GLOBAL NETWORK INITIATIVE

Forging Relationships, Evolving Together

GNI ANNUAL REPORT 2024
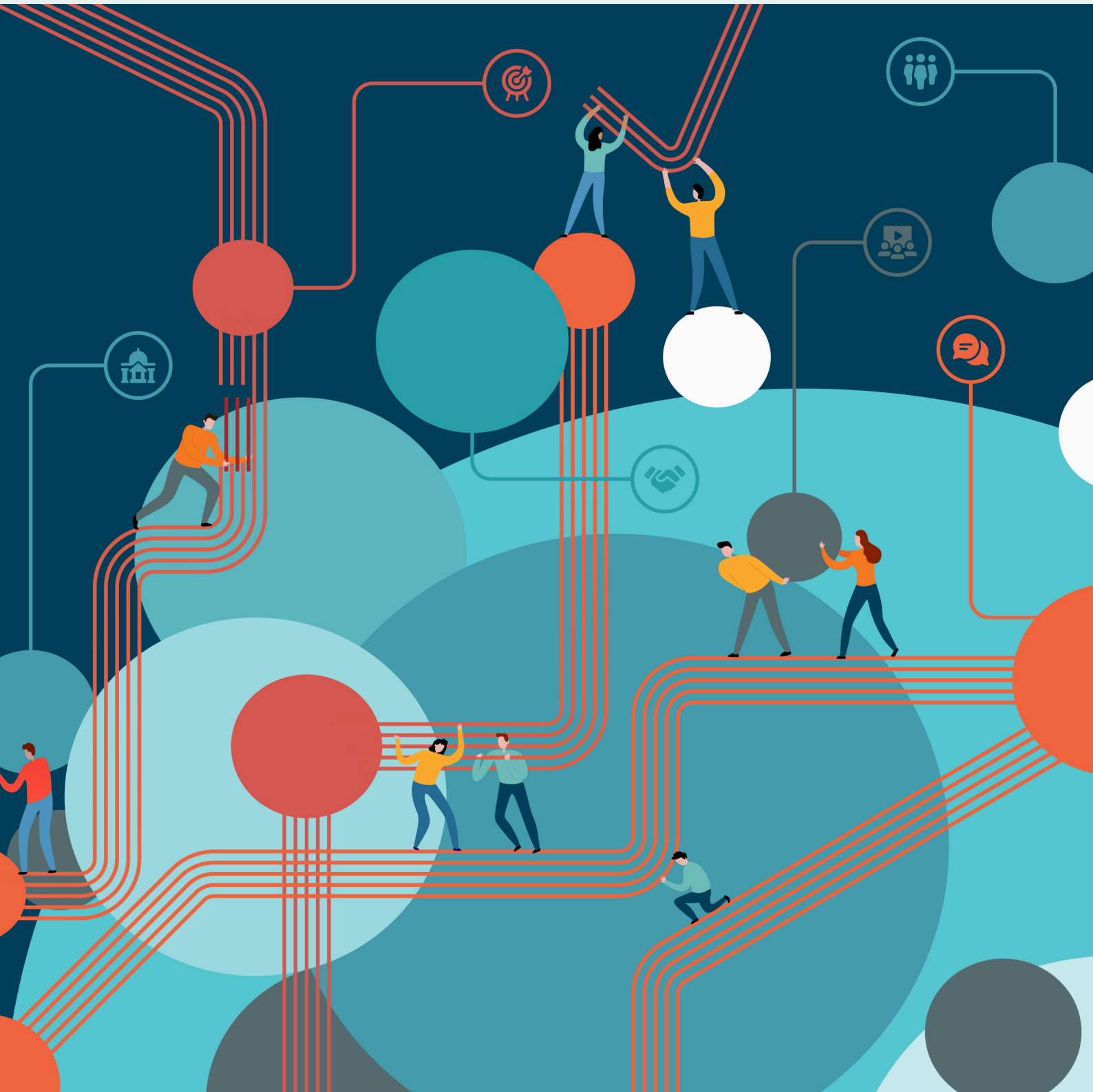
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A MESSAGE FROM
OUR BOARD CHAIRS

This was a very important year for GNI, which saw several transitions and governance changes in 2024 as it continued its work to protect freedom of expression and privacy rights in the technology sector across the world. The two of us joined in June and October as Independent Chair and Deputy Chair, respectively: Vicky brought her experience in the broader business and human rights world, which included long-term collaboration with GNI on its digital rights challenges in Myanmar, and Usama has many years of direct participation in GNI, including on the Board, in his capacity as Director of Pakistan-based research and advocacy organization Bolo Bhi.

We are very grateful to the previous Chair, David Kaye, and Vice Chair, Agustina Del Campo, who led the strategic realignment and transition of the organization. We have big shoes to fill and are excited to have the opportunity to bring our experiences and vision to this role!

As we worked with the membership and Board of GNI to implement recommendations from the strategic review, a key priority was the transition to a smaller Board of Directors that delegated the core role of Accountability to a specialized Accountability Committee. Feedback from our large membership recommended that the accountability process be opened up to the wider membership rather than staying board confidential, to ensure the inclusion of and active contribution from a wide spectrum of our diverse membership. The new accountability mechanism is customizable, reflecting the diversity of the companies that are part of GNI, from hardware providers to social media platforms, and telecom companies, and cloud providers in between. Most importantly, its structure has been shaped by the needs of GNI's membership, highlighting the multistakeholder nature of the organization.

We are proud to see GNI's growth through membership expansion, the incorporation of additional stakeholder engagement, and an increase in policy and learning work, including a deeper focus on regional and national level developments in the Global Majority. The increase demonstrates the effectiveness of the new Membership Engagement Strategy, which has emerged across the learning, policy, and accountability streams of our function. For example, we noticed that several discussions at our monthly policy committee calls translated into widely attended learning calls, in the typical GNI dynamic fashion!

GNI's commitment to protecting freedom of expression and privacy online is evident in all the work it does - from learning initiatives, such as work through the Action Coalition on Meaningful Transparency, to the numerous policy statements GNI has published in response to national and regional regulatory developments.

We were particularly excited to end the year with our Member Convening in Washington, DC, which was the first GNI gathering focused on strengthening GNI as a network. A record number of GNI members from the Global Majority were supported to travel to DC so that we could come together in person. This demonstrates GNI's commitment to creating an inclusive and meaningful network built on trusted relationships.

As we look beyond 2024, the ever-dynamic landscape of the tech and human rights space continues to create headlines and bring new challenges as well as opportunities. Our resolve remains to work with our membership to lead the way for protecting freedom of expression and privacy rights across the world. We are excited to continue to collaborate with GNI staff, the board, and the wider membership to help the organization achieve its mission and navigate the rapidly shifting ecosystem.

Vicky Bowman
Independent Chair

Usama Khilji
Vice Chair

INTERVIEW WITH GNI MANAGING DIRECTOR, ELONNAI HICKOK

Elonnai Hickok has contributed to the digital rights field for 15 years through international policy initiatives, and has presented worldwide on issues of digital rights and emerging technology, as well as the counterbalancing of governmental and individual interests and rights. Elonnai serves as a current co-chair of the Freedom Online Coalition Advisory Network, and has researched and written extensively on issues relating to privacy, cybersecurity, surveillance, intermediary liability, and emerging technologies, including artificial intelligence.

1. Your experience with GNI started by representing a CSO member and has evolved a couple of times since then. Since joining the staff in a leadership role in 2022, you have seen GNI reach key milestones. What reflections do you have on the organization's growth and evolving role in a shifting tech policy landscape, and how has your perspective guided this progress?

" I have had the privilege of engaging with GNI in multiple capacities, first as a member, then as an alternate Board member, and now as Managing Director. Across all these roles, I've seen GNI grow as a unique space that fosters connection across sectors, builds bridges between stakeholders, and brings diverse voices together to advance human rights in the digital age. At the heart of GNI's work is our vibrant, global membership, which comprises voices from companies, civil society, academia, and investors across various geographies who bring a diverse range of experiences, expertise, and visions to the table. In 2024, we welcomed members from across Africa, Southeast Asia, Europe, Latin America, MENA, and North America.

My experience has deeply informed my perspective on utilizing the power of networks like GNI to build relationships needed to catalyze change. GNI is uniquely positioned to amplify local and national priorities and perspectives to global spaces, while at the same time highlighting the ongoing gaps in evidence and expertise from the Global Majority that persist in shaping and informing the norms and frameworks that govern technology.

With the guidance of our new Chair and Vice Chair, Vicky Bowman and Usama Khilji, GNI has prioritized strengthening member engagement, elevating local and regional voices, and ensuring that our work remains relevant, effective, and grounded in human rights.

We strategically expanded our team with the addition of Min Aung as Accountability Manager and Hilary Ross as Program Lead. Like me, they both have prior experience working with GNI members – Min with Telenor and Hilary with the Berkman Klein Center. We have made GNI's processes more inclusive by opening eligibility for participation in our assessment process to all members, supporting participation from members in the Global Majority, and hosting our first in-person members' meeting —a space we hope to continue providing.

> **2. In a rapidly changing regulatory landscape, how does GNI's multistakeholder approach help companies and other stakeholders build resilient accountability frameworks?**

" In response to a multitude of regulatory changes and government practices, including mandatory due diligence, GNI continued to refine its assessment framework, enabling member companies to navigate complex government regulations and requests while increasing transparency and accountability around these scenarios. By opening GNI's assessment process, access to which was previously limited to Board members, to our Accountability Committee, we are expanding participation, allowing a more diverse range of expertise and perspectives, and in the process helping companies gain deeper insights, informed by ground realities across a growing number of Global Majority geographies.

GNI helps its members anticipate risks, understand ground realities, and assess the impact of government requests and restrictions. Our multistakeholder approach to accountability is unique in fostering dialogue among companies, civil society, academics, and investors. In doing so, GNI encourages more resilient and responsive accountability frameworks. As the technology and policy landscape continues to evolve, it's more important than ever for GNI to stay grounded in the human rights principles on which we were founded, the multistakeholder accountability we advocate for, and the collective voice through which we speak.

GNI staff and members at the Members' Meeting in Washington, DC

3. **What are some key insights GNI has gained from engaging on global regulatory trends as well as emerging regulatory regimes outside of Europe and North America, such as in Latin America, Africa, and Asia-Pacific? In this context, what opportunities and challenges do you see for multistakeholder collaboration amid an increasingly fragmented internet environment?**

Throughout 2024, we responded to regulatory developments in a wide range of countries, including Malaysia, Sri Lanka, Bangladesh, Senegal, Brazil, and Hong Kong. The expertise of our Global Majority membership has helped us explore nuances of trends like the Brussels effect, including how some governments are intentionally choosing approaches that diverge from the path set by governments in North America and Europe.

We have continued to observe shifts toward securitization and sovereignty, particularly in the context of Artificial Intelligence (AI). I am excited about the work we began on documenting government interventions in AI and their impact on human rights, a topic we highlighted in our 2024 Annual Learning Forum and a perspective that has been underrepresented in the discourse on AI.

Meanwhile, platform regulation has expanded across contexts in response to concerns such as disinformation, hate speech, cybercrime, and extremism. While some regulatory approaches focus on transparency, risk assessments, and stakeholder engagement, others aim for stricter control over digital technologies through measures like internet shutdowns, in-country data localization, or heavy penalties for non-compliance. We have also seen and responded to the use of traditional and new forms of informal government pressure on companies. The increase in national regulations targeting digital technologies raises the risk of internet fragmentation but also underscores the importance of multistakeholder initiatives like GNI in promoting policies based on international human rights standards to ensure coherence across regulatory frameworks.

At the international level, our participation in processes such as the UN's Global Digital Compact and the NetMundial+10 highlighted the importance of protecting the multistakeholder model of Internet governance. It clarified that this principle should not be assumed or taken for granted. Our advocacy around the UN Cybercrime Convention focused on the need to ensure that international agreements uphold the highest standards of human rights. We have reinforced these messages through our leadership in international, multistakeholder spaces, such as the Freedom Online Coalition Advisory Network, the Christchurch Call Advisory Network, and the OECD Expert Group on AI Risk and Accountability.

Together, our policy work and that of our members have served as another sobering reminder that opportunities for civil society to participate in policy processes freely and equally are under pressure both nationally and internationally. Still, through a network of trusted relationships, we have sought ways to support one another, build resilience, and promote a positive vision for the future of the Internet.

4. How does GNI's approach to funding influence its ability to adapt and advance its strategic priorities in a rapidly evolving digital rights landscape?

" Looking ahead, GNI will continue to grow as a space built on trusted relationships, where members can come together, despite their differences, to find common ground and shared solutions. These relationships are vital as we navigate rapid changes in technology, geopolitics, and society.

Our approach to funding is central to our organizational vision. In 2024, GNI piloted stakeholder engagement as a new area of focus. This work presents both a new revenue source and a way to foster trusted interactions between companies and human rights organizations. I am proud of this work and the various forms it is taking – from helping a company navigate the complexities of a context like Myanmar to examining risk assessments under the Digital Services Act with VLOPs & VLOSEs, academia, and civil society at our in-person European Rights and Risks Forum. By diversifying our support and aligning our fundraising with our strategic priorities, we have been able to build more inclusive spaces, expand our reach into underrepresented regions within the network, and respond to emerging issues.

Elonnai Hickok
Managing Director

2024 AT A GLANCE

BY THE NUMBERS

POLICY

10
Policy calls

8
Submissions to governments

16
Statements

ACCOUNTABILITY

6
First-time companies in 5th cycle

3
Company assessments conducted in 2024

6
New assessors accredited

7
Assessors renewed accreditation

STAKEHOLDER ENGAGEMENT

2
New Stakeholder Engagement initiatives piloted

LEARNING

8
Learning calls

1
Public annual learning forum

MEMBERSHIP

100
Members surpassed

18
New members

1
Members' meeting

37
Members were supported for travel to and participation in GNI meetings

COMMUNICATIONS

3
Newsletters

10
Blog posts

24
Press releases

64
Social media posts

Launched GNI Portal & website

Evolving as GNI

In addition to our work across the above categories, 2024 marked the culmination of a multi-year strategic review process designed to address the rapid growth in membership, evolve our unique assessment process, and allow us to respond effectively to a rapidly evolving regulatory landscape while maintaining the quality of work and distinct culture of trust between members. This process is outlined in the timeline below, and the resulting changes are described in more detail throughout this report.

2021

GNI's second strategic review addresses growing membership and globalizing regulations with recommendations for the organization.

2022

Strategic review concluded with 10 of 19 recommendations approved by the board.

2023

Assessment review and Governance Review undertaken to resolve remaining recommendations related to Assessment, Development, and Governance. Recommendations are approved.

2024

- **Updated accountability process is implemented**
- **Role of the Board is adjusted**
- **GNI Member Portal developed and launched**
- **Membership Engagement Strategy launched**
- **Participatory Members' Meeting in person**

> GNI frequently provides access to subject matter experts and in-country legal practitioners from whom we can learn directly. Members share our values and vision for the internet communication technology sector and support us in meeting our commitments to operate a responsible online platform and achieving our advocacy objectives in the public policy sphere.
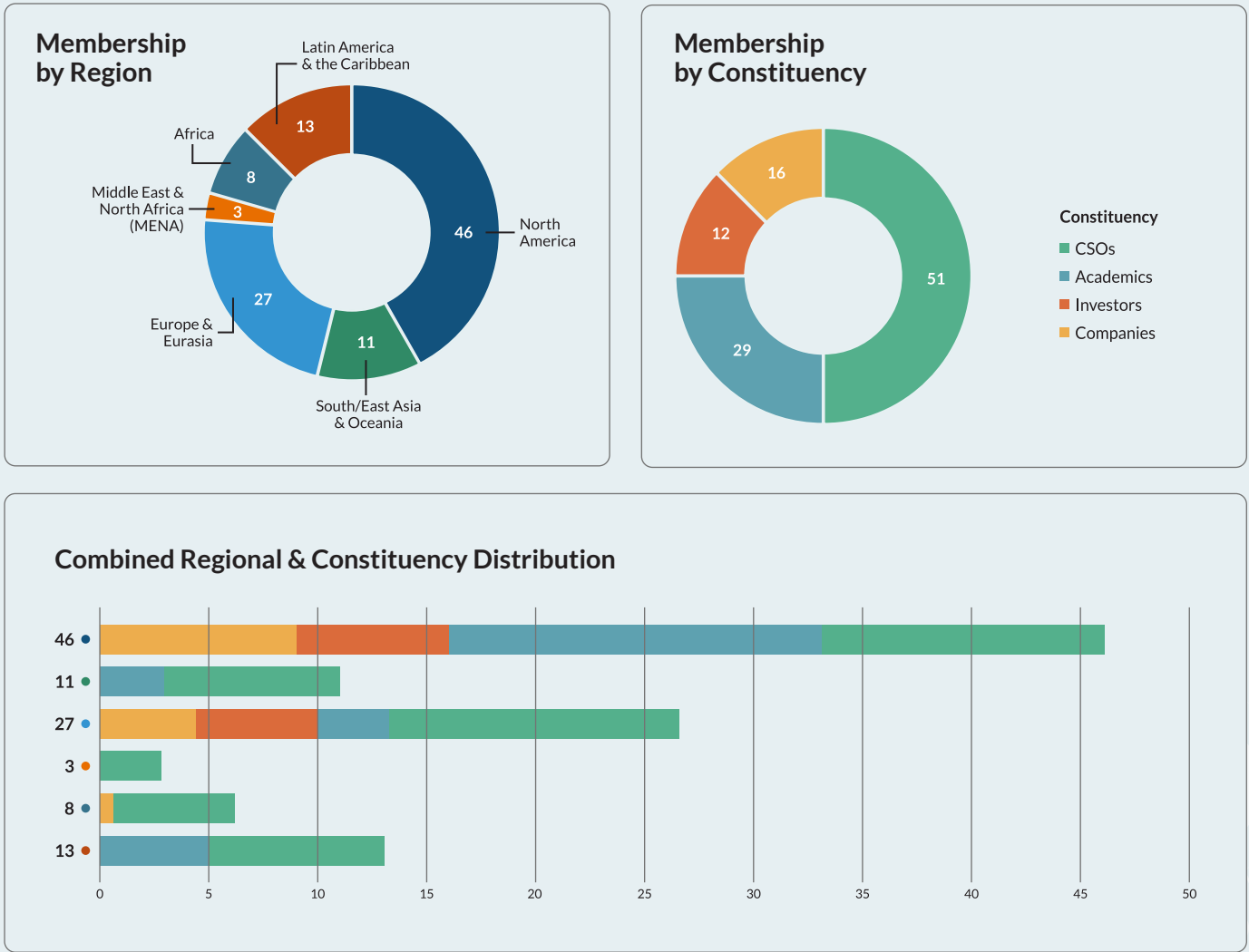>
> — Wikimedia Foundation (WMF)

MEMBERSHIP

GNI's rate of growth has been increasing in recent years, and we were proud to welcome the expertise of 18 new members across constituencies in 2024. Reflecting our commitment to diversifying GNI's membership, seven of our latest members are based in or focus on the Global Majority.

During 2024, our membership comprised 106 academic institutions & experts, civil society organizations, companies, and investors across 36 jurisdictions in every populated continent. GNI's multistakeholder membership, governance, and working methods contribute real-world context to discussions and serve as the foundation of our work on Policy, Learning, and Accountability, and Framework.

Membership by Region

Latin America & the Caribbean: 13
Africa: 8
Middle East & North Africa (MENA): 3
Europe & Eurasia: 27
South/East Asia & Oceania: 11
North America: 46

Membership by Constituency

Constituency
- CSOs: 51
- Academics: 29
- Investors: 12
- Companies: 16

Combined Regional & Constituency Distribution

46
11
27
3
8
13

0   5   10   15   20   25   30   35   40   45   50

Introducing New GNI Members 2024

Click on a member's name in the chart below to learn more about them and their interest in joining GNI.

ACADEMICS	
Member name	*Location (Focus)*
Anupam Chander	United States (Global)
Dunstan Allison-Hope	United States (Global)
Susan Ness	United States (N. America)
InternetLab	Brazil (Latin America)

INVESTORS	
Member name	*Location (Focus)*
Heartland Initiative	United States (Global)
Open Mic	United States (Global)
Sarasin	Europe & Eurasia (Global)

NGOS	
Member name	*Location (Focus)*
Arab Reporters for Investigative Journalism (ARIJ)	Jordan (MENA)
Data Privacy Brasil (DPBR)	Brazil (Latin America)
Digital Agenda for Tanzania Initiative (DA4TI)	Tanzania (Africa)
Digitally Right Ltd (DRL)	Bangladesh (E/S. Asia & Oceania)
Future of Free Speech	United States (N. America)
International Center for Not-for-Profit Law (ICNL)	United States (Global)
Partners Serbia	Serbia (Europe & Eurasia)
World Benchmarking Alliance Foundation (WBA)	Netherlands (Global)
Tech Global Institute (TGI)	Canada (Southeast Asia)
What to Fix (WTF)	Netherlands (Global, Southeast Asia)
East-West Management Institute (EWMI)	United States (N. America)

Deepening Member Engagement

GNI Convening and Members' Meeting

In November 2024, GNI hosted a participatory Members' Meeting in Washington, DC, and online, where we provided the first dedicated space for GNI members beyond the Board to gather in person and discuss GNI as a network, our work, and our priorities. We were excited to support the attendance of 17 NGO and academic members from 13 countries across Africa, Asia, Europe, the Middle East, and Latin America at the two-day event open to all GNI members. The Members Meeting was held alongside GNI's 2024 Annual Learning Forum: *Global Dynamics in Government Demands of Tech: Respecting Digital Rights Amidst Changing Regulatory, Technical, and Political Landscapes*, and a workshop held in collaboration with Atlantic Council's DFRLab titled '*Strategic Priorities for the Internet Governance Landscape in 2025*.'

With feedback from the membership, GNI resolved to account for distinct needs across geographies and business models when recruiting new company members, explore new formats and topics for our learning activities, and conduct activities that build cross-cutting connections between the expertise in each constituency.

The Members' Meeting saw participation from 70 GNI members. The space allowed us to announce a piloted mechanism for providing financial support to Global Majority members engaged in important GNI activities and working groups, train members interactively on GNI's updated accountability assessment, collaborate on GNI's 2025 Learning Agenda, identify key policy priorities around government interventions in AI, among other issues, and get to the heart of GNI's value added for both longstanding and new members to shape a shared vision for the coming years.

Attendees at the Members' Meeting were asked about the aspect of GNI they valued most. Experiences shared include:

*"An opportunity for learning **advanced perspectives**"*

"Keeping up with digital rights trends [in the] Global South"

*"Connections, learning, and **strategy creation among awesome people** in different sectors and professional communities **that wouldn't otherwise meet**"*

"[the] Ability to rapidly deploy cross-stakeholder expertise on key topics (e.g., Cybercrime Convention)"

*"The opportunity to **connect this global network** to our regional and local networks of digital rights activists from **around the Global South**"*

*"A space to **learn about** global internet policies and **potential harms from people living in the countries where these policies are being implemented.**"*

"A strong coalition and a stronger voice"

"Collaborative problem solving"

*"[GNI helps contribute to] **Better quality regulations and improving understanding of tech regulation amongst lay people**"*

GNI Member Portal

GNI's Member Portal, which was launched in the fall of 2024, offers a central hub for members to stay informed about GNI's recent and upcoming initiatives. The Portal makes it easy for GNI members to access past call notes, submit topics for upcoming discussions, and collaborate across time zones.

GNI staff and members at the Forum for Internet Freedom in Africa (FIFAfrica)

Collaborating with Members Around the World

In a crucial year for Internet governance, GNI leveraged opportunities to advance member priorities, expand our network, and bring together and connect with our members at digital rights conferences and regional events throughout the year.

GNI met with members and external partners at venues including the Forum on Internet Freedom in Africa (FIFAfrica) in Senegal hosted by GNI member Collaboration on International ICT Policy for East and Southern Africa (CIPESA), Privacy Week in Belgrade hosted by GNI Member PartnersSerbia, the Digital Rights in the Asia-Pacific (DRAPAC) Assembly and the Asia Pacific Regional Internet Governance Forum (APrIGF) in Taipei, the Summit for Democracy in Seoul, UNGA High-Level week in New York, and throughout Europe in consultations regarding the Digital Services Act.

> **Engaging with telecommunications companies in Tanzania was a turning point in my work on digital rights. The companies' openness and interest in improving transparency and privacy practices showed real potential for transformation. [My] experience highlighted the practical value of the GNI framework.**
>
> — Digital Agenda for Tanzania Initiative (DA4TI)

GNI staff and members at the Members' Meeting in Washington, DC

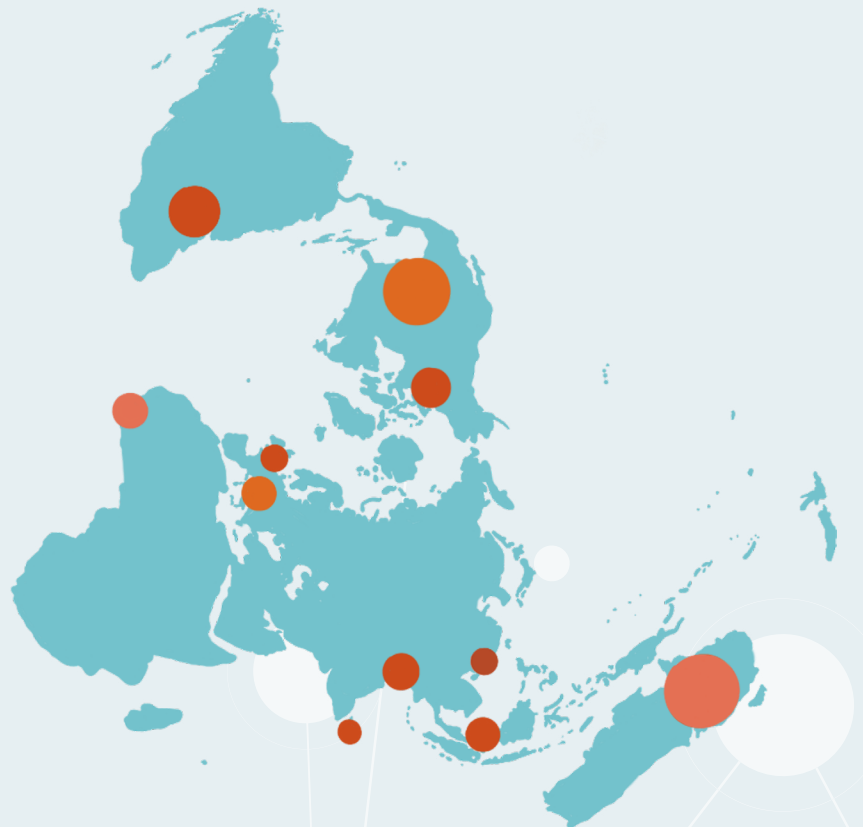# POLICY

2024 was a year defined by negotiation, recalibration, and the search for common ground. As governments sought to regulate fast-moving technologies, we continued to focus on our traditional policy priorities - content regulation, jurisdictional assertions and limits, network disruptions, and surveillance - while also engaging on emerging tech topics such as 5G and AI. GNI's unique multistakeholder positioning enabled us to engage in difficult conversations, building trust and bringing together stakeholders to work through differences based on a shared stake in protecting human rights online.

In 2024, GNI's policy engagements reflected the breadth and complexity of this shifting landscape. We contributed to regulatory processes across five continents, including detailed submissions to the UK Office of Communications (Ofcom) on transparency reporting, illegal harms, and children's online safety guidance under the country's Online Safety Act. We also raised serious concerns about the UK's Investigatory Powers (Amendment) Bill, warning against unchecked surveillance powers and risks to encryption.

In the European Union (EU), we offered expertise to inform the implementation of the Digital Services Act, aiming to guard against both ineffective implementation and overly broad or politicised interpretations or enforcement. Specifically, we provided input on draft transparency templates and responded to the first risk and audit reports under the law. We also reaffirmed support for the EU's Corporate Sustainability Due Diligence Directive, underscoring the value of cross-border human rights due diligence frameworks.

Across the Asia-Pacific region, we provided feedback on Australia's draft Online Safety Industry Standards and the broader Online Safety Act review.
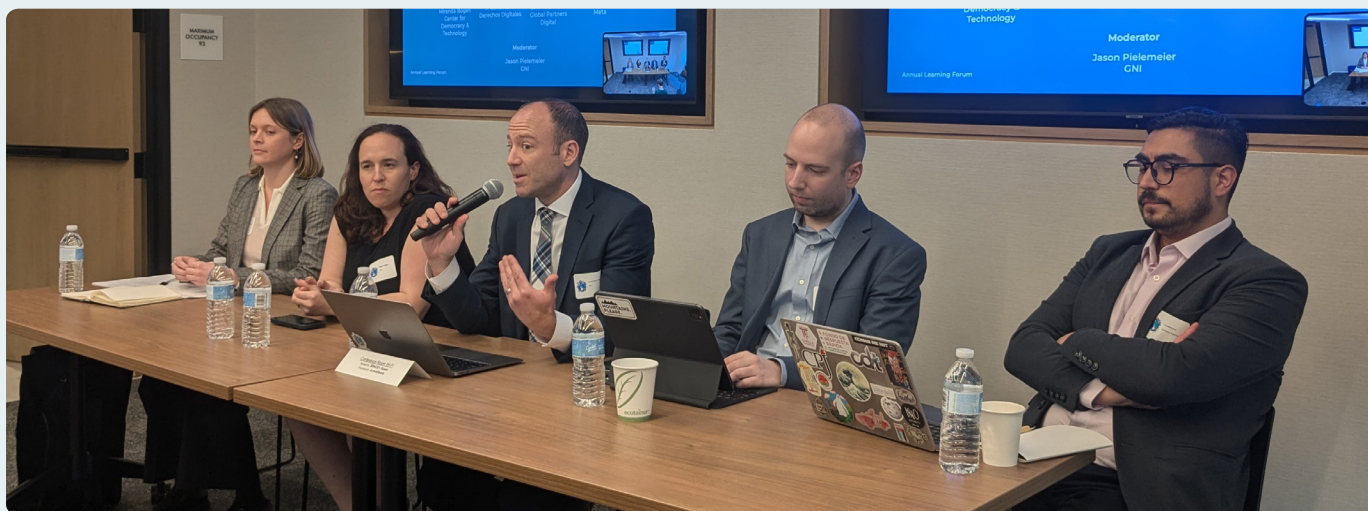
We voiced concern over Malaysia's new digital regulations in a letter to the Prime Minister, and welcomed Sri Lanka's plans to amend its Online Safety Act, urging transparent, rights-based revisions.

In North America, we provided input on Canada's proposed Artificial Intelligence and Data Act, highlighting risks in overbroad designations of "high-impact" AI. In the U.S., we commented on draft cybersecurity rules affecting Infrastructure as a Service providers.

We responded swiftly to digital repression and overreach – condemning network disruptions in Senegal and Bangladesh, opposing Hong Kong's ban on a protest anthem, and raising concern over Brazil's judicial decisions targeting X Corp and VPN users. In each case, GNI emphasized the core human rights principles of legality, necessity, and proportionality, while defending the digital rights of users and the responsibilities of platforms.

GNI also engaged in various internet governance processes. Contributing to the WSIS+20 review, the Global Digital Compact consultations, and the NETmundial+10 process, we helped reinforce the necessity of multistakeholder participation in global discussions and genuine inclusion of voices from the Global Majority. Following the UN's decision to host the Internet Governance Forum 2024 in Saudi Arabia, GNI declined to attend in person, calling for a more transparent and rights-based host selection process. We also issued two public statements opposing the draft UN Cybercrime Convention, warning it could legitimize surveillance and criminalize protected expression.

GNI Executive Director, Jason Pielemeier, at the public Annual Learning Forum

Throughout these efforts, GNI worked to elevate principled, rights-respecting approaches to governance in a time of accelerating technological and geopolitical change, pushing back against disproportionate and otherwise inappropriate government action. By centering transparency, accountability, and collaboration, we continued to serve as a bridge between sectors, regions, and perspectives committed to a more open and inclusive digital future. In the face of rising fragmentation and pressure on open digital spaces, our members championed building relationships that can endure, evolve, and foster learning and a sense of mutual trust and accountability.

LEARNING

GNI's Learning activities in 2024 centered on navigating the complex and rapidly evolving intersections of technology, regulation, and human rights. Learning calls among GNI's membership, emerging from contemporaneous policy issues, addressed the demand for deeper discussion of specific challenges. Through our Learning activities, members continued to investigate the human rights implications of emerging AI governance frameworks and the increasing use of censorship and surveillance at both national and international levels. With the benefit of confidential spaces to exchange experiences, deepen understanding of emerging risks, and collectively strategize on applying GNI's principles in increasingly challenging environments, these conversations underscored the ongoing need for inclusive dialogue, practical collaboration, and the development of rights-respecting approaches in the face of rising digital authoritarianism, regulatory fragmentation, and opaque technological developments.

GNI Managing Director Elonnai Hickok at UN General Assembly week B-Tech session on gender, tech and the role of business at the UNGC leader summit

Early in the year, The Action Coalition on Meaningful Transparency (ACT) launched the Transparency Initiatives Portal to track and advance transparency and accountability in the digital ecosystem. Convened jointly by GNI and the Brainbox Institute in 2022, the ACT complemented GNI's learning efforts by facilitating collaboration and trust-building across sectors, helping address persistent gaps in understanding how data is collected and used. ACT and GNI co-hosted a virtual public event on *Tech Transparency in the Global Majority* in April, spotlighting the critical need for context-driven approaches and stronger support for researchers in the Global South.

GNI partnered with the EU Mission in Geneva, UN B-Tech Project, and Humane Intelligence later in the year to host a multistakeholder workshop on _Algorithmic Risk Assessments, Audits, and Human Rights,_ building on _work_ that B-Tech, GNI, and others have done analyzing how human rights apply to generative AI technologies and bringing together experts to discuss responsible approaches to identifying and mitigating algorithmic harms. These events advanced critical cross-sector conversations on digital rights and platform accountability.

In collaboration with the Trust and Safety Foundation (TSF), GNI hosted a virtual workshop in October, titled "_Engaging Trust & Safety and Human Rights Practitioners on Rights-Respecting Responses to Government Demands_." Practitioners used the space to begin articulating the shared goals and objectives, as well as differences in guiding principles and approaches, between the trust & safety and human rights fields.

GNI's flagship Annual Learning Forum provided a critical public platform to unpack key issues for GNI's members and foster cross-sector understanding. The 2024 Forum, titled "_Global Dynamics in Government Demands of Tech_," focused on the evolving pressures governments are placing on tech companies, especially in relation to AI and Internet infrastructure. Featuring high-level speakers and expert panels, the Forum explored three core themes: _New Dynamics in Government Demands_, _Human Rights Implications of AI Governance_, and _Censorship and Surveillance at the Infrastructure Level._

GNI also hosted regional calls focused on Africa, Latin America, East and Southeast Asia, and South Asia, complementing our active participation in numerous conferences worldwide (see the Policy section of this report). These regional calls enabled more localized discussions of digital rights challenges, elevating regional perspectives and supporting more context-specific member engagement.

GNI Independent Board Chair Vicky Bowman at GNI's public Annual Learning Forum

STAKEHOLDER ENGAGEMENT

Through pilots carried out in 2024, GNI facilitated consultations on a fee-for-service basis for companies with key stakeholders to address important human rights issues. Drawing on credibility built from 17+ years of experience engaging and convening key actors across sectors on tech and human rights topics, a nonprofit mission to protect freedom of expression and privacy, a unique global network of members and partners around the world, a multistakeholder governance structure, and a staff with wide-ranging expertise, we designed engagements that met company needs while empowering and supporting stakeholders. Our approach to stakeholder engagement is grounded in international human rights principles and frameworks, which articulate the importance of meaningful engagement with stakeholders as part of broader human rights due diligence.

GNI's first stakeholder engagement activity was carried out in conjunction with the Digital Trust & Safety Partnership. Together, we convened the first in-person _European Rights & Risks: Stakeholder Engagement Forum_ in Brussels, gathering 75+ participants from both of our organization's member companies regulated as Very Large Online Platforms and Search Engines, civil society, and academia to explore systemic risk assessments under the EU Digital Services Act. The Forum was co-designed with participants in order to focus on stakeholder engagement, risk identification and management, and concerns around ineffective implementation and overly broad or politicised interpretations or enforcement.

Separately, GNI hosted virtual stakeholder engagements for an international company operating in Myanmar. These engagements focused on identifying human rights impacts of the company's operations in the country and discussing recommendations to address these positive and negative impacts in line with international human rights standards. GNI took care in structuring these engagements to identify and mitigate the potential risks to all participants from their participation.

The organizing team of the DTSP-GNI European Rights & Risks Stakeholder Engagement Forum

ACCOUNTABILITY

Until 2024, participation in GNI's landmark assessment process was open only to members of the GNI Board. When our membership was small enough to allow most members a Board seat, this built a culture of trust and facilitated a productive multistakeholder space to discuss sensitive issues related to responsible company decision-making. However, as our membership grew and enriched other pillars of our work, it became apparent that we needed to broaden opportunities for participation in assessment as well.

The Assessment Review conducted over the course of 2023 brought members together to discuss how best to ensure broader and deeper engagement by GNI's diverse members in the assessment process. In 2024, the Board approved a series of changes to expand GNI member involvement in the assessment process, manage the growing number of company assessments each cycle, and adapt the process to evolving worldwide regulations. The implications of these changes are summarized in the Overview of Assessment Updates table below.

Following a revision of the Assessment Toolkit and establishment of supporting processes in the first half of the year, the fifth cycle of assessments began on 1 July 2024. To support these evaluations, GNI has accredited 13 assessors with diverse geographic and sectoral expertise. This cycle will include 14 companies, participating in three tranches between Q3 2024 and Q2 2026. Three companies conducted assessments in 2024 and those reports will be evaluated by the Accountability Committee and Board in 2025. The remaining 11 companies will undergo assessment throughout 2025 and 2026.

GNI at the Center for Strategic International Studies event "The State of Trade and Technology Policy Entering 2024"

Overview of Assessment Updates

Category	Assessment Process Pre 2024	Fifth Cycle Assessment Process
GNI member Participation	The **Accountability Committee** ("AC"), reviewed and updated the Assessment Toolkit, and was open to GNI members. The **Case Study Working Group**[1] lead case selection,and was limited to members of the **GNI Board.**	In addition to reviewing and updating the Assessment Toolkit, the **Accountability Committee** now conducts initial assessment reviews of GNI member companies. The AC and its working groups are open to any GNI members that meet specific conditions[2]. The **Case Study Working Group** leads case selection and is open to any member of the Accountability Committee.
Responsibility for assessment	The **GNI Board** conducted Assessment Review Meetings and made a determination on the company's good faith implementation of the GNI Principles with improvement over time ("determination").	**An Assessment Review Task Force (ARTF)**[3] now conducts Assessment Review Meetings and arrives at an initial determination and recommendations. The **GNI Board** reviews the output of the Assessment Review Meetings and makes a final determination and recommendations.
Adaptations *Further details available on GNI's Confluence Blog*	Standardized format consisting of list of **process review questions and 8 case studies.**	Assessors receive guidance on how to interpret the standardized format to account for **company size, services offered, emerging trends in the tech sector, and exposure to new regulations.**
Assessment Frequency	All companies are assessed at the same time every 2-3 years.	Company assessments are staggered over a 3-year period, distributing work more evenly and allowing for flexibility.

GNI's Confluence Blog explains the assessment's adaptations for companies across the digital stack
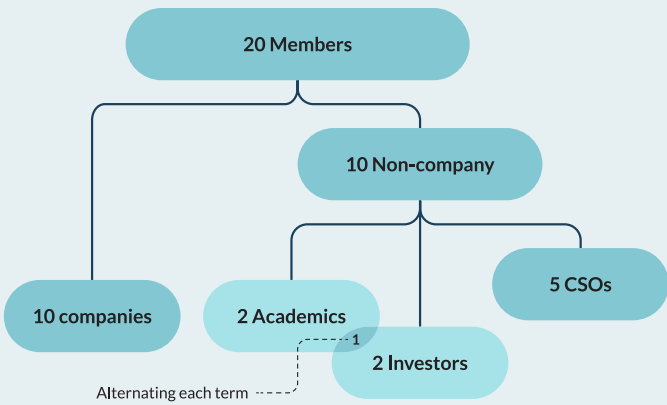
[1] Then called the Case Selection Guidance Working Group
[2] Participation in a certain number of assessments, undertaking assessment training, and attesting to GNI's assessment non-disclosure policy
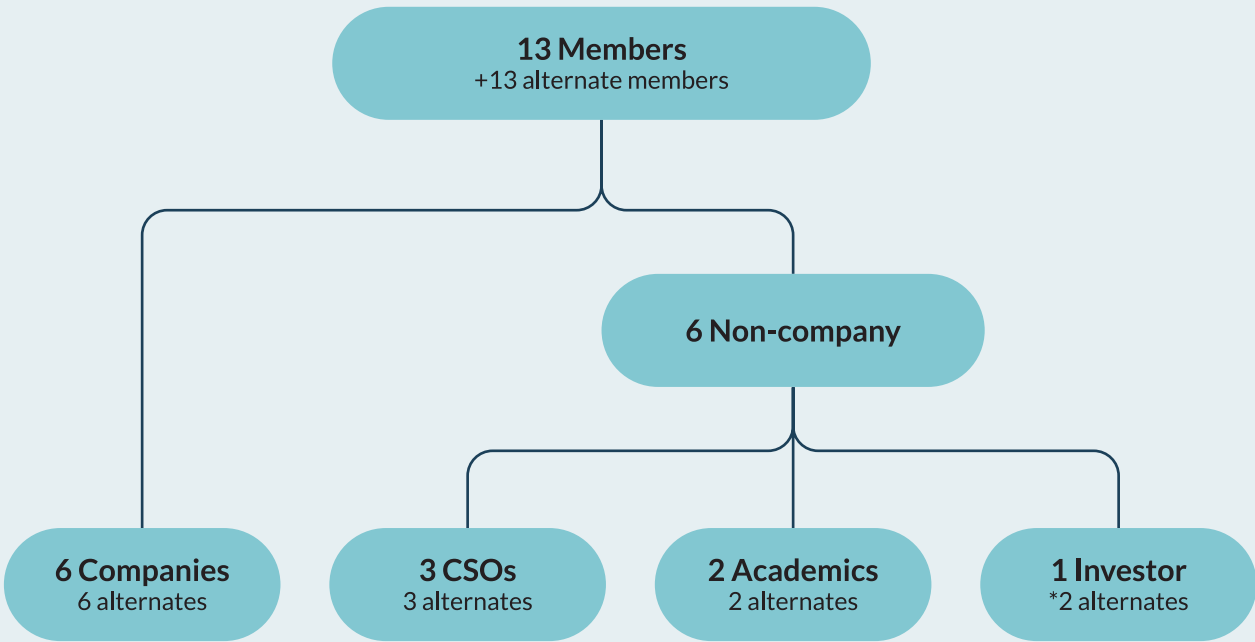[3] A randomly selected subset of the Accountability Committee

GOVERNANCE

GNI's Governance Review, conducted in 2023, recommended changes to the GNI Board's structure and functions, in addition to the expansion of the Accountability Committee's role in the assessment process (outlined on the right).

These changes are reflected in GNI's amended Governance Charter and in the diagram below, which illustrates the new Board structure.

Previous Board Structure

20 Members

10 Non-company

10 companies

2 Academics

2 Investors

5 CSOs

1

Alternating each term

New Board Structure

13 Members
+13 alternate members

6 Non-company

6 Companies
6 alternates

3 CSOs
3 alternates

2 Academics
2 alternates

1 Investor
*2 alternates

GNI BOARD 2024

Independent Chair	Vicky Bowman

Companies	Miranda Sissons, Meta
	Alex Walden, Google
	Fiona Cura-Pitre, Nokia
	Valerie Tiacoh, Orange
	Logan Smith, Yahoo
	Sarah Altschuller, Verizon

Civil Society Organizations	Lillian Nalwoga, CIPESA
	Thobekile Matimbe, Paradigm Initiative
	Mishi Choudhary, Software Freedom Law
	Center India

Academics and Academic Organizations	Jhalak Kakkar, NLUD/CCG
	Eduardo Bertoni, Independent

Investors	Nick Pelosi, Federated Hermes

Vice-Chair	Usama Khilji

Company Alternates	Patrick Day, Cloudflare
	Emil Lindblad Kernell, Ericsson
	Amy Colando, Microsoft
	Patrik Hiselius, Telenor
	Richard [Ricky] Gaines, Wikimedia Foundation (WMF)
	Matthew Amatruda, Zoom

Civil Society Alternates	Juan Carlos Lara, Derechos Digitales
	Allie Funk, Freedom House
	Rafael Zanatta, Data Privacy BR

Academic Alternates	Konstantinos Komaitis, Independent
	Susan Ness, Independent

Investor Alternates	Linda Sundberg, Church of Sweden
	Adam Kanzer, BNP Paribas

DEVELOPMENT

THE FORD FOUNDATION (2023 – 2024)

Continued to provide core support to GNI to strengthen the Network, including through a number of our governance and membership activities.

INTERNEWS GREATER INTERNET FREEDOM (GIF) CONSORTIUM (2020–2024)

2024 marked the conclusion of GIF, a four-year USAID-funded project implemented by Internews under a consortium model. Throughout the project, GNI leveraged its unique multistakeholder nature to improve capacity for private sector engagement by civil society at a local level using a research-based approach, while improving company responsiveness to civil society efforts to engage companies on recommended policy changes around freedom of expression and privacy. This also included hosting workshops around human rights frameworks, and deeper-dives, such as a workshop around reading and interpreting company transparency reports.

OMIDYAR NETWORK (2024)

Continued to provide core support to GNI to enable the organization to contribute effectively to the internet freedom landscape through policy statements, research, and engagement with various stakeholders.

THE NETHERLANDS MINISTRY OF FOREIGN AFFAIRS (2024 – 2025)

Provided funding to GNI through the project "Global Multistakeholder Collaboration for Strengthening the Information Environment by Protecting Freedom of Expression and Privacy Online". The project aims to support the private and public sector in protecting the right to freedom of expression and privacy, particularly in the context of enabling and supporting a rights-respecting information environment.
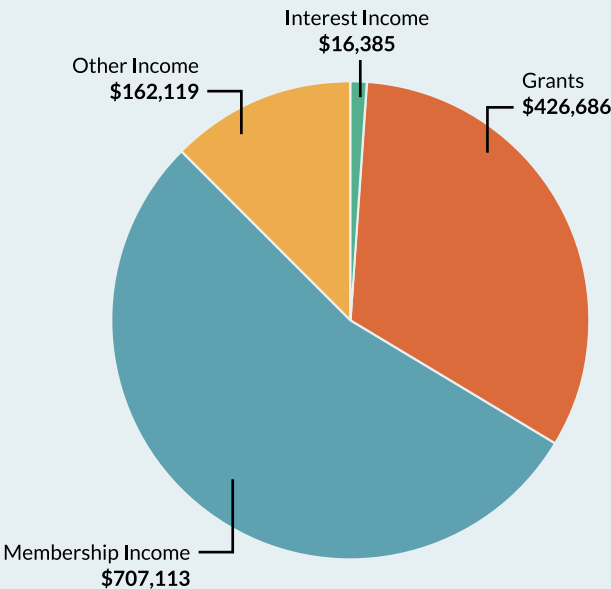
NATIONAL ENDOWMENT FOR DEMOCRACY (2024 – 2025)

Provided funding to GNI through the project "Protecting Freedom of Expression and Privacy Online". The project aims to promote the protection of freedom of expression and privacy in the technology sector and foster government accountability to protect human rights in digital policy in the Global Majority. This grant enabled GNI to host our first ever Members Meeting, provide support to Global Majority members to participate in GNI, and provide travel support to Global Majority members to key international digital rights conferences.
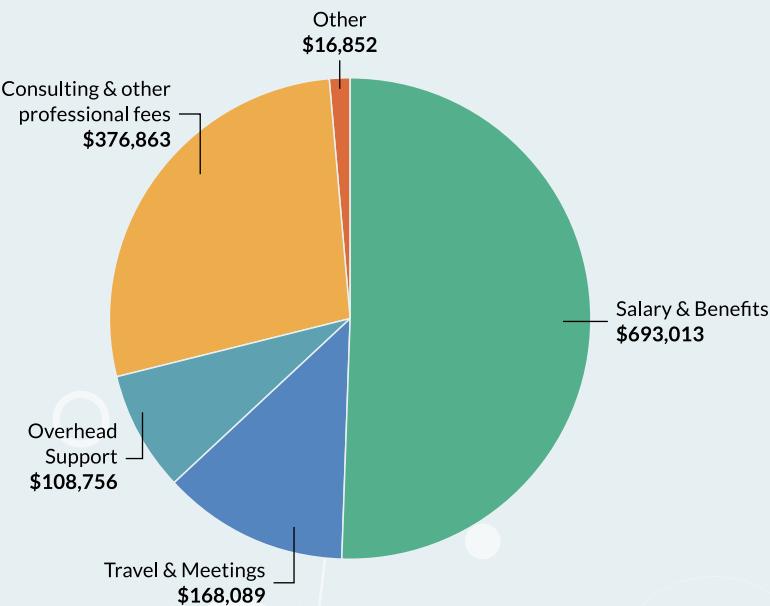
FINANCIALS

Revenue, Gains, and Other Support

Total Revenue: $1,312,303

Interest Income
$16,385

Other Income
$162,119

Grants
$426,686

Membership Income
$707,113

Total Public Support & Revenue

Total Expenses: $1,363,574

Other
$16,852

Consulting & other
professional fees
$376,863

Salary & Benefits
$693,013

Overhead
Support
$108,756

Travel & Meetings
$168,089

Assets

$(51,271)
Excess of income over expenses

$1,533,398
Net assets beginning

$1,482,127
Net assets ending

ACKNOWLEDGEMENTS

GNI Team

Jason Pielemeier
Executive Director

Elonnai Hickok
Managing Director

Min Thu Aung
Accountability Lead

Hilary Ross
Programs Lead

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Communications Associate*

Idan Ben Yakir
*Sr. Operations and
Policy Associate*

Setu Upadhyay
*Membership &
Learning Associate*

**Montserrat
Legorreta Luna**
Programs Associate

Staff at the 2024 GNI Team retreat

GNI also benefited from the support of five research fellows. We thank Policy and Communications Fellow Samaya Anjum, Graduate Fellow from Georgetown University's Masters in Science in Foreign Service (MSFS) program Maria Paula Salmón, and, with thanks to Board member Eduardo Bertoni, the Fellows from the American University Washington College of Law, Center for Human Rights and Humanitarian Law Michael Monteiro, Oscar Chen, and Eric Le Houerou. We also appreciate the support of our undergraduate intern Ashwin Prabu.

Support

Legal

GNI is grateful for the legal advice and support it receives from White & Case LLP, with particular thanks to Charles Moore, Clare Connellan, John Hannon, Gabrielle Hodgson, Daniel Levin, Marc Israel, and Kate Kelliher.

Accounting and Administration

We would like to acknowledge the assistance of staff from Brand K Partners.

Design and Compilation

Designer Meher Rajpal produced this report. 2025 intern Aamer Nassar compiled data and assisted with report authorship.

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