector-wide collaboration — first through the Telecommunications Industry Dialogue, and later through GNI membership, was critical to refining and implementing HRDD good practices.
- Nathalie Maréchal of Ranking Digital Rights pointed to new indicators on the index covering publicly available policies and practices on targeted advertising and algorithmic decision making.
- 'Gbenga Sesan of Paradigm Initiative encouraged companies to "go beyond the minimum" of meeting local law requirements and endeavor to apply the same standard in both rights-respecting and more difficult markets for users' rights.
- Chinmayi Arun of Yale Law School reflected on lessons learned from her work on hate speech in Asia, calling for better consultation with diverse, local perspectives while acknowledging the challenges of scaling effective solutions.
- Dunstan Allison-Hope of Business for Social Responsibility (BSR) outlined the importance of both corporate system-wide and ICT sector-wide approaches to HRDD and HRIA and emphasized the uniquely challenging nature of HRDD in the sector given the rapid pace of technological change.
- Théo Jaekel of Ericsson walked through the companies' sensitive business process, which helps the company consider the full range of possible impacts of major sales and end use.

> "The whole concept of doing human rights impact assessments is fundamental to then really understanding how your technology is being created and how it's being deployed. I think some of the early work was really led by the human rights community, by the civil society organizations. A lot of it came together in the Global Network Initiative, GNI. When you look at other companies that have been involved in GNI from the early days, including companies like Google and Facebook, people are working through these [issues]. These are not easy things, and I think we are going to need more companies to do this."
>
> **MICROSOFT PRESIDENT BRAD SMITH,** SPEAKING AT THE "THE FUTURE OF HUMAN-CENTERED AI," EVENT AT STANFORD UNIVERSITY

The day's discussion, including live and remote participation, helped identify lessons learned for each step of effective HRDD — identifying human rights risks, integrating findings, tracking effectiveness, and communicating results publicly. (Read more in the event report).

MEMBERS GRAPPLE WITH CONTEMPORARY DIGITAL RIGHTS CHALLENGES, INCLUDING THE IMPACTS OF EMERGING TECHNOLOGIES

Trust is a critical element of GNI's multistakeholder collaboration, offering a uniquely safe space for members to share varied insights on timely and sometimes-sensitive issues. The learning agenda is set by the GNI Learning Committee (See Governance TK), and it covers topics referred by members or the board. In 2019, GNI held a series of Chatham House sessions with members and other experts to take forward GNI's work on new or emerging issues:

- **Artificial Intelligence and Freedom Expression and Privacy Rights**
  This session featured a deep dive on the human rights implications of AI technology, covering both the positives and

potential outcomes and the role various normative frameworks and governance mechanisms, including human rights law can and should play in maximizing the positive benefits of AI. The co-authors of the Berkman Klein Center report: "Artificial Intelligence and Human Rights: Opportunities and Risks," also presented their results.

- **Government Access to User Data via Third Parties**
  In recent years, some government authorities have moved beyond conventional means to access information held by ICT companies, such as requests, demands, or surveillance activities and are interested in obtaining this data indirectly via third parties. This session introduced a human rights lens by GNI academic members, and featured presentations from the Center for Democracy and Technology, UConn Human Rights Institute, Oxford Internet institute, University of Virginia School of Law, and the University of Amsterdam.

- **Government use of Facial Recognition Technology: How to Ensure that Democratic Governments take the lead and Regulate Responsibly?**
  This learning session, held alongside GNI's Annual Meeting of Members, featured a presentation on the first-ever global index on artificial intelligence-enabled surveillance, compiled by the Carnegie Endowment for International Peace, followed by perspectives from Microsoft on governing the use of facial recognition technology. Informed by these presentations, meeting participants considered the application of the GNI framework to facial recognition technology.

BUILDING BRIDGES THROUGH SHARED LEARNING WITH EXTERNAL EXPERTS AND INTERESTED STAKEHOLDERS

In addition to the annual learning forum, GNI's shared learning activities contributed to notable initiatives and conversations on ICT laws and policies and Internet governance:

- **Reflecting on Facebook's Proposed Oversight Board for Content Decisions, London**

  Soon after publishing a draft charter and as part of ongoing consultations, Facebook gathered members' input on its proposed independent body for users to appeal content decisions.

- **The Human Rights Impacts of 5G Technologies, Tunis and Lagos**

  "Millimeter waves, small cells, beamforming, oh my! Anticipating and addressing human rights impacts in a 5G environment," at RightsCon in Tunis, Tunisia and "How 5G 5th generation mobile network will affect human rights in Africa" at the FIFAfrica in Lagos, Nigeria, offered members' perspectives and opportunities to engage with experts on the **risks and opportunities for freedom of expression and privacy emerging from increasing adoption of 5G technologies**. These interventions built on a session GNI first organized at the FOC Conference in November 2018.

EXCHANGING BUSINESS AND HUMAN RIGHTS PERSPECTIVES WITH MULTILATERAL ORGANIZATIONS

GNI's June board meeting was hosted by UNESCO in Paris, where Assistant Director General for Information & Communication Moez Chakchouk updated GNI members on UNESCO's Internet Universality ROAM-X Indicators. This framework integrates rights, openness, access to all, multistakeholder participation, and cross-cutting issues to assess the development of the Internet in different countries. In addition, GNI members met with representatives from the OECD — discussing the application of the OECD Due Diligence Guidance for Responsible Business Conduct to communications technologies specifically.

GNI engagement on HRDD and HRIAs included participation in an in-person consultation in Tunis and input virtually on the UN Human Rights Business and Human Rights in Technology ("B-Tech") project, particularly HRDD on product end uses, as well as participation in an expert workshop led by the Danish Institute of Human Rights coinciding with the release of a Handbook on Human Rights Impact Assessments. Collaboration with members and experts on good practices for digital rights due diligence will continue to be a core focus for GNI's learning agenda in 2020.

WORKSHOPS FOR CIVIL SOCIETY AND SMALL AND MEDIUM-SIZED ENTERPRISES

Over the summer GNI staff supported GNI member GPD with training workshops for CSOs and SMEs in Mexico City and Nairobi. In each workshop, GNI presented insights into why businesses should respect human rights and used the GNI Principles and Implementation Guidelines as an example of a useful guiding framework. In addition, GNI prepared a guide for workshop participants that explains, in accessible language, how GNI can help SMEs respect freedom of expression and privacy.

Alongside GPD and Bloggers Association of Kenya, GNI articulated the value of multistakeholder collaboration on freedom of expression and privacy and explained why companies would seek to collaborate with civil society and vice versa.

In Mexico, GNI staff joined GPD and R3D to facilitate the workshop "Promoting Business and Human Rights in the Tech Sector to Advance Internet Freedom" for CSOs. GNI offered an introduction to advocacy planning and how to use a strategy advocacy canvas, including an exercise to develop SMART objectives; an overview of commercial, legal, strategic and leadership incentives for SMEs to engage with CSOs and vice versa; and a presentation about GNI and the GNI Principles.

In both Kenya and Mexico, GNI staff held parallel meetings to meet potential fellows and build relationships that will enhance future policy advocacy in each region. Further, GNI used these opportunities to increase the understanding of the policy environments of each region, which will inform existing policy advocacy strategies and future policy consultation roundtables.

GOVERNANCE

The GNI Board is composed of up to ten representatives from companies, up to five from civil society organizations, up to two from the academic constituency, up to two from the investor constituency, and an independent chair. There is one additional seat for an academic or investor representative, alternating between the two constituencies every 18 months. Each board member also designates an alternate board member from within its organization or constituency. In 2019, the following members served on the GNI Board of Directors:

INDEPENDENT CHAIR

MARK STEPHENS, CBE

ICT COMPANIES

MIRANDA SISSONS, *Facebook* [1]
LEWIS SEGALL, *Google*
STEVE CROWN, *Microsoft/LinkedIn*
FIONA CURA-PITRE, *Nokia* [2]
YVES NISSIM, *Orange*
ANITA HOUSEHAM, *Telenor Group* [3]
PATRIK HISELIUS, *Telia Company*
NICOLE KARLEBACH, *Verizon Media*
LAURA OKKONEN, *Vodafone Group*

CIVIL SOCIETY ORGANIZATIONS

GREG NOJEIM, *Center for Democracy and Technology*
ROBERT MAHONEY, *Committee to Protect Journalists*
CHARLES BRADLEY, *Global Partners Digital* [4]
JULIE OWONO, *Internet sans Frontières* [5]
KAT DUFFY, *Internews*

ACADEMICS AND ACADEMIC ORGANIZATIONS

JESSICA FJELD, *Berkman Klein Center for Internet and Society at Harvard University*
MEG ROGGENSACK, *Georgetown University Law Center (Independent)*
K.S. PARK, *Korea University Law School (Independent)*

INVESTORS

ADAM KANZER, *BNP Paribas Asset Management*
BENNETT FREEMAN, *EIRIS Conflict Risk Network*

In 2019, the following members served as alternates in the board:

ICT COMPANY ALTERNATES

MOIRA OLIVER, *BT Group*
THÉO JAEKEL, *Ericsson* [6]
ALEX WAROFKA, *Facebook*
ALEXANDRIA WALDEN, *Google*
BERNARD SHEN, *Microsoft/LinkedIn*
SILVIA GARRIGO, *Millicom*
CHRISTOPH STECK, *Telefónica*
SARAH ALTSCHULLER, *Verizon Media* [7]
DOROTHEE D'HERDE, *Vodafone Group* [8]

CIVIL SOCIETY ORGANIZATION ALTERNATES

EMMA LLANSÓ, *Center for Democracy and Technology*
ELONNAI HICKOK, *Centre for Internet and Society*
USAMA KHILJI, *Bolo Bhi*
ARVIND GANESAN, *Human Rights Watch*
ANDREAS REVENTLOW, *International Media Support*

ACADEMIC ALTERNATES

CHINMAYI ARUN, *(Independent)*
AGUSTINA DEL CAMPO, *Centro de Estudios en Libertad de Expresión*
MOLLY LAND, *Human Rights Institute at the University of Connecticut*

INVESTOR ALTERNATE

LAUREN COMPERE, *Boston Common Asset Management*

1 Miranda Sissons replaced Andrew O'Connell from Facebook in October 2019.
2 Fiona Cura-Pitre replaced Oezlem Decker from Nokia in April 2019.
3 Anita Househam replaced Sidsela Nyebak from Telenor in February 2019.
4 Charles Bradley replaced Jodie Ginsberg from Index on Censorship in May 2019.
5 Julie Owono replaced Cynthia Wong from Human Rights Watch in May 2019.
6 Théo Jaekel joined in October 2019 replacing Phillip Malloch from Telia Company.
7 Sarah Altschuller joined the board as an alternate in December 2019.
8 Dorothee D'Herde joined the board as an alternate in December 2019.

COMMITTEES' CO-CHAIRS, AND SPECIAL REPRESENTATIVES

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

COMMITTEE	COMPANY CO-CHAIRS	NON-COMPANY CO-CHAIRS	SPECIAL REPRESENTATIVES
ACCOUNTABILITY	Laura Okkonen *Vodafone Group*	Meg Roggensack *Georgetown University Law Center, Academic*	Greg Nojeim *Center for Democracy and Technology, NGO* Adam Kanzer *BNP Paribas Asset Management, Investor*
MEMBERSHIP	Moira Oliver *British Telecom*	Usama Khilji *Bolo Bhi, NGO*	Molly Land *Human Rights Institute at the University of Connecticut, Academic*
DEVELOPMENT	vacant	Kat Duffy *Internews, NGO*	Bennett Freeman *EIRIS, Conflict Risk Network, Investor* Elonnai Hickok *Centre for Internet & Society, NGO*
POLICY	Alex Walden *Google*	Jessica Dheere *SMEX, NGO*	Agustina Del Campo *CELE, Academic* Jonas Kron *Trillium Asset Management, Investor*
LEARNING	Silvia Garrigo *Millicom*	Caroline Kaeb *The Wharton School, Academic*	Alp Toker *NetBlocks, NGO*

WORKING GROUPS

In 2019, the following working groups were active in GNI:

1. The China and other Difficult Jurisdictions Working Group is tasked with discussing the application of the GNI Principles in difficult jurisdictions, with a focus on China.
2. The Company Membership Expansion Working Group develops strategies to explore how GNI can attract and accommodate smaller or regional new members to GNI's company constituency.
3. The Intermediary Liability Working Group is responsible for examining content regulation initiatives and developing recommendations to help GNI engage more proactively and effectively in the ever-expanding range of such efforts.

STAFF

Judith Lichtenberg

David Sullivan

Jason Pielemeier

Rocío Campos

Nikki Bourassa

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 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 develops and implements 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 manages 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 Google Policy Fellow Nakul Nayak who conducted research on GNI's policy including on the Court of Justice of the European Union decisions and on network disruptions in India and provided logistical support during our annual forum; and Georgetown University Master of Science in Foreign Service Fellow Thamesha Tennakoon who conducted research on human rights due diligence and supported our learning, membership, and communications work.

Chris Sheehy

Nakul Nayak

Thamesha Tennakoon

FINANCIALS

REVENUE, GAINS & OTHER SUPPORT

Interest Income	$836
Contributions & Grants	$657.394
Membership Income	$868,987
Gain on Disposition of Fixed Assets	$0

TOTAL PUBLIC SUPPORT & REVENUE
$1,527,217

Excess of Income over Expenses	$284,346
Net Assets Beginning	$552,365
Net Assets Ending	$836,711

EXPENSES

Salary & Benefits	$768,127
Travel & Meetings	$132,394
Total Accounting & Administrative Support	$91,100
Consulting & Other Professional Fees	$197,878
Total Office Support & Rent	$33,080
Total Office Supplies & Miscellaneous	$20,292

TOTAL EXPENSES
$1,242,871

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LEGAL

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We greatly appreciate the support received from the Center for Democracy and Technology for hosting our assessment review meeting in November and particularly to Michael Grimes for providing technical assistance.

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.

PHOTOS CREDITS

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