ARTICLE 13 UNCAC
PARTICIPATION OF SOCIETY

ISRAEL (SEVENTH MEETING)

In relation to enhancing the transparency of and promoting the contribution of the public to decision-making processes (article 13(1)(a)):

- Description of how ICT is used to promote citizen and stakeholder involvement in decision-making processes, such as through large-scale consultations, online platforms, working groups, task forces, citizen referendums and community meetings, and measures to promote such involvement;

Transparency in the Government – Open Government

Israel has elected to promote the policy of open government, and has joined the International Open Government Partnership, a multilateral initiative launched in 2011 that aims to secure commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. There are currently 70 participating countries, following the initial cycle which included Ireland, France, Tunisia, Serbia, Turkey, Mongolia, New Zealand and Trinidad and Tobago. Israel's decision to join was born out of the understanding that recent innovations in communication and information technologies allow a significant improvement of the traditional democratic system, and its relationship between the individual and the government. The goal of open government policy is to empower the individual, the society and the State on the basis of three fundamental principles:

- Transparency and active reporting to the public
- Public participation
- Accountability

These three principles, combined with the recognition of technology’s significant role in facilitating change, are the central components of the International Open Government Partnership for Promoting Open Government Policy.

Israel is committed to freedom of information and to promoting transparency and accessibility to data and information produced in the public sector. We view information as a public resource that each citizen has the right to access freely. The Government has an obligation to make public information accessible to the public, in a manner that allows it to be used in a variety of ways (including processing or improving it). The principle of transparency and active reporting to the public should not be seen as conflicting with individual rights and public interests such as the right to privacy, state security and intellectual property.
The **Open Government Forum**, consists of 35 representatives from government (10), civil society (10), academia and research (10) and business (5), tasked with developing and monitoring the implementation of Israel's national action plan on Open Government. In addition to the forum which meets annually, specific working groups focus on issues, including open data, freedom of information, increasing public participation in governance, and the Gov.il website. Members of these working groups include members of the forum and additional members of the public who requested to participate. The working groups provide regular forums for public feedback on government policies in the aforementioned areas.

- **Description of ICT measures adopted to provide opportunities for individuals and groups outside the public sector to be consulted during legislative drafting processes:**

Transparency in the Government - ICT (Information and Communication Technology) Authority

The **ICT Authority** (subordinate to the Prime Minister's Office) manages a working group on open data with civil society and business representatives, with jointly determined agendas and public input on government decision making in the field of open data. Visitors to the data.gov.il website can provide feedback on datasets and submit requests for additional data. In addition, meetings are regularly held with civil society organizations and businesses to identify demand for additional data.

**Govshare** (cross-governmental e-platform for public consultation on all issues) provides different formats for consultation, such as online roundtable discussions, surveys, public knowledge communities, open forums, blogs.

**Data.gov.il** provides a platform for every government ministry and authority to share open data with the public. Government decision 2985 (14/03/2011) requires ministries to map and share at least five databases with the public, and this goal has been included in the annual work plans for ICT managers in ministries. A soon to be released inter-ministerial report on open data will expand activity in this field. The ICT Authority together with various ministries holds "hackathons" to encourage public use of government data and enable requests for additional data sources. The Ministry of Finance publishes the Government's approved annual budgets and monthly updates on implementation on data.gov.il. A civil society organization created the site "Open Budget" based on this data to facilitate easy public access to the data.

The Israeli government adopted a resolution requiring government ministries and authorities to enable members of the public to contact them, submit and receive applications or documents digitally (email) as well as by fax. The resolution also requires authorities to submit these means of contact to the ICT authority in order to publish them centrally on the government website gov.il, and recommended assessing expansion of the resolution to include government owned companies and municipal authorities.

The ICT Authority recently released a **centralized platform for ministry websites (Gov.il)** that consolidates all government e-services on a single platform, so as to facilitate and enhance citizens' access to such services. Users may submit feedback on all
aspects of the website and services provided therein. E-payments of fees and fines are also available on the website, enabling better tracking of payments, and centralized tracking of a significant portion of the government's income.

There is enhanced accountability through measurement and evaluation of government performance – the ICT Authority releases annual reports detailing the performance of various ministries and authorities in providing public services (in-person, telephone and e-services). Ministry work plans including measurable outcomes are publicized annually online to the public.

• Description of the ways in which ICT is used to facilitate public consultations before regulations or other administrative policies are issued, and of any consequences of failure to adhere to the requirement to facilitate such public participation.

Transparency and public consultation in the decision-making process

According to regular procedure, before any law is drafted or proposed (including any laws in relation to corruption), a draft bill (a "Memorandum") is distributed to a wide variety of non-governmental actors, including NGOs and academics in the legal field. The Memoranda are made public via the "tazkirim" website (http://www.tazkirim.gov.il – those interested can access the website, register to receive updates and comment online in relation to the bill). Memoranda are also published on the Knesset (Israeli Parliament) website (http://knesset.gov.il/main/eng/home.asp) and on the "data.gov.il" platform. This information forms the basis of the civil society website "Open Knesset". The publication provides the public with the opportunity to directly contact members of Knesset with regards to proposed legislation (contact details for all members of Knesset are publicized on the Knesset website). This promotes governmental transparency, in accordance with Article 13(a) of the Convention, and provides members of the public, including any interested organizations, with the opportunity to comment on the bill and a forum to exchange ideas on central issues.

Comments on the Memorandum may be sent to the Ministry of Justice within 21 days of its distribution. These comments could lead to further discussions on the proposed legislation. Through consolidation of the comments and revision of the text, the Memorandum is revised into a "Draft Law", which is then submitted for the approval of the Ministerial Committee for Legislation, in order for it to be considered by the Knesset. The Draft Law is then submitted to the appropriate Knesset committee (which usually conducts discussions that are open to the public), and from there it is presented to the Knesset for a first, second and third reading. At each stage, the Draft Law may be subject to modifications. Upon completion of the process, the text is formally adopted and the newly enacted statute is published in the Official Gazette.

Knesset debates are open to the public according to section 27 of the Basic Law: Knesset, and most are aired on television according to the Television Broadcasts from the Knesset Law, 2003. In addition, plenary sessions are filmed and made available for
viewing by the general public by electronic means in accordance with section 40 of the Knesset Rules of Procedure. Protocols from the plenary sessions are also available online. All meetings of Knesset committees are also filmed and open to the public, and their protocols are available online unless there is a specific reason (for example, protection of privacy or security reasons) for the meetings to be private, in accordance with sections 118 and 120 of the Knesset Rules of Procedure. Journalists and representatives of civil society organisations are also able to attend all plenary sessions and committee meetings (other than those that are classified). Lobbyists that represent various interest groups (including corporate interests and public interests) are also able to attend committee meetings. A recent legislative amendment provides that in such a case, the details of the lobbyist, including the company they work for, the client they represent and any additional clients that may have an interest in the meeting, are included in the protocol of the meeting (in accordance with section 68 of the Knesset Law, 1994).

The Knesset has a website, Facebook page and Twitter account that are updated regularly. Each committee publishes its provisional agenda and associated documents online in advance of meetings, and the committee spokesperson publishes a summary of the meeting afterwards.

Some Members of Knesset have begun publicizing their weekly calendars to the public. Attendance records of members of the Knesset are published online in real time through the Knesset website.

In December 2014, the Knesset launched its National Legislative Database. All bills, as well as all legislation that has been passed, including all legislation that aims to combat corruption, are published online. The database in relation to legislation includes full details of the history of the legislation – who proposed the bill (whether it was the government, a member of the Knesset or a Knesset committee), past versions of the bill, relevant protocols in relation to debates about the bill and all amendments to the legislation. This allows any member of the public to be able to trace the history of all legislation, and to understand the purposes of the legislation. The Knesset plans to expand the details available in the database to include the current status of any bills going through the Knesset, which committee is responsible for such a bill, and any additional documents that have been submitted in relation to the bill (for example, briefs and reports from academic experts, members of the public and representatives of civil society organizations).

Government Resolutions – Government resolutions, including in matters relating to anti-corruption measures, are generally published online. Prior to government meetings, the agenda for the meetings as well as the draft text for the resolutions are also published online, subject to certain restrictions.

The internet is additionally utilized by the Israel Government Portal to enable increased participation by the general public in a wide variety of issues of public concern. Citizens may use the portal to directly address any administrative authority and to have their queries answered accordingly. In addition to the public websites, a growing number of
government and local authorities make use of online social media such as YouTube, Facebook and Twitter, to communicate with the public.

Given all of the information that is openly and easily available to the general public online, especially the availability of bills, protocols, filmed sessions and other documents, the public is able to follow parliamentary debates and understand the considerations and views that shaped the adoption of a given legislative text. In this way, the Knesset uses information and communication technology to promote citizen and stakeholder involvement in decision-making processes, encourage an institutional culture of transparency, open data, open-door policies and regular communication between the Government and civil society, and facilitate public consultations.

In 2005, Israel launched a website to publish all its official publications (http://www.justice.gov.il/En/Units/OfficialPublications/Pages/default.aspx), including all bills that have been submitted in the Knesset (including explanatory notes). This facilitates complete and immediate access to all official bills in advance of parliamentary debate.

In relation to ensuring that the public has effective access to information (article 13(1)(b)):

- Legislation, regulations, policies and procedures regarding public access to information through ICT, such as online platforms, including details regarding:
  - Means by which requests may be submitted (in writing, via Internet, by telephone);
  - The types of bodies required to publish information;
  - The scope of the information published;
  - Any information that must be submitted by the requester as part of the request for information;
  - Costs charged to submit a request;
  - Applicable time limits within which the Government must respond to the request;
  - Grounds on which a request by a member of the public for information may be denied;

The Freedom of Information Law facilitates public access to government documents (subject to certain limitations). Additionally, administrative and local annual working plans are regularly published online by local and state authorities, enabling greater transparency on both the local and national government authorities. The law enhances the public's ability to monitor and the management of public affairs.

In accordance with a government resolution 3573 of April 2005 and with an Accountant General directive, all government ministries must include the gov.il portal logo and URL (www.gov.il) in all official publications (documents, envelopes, payment vouchers, etc.). Additionally, Israel set up a website "shituf.gov.il" ("shituf" means "sharing" or "participation" in Hebrew), to facilitate public participation in decision making, and is part of the Israel E-Government project, aimed at strengthening connections between the citizens and the government by improving both the level of accessibility of public
authorities and the transparency of their actions. The website features, for example, proposed legislation and reports published by government ministries. The gov.il website consolidates the online services and information provided by various Israeli government bodies.

The Freedom of Information Unit (subordinate to the Ministry of Justice) was established in 2011 in order to raise awareness, explain and promote the implementation of the Freedom of Information Law, as well as to increase the quantity and the quality of information that will be published for the public. The Freedom of Information Unit manages a comprehensive website (http://www.justice.gov.il/En/Units/FreedomInformation/Pages/AboutTheFreedomOfInformationUnit.aspx) that includes information regarding the Freedom of Information Law, the powers of the Freedom of Information Unit, laws and regulations and other widely accessible information to ensure the public is informed.

The public is able to lodge online requests for information to approximately 500 different public authorities. Some answers to requests for information (taking into consideration privacy interests), are published online. A request for information can be lodged by any means, provided it is in writing. The person requesting information does not need to detail the purpose of the request. The request must include the applicant's contact details so that the public authority is able to respond. The request should also state whether the person filing it is an Israeli citizen or resident (only citizens or residents are able to request information, unless a non-citizen non-resident is requesting information about himself or herself). The application costs approximately 20 NIS (approximately 4.50 Euro) and there are several exemptions from payment. In circumstances where the request for information necessitates more extensive work by the government department in order to respond, the applicant may need to pay an additional cost to cover the relevant overhead expenses. The government must respond to the request within 30 days (an extension can be granted in special circumstances). There are 20 grounds upon which a request by a member of the public for information can be denied – the main grounds being a breach of privacy, a security threat, protection of commercial secrets, and an unreasonable expenditure of resources in order to fulfill the request. The Freedom of Information Law requires each public authority to appoint a focal point responsible for responding to requests for information. Failure to provide information as required by the Freedom of Information Law is grounds for an administrative petition.

The Freedom of Information Unit is empowered, among other things, to investigate complaints against government ministries and auxiliary units, on the following matters:

- Failure to publish annual reports in a timely manner
- Failure to publish information that the authority is required to publish under the Freedom of Information Law (administrative guidelines and environmental information) without duly giving reasons
- Failure to respond to request for information by the time set therefor in the Freedom of Information Law
- Denial of a request for information without providing an explanation
• Manner of calculation of fees

In addition, pursuant to Government Resolution 2950 (06/03/2011), the Freedom of Information Unit has the power to issue guidelines to government ministries and auxiliary units for correcting any failures to implement the provisions of the Freedom of Information Law. This can be done after the relevant authority has been afforded the opportunity to voice its position.

• Description of steps taken to ensure that existing laws, regulations, policies and procedures regarding access to information are widely known and accessible to the public;

Complementing the website, the Freedom of Information Unit manages an active Facebook page and runs radio and television campaigns. All of these mediums are used for the purpose of increasing awareness of the public to their right to information. The Israeli Police have a Cyber Unit that is also active in the prevention of and fight against corruption. The Cyber Unit investigates particularly sophisticated cyber crimes against national infrastructure and financial institutions, the dissemination of computerized viruses and cyber extortion.

In relation to undertaking public information activities that contribute to non-tolerance of corruption, as well as public education programmes, including school and university curricula (article 13(1)(c));

• Description of public information (education and awareness-raising) activities that contribute to non-tolerance of corruption, particularly those using ICT, including specific initiatives targeting groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations;

The Israeli Broadcasting Authority (public television and radio) promotes many different news and documentary programs on current events, including news related to corruption and the battle against it, aiming to inform and educate the public. For example, "Kol Israel", the national radio network which forms part of the Israeli Broadcasting Authority, regularly broadcasts numerous segments and special broadcasts that deal with issues of corruption and fraud, in Hebrew, Arabic, Russian, Amharic and English. There are also a few weekly broadcasts that dedicate a major part of their agenda to issues of corruption. These broadcasts are an opportunity to educate the public about corruption through current events, and provide a platform for different experts and scholars on the subject. In 2012, for example, there were 177 reports and segments relating to corruption in the different broadcasts of "Reshet Bet", one of the main stations of the national radio network. Television and print news are also very active in Israel, as journalists are free to investigate and publish news and opinions regarding acts of corruption.

Anti-Corruption and Anti-Bribery Brochure – The Ministry of Justice has widely distributed, within the public and private sectors, and including on its website, an informational brochure concerning Israel's domestic and international efforts to combat corruption. The brochure, which refers, inter alia, to the Convention, is intended to be a
useful tool for the dissemination of information about anti-corruption efforts. The brochure also provides information on contact points for reporting suspicions of corruption-related offences and obtaining more information regarding the prevention of corruption. The brochure is available in Hebrew and English.

**Media Campaigns** - Israeli authorities are pursuing a multifaceted approach to raising awareness regarding the need to eradicate corrupt practices. Among other efforts, the Ministry of Justice has issued press releases to major Israeli newspapers and news websites on several occasions over the last few years, regarding the overall aims of Israel's international efforts in relation to the struggle against corruption.

• *Description of the use of ICT in educational courses or modules that have been introduced in primary and secondary schools that include components on corruption or related issues such as ethics, civil rights or governance;*

**Schools** – In accordance with Article 13(1)(c) of the Convention, the Israeli education curriculum in elementary schools and junior high schools includes several programs and activities on the values and rules of a democratic society and on citizenship in a democratic society. Among these are values of integrity, justice and probity. In junior high and high schools, the curriculum includes "civic studies". Some of the topics taught in civic studies are the principles of a Jewish and democratic society as well as the structure of government, the separation of powers and the rule of law. All of these topics are part of the measures taken to educate children and young adults for good citizenship and public involvement.

The Israel Ministry of Education, through its Information Technologies Division, is tasked with educating on, and promoting the use of, information and communications technologies (ICT) within the national public education system. The ICT curriculum includes a national educational program called "Life Online" that aims to educate Israeli students toward digital literacy and digital citizenship, as well as raise awareness towards harmful and non-ethical behavior, with an emphasis on online ethics and safety. Digital literacy includes students' ability to use various online mechanisms and find relevant information online. This includes finding anti-corruption bodies for the reporting, including anonymously, of any incidents that may constitute an offence or corruption. The program also includes components and values, ethics, norms for online behavior and digital citizenship (for example, intellectual property rights). These modules are adjusted to various age groups and sectors and are also available in the “Educational Cloud” (details below).

The “Life Online” national program is widely implemented and deployed in the entire public education system and institutions. The program, through its online platforms and social media, promotes the knowledge and skills needed for information sharing amongst its participants. The program contributes to fostering a zero-tolerance approach to any kind of harmful or wrong-doing incidents, including corruption, by encouraging students to take personal and social responsibility and not to be a passive bystander when he/she encounters an offensive or harmful incident. By exposing the students to the online
reporting tools that are available within the platforms that they are using, this program encourages all students to report such incidents. Ultimately, one of the expected outcomes of this program is the prevention of corruption – having students, and later adult citizens, who feel comfortable with reporting about various social harms and injustices, including corruption.

The “Life Online” program also created a dedicated website as part of the “Educational Cloud”. This website includes educational resources for students, teachers, and parents. It is an online platform that serves as a national centralized hub for distributing content and sharing activities. A key educational theme is the emphasis placed on taking personal responsibility for reporting, either online or offline, once a person encounters harmful activity. Such reports can be on a wide variety of incidents, including corruption. The Israel Ministry of Education also operates further various means and technologies including a dedicated Online Ethics and Safety page on Facebook, a YouTube channel, and more. These interactive environments are used for the purposes of undertaking public information activities.

In addition, the "E-Government Agency" of Israel has created a child-friendly website (kids.gov.il) for the education and engagement of children. The website aims, among other things, to teach children about the branches of government, the main institutions of the State and their respective responsibilities, and the concept of separation of powers. The website is designed to reach out to children and allow them to take a first step towards understanding the norms and ethics in a democratic society, with the goal of increasing their future involvement in society. For example, children can use the website to learn about the different government ministries and law enforcement agencies, the judiciary system, the responsibilities of judges and the importance of the judiciary system for the rule of law. This website is a part of the ongoing process to make the government more transparent and accessible to different age groups.

Further, the Freedom of Information Unit held a competition to select a poster to be used to promote the awareness of the importance of freedom of information among the general public. As the goal of the competition was to reach a young audience, the contestant pool for this competition included only students in the fields of art and design. The competition was promoted using Facebook, and students were able to upload their designs to the Freedom of Information Unit's Facebook page, after which voting was conducted online to select the winner.

- Description of the use of ICT in university courses or modules that include components on corruption or related issues such as public administration, public procurement, ethics, criminal law or corporate governance.

Universities – A large number of universities and colleges in Israel offer different courses on corruption and related issues (such as public administration, public procurement, ethics, criminal law or corporate governance), in the fields of law, government, communication, philosophy and business administration. The following are several examples of such courses: "Political Corruption"; "Business Ethics";
"Governmental Corruption and Economic Crimes"; "White Collar Crimes"; "Money Laundering"; "Corporate Crimes"; "Business Ethics"; "Principles Of Public Administration"; "Ethics in Research"; "The Role Of The Media" and others. In addition, officials from the Ministry of Justice have lectured in several law school classes on international legal instruments aimed at fighting bribery and corruption.

Israel is one of the founding member states of the International Anti-Corruption Academy (IACA), having signed the Establishment Agreement of IACA in December 2010 and ratified it in September 2012.

The International Law Forum in the Hebrew University holds weekly seminars to discuss developments in international law and their legal implications for Israel.

In relation to respecting, promoting and protecting the freedom to seek, receive, publish and disseminate information concerning corruption (article 13(1)(d)):
• Outlines of the procedures or regulations that ensure the freedom of the public to seek and receive information concerning corruption, in particular using ICT. States parties and signatories may wish to include the following information, if applicable:

Please see above.

• Any restrictions applicable to exercise of the freedom to seek, receive, publish and disseminate such information, in particular using ICT, including:

The definition of "information" according to the Freedom of Information Law is very broad and includes information concerning corruption. As noted above, there are 20 grounds upon which a request by a member of the public for information can be denied – the main grounds being a breach of privacy, national security threat, protection of commercial secrets and an unreasonable expenditure of resources in order to fulfill the request.

• Description of procedures that allow a member of the public to apply for review of, or appeal against, the application of such a restriction by the Government.

A member of the public is able to apply to the Administrative Court for review of a refusal by a public authority to provide information as per a request. The decision by the Administrative Court can be appealed to the Supreme Court.
Enactment of laws: according to regular procedure, before any bill is drafted or proposed, a Bill Proposal (a "Memorandum") is distributed to a wide variety of nongovernmental actors, including NGOs and legal academics. The Memoranda are also made public via a government website. This provides members of the public, including any interested organizations, with the opportunity to comment on the proposed Bill. Proposed legislative amendments relating to corruption offences measures aimed at preventing corruption are also distributed in this manner. Comments on the Memorandum can be sent to the Ministry of Justice within 21 days of its distribution. These comments may lead to further discussions on the proposed legislation. Through consolidation of the comments and revision of the text, the Memorandum is revised into a proposed "Draft Bill", which is then submitted for the approval of the Ministerial Committee for Legislation, in order for it to be considered by the Knesset (the Israeli Parliament).

The Draft Bill is then submitted to the Knesset for a first, second and third reading at the appropriate Knesset committee (which usually conducts discussions that are open to the public). Pending the completion of the process, the Bill is formally adopted and the newly enacted statute is published in the Official Gazette.

Government Resolutions: Government resolutions, including in matters relating to anti-corruption measures, are generally published online. Prior to government meetings the agenda for the meetings, as well as the draft text for the resolutions, is also published online, subject to certain restrictions.

The Freedom of Information Law, 1998 facilitates public access to government documents (subject to certain limitations). The law enhances public power and ability to review and control the management of public affairs. Additionally, administrative and local annual working plans are regularly published online by local and state authorities, enabling greater transparency and control on both the local and national government authorities.

In addition to the public websites, a growing number of government and local authorities make use of online social media such as YouTube, Facebook and Twitter, to communicate with the public.
"Shituf" - a website set up to facilitate public participation in decision making, forms part of the Israel E-Government project, aimed at strengthening connections between the citizens and the Government, by improving both the level of accessibility of public authorities and the transparency of their actions. The gov.il website consolidates online services and information provided by various Israeli Government bodies.

Computer networks and cyberspace technology are additionally utilized by the Israel Government Portal to enable increased participation by the general public in a wide variety of issues of public concern. Citizens may use the portal to directly address any administrative authority and to have their queries answered accordingly. In accordance with a government resolution of April 2005 and with an Accountant General directive, all government ministries must include the gov.il portal logo and URL, www.gov.il, in any official publication (documents, envelopes, payment vouchers, etc.).

Israeli authorities engage in providing public information on the need to curb corruption on a regular basis. The following are some representative examples: The International Law Forum in the Hebrew University holds weekly seminars to discuss developments in international law and their legal implications for Israel. In April 2009, a specific seminar was dedicated to the offence of foreign bribery. The seminar included presentations by senior officials from the Ministry of Justice, followed by a lively debate. The importance of conducting the forum was invaluable especially with regards to awareness-raising efforts, as attendees included government officials, law professors, academics, students and members of the general public.

Senior officials from the Ministry of Justice have lectured in Law School classes on international legal instruments aimed at fighting bribery and corruption. The Institute of Legal Training for Attorneys and Legal Advisers, which is the main provider of continuing legal education courses in Israel, frequently arranges professional training on non-tolerance of corruption.

Ministry of Justice officials regularly participate and occasionally make presentations at the quarterly SESSIONs of the Anti-Bribery Business Forum, which was established by the Manufacturers Association Israel (MAI) in July 2010. The purpose of the Forum is to facilitate awareness to measures of prevention of bribery in the business sector. The Forum serves the manufacturing industry as a central source of valuable knowledge as well as business assistance to the private sector on such issues as Israeli legislation in this field. The Forum seeks to assist companies in Israel to lawfully comply with the anti-bribery statutory regime. Forum meetings are regularly attended by MAI officials and NGOs, and are chaired by the legal counsel of one of Israel's leading corporations. In some cases, government officials are also invited to attend forum meetings.

The Israel Ministry of Defence (MOD) initiated an awareness-raising campaign related to anti-bribery measures, aimed at defence exporters. This included, inter alia, the following:
- The annual Defense Export Controls Directorate (DECD) Conference, which took place in March 2010, and which was attended by the majority of registered defense exporters.
The conference featured a presentation by MOJ officials on the foreign bribery offence and the OECD Anti-Bribery Convention.

- The DECD also sent newsletters to registered defense exporters which included information regarding the offence of foreign bribery and the OECD Anti-Bribery Convention.

- A seminar focusing on anti-bribery corporate compliance programs was held by the MOD in November 2010. The seminar was attended by over 200 representatives of leading defense exporters and Israeli law firms. In addition, representatives of relevant government ministries attended this seminar. One of the main objectives of the seminar was to provide defense exporters with practical tools in order to formulate and implement appropriate anti-corruption compliance programs. Fundamental principles of such compliance programs, as established by the MOD, were presented in the seminar. The keynote speaker was the Director General of the MOD. Additional presentations were given by the MOJ, MOD, a representative of an Israeli defense industry and a group of lawyers from a leading global law firm which shared its extensive experience in the field of compliance with regards to anti-corruption standards.

- The MOD's Legal Adviser participated in a conference, organized by a prominent Israeli law firm, dedicated to compliance with anti-bribery obligations, in October 2010 and made a presentation on the offence of foreign bribery.

The Israel Freedom of Information Act, 1998, establishes the right of the public to seek and receive information from government authorities, including on matters related to corruption. The Act is made public online on various government websites, including details on the procedures for filing a request for information pursuant to its provisions.

As a general matter, the public can report crimes to the Israel Police (hereinafter: IP) through the general IP emergency phone number for reporting suspicions of crimes; by filing complaints in person at the various police stations around the country; by sending a written complaint to the Investigative and Intelligence Department; or through the IP's general website. The information received is then referred to the relevant investigative unit. This includes, *inter alia*, reports on suspicions of corruption. The Israel Police website describes in greater detail the above-noted means of reporting. In addition, any person can file corruption related complaints online via the governmental portal; the State Comptroller's website or the Civil Service Commission website.