



GLOBAL  
NETWORK  
INITIATIVE

# NAVIGATING A SHIFTING DIGITAL LANDSCAPE

GNI ANNUAL REPORT 2022





# TABLE OF CONTENTS

<b>OPENING LETTER</b>	<b>3</b>
<b>SPECIAL FEATURE: INTERVIEW WITH JASON PIELEMEIER</b>	<b>5</b>
<b>2022 IN NUMBERS</b>	<b>7</b>
<b>MEMBERS &amp; FELLOWS</b>	<b>8</b>
GNI's Growth by Constituency	8
Members by Region	8
Summary of New Members	8
Emerging Voices Fellowship Program	10
Grants	10
<b>EVOLVING AND HOLDING COMPANIES ACCOUNTABLE</b>	<b>11</b>
Strategic Review	11
GNI Assessment and PAR	11
<b>POLICY ADVOCACY TO ADVANCE HUMAN RIGHTS</b>	<b>13</b>
Issues in Focus	13
<b>GNI IN NEWS</b>	<b>15</b>
<b>LEARNING AT A GLANCE</b>	<b>16</b>
12 Learning Calls	16
Annual Learning Forum	17
<b>GOVERNANCE</b>	<b>18</b>
The GNI Board	18
GNI Board Alternates	19
Committees and Working Groups	19
GNI Staff	20
<b>2022 FINANCIALS</b>	<b>21</b>
Revenue, Gains and Other Support	21
Expenses	21
<b>ACKNOWLEDGEMENTS</b>	<b>22</b>



# OPENING LETTER

Dear Friends,

2022 was a year of opportunities that we couldn't have anticipated emerging from the perils of the COVID-19 pandemic. After more than two years, the mere ability to host in-person board meetings and events such as the GNI Annual Learning Forum in Washington DC served as an important morale boost.

At the same time, the post-Covid period revealed gaps in efforts to safeguard freedom of expression and internet privacy through a magnified lens. Geopolitical developments around the world drew further attention to the role of the Information and Communication Technology (ICT) sector during inter-state armed conflict, as well as new pressures to restrict access to content and services, including across borders. This shift in regulatory environment involving significant regulatory activity vis-à-vis the societal impacts of ICTs prompted a year of deep introspection on the relevance and growing significance of the GNI framework.



This shift in regulatory environment involving significant regulatory activity vis-à-vis the societal impacts of ICTs prompted a year of deep introspection on the relevance and growing significance of the GNI framework.

Thanks to our growing membership, we reaffirmed our commitment to fostering dialogue aimed at addressing these challenges. Informed by globally diverse perspectives and human rights principles at the center of our collective efforts, GNI took some important steps to support its unique position in the ICT sector. These include:

- > A strategic review, facilitated by an expert external consultant, on GNI's growth, scope and structure, to help maximize our unique added value in the evolving global landscape. Guided by membership-wide surveys, interviews and focus groups, we arrived at nineteen approved recommendations on scope and growth.
- > The fourth cycle of GNI's public [assessment](#) process included eleven GNI company members who underwent a review of their independent assessments from the GNI Board. The assessments act not only as a mechanism for review and consideration of company policies and practices to uphold the GNI Principles but as a shared learning opportunity for GNI members. GNI will be releasing a public assessment report later in 2023.
- > With the help of our members, we worked on thirteen letters, statements, submissions, presentations and resources focusing on our four [policy priorities](#). These include Network Disruptions, Intermediary Liability and Content Regulation, Privacy and Surveillance, and Jurisdictional Assertions & Limits. Our resources highlight emerging threats to privacy and freedom of expression as states develop new ways to access and regulate online user-generated content.

An important contribution this year has been toward the Russia-Ukraine War. The conflict added new urgency to a set of considerations and challenges related to the applicability of the GNI framework in the context of international armed conflict where the Law of Armed Conflict (LOAC) applies. GNI issued a [statement](#) to the Council of the European Union about the plausible impacts of the EU's sanctions on Russian broadcasters and made a [submission](#) that informed the report of the United Nations Special Rapporteur on the challenges to freedom of expression that arise during armed conflicts.

GNI also attended several international events and convenings as an opportunity to collectively address threats to freedom of expression and privacy rights in the ICT sector. Led by Jason and Elonnai, the GNI team organized workshops and sessions on human rights due diligence, digital rights during conflicts, and meaningful transparency at the Freedom Online Coalition (FOC), Digital Rights and Inclusion Forum, Internet Governance Forum, and the U.S. government-led Summit for Democracy, among others. We also remain closely involved with the Council of Europe's [digital partnership](#), the Global Internet Forum to Counter Terrorism, the United Nations, the OECD Project on Voluntary Transparency Reporting for Terrorist and Violent Extremist Content, and Technology for Development.

GNI was excited to see our membership continue to grow in numbers and diversity. In pursuit of our mission to promote collaboration across constituencies, this year GNI welcomed thirteen new members and fellows from Brazil, Malawi, Indonesia, Palestine, Argentina, South Africa, Canada, and the USA.

In 2022, GNI also went through several staff transitions. After eight years of exceptional leadership and immense dedication to GNI, Judith Lichtenberg stepped down as Executive Director of the organization in May. The Board appointed as ED Jason Pielemeier, who has already translated his long experience with GNI and the broader internet governance sector into extraordinary leadership. We were also joined by Elonnai Hickok, a well-known and accomplished leader in the tech and human rights space, as GNI's first Managing Director. During this vital period, we're delighted to have Jason and Elonnai mobilize another year of multistakeholder collaboration, membership growth, and policy advocacy. Chris Sheehy, Idan ben Yakir, and Montserrat Legorreta, joined in 2022 by Ramsha Jahangir, have played deeply important roles in advancing GNI's policy, learning, and assessment objectives, rounding out a small but mighty staff.

With all that, we also know that GNI does not function without the commitment of its members, many of whom devote hours 'beyond the call of duty' as participants, advocates, thinkers, and leaders within and on behalf of GNI.

To conclude, we are very grateful to our donors, members, board, and growing staff for their indispensable contributions and unwavering commitment to our mission and for making 2022 another year of continued resilience.



*David Kaye*

**David Kaye**  
Independent Chair



*Agustina Del Campo*

**Agustina Del Campo**  
Vice Chair



# SPECIAL FEATURE: INTERVIEW WITH JASON PIELEMEIER

*In May 2022, the GNI Board unanimously appointed Jason Pielemeier, who previously served as GNI's Deputy Director and Policy Director, as its new Executive Director.*

*Jason became Executive Director at an exciting moment for the organization and will work to further grow and strengthen GNI, while enhancing its impact. This year, GNI conducted its fourth and largest assessment cycle, concluded a strategic review, and continues to welcome new members across all of its constituencies.*



## How has GNI evolved since you first joined in 2017?

The biggest change in GNI over the last six years has been its significant growth in membership. When I joined the organization in 2017, we were working alongside roughly three dozen members. While we had just welcomed a large number of telecom and equipment companies and initiated the first cohort of our pilot fellowship program with Majority World NGOs, the vast majority of our members were still based in North America and Europe.

Since then, our membership has increased almost threefold and currently comprises companies, organizations, and individuals representing a broad range of services and perspectives from every region of the world. While much of this growth has occurred in our NGO constituency, we have also added important, non-Western companies like Frontiir, Line Corporation, and MTN. This has expanded our understanding of, sensitivity to, and impact on regional and local levels. GNI has slowly but surely been able to actualize the “global” in our name, and this has been tremendously exciting to be part of.

Of course, growth can also create challenges - “growing pains,” as it were. Fortunately, our Board and my predecessor, Judith Lichtenberg, were wise to this and established a comprehensive Strategic Review process in 2021, which has helped us take stock of how we can evolve to better accommodate our growing membership and address the changing freedom of expression and privacy challenges of the digital age. This includes being more creative and deliberate about GNI's focus and working methods, improving our efforts around membership engagement and inclusion, and proactively seeking to contribute to emerging regulatory frameworks that encourage responsible business conduct. It will also entail expanding our staff to acquire relevant expertise and build a truly international team capable of meeting our members where they are increasingly located.

## GNI is in its second decade now. What are key lessons learned and how can that knowledge be translated into global efforts in an ever-changing regulatory environment?

From GNI's inception, until somewhat recently, there was a rough consensus among the broader digital rights community that ICTs were at best rights-enhancing and at worst rights-neutral. This began to change in the mid-2010s as abuses of digital technologies by governments and controversies around company uses of data raised increasing concerns about the “misuse of tech.”

More recently, the COVID-19 pandemic provided a reminder of how useful - indeed critical - ICTs are for those that have the ability to access them, while underscoring remaining connectivity disparities. Over this same period, we also witnessed increasing geopolitical tensions related to the growing influence of China, as well as an uptick in civil and interstate armed conflict.

The net result of these trends for the ICT sector is that we have entered a period of intense regulatory activity with more governments pushing forward efforts to control the deployment, use, and oversight of these technologies. There is no doubt that the most significant legislative development in the sector to date is the European Union's Digital Services Act (DSA), which was introduced in December 2020 and approved in October 2022. The DSA is a pivotal piece of legislation that will have direct impacts on companies doing business in Europe, and presages a broader shift in how digital content is likely to be governed globally. It also represents the most significant regulatory effort that explicitly attempts to regulate the sector in a rights-respecting manner, which is a key reason why GNI has been generally supportive of it and continues to work closely on its ongoing implementation.

In sum, recent events have underscored both the critical role of ICTs and the importance of human rights as a framework for fostering global cooperation and responsible business conduct. As the world's largest and most significant multistakeholder initiative working to foster respect for human rights, GNI is incredibly well positioned to continue shaping both mandatory and voluntary efforts to ensure collective collaboration toward a more rights-respecting ICT sector.

## **In your opinion, what is the role that GNI plays within the broader ecosystem of accountability in the ICT sector as a multistakeholder initiative and how does it complement public regulation?**

Regulatory developments in the European Union and elsewhere are reinforcing and accelerating many of the steps that leading ICT companies have already taken to improve corporate governance. GNI has been actively working to endorse and foster multistakeholder collaboration as a critical means for designing, implementing, and ensuring that this shift from voluntary to mandatory regulation results in a floor of good practice, rather than a ceiling that reduces responsible business conduct to a lowest-common-denominator compliance-focused checklist. We have spent the last fifteen years systematically identifying lessons and generating cross-stakeholder consensus around key good practices that are present in these emerging regulatory approaches, such as transparency reporting, risk assessment and mitigation, auditor accreditation and training, and stakeholder engagement, so we have a lot of experience and insight to share!

The emergence of mandatory risk assessment and due diligence audits and reporting creates the potential for both synergy and overlap with the GNI assessment process. Realizing the implications of this regulatory shift on our work, we are considering potential overlaps and gaps between those obligations and GNI's assessment process. This year, we issued a [request for proposals](#) to research opportunities for synchronizing GNI assessments with mandatory risk assessment/due diligence activities, and we look forward to that research helping inform how we may want to evolve GNI assessment to ensure it continues to add unique value to our members and the general public.

It is an exciting time for GNI; we're growing but also learning and adapting!

# 2022 IN NUMBERS

## GOVERNANCE



20

BOARD  
MEMBERS



19

BOARD  
ALTERNATES



5

COMMITTEES



1

STRATEGIC  
REVIEW

## ACCOUNTABILITY



1

ASSESSMENT CYCLE  
COMPLETED '21/22



11

COMPANIES  
ASSESSED



2

FIRST-TIME  
COMPANIES  
ASSESSED

## COMMUNICATIONS



4

BLOG  
POSTS



12

MEDIA  
FEATURES



8,994

TOTAL FOLLOWERS  
ON TWITTER



1,005

NEW TWITTER  
FOLLOWERS

## POLICY

### 14 POLICY ADVOCACY OUTPUTS



1

POLICY GUIDE



6

SUBMISSIONS TO  
GOVERNMENTS



7

STATEMENTS



1

POLICY  
PRIORITIES  
REVIEW



### 61 POLICY EVENTS

57

EXTERNAL EVENTS  
ATTENDED BY GNI

4

GNI-HOSTED  
PUBLIC EVENTS

## MEMBERSHIP

### 85 MEMBERS



34

CIVIL SOCIETY  
ORGANIZATIONS



21

ACADEMIC  
MEMBERS



19

COMPANY  
MEMBERS



11

INVESTORS

### 13 NEW MEMBERS



5

CIVIL  
SOCIETY  
ORGS



2

ACADEMIC  
MEMBERS



2

COMPANY  
MEMBERS



1

INVESTOR



3

FELLOWS

## LEARNING



12

LEARNING  
CALLS



1

ANNUAL  
LEARNING  
FORUM



3

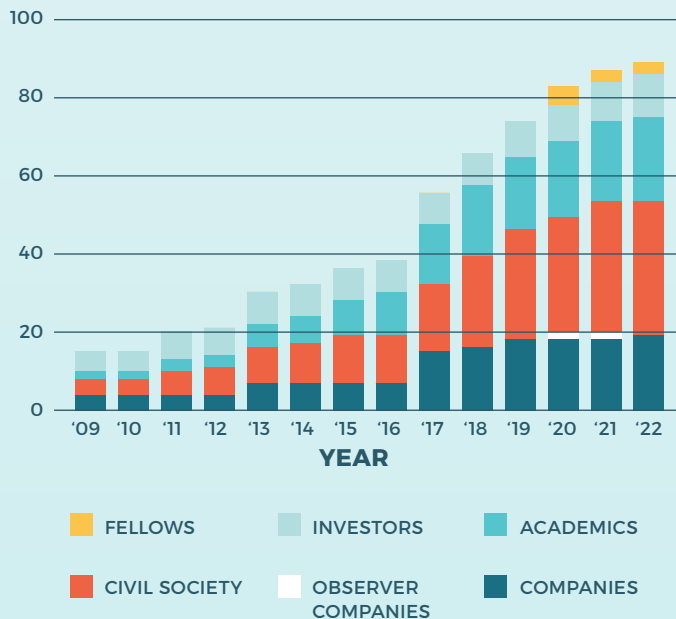
ACTIVE  
WORKING  
GROUPS



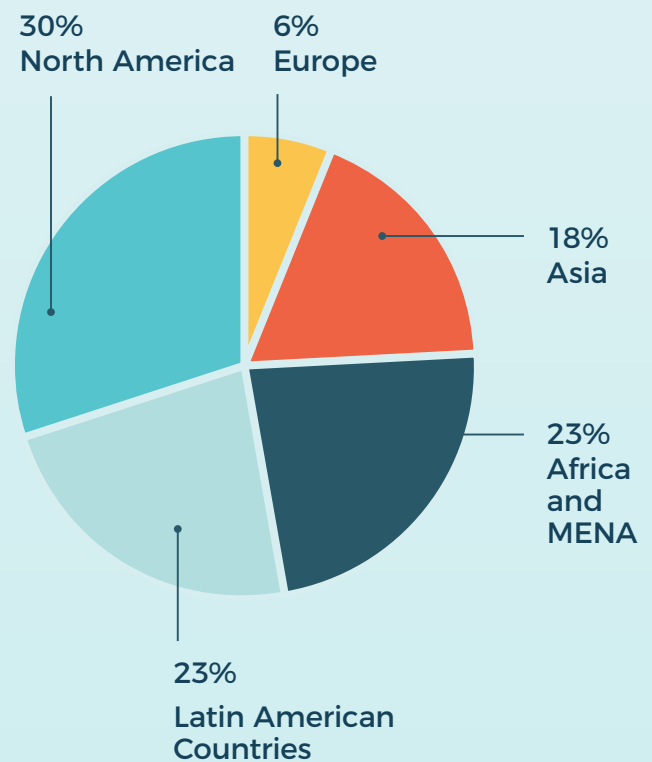
# MEMBERS & FELLOWS

## GNI'S GROWTH BY CONSTITUENCY

includes Fellows & Observers



## MEMBERS BY REGION



## SUMMARY OF NEW MEMBERS

### JOINING THE ACADEMIC CONSTITUENCY



**Eduardo Bertoni** is the Representative of the Regional Office for South America for the Inter-American Institute for Human Rights. He previously served on the GNI Board for several years until 2016.



**ULA Institute for Technology, Law and Policy** is a collaboration between the UCLA School of Law and the UCLA Samueli School of Engineering. It aims to foster research to ensure that new technologies are developed and regulated in socially beneficial and accountable ways.



## JOINING THE CIVIL SOCIETY CONSTITUENCY



**JustPeace Labs** is a California-based organization, founded and led by women, focusing on software development, peacebuilding, and business and human rights.



**Freedom House** is an independent watchdog founded in 1941. It advocates for democracy and people's ability to exercise their fundamental rights through research and direct support to human rights defenders.



**National Democratic Institute** is a non-profit organization operating in more than 150 countries. It promotes accountability in governments by building political and civic organizations, safeguarding elections, and promoting citizen participation.



**Institute for Technology and Society of Rio de Janeiro** supports research and capacity development programs in Latin America and the Global South to advocate freedom of expression, privacy, access to information, and new technologies.



**Zamleh - The Arab Center for the Advancement of Social Media** is a non-profit that supports the capacity building of civil society organizations in digital safety and activism, with a focus on monitoring and documenting digital rights violations carried out against Palestinians.

## JOINING THE COMPANY CONSTITUENCY



**Zoom** is a California-based publicly traded company that became the first to develop, and has since set the standard for, a secure and frictionless video-based communications platform.



**MTN Group** is Africa's largest telecommunication company, headquartered in Johannesburg, South Africa. It serves 272 million users across 19 markets in Africa and the Middle East.

## JOINING THE INVESTOR CONSTITUENCY



**NEI Investments** is a Canadian assets manager with over 35 years of experience in responsible investment. It is supported by a diverse lineup of actively managed RI solutions advised by global investment managers and overseen by NEI's proprietary Investment Management, Asset Allocation, and Environmental, Social, and Governance (ESG) teams.

## EMERGING VOICES FELLOWSHIP PROGRAM

GNI welcomed three fellows through its [Emerging Voices Fellowship](#) program. Fellows included:



Francisco Brito Ruz, the Executive Director of the Brazil-based [InternetLab](#). His research titled “[Leveling the Playing Field: Achieving Fairness and Transparency in Content Moderation on Digital Platforms](#)” explores the practical effects of and presents recommendations on layered moderation systems.



Charles Kajoloweka is the founder and Executive Director of [Youth and Society](#) (YAS) in Malawi. His Policy Brief for the Fellowship observed and evaluated the implications of Malawi’s Electronic Transactions and Cyber Security Act (ETA) on freedom of expression online.



Wahyudi Djafar is a digital policy researcher representing [ELSAM](#) (Institute for Policy Research and Advocacy) in Indonesia. His fellowship research focused on Indonesia's Personal Data Protection Law and the challenges in its implementation.

## GRANTS

In 2022, GNI received support from the U.S. State Department, the Dutch Government, Omidyar Foundation, the Ford Foundation, and Internews (through the USAID-funded GIF project). These grants support work related to diversifying GNI’s membership, supporting Global Majority participation in GNI, building the capacity of CSOs to engage with the tech companies, building Collaborative Policy Coalitions, running the Emerging Fellows program, and leading the [Action Coalition on Meaningful Transparency](#).



# EVOLVING AND HOLDING COMPANIES ACCOUNTABLE

## STRATEGIC REVIEW

Following a series of inclusive and participatory conversations, GNI started a strategic review in 2021 to help the organization determine how it can maximize its unique added value in the evolving global landscape. This was led by external consultant, [Joy Olson](#).

The review process identified GNI's scope, growth and inclusion (DEI), and organizational structure as the main areas to examine. Through membership-wide surveys, one-on-one interviews, focus groups, and attendance during GNI activities, the consultant led discussions to arrive at recommendations shared across Board meetings over 2022. In total, 19 recommendations on scope and growth were approved, while the recommendations made on structure were determined to require additional work. Therefore, the Board approved two follow-on processes to deepen organizational understanding and examination of emerging regulatory developments and internal governance issues. To take forward the former, in Q4 2022, GNI put out a [request for proposals](#) for a "Research Report on Emerging Regulation on Corporate Human Rights Risk Assessment/Due Diligence." On the latter, GNI contracted with former founding GNI Board member, Michael Samway, to facilitate work and develop a report on governance-related issues that impact organizational growth, membership engagement, and DEI.

## GNI ASSESSMENT AND PAR

GNI's company assessment process is centered on a unique, independent review of companies' policies and practices for implementing the GNI Principles and Implementation Guidelines. The methodology detailed in the [GNI Assessment Toolkit](#) ("toolkit") is designed to provide a consistent structure, while allowing flexibility for GNI's diverse member companies, ultimately allowing GNI's multistakeholder Board extensive insights upon which to determine whether each company is implementing the GNI framework in good faith, with improvement over time. Throughout 2022, GNI companies and members participated in the fourth cycle of GNI independent [assessments](#).



"GNI's unique assessment process gives me insights I couldn't get elsewhere on how tech companies are implementing human rights policies and engaging with governments. As an investor, this allows me to better understand the sector and to help shape industry good practice. As a GNI board member, the process gives me confidence that our corporate members are 'walking the talk.'"

Adam Kanzer, Head of Stewardship, Americas,  
BNP Paribas Asset Management

GNI assessments rely heavily on the role played by independent **assessors**, who are accredited by the GNI Board as meeting specific **independence and competency criteria** and must undergo mandatory assessor training. The toolkit provides a structured approach for assessors to undertake a **Process Review**, which examines a company's systems, policies, and procedures to implement the GNI Principles. This is informed by interviews with key personnel and review of company documentation, as well as a set of **case studies** which look at specific cases for each company to demonstrate policies and processes in practice. The reports produced by assessors are ultimately presented to the Board for review to inform the discussion about the companies' approaches to implementation.

Non-company members of the Board play a key role in the process. A working group of GNI members suggests at least two cases per company that must be addressed in assessment reports. After assessors have produced the reports, board members gathered into study groups to review each report in depth, and shared questions for companies and their assessors and identified learning points in advance of each review meeting. Continuous learning and improvement is core to this process; companies must report back on progress in implementing recommendations from previous cycles, and staff and members track key lessons and learning from discussions.

At the conclusion of each cycle, GNI releases the public assessment report, and companies also report independently on the results of their assessment. GNI will be releasing this report later in 2023, which will include a summary of the progress made by GNI and the Board's determination for each company assessed. Among other topics, the report will explore lessons learned, examples of the requests members receive – including publication of select case studies, and key takeaways from review meetings throughout the year. Stay tuned at [globalnetworkinitiative.org/company-assessments](https://globalnetworkinitiative.org/company-assessments).





# POLICY ADVOCACY TO ADVANCE HUMAN RIGHTS

## ISSUES IN FOCUS

GNI is uniquely positioned to convene stakeholders from multiple constituencies to collectively promote the rule of law and human rights. It has responded to and helped companies navigate laws and policies affecting freedom of expression and privacy rights around the world. GNI does this by focusing on four sets of priorities: network disruptions, content regulation, privacy & surveillance, and jurisdictional assertions and limitations.

Throughout 2022, there was a surge in activities by governments and bad-faith actors that caused disruptions of digital services and Internet access, typically during moments of crisis. The consequences stretch beyond stifled speech, to the breakdown of emergency communication lines and the blockade of vital health and payment services. GNI's multi-stakeholder platform has treated **network disruptions** with utmost importance and urgency.

- > In September, GNI joined local and international actors to [condemn the violence and internet restrictions](#) perpetrated by **Iranian** authorities against nationwide protests sparked by the death of Mahsa Amini.
- > Earlier in the year, GNI's membership was also engaged in the deliberations for the [UN Report on Internet Shutdowns and Human Rights](#), accurately anticipating the application of network disruptions to suppress dissent and cover up human rights violations.
- > GNI welcomed in April the global partnership on the [Declaration on the Future of the Internet](#) promoting government accountability and collaboration in the “multistakeholder system of Internet governance”.
- > The [Freedom Online Coalition's Task Force on Internet Shutdowns](#) (FOC-TFIS) which GNI co-chairs, completed its inaugural year and was renewed for continued work in 2023. Through its work on TFIS, GNI helps improve information sharing among stakeholders regarding internet shutdowns, and contributed to the [UN Human Rights report on Internet Shutdowns](#)

In October 2020, GNI published its [Content Regulation and Human Rights Policy Brief](#) which uses a human rights lens to analyze over 20 government regulations claimed to address digital harm. Informed by multi-stakeholder consultations and expert opinion, GNI has applied this document to understand and provide recommendations on laws and policies to maximize digital rights protection, primarily on regulating digital content and conduct:

- > GNI issued a [statement](#) in April on **Kazakhstan's** draft amendments to the Law of Informatization. It proposed overbroad categories of online platforms to remove or limit access to a disproportionate amount of information as a way to address the cyberbullying of children.

- > GNI, having closely followed regulatory developments in **Pakistan's** ICT sector for several years, expressed **deep concerns** on the legalization under the Prevention of Electronic Crimes Act (PECA), without democratic consultation, of arbitrary charges against any speech deemed defamatory to the government.
- > GNI membership provided important **feedback** to the industry codes of **Australia's** Online Safety Act for improving transparency and people's right to an effective remedy, against the concentration of power and overly broad application of the Bill.
- > GNI engaged with the Office of the High Commissioner for Human Rights (OHCHR) on the **challenges** to freedom of expression during armed conflicts and the **practical application** of the UN Guiding Principles on Business and Human Rights to ICT Companies.

A major part of the world witnessed rising challenges posed by state **surveillance**, including government demands for users' data that infringe on privacy.

- > GNI released a **statement** calling for the withdrawal of **Myanmar's** Cybersecurity Law, analyzing how the law's vague prohibitions, combined with mandatory data localization would criminalize and severely curtail free speech.
- > Similarly in **Bangladesh**, GNI **issued** a letter to the Telecommunication Regulatory Commission (BTRC) highlighting a series of concerns on a draft regulation's traceability requirements, excessive punitive requirements, and overbroad obligations for ICT companies to comply with state orders.

GNI also works towards promoting and protecting freedom of expression and privacy through participation in multistakeholder initiatives. This includes the Christchurch Call Advisory Network, the Freedom Online Coalition Advisory Network, Internet & Jurisdiction Policy Network, and the GIFCT Transparency Working Group.

## JURISDICTIONAL ASSERTIONS: RUSSIA IN FOCUS

In March 2022, GNI joined the broader global community in **expressing** its shock and opprobrium at the full-scale Russian invasion of Ukraine. Reiterating its commitment to the **GNI Principles on Freedom of Expression and Privacy**, GNI also issued a **statement** to the Council of the European Union outlining its concerns about the impacts of the EU's sanctions on Russian broadcasters. While recognizing legitimate concerns around Russian disinformation related to the war in Ukraine, as well as the EU's right to respond, GNI raised concerns about the potentially disproportionate nature of these sanctions and the danger that they could be invoked as justification for broader limitations on freedom of expression around the world.



## GNI IN NEWS

As an indicator of GNI's increased visibility in 2022, our work received widespread attention and became featured in media outlets from around the world. These include [\*The Print, Market Screener\*](#), [\*The Daily Star\*](#), [\*China IT News\*](#), [\*Fierce Wireless\*](#), [\*PC Mag\*](#), [\*Verdict\*](#), [\*Wired\*](#), [\*Telecompaper\*](#), [\*ITWeb\*](#), and [\*MediaNama\*](#). GNI Executive Director Jason Pielemeier also [co-authored a piece](#) analysing a report by the U.S.-based Council on Foreign Relations (CFR) and arguing against a proposed shift in American internet policy away from its vision for a “global, open, secure, and interoperable internet.”



“We want to make sure whatever we do in the name of the Ukrainian people and in the name of condemning Russian aggression is consistent with human rights norms,” Jason Pielemeier said. “If in the haste to condemn and respond, we undermine that foundation of commitment to and demonstrated reliance on those international rules, we undermine our message and potentially give Putin and the Russians ammunition to fire back against Western governments.”

“Russian sanctions could be a legal landmine for messaging apps,” [\*Protocol\*](#), Issie Lapowsky, Mar 10, 2022



GNI Executive Director Jason Pielemeier [co-authored a piece](#) analysing a report by the U.S.-based Council on Foreign Relations (CFR) and arguing against a proposed shift in American internet policy away from its vision for a “global, open, secure, and interoperable internet.”

“In Defense of the Global, Open Internet,” [\*Lawfare\*](#), September 1, 2022





# LEARNING AT A GLANCE

## 12 LEARNING CALLS

An important part of GNI's mission is to hold learning calls that allow for open and transparent discussions among its different stakeholders that encourage meaningful exchange of ideas and concerns. The learning agenda is driven by members' interests and seeks to improve our collective understanding of the most pressing challenges to freedom of expression and privacy in the ICT sector.

For example in July 2022, GNI hosted a member-initiated learning call on the fallout from the *Dobbs* decision made by the U.S. Supreme Court that effectively overturned *Roe v. Wade*. Members reflected on its far-reaching consequences on reproductive and privacy rights, as envisioned by the GNI Framework. As U.S. states increasingly criminalize abortion and abortion-related activity, members discussed the risks of increased efforts to access company data for the purposes of prosecuting abortion-related offenses, and the steps that ICT companies can and should take to mitigate privacy infringements. GNI provided a platform for constructive dialogue between different stakeholders to identify good practices and possible responses and improve shared understanding of the changing legal environment.

In addition to the *Dobbs* call, GNI organized 11 more learning discussions on various topics, such as:

- > "Content Regulation at a Crossroad: Comparing UK and EU Approaches" with Prabhat Agarwal, DG Connect, and Damian Collins, Member of UK Parliament
- > Cloudflare on its decision to withdraw services from the controversial website "Kiwi Farms"
- > Subscriber privacy, IMSI catchers, and 5G Standard setting
- > "Battlefields of the Future" with the Stockholm International Peace Research Institute (SIPRI) alongside GNI Q2 Board Meeting in Stockholm
- > Ranking Digital Rights on their 2022 Big Tech Scorecard
- > Russian "Landing Law" with local registration requirements





## THE ACTION COALITION ON MEANINGFUL TRANSPARENCY

### Shared Learning on Barriers to Digital Transparency

The Action Coalition on Meaningful Transparency is an initiative launched under the auspices of the Danish Tech for Democracy Initiative. GNI helped establish the ACT and serves on its civil society Steering Committee. The ACT also features an Advisory Group of public and private sector representatives, which support the coalition's efforts to enhance meaningful digital transparency, including by amplifying and aligning existing efforts and elevating underrepresented voices in these conversations.

Throughout 2022, GNI and the ACT project lead, Brainbox Institute, utilized GNI's trusted space to foster a series of member conversations on the obstacles to meaningful digital transparency, recognizing members' shared commitment to this goal. The first, in Stockholm in May alongside GNI Board Meeting, centered around a case study on algorithmic transparency around efforts to address alleged online extremism, breaking down member understanding of different legal, technical, and other barriers the case presented for digital transparency. In September, GNI and Brainbox held a session alongside its annual meeting of members in DC, centered on emerging transparency reporting legal mandates, with deep dives from members in India and Brazil, as well as thoughts from companies who might be tasked with compliance. Civil society and academics who have done extensive research or ranking of company transparency efforts also shared experiences and lessons learned. More information about the ACT can be found at <https://www.meaningfultransparency.tech/>.

## ANNUAL LEARNING FORUM

On September 27, 2022, GNI convened its **Annual Learning Forum** on "Taking Due Diligence Out of the Box". Inaugurated by GNI Independent Board Chair David Kaye, the Forum hosted 3 panels on the *Global Implications of Regional Regulation with a focus on Latin America*, *Mapping HRDD throughout the ICT Sector*, and *HRDD in Conflict Settings*. It featured panelist representatives from Ericsson, MTN Group, Business for Social Responsibility, JustPeace Labs, Paradigm Initiative, and the Inter-American Commission on Human Rights.

A full-length recording of the Annual Learning Forum can be viewed [here](#).

Throughout the sessions, panelists underscored the impact of Human Rights Due Diligence, exploring changing regulatory contexts around the world with the Organization of American States (OAS) Special Rapporteur on Freedom of Expression. They explored useful tools, such as the GNI-BSR **ecosystem mapping** for HRDD across the "ICT stack," and key considerations, emphasizing meaningful multi-stakeholder collaboration as a necessary avenue for effective due diligence exercises.





# GOVERNANCE



## THE GNI BOARD

The following members currently serve on the GNI Board:



### INDEPENDENT CHAIR

David Kaye



### VICE CHAIR

Agustina Del Campo,  
CELE

### ACADEMICS AND ACADEMIC ORGANIZATIONS

**Jessica Fjeld**, Berkman Klein Center for  
Internet and Society at Harvard University

**Eduardo Bertoni**, (Independent Academic)

**K.S. Park**, Korea University Law School  
(Independent Academic)

### CIVIL SOCIETY ORGANIZATIONS

**Greg Nojeim**, Center for Democracy &  
Technology

**Lillian Nalwoga**, CIPESA

**Lea Kaspar**, Global Partners Digital

**Melody Patry**, Internews

**Mishi Choudhary**, Software Freedom Law  
Center India

### ICT COMPANIES

**Miranda Sissons**, Meta

**Lewis Segall**, Google

**Steve Crown**, Microsoft

**Fiona Cura-Pitre**, Nokia

**Yves Nissim**, Orange

**Anita Househam**, Telenor Group

**Patrik Hiselius**, Telia Company

**Nicole Karlebach**, Verizon

**Logan Smith**, Yahoo

**Moir Thompson Oliver**, Vodafone

### INVESTORS

**Adam Kanzer**, BNP Paribas Asset  
Management

**Lauren Compere**, Boston Common Asset  
Management



## GNI BOARD ALTERNATES

The following members serve as alternate board members:

### ACADEMICS AND ACADEMIC ORGANIZATIONS ALTERNATES

**Jhalak Kakkar**, Centre for Communications Governance at National Law University

**Caroline Kaeb**, Zicklin Center for Business Ethics Research at The Wharton School (Independent)

**Vivek Krishnamurthy**, University of Ottawa (Independent)

### CIVIL SOCIETY ORGANIZATIONS ALTERNATES

**Usama Khilji**, Bolo Bhi

**Torsha Sarkar**, Centre for Internet & Society

**María Paz Canales**, Derechos Digitales

**Deborah Brown**, Human Rights Watch

**Magnus Ag**, International Media Support

### ICT COMPANY ALTERNATES

**Lydia Hopton**, BT Group

**Théo Jaekel Ericsson**

**Alex Warofka**, Meta

**Alexandria Walden**, Google

**Bernard Shen**, Microsoft/LinkedIn

**Sarah Altschuller**, Verizon

**Dorothe D'Herde**, Vodafone

**Rebecca MacKinnon**, Wikimedia

### INVESTORS ALTERNATES

**Emilie Westholm**, Folksam



## COMMITTEES AND WORKING GROUPS

GNI's Committees and working groups are important mechanisms for member engagement, learning, and organizational development. The Executive Committee draws only from GNI Board members and is chaired by the independent board chair. GNI's five other committees — Accountability, Policy, Learning, Membership, and Development — are open to all GNI members.

Working groups are formed on an ad-hoc basis to address specific issue areas. In 2022, the following working groups were active:

**THE DIFFICULT JURISDICTIONS WORKING GROUP** serves as a forum for discussing challenges that arise in countries with poor or deteriorating human rights and rule of law practices, involving matters of accountability, learning, and policy.

**THE HUMAN RIGHTS DUE DILIGENCE WORKING GROUP** is co-led by GNI and Business for Social Responsibility (BSR). It recently developed a comprehensive [“Ecosystem Mapping Tool”](#) that charts relationships and responsibilities across the techspace.

**THE LAWS OF ARMED CONFLICT WORKING GROUP** was established in April 2022 to bring together expertise and perspectives from across GNI's broad membership to discuss the scenarios, questions, and guidance that arise for ICT companies in contexts of armed conflict.

## GNI STAFF

GNI went through several transitions in staff over the course of 2022. GNI expresses deep appreciation for the work and dedication of Judith Lichtenberg, who was its Executive Director since 2015. Under Lichtenberg's leadership, the organization's size and influence grew significantly, with over 50 new members. GNI developed a detailed toolkit to streamline its assessment process and successfully completed its second and third assessment cycles, putting the GNI Principles into practice.

GNI is also grateful for the work of Rocío Campos and Sarina Phu who served as its Communications Manager and Research & Programs Associate, respectively, until 2022. Their roles sustained GNI's operations and ensured a smooth transition upon their departure. GNI also thanks Communications & Membership Associate Ariana Nikmanesh, who supported GNI's internal and external communications and efforts to embed diversity, equity, and inclusion across the organization until September 2022.

In May, Jason Pielemeier was unanimously appointed as Executive Director by the GNI Board. Jason previously served as GNI Deputy Director and Policy Director for several years, after coming to GNI in 2017 from the U.S. State Department. In September, 2022, GNI welcomed Elonnai Hickok as its first Managing Director. Elonnai is a former GNI participant and Board member, who brings with her deep expertise on digital rights, emerging technologies, and organizational development. Ramsha Jahangir also joined in September as Senior Policy & Communications Associate, responsible for overseeing communications and spearheading the activities and outputs for GNI's Policy Committee.

The organization welcomed two Georgetown Law Master of Science and Foreign Service (MSFS) Fellows for the academic year 2022-2023, Elizabeth Whatcott and Min San Hsieh, as well as Sara Griffiths for one semester as part of the Law School's BHR Practicum. Fellows have been an integral part of the team, contributing to GNI's policy work, strategic review, and communications efforts with internal and external stakeholders.



**Jason  
Pielemeier**

Executive  
Director



**Elonnai  
Hickok**

Managing  
Director



**Chris  
Sheehy**

Research and  
Policy Manager



**Idan  
Ben Yakir**

Senior Operations  
and Policy  
Associate



**Ramsha  
Jahangir**

Senior Policy and  
Communications  
Associate



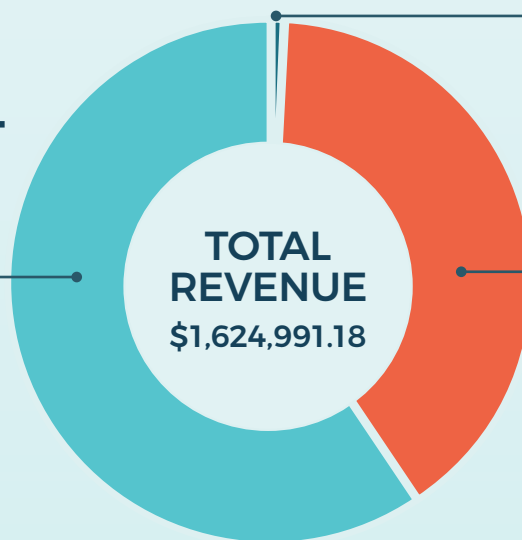
**Montserrat  
Legorreta**

Operations and  
Program Associate

# 2022 FINANCIALS

## REVENUE, GAINS AND OTHER SUPPORT

**60%**  
**\$962,181.80**  
 Contributions & Grants

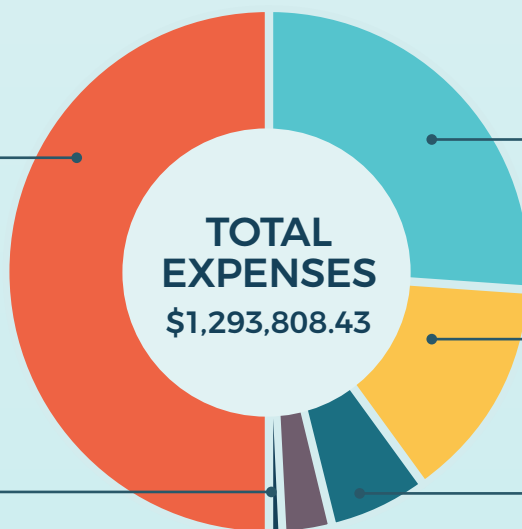


**<1%**  
**\$3,869.74**  
 Interest Income

**40%**  
**\$658,939.64**  
 Membership Income

## EXPENSES

**50%**  
**\$652,311.12**  
 Salary & Benefits



**26%**  
**\$331,022.26**  
 Consulting & other professional fees

**14%**  
**\$187,176.77**  
 Travel & Meetings

**6%**  
**\$72,200.00**  
 Total Accounting & Administrative Support

**3%**  
**\$35,458.99**  
 Total Office Support & Rent

**1%**  
**\$15,639.29**  
 Total Office Supplies & miscellaneous

## ASSETS

**\$331,182.75**  
 EXCESS OF INCOME  
 OVER EXPENSES

**\$1,352,719.31**  
 NET ASSETS BEGINNING

**\$1,683,902.06**  
 NET ASSETS ENDING



# ACKNOWLEDGEMENTS



## LEGAL

GNI is grateful for the legal advice and support it receives from White & Case LLP, especially Charles Moore, Clare Connellan, John Hannon, Gabrielle Hodgson, Emily Holland, Daniel Levin, Earle Miller, and Mariana Seixas.

## ACCOUNTING

We would like to acknowledge the assistance of staff from Glass Jacobson Financial Group, especially Andrea Montali, Marc Friedman, and Rebecca Regnier.

## DESIGN

The female-lead firm Christy Batta Design 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 also thank our Policy and Communications Intern Samaya Anjum for her support on this report.