

# Silent Networks in the Electoral Spotlight: Activist Coalitions and the Diffusion of Global Corporate Norms

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## Abstract

Existing IR theories hold that policymakers discipline a rule breaker to the extent that the breach affects their own political survival. However, governments in the Global North have increasingly begun to condemn their home-grown multinational companies for breaking global norms on climate and human rights in the Global South, even when domestic audiences pay little attention to such issues during elections. This paper advances a bureaucratic contact theory to explain government enforcement decisions on low-salience compliance issues. I argue that as unpopular issues receive less attention from elected officials during election periods, career bureaucrats play a crucial role in norm enforcement at these times. Faced with high demand for compliance-related tasks during election periods, bureaucrats are incentivized to cherry-pick promising cases. I argue that complainants can elicit a favorable enforcement outcome during an election only when home country-based activists join forces with them and help cross-pressured bureaucrats screen promising cases. I find supporting evidence from the OECD Guidelines' Specific Instance process. This article shows that in the Global North, the electoral spotlight can have distributional consequences for norm beneficiaries in the Global South, and that activists' ties to home country bureaucrats play an essential role in norm diffusion.

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# Introduction

Governments have devised various standards and codes of conduct to encourage multinational companies (MNCs) to comply with labor, climate, and human rights norms in host countries. Most of these initiatives lack direct enforcement mechanisms and rely on governments' resolve to enforce them. Thus, IR scholarship on this topic privileges the role of domestic political mobilization. In this tradition, studies predict that office-seeking policymakers will hold norm violators accountable if domestic constituencies mobilize for compliance, affecting the policymakers' chances of re-election (Spar 1998; Simmons 2009; Dai 2005; Chaudoin 2014).

This domestic constituency mechanism fails to explain why governments punish rule breakers even when compliance issues have little to no effect on incumbents' electability. Most cases of global norm violations go unnoticed by domestic audiences. For example, in the UK, there was little media coverage or political mobilization when 700 Cambodian households sought legal and political recourse against the sugar industry's sustainability certification body, *Bonsucro*, which is headquartered in the UK (UK National Contact Point 2022). In 2019, the complainants filed a complaint against the association with the UK government, alleging that "*Bonsucro* failed to hold *Mitr Phol* accountable after the Thai sugar giant grabbed their land and left them homeless and destitute," in breach of the OECD Guidelines for Multinational Enterprises (OECD Watch 2022b). Similarly, voters in the Netherlands paid little attention when activists filed a complaint against ING Bank for violating environmental norms enshrined in the OECD Guidelines and the Paris Agreement.<sup>1</sup> Existing theories predict that governments will brush off such complaints. Office-seeking policymakers care about their image and their re-election, and to the extent that MNC operations have little effect on these, the argument goes, such policymakers have weak in-

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<sup>1</sup>Greenpeace Netherlands, one of the complainants, stated that "to be responsible, businesses must report emissions and climate risks, or they too will face investigations and even lawsuits." Greenpeace Nederland. "ING Bank on the hook for not reporting climate pollution." See [https://complaints.oecdwatch.org/cases/Case\\_476](https://complaints.oecdwatch.org/cases/Case_476).

centives to weigh in. Contrary to this expectation, both the Dutch government and the UK government publicly stated that the two respective companies had breached relevant global norms and demanded that they adjust their corporate policies in line with those norms.

This paper asks: Why do governments enforce global corporate norms and discipline rule breakers even when domestic audiences pay scant attention to such issues? To answer this question, I closely examine how domestic political factors such as election proximity shape governments' decisions regarding corporate norm enforcement. Focusing on the principal-agent relationship between elected officials and bureaucrats, I argue that bureaucrats' responsibility increases during elections. Because an incumbent aims to expend his or her political capital efficiently and target resources toward high-salience election issues, election proximity expands bureaucratic authority over enforcement decisions. Based on this premise, I advance a theory of bureaucratic contact to explain enforcement decisions on low-salience issues such as global corporate norms. I theorize that bureaucrats are pressured to cherry-pick promising cases when making enforcement decisions, and expect their decisions to have little effect on their promotion prospects. In these circumstances, complainants with ties to home country-based advocacy organizations enjoy a unique advantage in terms of their ability to achieve a disciplinary decision; this is because bureaucrats under resource constraints tend to view cases more favorably and process information more easily when home country-based activists, who understand the relevant enforcement mechanisms, help them contextualize compliance information. This theory predicts that foreign pro-compliance groups, including authoritative experts and prominent transnational NGOs, face a disadvantage during election times despite their significant mobilization capacities. Without the ability to navigate complex and strained bureaucracies, prominent transnational NGOs and experts without ties to domestic bureaucrats tend to struggle during election times. Altogether, this theory points to an alternative pathway for enforcement when the electoral spotlight shifts attention away from these less salient issues. It privileges the role of domestic activists as lobbyists and interpreters who help complainants navigate the complex and foreign bureaucracy.

I test the theory focusing on the OECD Guidelines for Multinational Enterprises (hereafter, the Guidelines). The Guidelines delineate codes of conduct for MNCs regarding their operations' impact on human rights and the environment across borders. The drafters of the Guidelines granted governments the autonomy to determine when and how to pressure companies into complying with the Guidelines, expecting that reputational considerations would lead to government pressure and corporate compliance. This paper draws from OECD Watch's specific instances complaint database, a relatively new set of data that depicts how governments have responded to allegations that MNCs have engaged in norm violations. The database contains detailed information about complaints of specific instances from 2000 to 2018. Based on a careful reading of adhering governments' decisions and their final statements on norm violation complaints, I assess various outcome variables that measure governments' attitudes toward the alleged norm violations. Consistent with the theory's prediction, I find that the involvement of domestic activist organizations increases the likelihood that an MNC will be disciplined during an election period, and this tendency is more pronounced in countries where the power to make decisions about enforcement is shared across multiple bureaucratic agencies.

This paper makes several contributions. Scholars interested in the role of domestic politics in IR have examined how policymakers' electoral incentives change their foreign policy agendas. Studies in this area have analyzed international trade policies with nationwide economic implications (Rickard 2012, 2018; Conconi et al. 2014; Chaudoin 2014; Conconi et al. 2017; Brutger and Li 2019; Brutger et al. 2022), major environmental agreements (Dai 2005), and security issues (Fang 2008). Despite the major contributions of these studies, their main theoretical mechanism relies heavily on the assumption that domestic audiences hold politicians accountable for their decisions. This assumption is especially problematic in the case of global corporate norm enforcement. Individual corporations' malpractice rarely becomes an issue during elections. Furthermore, MNCs wield strong influence in elections;

financing campaigns and making promises to onshore jobs.<sup>2</sup> Despite the importance of this issue, little attention has been paid to incumbent governments' willingness to go against the interests of powerful MNCs to enforce norms during election periods. This paper proposes an alternative perspective, prioritizing the role of domestic activist groups and their connections to bureaucrats as explanatory factors that explain the effect of elections on enforcement decisions.

Second, studies of corporate labor or environmental standards have largely provided firm-level explanations, leaving unanswered how politicians' office-seeking incentives affect the diffusion of those norms. Notable works in this realm have explained: how firms' engagement in global supply chains strengthens their incentives to adopt stricter standards (Malesky and Mosley 2018; Greenhill et al. 2009; Vogel 1997), why firms voluntarily embrace environmental codes of conduct (Green 2013), and how firm-driven private regulations preempt stricter public regulations (Malhotra et al. 2019). Aside from several studies on trade agreements and norm diffusion (Hafner-Burton 2011; Lechner 2016; Hafner-Burton et al. 2019), there have been few efforts to analyze governments' incentives to regulate and discipline individual corporations. This paper fills this important gap.

## The Domestic Constituency Mechanism

Many international agreements lack punitive enforcement mechanisms. Thus, scholars of international institutions have focused on how domestic constituencies shape governments' compliance decisions. Most notably, Dai (2005) has argued that governments' compliance decisions reflect the electoral leverage of domestic constituencies, showing that the Long Range Transboundary Air Pollution Convention gave environmental activists crucial political leverage over office-seeking incumbents' compliance decisions. Simmons (2009) has

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<sup>2</sup>Recent papers demonstrate that voters punish incumbents for offshoring in their electoral districts, and incumbents adjust their policy positioning according to their constituents' preferences on offshoring (Rickard 2022; Owen 2017). Furthermore, MNCs make generous campaign contributions to influence the policy-making process in industrialized democracies (Kim 2017; Osgood et al. 2017; McCarty et al. 2016).

highlighted the domestic constituency mechanism, showing that international human rights treaties mobilize pro-compliance groups. Chaudoin (2014) has argued that potential plaintiffs strategically initiate WTO trade disputes depending on the strength of pro-compliance groups within the defendant country. Other studies have focused on legislative veto players: most notably, Lupu (2015) has contended that legislative veto players increase the likelihood of compliance with human rights treaties by making it difficult for the executive to use formalistic repressive tactics. Overall, there has long been broad consensus that international institutions empower pro-compliance groups by giving them electoral or legislative leverage.

However, several recent studies have problematized the nexus between international institutions and pro-compliance groups in the areas of trade, (Naoui and Urata 2013; Peritz 2020), human rights (Chaudoin 2016; Terman 2016), and EU disintegration (De Vries et al. 2021). These scholars argue that international treaties and norms may empower anti-compliance groups as much as they mobilize pro-compliance groups. For example, Chaudoin (2016) has argued that international institutions enhance compliance only when pro- and anti-compliance groups are balanced in the strength of their efforts; he showed that the ICC indictment of two Kenyan presidential candidates empowered anti-compliance activists, a backlash that thwarted the ICC's indictment efforts (Chaudoin 2016). All told, the general assumption in the field has been that compliance issues become more salient during important domestic political events such as elections, either because such issues are politicized and mobilize anti-compliance groups or because they open a window of opportunity for pro-compliance groups.<sup>3</sup>

However, in reality, outside of major WTO disputes, few compliance issues have received wide attention from domestic audiences. When it comes to alleged breaches of global environmental or human rights norms, media coverage is sparse at best. For example, among countries who adhere to the OECD Guidelines, the UK receives the largest number of com-

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<sup>3</sup>Chaudoin (2014) shows that the EU–US WTO dispute on zeroing (DS-294) gained substantial media attention, which helped the electorate hold politicians accountable. In a similar vein, Pelc (2013) has argued that when the US is drawn into WTO dispute settlement, US citizens seek information about the dispute on the internet.

plaints for violating the Guidelines. Figure 1 depicts the amount of UK media coverage of allegations of norm violations by UK companies operating in host countries from 2018 to 2021, and compares it with UK media coverage of various WTO disputes related to Meat and Meat Product, when the European Communities (EC) were taken to court by Canada and the US. These EC Hormones cases received consistent media coverage over the duration of the dispute resolution proceedings. In contrast, the eight cases of alleged violations of the Guidelines received little to no attention. Most notably, Lawyers for Palestinian Human Rights filed a complaint against JCB, a UK-based tractor company, for failing to conduct due diligence regarding human rights and argued that “JCB’s products were used in the demolition of Palestinian property and settlement-related construction in the occupied West Bank, including East Jerusalem (OECD Watch 2019).” In addition to the complaint through the Guidelines, JCB was listed in the UN Office of the High Commissioner for Human Rights’ database as an enterprise involved in activities that may have had human rights impacts in the occupied Palestinian territories (JCB failed to 2021). Despite the salience of this case within international organizations such as the OECD and the UN, it received little media attention in the UK. In 2021, only ten articles covered the UK government’s recommendations to JCB. Although one article appeared in the *Guardian*, people in the UK did not seek any more information on JCB or the company’s due diligence on human rights than they did before the complaint or before the *Guardian* article appeared: Google Trends indicates that web searches for the term “JCB” remained consistent throughout November 2021, when the UK government made a disciplining recommendation to JCB and the *Guardian* reported the news (See Figure 8 in Appendix). Altogether, this case vividly illustrates the difficulty of gaining domestic audiences’ attention when it comes to compliance issues, let alone mobilizing them in support of the cause.

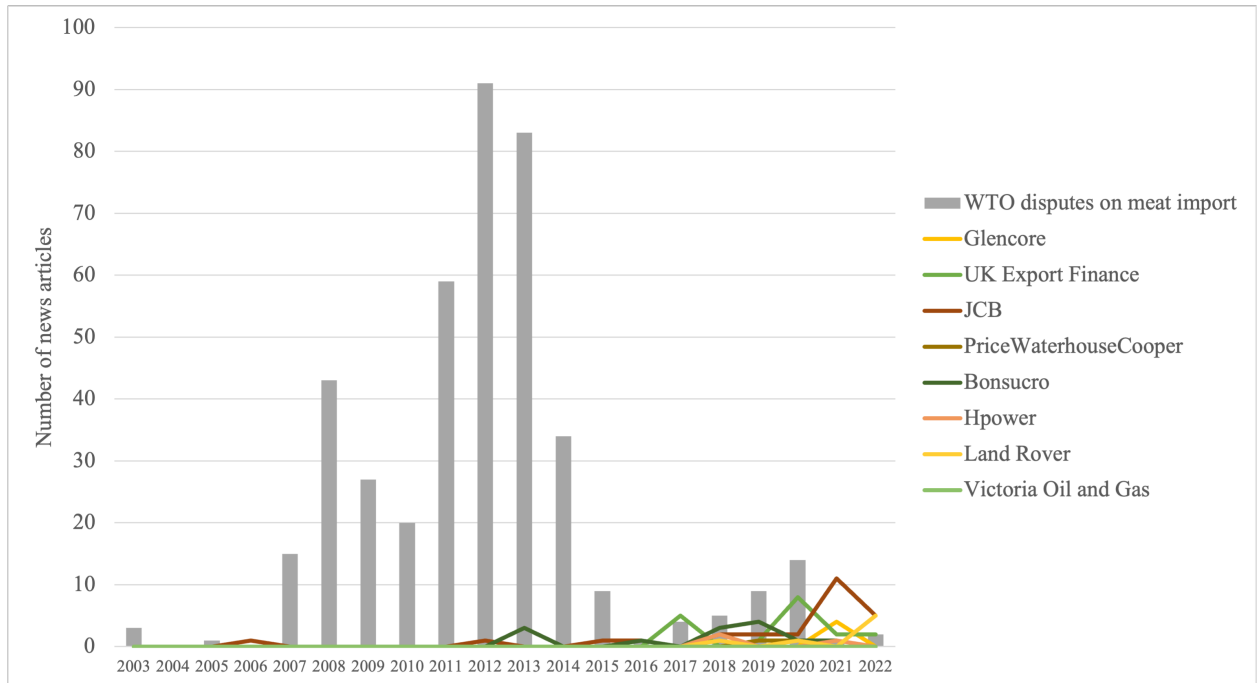
So, why do governments discipline norm-breaking corporate actors when allegations of misconduct receive little to no attention from domestic audiences? Various theories on the political business cycle do not predict that an incumbent would adjust their policies in line

with demands from pro- or anti-compliance groups. They would be more likely to do so in regard to high-salience issue areas with nationwide implications such as national security (Brutger and Kertzer 2018; Sartori 2002; Crescenzi 2007; Morse 2019) or economic issues with significant consequences for investor perceptions (Doshi et al. 2019; Gray 2013; Barry et al. 2013).

Unlike those salient issues, global norms regarding labor, the environment, and human rights receive little attention in domestic politics. In the early 2000s, when governments began codifying and implementing global corporate rules such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, only 9% of the American electorate said that the economic impact of environmental protection is an extremely important issue to them, while 15% of respondents said that they had not thought about the issue at all. At the same time, 41% of these respondents said that health care is an extremely crucial issue. Only 0.2% of the respondents said that they had not thought about healthcare at all (ANES Time Series Study 2004).

Compliance issues' lack of salience affects the behavior of activists and policymakers alike. First, if elections affected enforcement decisions in low-salience issues, activists would strive to attract public attention to these issues during elections. However, voters' attention is finite and scarce. It has been well established that rationally ignorant voters may have weak incentives to acquire information on the government's enforcement decisions, knowing that their votes have a low probability of affecting the outcome of the election (Martinelli 2006; Downs et al. 1957). In turn, strategic activists refrain from allocating resources to low-salience compliance issues during election times. In an example that supports this reasoning, advocacy organizations that filed a complaint regarding MNCs' compliance with the OECD Guidelines were slightly less likely to issue press releases when they filed a complaint closer to a major election as opposed to during non-election times (Figure 2) The low salience of corporate norm issues may also affect policymakers' calculus as to foreign policy decisions. Kelley and Pevehouse (2015) illustrated that President Obama did not transmit the



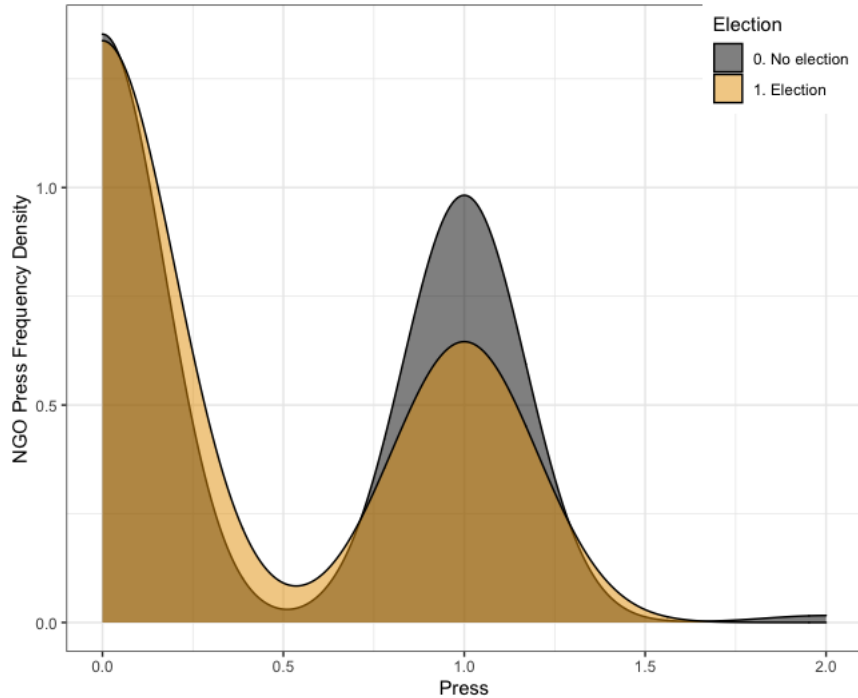


**Figure 1** – Amount of UK media coverage of the alleged violations of the OECD Guidelines vs. WTO dispute on Meat and Meat Products (Hormones), Keyword searches on *Factiva Press Release Service (UK)*

Framework Convention on Tobacco Control to the Senate because he had more important domestic issues on which he wanted to expend his political capital. Similarly, the Clinton administration struggled to garner support for NAFTA while building a legislative coalition to support the healthcare reform bill. All told, although pro- and anti-compliance groups in the domestic political space strive to apply leverage during elections, most compliance issues are not salient enough to affect policymakers’ calculus on enforcement decisions.

## Bureaucratic Connections in the Electoral Spotlight

If office-seeking motivations have little effect on enforcement decisions, what explains the enforcement of global norms? What makes policymakers discipline MNCs during election times despite the low salience of compliance issues? I develop a bureaucratic contact theory that explains variation in enforcement decisions at different times. This theory focuses on bureaucrats’ crucial role in the decision-making process and the increased importance of this



**Figure 2** – Density Plot for the Frequency of Press Releases by NGOs During Election Times versus. Non-election Periods

role during election times. It suggests that it is difficult for bureaucrats to process information about MNC behavior in foreign contexts; even when they have the expertise, they have weak incentives to invest resources in resolving complaints that receive little attention from the principal. Thus, bureaucrats are compelled to screen and cherry-pick promising cases. Ultimately, I argue that bureaucrats tend to discipline a norm-breaking company only when the case attracts the attention of domestic advocacy groups that have the resources to help the bureaucrats process information about it.

Elected officials have weak incentives to attune their enforcement decisions to the demands of pro-compliance groups during election times. The opportunity cost of disciplining a major MNC may be too high for an incumbent, even if the decision helps gain some marginal support from pro-compliance groups. An incumbent facing a major election may seek to accomplish other crucial goals, such as scoring points with a protectionist domestic constituency in need of jobs (Owen 2017), boosting the morale of a pro-MNC constituency with ethnocentric values (Andrews et al. 2018), or even collecting campaign contributions

from MNCs (Osgood et al. 2017; Kim 2017). To get a favorable outcome, an MNC may provide a swift solution that benefits the incumbent (e.g., a promise to onshore jobs or a donation of campaign funds) in exchange for dismissal of the complaint. All things considered, governments' incentives to engage in image management generally fail to trump immediate rewards that can placate pro-compliance domestic audiences. In this way, proximate elections may, in fact, limit the issue space for pro-compliance groups while more salient issues are in the spotlight.

*Hypothesis 1. Election proximity alone is unlikely to affect government decisions on norm enforcement.*

Alternatively, I contend that career bureaucrats make important calls concerning norm enforcement when the issues have low salience, especially during election times. It has been well-established that elected officials delegate decision-making power to career bureaucrats when they do not have the resources or time to execute certain tasks. Such delegation can lead to agency shirking or slippage, since the elected official, the principal, cannot perfectly monitor the agent's behavior (Hawkins et al. 2006). Such slippage is likely to be more severe during election times. Several studies have shown that bureaucratic activities expand when the principal is constrained (Junge et al. 2015; Boushey and McGrath 2020; McCubbins et al. 1987: e.g., during legislative gridlock). If an election period increases the likelihood of gridlock or resource constraints that affect executive and legislative branch actors whose political resources are targeted toward high-salience issues, bureaucrats will be likely to exercise stronger discretion over low-salience issues.

Faced with an increase in demands during election periods, bureaucrats in this area are likely to adopt a variety of coping strategies when making enforcement decisions. The literature on street-level bureaucrats has documented how client-facing public service workers demonstrate coping behaviors in order to manage the gap between the "interminable demands for their services and the limited resources available" (Vedung 2015: p.16). Specifically, Winter and Nielsen (2008) show that street-level bureaucrats such as teachers and

health workers adopt *creaming strategies*, that is, cherry-picking cases that result in substantive success, cost efficiency, or quantitative performance improvement (Vedung 2015: p.16-7). Admittedly, bureaucrats exercising oversight of global corporate norms are hardly “street-level” bureaucrats. Typically, they are mid-career bureaucrats in foreign or trade ministries; less often this responsibility is shared among multiple ministries such as labor or home affairs. Overall, it is fair to say that such bureaucrats hold technical expertise in economics, law, or global governance.

Although their areas of expertise are quite different from those of typical street-level bureaucrats, they share common challenges in their day-to-day activities. First, due to the low salience of the issue at hand (e.g., corporate norms), they suffer from a shortage of resources. In the case of the OECD Guidelines, out of 49 adhering governments in 2019, 19 relied exclusively on part-time staff to oversee the implementation of the Guidelines, and four did not have any staff responsible for the task; 24 governments reported that they did not have any budget solely dedicated to enforcing the Guidelines (OECD 2019: p.44). Summarizing these resource constraints, OECD (2019) stated that “in most cases, members of staff are also responsible for other Government portfolios and therefore have little time to spend on related tasks.” Second, like street-level bureaucrats, bureaucrats in charge of corporate norm enforcement engage in client-facing tasks. For example, they must gather information on incidents that took place in foreign territories and interpret the information according to their own country’s domestic standards. To accomplish this task, bureaucrats must interact with the victims of global norm violations, who are rarely equipped with the legal or institutional resources to navigate a foreign government’s institutional space. In the case of Chungwon Fashion (based in Korea and operating in the Philippines), victims of the company’s labor malpractice were mostly Philippine nationals with limited knowledge of the Korean government’s bureaucratic structure. Only after joining forces with two Korea-based labor groups did the victims begin contacting various Korean ministries. On a logistical level, language differences pose another obstacle to enforcement. In the dispute

between labor unions and Triumph International, a Swiss undergarment manufacturer operating in Thailand, the victims could not take advantage of the OECD mechanism because the Swiss government did not “provide the funding to bring the victims to Switzerland or for translation of key documents” (Thai and Filipino Labor Unions vs. Triumph International).

It is my contention that bureaucrats are more likely to reach a decision favorable to the victim when they gain information on the complaint from activists who understand the home country’s enforcement process. Activists based in the country where an MNC is headquartered act as interpreters who can help cherry-pick cases and reduce the workload of cross-pressured bureaucrats. For this reason, victims’ coalition strategies are a key determinant of government enforcement decisions. Victims of norm violations can form a transnational coalition of advocacy organizations in an attempt to elicit a favorable decision. This paper theorizes that an advocacy organization with a home country presence has a unique advantage when lobbying their home government to discipline an MNC, especially during election times. The organization must funnel information about MNC operations to the right decision-makers and convince them to consider the case. Home NGOs are effective lobbyists because they have prior relationships with bureaucrats in the home government and understand the procedures of the home bureaucracy. Supporting this line of reasoning, recent studies have depicted NGOs as akin to lobbyists and revealed that within IOs, NGOs affect international policy outcomes by providing information in return for access to policymakers (Murdie and Hicks 2013; Dellmuth and Tallberg 2017; Tallberg et al. 2018). Domestic NGOs can reduce foreign victims’ lobbying costs and help bureaucrats understand and process information relevant to complaints.

*Hypothesis 2-1. During election times, governments are more likely to discipline MNCs when they receive complaints from coalitions that include NGOs based in their own country.*

The theory also predicts that principal-agent slack will be more severe when decision-making power is shared across multiple bureaucratic agencies. When there are multiple agencies in charge of the same task, bureaucrats need to overcome inter-agency silos. When

bureaucrats already face staff shortages and language barriers in their communication with complainants, the silo problem can delay the process, incentivizing them to pass the buck to other governments or cherry-pick only the most promising cases. Studies in public administration have convincingly argued this line of reasoning and demonstrated that silos lead to poor organizational performance (Gulick 1937; Weber 1978). Recent papers have shown that siloed thinking leads to turf battles even in highly centralized IOs like the EU (Trondal 2012; Vantaggiato et al. 2020). The involvement of home-based activists can help bureaucrats reach a favorable and speedy decision for victims because NGOs familiar with the home government can facilitate inter-agency coordination.

*Hypothesis 2-2. During election times, governments that delegate decision-making on norm enforcement to multiple bureaucratic agencies are more likely to discipline MNCs when they receive complaints from coalitions that include NGOs based in their own country.*

## **Alternative Accounts**

An alternative argument would emphasize the positive side of the election effect that superstar transnational NGOs or prominent individual experts can deliver. This view posits that activist coalitions become most powerful when they can put governments and MNCs in the spotlight and increase media attention to the case at hand. If this mobilization-centric view is valid, victims of norm violations would seek to ally themselves with impartial and reputable third-party experts (e.g., UN panelists) or transnational NGOs with abundant resources, rather than NGOs based in the MNC's home country, thus increasing the chances of naming-and-shaming.

*Alternative Hypothesis 1. During election times, governments are more likely to discipline MNCs when they receive complaints from coalitions controlled by major advocacy organizations in third countries or individual experts affiliated with major international organizations.*

Another alternative view highlights the moral basis of norm diffusion. In particular, Busby (2007) shows that a religious framing of debt relief for poor countries enhanced the moral profile of the policy, thus expanding the pro-relief coalition in certain developed countries. In the same vein, Busby (2010) argues that “weak actors are able to exercise influence and induce states to embrace new policy commitments induced by norms,” (p. 50). In this view, the representation of victims and their involvement must constitute an integral part of the framing strategy. For a coalition to formulate an appropriate message with strong moral appeal, it is crucial for the coalition to represent victims of norm violations. Organizations in host countries are better equipped than home country organizations to collect information on an MNC’s operations from victims and represent them.<sup>4</sup> Host NGOs’ involvement, according to this view, is a necessary condition to enhance the moral profile of the coalition’s case. If this alternative view is valid, I expect to find the following:

*Alternative Hypothesis 2. During election times, governments are more likely to discipline MNCs when they receive complaints from coalitions managed by NGOs in host countries.*

## **The Case of OECD Guidelines**

International laws that enshrine global norms regarding MNC activity largely rely on the power of reputation. Most of those initiatives depend on firms’ voluntary commitments to adjust their behavior (e.g., ISO standards) (Green 2013; Prakash and Potoski 2006; Potoski and Prakash 2005) or governments’ incentives to enforce norms to build a reputation for compliance (e.g., the ILO Tripartite Declaration and the UN Global Compact) (Hale 2008; Johnston 2001). Among them, the OECD Guidelines represent the most formalized non-judicial procedure through which individuals can register complaints about MNC operations

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<sup>4</sup>For example, Coletivo Alternativa Verde (CAVE), an NGO based in Brazil, and SIPETROL, a São Paulo-based mining union, allied with Friends of the Earth Netherlands to file a complaint on Royal Dutch Shell in 2006. Shell was allegedly storing chemicals at their facilities in Brazil, which might have a negative health impact on the company’s employees and local residents. (See “CAVE and FoE Netherlands vs. Royal Dutch Shell,” 15 May 2006. [https://complaints.oecdwatch.org/cases/Case\\_92](https://complaints.oecdwatch.org/cases/Case_92)) Because CAVE and SIPETROL formed close ties with the victims in this case and took the initiative in filing a complaint in Brazil’s domestic court in 1993 (Alves et al. 2018), these organizations successfully promoted the case.

on a global scale (Ruggie and Nelson 2015).

The OECD published the first draft of the Guidelines in 1976 in response to the unsuccessful attempt by the Group of 77, a coalition of developing countries, to negotiate a legally binding treaty governing MNC activity (OECD 2018: 20). Because designers of the Guidelines understood the challenge of negotiating a binding treaty, they negotiated “non-binding principles and recommendations addressed by governments to MNCs, (OECD Guidelines Preface).” It was not until the collapse of the OECD negotiation for a Multilateral Agreement on Investment (MAI) that the OECD instituted the formalized procedure known as “specific instances” (Ruggie and Nelson 2015). Faced with the criticism that the OECD MAI would provide excessive protection for MNCs at the expense of human rights and the environment, the OECD revised the Guidelines to incorporate such grievances in 2000.

Since 1984, adhering governments have been required to establish National Contact Points (NCPs) to handle issues related to the Guidelines. In response to grievances about the ineffectiveness of the Guidelines, the 2000 revision amplified the role of adhering governments in addressing issues of implementation in specific instances (Khoury and Whyte 2019).<sup>5</sup> In this new procedure, individuals or organizations can file a complaint to designated NCP(s) about an MNC’s operational compliance with norms related to labor, bribery, human rights, and the environment. Upon receipt of the complaint, the NCP makes “an initial assessment of whether the issues raised merit further examination and respond to the parties involved,” (OECD Guidelines 2011: p.72). If the NCP decides that the case merits further consideration, it offers “good offices to help resolve the issue” (p. 72). Once the procedure is over, the NCP makes “the outcome of the procedures publicly available,” and makes “recommendations on the implementation of the Guidelines as appropriate,” (p. 73).

The Guidelines’ specific instances procedures are a useful case for studying whether ac-

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<sup>5</sup>That said, governments were allowed to adopt different approaches in setting up their NCPs. For instance, Greece located its NCP in the Ministry of Economy and Development without involving other ministries (OECD 2017). Unlike Greece, Belgium’s NCP responsibilities are shared among several ministries handling economic issues, foreign affairs, labor, environmental affairs, and justice (OECD 2017). In another example, the Netherlands has a single independent agency attached to the Ministry of Foreign Affairs while experts in various issue areas sit on the agency (OECD 2017).



tivists can push governments to discipline powerful MNCs via a non-judicial process, as it provides a rare opportunity to gauge government attitudes toward MNC behavior overseas. I now turn to the data and analysis.

## Data

To construct the dependent variable on government handling of complaints, I use OECD Watch's data on specific instances from 2000 to 2018; this database records how adhering governments handle allegations of norm violations. It contains detailed information on 190 cases of specific instances in this period. Importantly, each case entry has detailed information on a) the complainants (i.e., NGOs and trade unions) who filed the case, b) the respondents who allegedly breached the Guidelines, and c) which government is responsible for the case and the government's statements on the case.

## The Dependent Variable

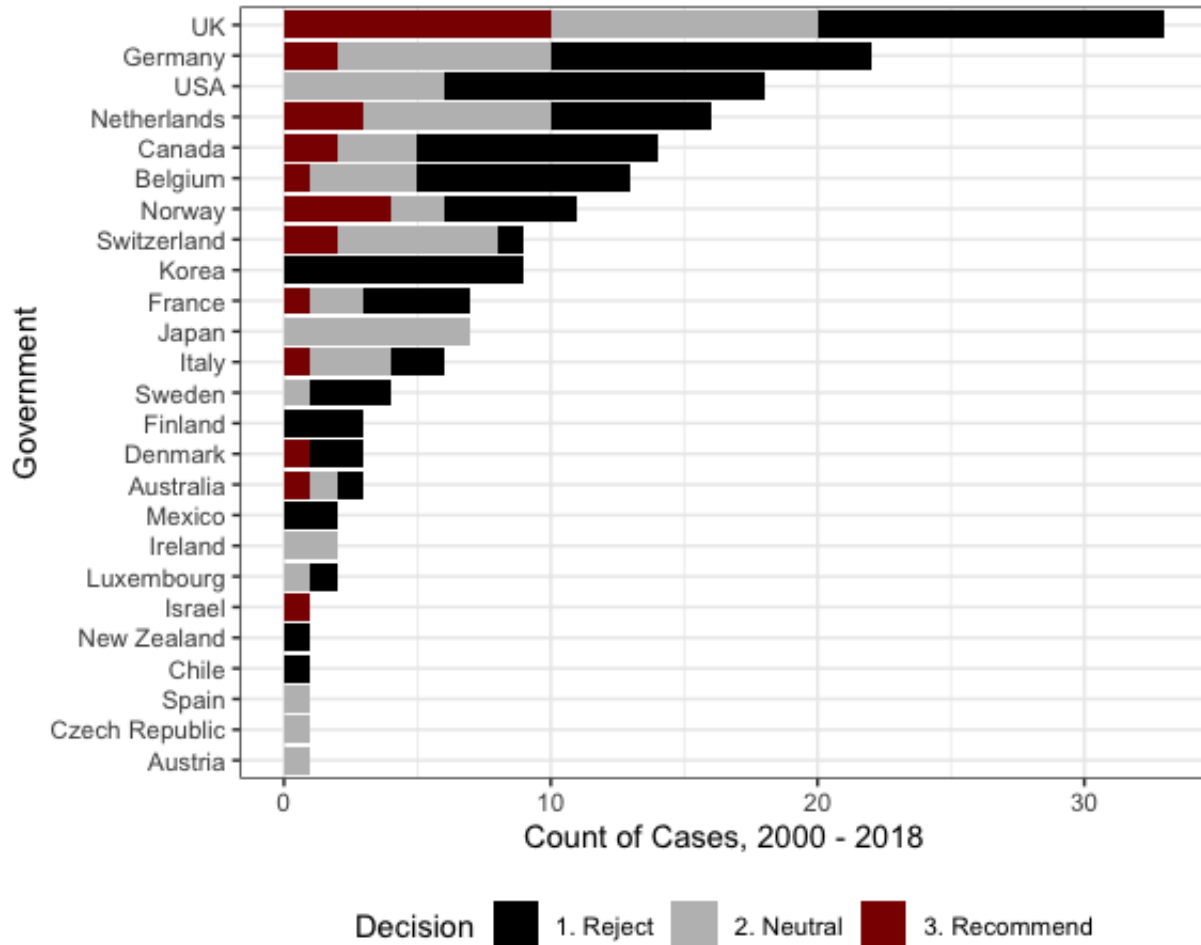
When faced with a complaint about MNC activity, a government typically responds in one of three ways: a) the government can reject the case or choose to vindicate the MNC; b) the government can avoid taking sides and act as an impartial mediator; or c) the government can recommend that the MNC disclose more information and adjust its policy to comply with the norm in question. I carefully read the summary descriptions of 190 cases and government statements and coded the outcomes in the form of an ordered variable that was coded 1 (vindication), 2 (neutral), or 3 (recommendation). I call this ordinal variable *Recommendation*. Figure 3 depicts the data.

Vindication can take various forms. A government can reject a complaint on procedural grounds, and such rejection is commonplace: 45% of the complaints in the data set were rejected on procedural grounds. For example, the UK government rejected a case related to UK Export Finance, the UK export credit agency, arguing that UK Export Finance is not

a multinational enterprise, and is hence “not covered by the Guidelines” (UK NCP 2020). This decision was controversial, however; other governments had previously accepted similar complaints, having determined that the Guidelines were applicable to their own export credit agencies. This illustrates that government decisions at such initial stages are not purely procedural. Other times, a government may explicitly exonerate an MNC during or following the mediation process. One example is Germany’s handling of *Fian and Wake up and Fight for Your Rights vs. Neumann Kaffee Gruppe*. The complainants claimed that the Ugandan army evicted residents from their land to help *Neumann Kaffee Gruppe*, a coffee importer, set up a coffee plantation (OECD Watch 2022a). As a result of the eviction, more than 2000 people had to flee to a nearby forest without receiving any compensation or accommodation (OECD Watch 2022a). Although the German government accepted the case for mediation, it explicitly vindicated the company’s decision, saying that *Neumann Kaffee Gruppe* could not have known that their use of the land would be controversial (OECD Watch 2022a; The German NCP 2011). I categorize both types of decisions—procedural rejections and explicit vindications—as vindications. As Figure 3 indicates, among the top five recipients of complaints, North American countries—Canada and the US—have tended to reject more claims than their European counterparts, the UK, Germany, and the Netherlands. Newly developed countries such as South Korea and Mexico dismissed all complaints they received from 2000 to 2018.

Mediation is also common. Governments often mediate cases on neutral grounds without making any recommendation. For example, the Japanese government concluded a case submitted by labor unions in Japan and Thailand against Suzuki Motor Corporation on the grounds that “the parties involved could not reach an agreement” (The Japanese NCP 2017). In its final statement, the government carefully limited its role to the provision of procedural guidance (The Japanese NCP 2017). Approximately 35% of the cases in the data set fall into this category.

Finally, a government can make specific recommendations to an MNC. Although dis-



**Figure 3** – Government Propensities to Vindicate MNC activity

ciplining recommendations are relatively rare, some governments are proactive in issuing specific recommendations to MNCs. When handling an allegation against construction companies operating in Russia, the Belgian government recommended that the companies “communicate to the public about potential hazards to the environment” since environmental information is “not considered confidential company information” (NCP Belgium 2014). Overall, compared with other countries, the UK, Canada, Germany, and the Netherlands tended to make more disciplining recommendations to MNCs following the mediation process (Figure 3). Cases in this category make up 15% of the data set.

## Explanatory Variables

### *Election Timing*

Domestically, elections are sensitive times during which incumbents seek to claim credit for their policy accomplishments. To capture any electoral incentive that could affect government decisions, I draw from the International Foundation for Electoral Systems (IFES) database to construct a binary variable *Election* (The International Foundation for Electoral Systems 2020). This variable is designed to measure if a case was filed within a six-month window before a presidential election (in presidential systems) or a general election (in parliamentary systems). This variable presumes that a case filed within this window is likely to get more public attention, thus putting the incumbent in the spotlight for their actions. Given that the six-month window could fail to capture the relationship between electoral proximity and government attitudes, I conduct a number of robustness checks in which I vary the proximity threshold.

### *Activist Coalitions*

Coalitions are an important component of my theory. I code coalition types based on information about the complainants. The OECD Watch Database provides detailed information on complainants' identities, including their physical addresses and whether they identify themselves as NGOs or trade unions. Drawing from the database, I construct three variables to categorize the coalition types.

First, *Home Coalition* measures whether a coalition has a sufficiently large number of groups with the proximity to pressure governments and MNCs. Hypothesis 2 posits that governments tend to be more responsive to demands from organizations based in their own countries. To operationalize this measure, I identify complainants based in the same country as the MNC's headquarters and calculate the proportion of home-based organizations in a coalition (variable name: *Home Coalition*).

Second, I have theorized that during elections, coalitions dominated by outsiders are

disadvantaged relative to home coalitions. In particular, I hypothesize that host country NGOs that represent victims of norm violations, despite their legitimate standing, may not be successful at pressuring governments to issue a disciplining recommendation. To test this hypothesis, I match complainants' addresses with the sites of MNC operations, calculating the proportion of complainants based in the host countries where the MNC operations produced complaints (variable name: *Host Coalition*).

I also test the influence of third-party transnational activists and experts, who have abundant resources but no direct stake in a given case. Complainants that fall into this category range from UN expert panelists to transnational NGOs such as Greenpeace International. I call this variable Star Coalition, as these complainants have abundant resources and authoritative status across multiple jurisdictions.<sup>6</sup>

## Controls

*Peer Review* IR literature suggests that during times of close public attention, governments become more sensitive to their reputations and more likely to comply with international rules. In the context of the OECD Guidelines, adhering governments voluntarily agree to undergo peer review in a designated year. Although the OECD Secretariat facilitates this review process, typically representatives from two to four peer governments carry out peer review visits. The peer reviewers meet with government officials, NGOs, and businesses during the visit, and these may include previous complainants from closed cases. After the on-site visit, the reviewers issue a peer review report and make recommendations. The peer review process was formally implemented as part of the 2011 update to the Guidelines

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<sup>6</sup>In 90 cases (49% of the entire cases), at least one organization outside of the home and host countries participated as a co-filer in the process. Activist coalitions that participated in the process show considerable diversity. The data indicates that a major portion of the complainant coalitions in the OECD procedure formed among organizations based in the home and the host countries (as shown on the Home–Host axis). The scarcity of coalitions between host-based and transnational organizations or pure third party organizations shows that complainants' nationality is a potent factor that affects their perceived legitimacy. In line with Wellhausen (2014)'s argument that nationalities serve as a crucial shield for MNCs in host countries, victims of MNC operations also seek a shield in the form of home country nationality to enhance their chances of achieving norm diffusion in the home country.

(Paragraph 19, Section II, 2011 Guidelines). As of this writing in 2021, 22 countries have experienced peer review, including ten in the data set (2001 - 2018). Of course, this is a highly endogenous process. Governments may strategically avoid signing onto the process when a controversial case is pending. That said, potential complainants may strategically file a case once their government signs onto a peer review, thus decreasing the government's control over the spotlight effect during peer review. Thus, I focus on whether or not a case was filed during a country's peer review period. Here, cases are coded 1 if they were filed during the review process and 0 if they were not (variable name: *Peer Review*).

*Coalition Size* I also control for *Coalition Size*, a variable that captures the number of organizations that participate as complainants in a case. This is an important control to account for cases' salience. In some cases, only one organization or an individual lodges a complaint. These solo cases tend to gain little media traction, which affects governments' calculus in the mediation process. On the other end of the spectrum, there are cases in which a dozen high-profile NGOs co-file a single complaint. For example, a group of transnational NGOs including Friends of the Earth, Germanwatch, and the Corner House (UK) allied themselves with local NGOs to file a complaint about BTC Oil's operations in Georgia, Azerbaijan, and Turkey. Twelve organizations in total participated in the case as complainants, and they issued two press releases during the mediation process.

*The Strength of Complaints* Governments may respond differently to complaints based on the relative strength of the cases. In the context of the World Trade Organization's dispute settlement procedure, scholars have found that complainants often invoke articles with little relevance to their cases. These studies find that the "kitchen sink approach" incentivizes panelists to exercise judicial economy, refraining from ruling on certain arguments raised in the complaints (Brutger and Morse 2015; Busch and Reinhardt 2006). While there are many differences between OECD and WTO procedures, they are analogous in one important way: in complainants' submissions, they must specify which article(s) of the Guidelines have been violated. The number of cited articles varies significantly: the median number

of cited articles is 5 and the mean is 6, but many complaints do not cite any specific provision in the Guidelines (See Figure 7 in the Appendix). Unlike in the WTO procedure, however, adhering governments have the leeway to dismiss an OECD claim based on the general weakness of the case instead of exercising judicial economy. Thus, governments may reject a case if a complainant invokes too few articles, but invoking too many articles—the kitchen sink approach—may also lead to rejection. To account for this non-linear dynamic, I control for the number of provisions cited using a quadratic term for the variable. The summary statistics of the data is provided in the Appendix (Table 4).

## Results

In this analysis, I use the ordered outcome variable (1 for rejection, 2 for neutral mediation, and 3 for recommendation) and estimate a set of ordered logit models. I interact election proximity with *Home Coalition*, the proportion of home country-based NGOs in a complainant coalition. If my main hypothesis is valid, election proximity is not expected to meaningfully correlate with *Recommendation*, and the interaction term should be positively associated with *Recommendation*, the outcome variable. All standard errors are clustered at the home country level, as the explanatory variable—elections—is assigned at the level of a home country. I also include a yearly time trend variable (*Year TT*)

Table 1 reports the results for the effect of *Election* conditional on complainants' coalition strategy. While election proximity is positively associated with stronger enforcement of corporate norms in Model 1, the results indicate that election proximity alone does not increase the likelihood of *Recommendation*. The *Election* variable, that is, whether a case was filed in the six-month window before an election, is negatively associated with *Recommendation* in some models; however, the coefficient on *Election* is not statistically significant. Overall, the results here provide evidence that supports the conjecture in Hypothesis 1: election proximity alone has little to no effect on government enforcement decisions.

The analysis shows that the election spotlight has clear distributional effects for complainants. Model 3 tests whether home-based coalitions enjoy the benefit of election proximity (Hypothesis 2-1). The results suggest that this may be true: for cases filed during an election campaign, the predicted probability of a government recommendation is 39% for those brought by home-based NGOs, while the probability of a recommendation drops to only 10% for those brought by an outside coalition that includes no home-based organizations ( $p < 0.01$ ; Figure 4, Panel 3. Recommend). In cases where the coalition makeup changes from home-based to foreign-based, the probability of rejection increases from 19% to 56% (37 percentage points) for a case filed closer to an election (Figure 4, Panel 1. Reject).

The results of Model 3 alone do not fully explain whether the positive association between home-based coalitions and disciplinary actions can be attributed to home-based NGOs' access to bureaucrats. Alternatively, as the traditional perspective argues, home-based NGOs may be better equipped to mobilize a domestic constituency despite the low salience of the Guidelines. Hypothesis 2-2 tests this possibility. In this analysis, I examine how adhering governments delegate the enforcement of the Guidelines among various bureaucratic agencies. The OECD's annual reports describe whether governments delegate the decision-making power to a a) monopartite, b) interagency, c) bipartite, d) tripartite, e) or quadripartite entity, or f) an independent third-party committee (OECD 2013). I conduct additional tests to tease out the micro-foundations in the context of bureaucratic contact theory. If the theory is valid, I expect that during elections, home-based NGOs' role would be particularly important in complex bureaucracies with many decision-making bodies (Hypothesis 2-2). I have theorized that delegation to multiple bureaucratic agents causes inter-agency silos, and home-based NGOs have an advantage in navigating these complex bureaucracies and eliciting a disciplinary decision even in cases that receive little attention during an election. Table 8 in the Appendix provides evidence in support of this line of reasoning: during election periods, home-based coalitions are more likely than foreign coalitions to elicit a recommendation from their government, and this likelihood increases even more when the



decision-making power is shared across a larger number of bureaucratic agencies. Taken together, these analyses indicate that home-based advocacy groups enhance the chances of a disciplinary recommendation by helping complainants navigate the complex bureaucracy.

Now I turn to testing the alternative hypotheses. In line with my theoretical conjecture, the results show that governments exhibit completely different behavior when coalitions of superstar NGOs or transnational experts are involved in complaints during an election. While the previous analysis on home coalitions showed that the government was willing to discipline MNCs during election periods, the results from Model 4 in Table 1 show that the government is more likely to protect MNC operations during a campaign, especially if third-party activists are involved. The probability of a recommendation is 28% during a campaign if the complainants' coalition does not include third-party activists; this probability decreases to 2% when the case is led by a third-party coalition without any ties to home or host country-based organizations (Figure 4). The results suggest that during electoral campaigns, governments tend to spare MNCs if the complainants are too foreign or too powerful, and that this type of outside coalition faces a significant disadvantage during election campaigns.

Finally, Models 6 and 7 test the relationship between election proximity and government attitudes toward norm enforcement, conditional on the influence of host country-based activists within complainant coalitions. As some studies prioritize the role of representation and moral framing, I test whether the involvement of host country-based organizations increases the likelihood of a recommendation (Alternative hypothesis 2). In this case, the results are mixed. The negative coefficient on the interaction term indicates that during an election campaign, the likelihood of a government recommendation decreases as the proportion of host-based groups in a complainant coalition increases; however, the standard error is too large to determine the validity of this hypothesis.<sup>7</sup>

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<sup>7</sup>I find little support for the moral framing hypothesis when I use a seven to ten month window to operationalize the election proximity variable. Table 7 in the Appendix reports the results. The interaction between *Election* and *Host Coalition* is negatively associated with *Recommendation* and highly significant

All told, the findings in this paper show that the electoral spotlight engenders serious inequality among norm beneficiaries. Those with ties to home country-based activists enjoy a relative advantage when pressuring governments to discipline MNCs during elections, especially when the enforcement power is delegated to multiple agencies. More strikingly, those with ties to transnational activists or UN experts tend to do poorly during elections. The findings offer a glimpse into how enforcement decisions are made with regard to low-salience issue areas. They show that the politics of corporate norm diffusion are deeply embedded in the cauldron of national and bureaucratic politics, in a way that diverges from the explanations set forth in some previous studies on compliance.

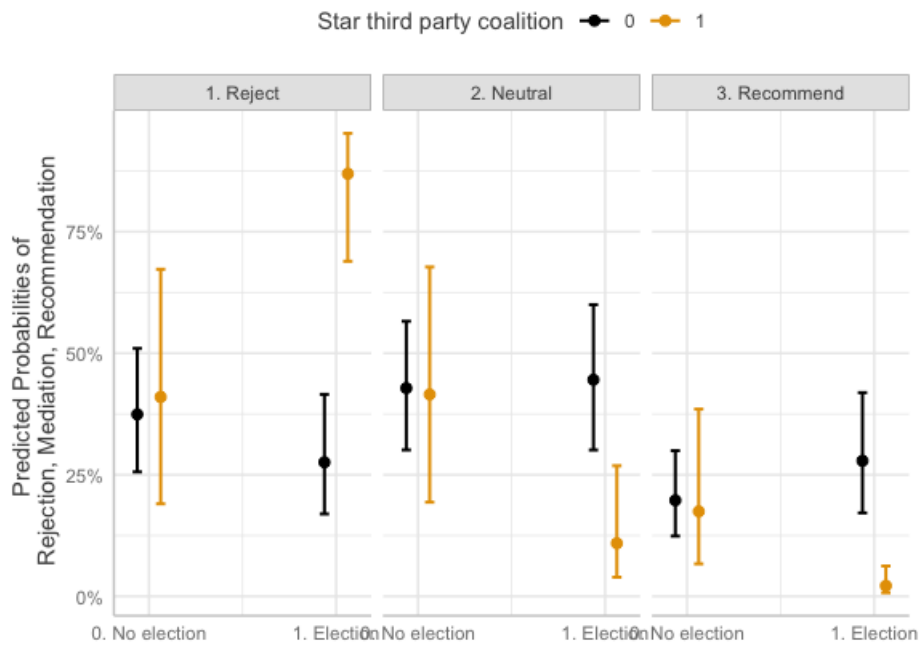
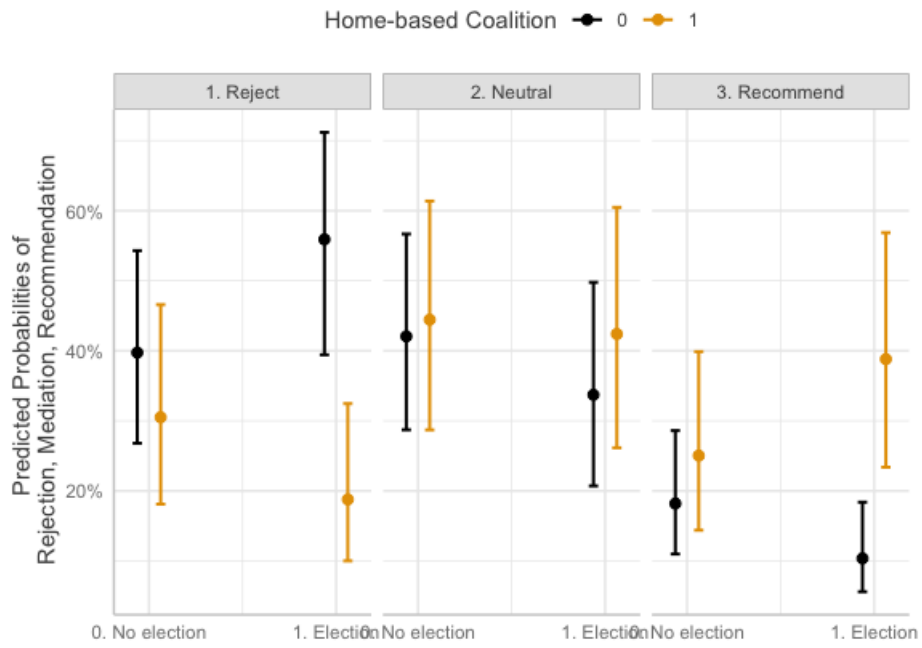
**Table 1** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes

|                         | DV: REJECTION - NO POSITION - RECOMMENDATION |                     |                     |                     |                     |                     |                     |
|-------------------------|--|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
|                         | (1)  | (2)                 | (3)                 | (4)                 | (5)                 | (6)                 | (7)                 |
| ELECTION                | 0.04<br>(0.33)                               | -0.04<br>(0.35)     | -0.65**<br>(0.29)   | -0.06<br>(0.30)     | 0.45<br>(0.32)      | 0.03<br>(0.34)      | 0.09<br>(0.30)      |
| HOME COALITION          |  | 0.65<br>(0.40)      | 0.41<br>(0.40)      |                     |                     |                     |                     |
| ELECTION:HOME COALITION |  |                     | 1.29***<br>(0.18)   |                     |                     |                     |                     |
| STAR COALITION          |  |                     |                     | -0.45<br>(0.51)     | -0.15<br>(0.51)     |                     |                     |
| ELECTION:STAR COALITION |  |                     |                     |                     | -2.71***<br>(0.06)  |                     |                     |
| HOST COALITION          |  |                     |                     |                     |                     | -0.48<br>(0.48)     | -0.44<br>(0.48)     |
| ELECTION:HOST COALITION |  |                     |                     |                     |                     |                     | -0.19<br>(0.13)     |
| COALITION SIZE          | -0.01<br>(0.08)                              | 0.01<br>(0.08)      | 0.01<br>(0.08)      | -0.01<br>(0.07)     | 0.004<br>(0.07)     | -0.02<br>(0.08)     | -0.02<br>(0.09)     |
| PEER REVIEW             | 1.64***<br>(0.04)                            | 1.57***<br>(0.06)   | 1.57***<br>(0.04)   | 1.59***<br>(0.06)   | 1.35***<br>(0.06)   | 1.72***<br>(0.06)   | 1.74***<br>(0.05)   |
| PROVISION               | 0.03<br>(0.07)                               | 0.02<br>(0.08)      | 0.01<br>(0.08)      | 0.02<br>(0.08)      | 0.01<br>(0.08)      | 0.01<br>(0.08)      | 0.005<br>(0.08)     |
| PROVISION2              | -0.002<br>(0.004)                            | -0.002<br>(0.004)   | -0.001<br>(0.004)   | -0.002<br>(0.004)   | -0.001<br>(0.004)   | -0.001<br>(0.005)   | -0.001<br>(0.005)   |
| YEAR TT                 | 0.06***<br>(0.0002)                          | 0.08***<br>(0.0003) | 0.08***<br>(0.0003) | 0.06***<br>(0.0002) | 0.06***<br>(0.0002) | 0.07***<br>(0.0002) | 0.07***<br>(0.0002) |

Notes:

\*\*\*p < .01; \*\*p < .05; \*p < .1; Clustered SEs at the home country level

( $p < 0.01$ ), suggesting that host country-based complainants are less likely to get a favorable outcome if they file a case closer to an important national election (e.g., a presidential or general election).



**Figure 4** – Predicted Probabilities of Reject, Neutral Mediation, and Recommendation Based on Coalition Attributes

## Robustness Checks

The submission of complaints is an endogenous process. While this paper focuses on the effect of election proximity, case submissions and election proximity are potentially interrelated. For example, activists may file a case closer to a national election if the case is closely related to major election issues such as labor or the environment, rather than a localized issue such as bribery. Activists may expect to gain support for the case from pro-labor or pro-environment voters in the home country by timing the case to coincide with the election period. On the other hand, activists may forgo timing a case to an election if the home government is already scheduled to undergo the OECD Guidelines’ peer review process. If the peer review process is underway, activists can expect the opportunity to pressure the government through the review process, weakening their incentives to file a case during an election period. Finally, activists may submit a complaint during an election period if the case is relatively weak.

I use coarsened exact matching to address these issues.<sup>8</sup> Treating *Election proximity* as a treatment variable, I match the treatment on *Peer Review*, *Number of Cited Provisions*, *Labor*, and *Environment*. As Figure 5 describes, there is a significant imbalance between the treated and control cases with regard to the nature of the issues (e.g., the environment), peer review, and procedural strength. Using matching techniques, I reduce the gap between the treated and untreated observations to a reasonable degree.

The results are reported in Table 2. Overall, they confirm the theoretical conjecture of this paper. *Peer review* remains positively associated with norm enforcement and statistically significant ( $p < 0.01$ ). Compared with the previous analysis, the quadratic relationship between the number of cited provisions and a resulting recommendation confirms the theoretical conjecture: as the number of cited provisions increases to a certain degree, the likelihood of recommendation increases, but then begins to decrease if too many provisions are cited.

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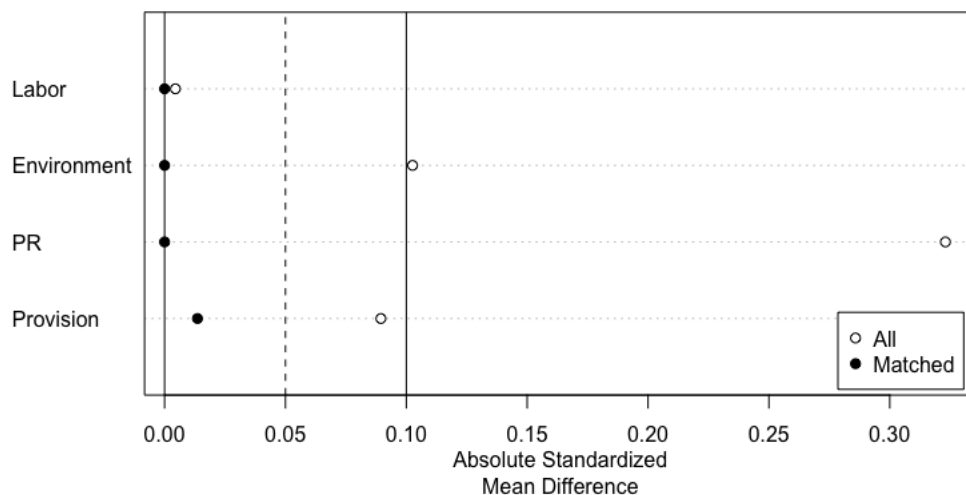
<sup>8</sup>In this case, coarsened exact matching is preferable to other matching techniques such as propensity score matching. Most importantly, this technique allows me to adjust “the imbalance on one variable without affecting the maximum imbalance of any other” variable (Blackwell et al. 2009).

As the results from Model 2 indicate, election proximity enhances the likelihood of norm enforcement if the complainant alliance is predominantly composed of home country-based advocacy organizations; the predicted probability of a government recommendation during an election increases from 10% to 37% if the activist coalition is exclusively home-based versus entirely foreign. This analysis also indicates that the home advantage is particularly pronounced during election periods: when a national election is not proximate, the predicted probabilities of recommendation are relatively similar (16–17%) across different coalition attributes.

In line with the broad theoretical conjecture, the results from Model 3 show that coalitions with ties to host countries face a disadvantage in soliciting norm enforcement from an MNC's home government during an election period. Similarly, the results from Model 4 in Table 2 show that third party star coalitions face a significant disadvantage when soliciting recommendations in the lead-up to an election. That is, while an activist coalition that does not include any transnational experts or organizations has a 31% likelihood of gaining a disciplinary recommendation against an MNC when an election is proximate; the predicted probability drops to 2% if the case is filed by foreign entities without any ties to the host or home countries.

## Discussion

The IR literature has long considered electoral leverage to be a key mechanism through which pro-compliance groups promote global corporate norms, especially when the international laws that address these norms are non-binding. Focusing on the enforcement of these norms, this paper shows that the domestic constituency mechanism does not fully explain enforcement decisions, which receive scant attention from domestic audiences. The theory and findings of this paper highlight the role of silent networks of local NGOs and bureaucrats in home countries. The paper examines the understudied role of bureaucrats,



**Figure 5** – Balance Plot Before and After Matching

**Table 2** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes from Matched Data

|                         | ORDERED DV: RECOMMENDATION |                     |                     |                     |
|-------------------------|----------------------------|---------------------|---------------------|---------------------|
|                         | (1)                        | (2)                 | (3)                 | (4)                 |
| ELECTION                | 0.22<br>(0.39)             | -0.56<br>(0.39)     | 0.27<br>(0.34)      | 0.50<br>(0.46)      |
| HOME COALITION          |                            | -0.08<br>(0.50)     |                     |                     |
| ELECTION:HOME COALITION |                            | 1.72***<br>(0.19)   |                     |                     |
| HOST COALITION          |                            |                     | 0.88<br>(0.61)      |                     |
| ELECTION:HOST COALITION |                            |                     | -0.38***<br>(0.12)  |                     |
| STAR COALITION          |                            |                     |                     | -0.65**<br>(0.32)   |
| ELECTION:STAR COALITION |                            |                     |                     | -2.41***<br>(0.13)  |
| COALITION SIZE          | -0.10**<br>(0.05)          | -0.08*<br>(0.05)    | -0.11**<br>(0.05)   | -0.08<br>(0.06)     |
| PEER REVIEW             | 1.65***<br>(0.01)          | 1.59***<br>(0.02)   | 1.78***<br>(0.03)   | 1.53***<br>(0.05)   |
| PROVISION               | 0.41***<br>(0.01)          | 0.39***<br>(0.07)   | 0.45***<br>(0.13)   | 0.46***<br>(0.11)   |
| PROVISION2              | -0.03***<br>(0.01)         | -0.03***<br>(0.01)  | -0.04***<br>(0.01)  | -0.04***<br>(0.01)  |
| YEAR TT                 | 0.07***<br>(0.0002)        | 0.07***<br>(0.0002) | 0.06***<br>(0.0003) | 0.08***<br>(0.0003) |

Notes: Clustered SEs

\*\*\*p < .01; \*\*p < .05; \*p < .1;

showing that their influence expands during important national elections and that they are cross-pressured by their expanded authority and increased client demands when the electoral spotlight is shining. In these circumstances, the bureaucrats may be biased in favor of complaints vouched for by actors in domestic civil society who understand how things work in the home country.

This paper advances our understanding of how various coalition strategies moderate the effect of elections on norm diffusion. Bridging previous studies on transnational activism and international institutions, this article shows that governments respond differently to the electoral spotlight depending on complainants' coalition strategies. Governments tend to vindicate MNC activity if the complaining coalition consists predominantly of transnational experts or NGOs located in host countries, especially during election times. For one thing, these findings show that the conventional wisdom on moral framing and representation may have little relevance when the electorate does not care enough about the issue at hand. Governments are unlikely to discipline MNCs when the victims are primarily assisted by NGOs based in the host countries where the norm violations allegedly occurred. Departing from the conventional understanding of the power of moral frames, this paper shows that coalitions of the weak, represented by local NGOs in host countries, generally do not increase the possibility of norm diffusion. The results also reshape our understanding of the power of transnational experts and third-party NGOs. This paper shows that the involvement of superstar experts and transnational advocacy groups actually disadvantages victims during election periods, when incumbents target their resources toward high-salience issues. In other words, the electoral spotlight can cast a shadow over low-salience enforcement issues, disadvantaging outside actors without ties to domestic groups in the country where an MNC is headquartered.

This article has several implications for scholars and policymakers. First, it helps scholars better understand how activist coalitions successfully pressure governments into norm enforcement. There is a large body of literature on norm compliance; IR scholars have argued

that domestic political mobilization, especially by transnational activist networks, is a crucial determinant of norm diffusion. As the world has become more connected, however, TANs have evolved in lockstep. Some alliances are led by victims of norm violations in the Global South while organizations in the Global North play a marginal role; other partnerships are genuinely “transnational” and include concerned organizations in countries without much direct stake in a given case. Despite these evolving coalition strategies, we know relatively little about how the coalition dynamics within transnational networks shape corporate norm diffusion. This article fills this gap in our understanding of how transnational networks have operated during the heyday of globalization. Considering the striking finding that governments are typically dismissive of transnational networks led by host country organizations, this paper calls for a reorientation of our understanding of how industrialized democracies respond to foreign activists with limited insider connections.

Building on this insight, this paper reorients our understanding of the election effect. Although a few recent studies have shown that the public scrutiny that comes with an international spotlight may hamper genuine compliance (Carnegie and Carson 2018; Búzás 2018), the IR field has long posited that the spotlight effect (i.e., peer monitoring among IO members or electoral leverage during campaigns) is one of the few strategies weak activists can use to pressure governments into compliance. The primary findings of this paper add crucial nuance to our understanding of the electoral spotlight: public scrutiny during an electoral campaign may not necessarily promote norm compliance, and the spotlight may even decrease the chances of norm enforcement for some norm beneficiaries, especially outsiders without the resources to network with home bureaucrats. This paper advances an alternative view of bureaucrats in international politics. Despite their technical expertise, while juggling multiple responsibilities, they may struggle to keep up with new global norms. Election times provide leeway for bureaucrats to exercise discretion when it comes to norm enforcement and incentivize them to prioritize only the most efficient and promising cases. Instead of focusing on how activists mobilize pro-compliance voters during elections, this



article shines a light on an alternative pathway by which the election spotlight activates silent networks of bureaucrats and domestic civil society.

## References

- Alves, M. A., Ometto, M. P. and Guimaraes, P. C. V. (2018), Blame and litigation as corporate strategies in the context of environmental disasters, *in* G. J. Robert, C. C. Miller and K. S. Helgesson, eds, ‘The Routledge Companion to Risk, Crisis and Emergency Management’, Routledge, London, U.K.
- Andrews, S., Leblang, D. and Pandya, S. S. (2018), ‘Ethnocentrism reduces foreign direct investment’, *The Journal of Politics* **80**(2), 697–700.
- ANES Time Series Study (2004), 2004 time series study, Technical report, American National Election Studies.  
**URL:** <https://electionstudies.org/data-center/2004-time-series-study/>
- Barry, C. M., Chad Clay, K. and Flynn, M. E. (2013), ‘Avoiding the spotlight: Human rights shaming and foreign direct investment’, *International Studies Quarterly* **57**(3), 532–544.
- Blackwell, M., Iacus, S., King, G. and Porro, G. (2009), ‘cem: Coarsened exact matching in stata’, *The Stata Journal* **9**(4), 524–546.
- Boushey, G. T. and McGrath, R. J. (2020), ‘Does partisan conflict lead to increased bureaucratic policymaking? evidence from the american states’, *Journal of Public Administration Research and Theory* **30**(3), 432–447.
- Brutger, R., Chaudoin, S. and Kagan, M. (2022), ‘Trade wars and election interference’, *The review of international organizations* pp. 1–25.
- Brutger, R. and Kertzer, J. D. (2018), ‘A dispositional theory of reputation costs’, *International Organization* **72**(3), 693–724.
- Brutger, R. and Li, S. (2019), ‘Institutional design, information transmission, and public opinion: Making the case for trade’, *Journal of Conflict Resolution* p. 00220027221085072.
- Brutger, R. and Morse, J. C. (2015), ‘Balancing law and politics: Judicial incentives in wto dispute settlement’, *The Review of International Organizations* **10**(2), 179–205.
- Busby, J. W. (2007), ‘Bono made jesse helms cry: Jubilee 2000, debt relief, and moral action in international politics’, *International studies quarterly* **51**(2), 247–275.
- Busby, J. W. (2010), *Moral movements and foreign policy*, Vol. 116, Cambridge University Press.
- Busch, M. L. and Pelc, K. J. (2010), ‘The politics of judicial economy at the world trade organization’, *International Organization* **64**(2), 257–279.
- Busch, M. L. and Reinhardt, E. (2006), ‘Three’s a crowd: third parties and wto dispute settlement’, *World Politics* **58**(3), 446–477.
- Búzás, Z. (2018), ‘Is the good news about law compliance good news about norm compliance? the case of racial equality’, *International Organization* **72**(2).

- Carnegie, A. and Carson, A. (2018), ‘The spotlight’s harsh glare: Rethinking publicity and international order’, *International Organization* **72**(3), 627–657.
- Chaudoin, S. (2014), ‘Audience features and the strategic timing of trade disputes’, *International Organization* **68**(4), 877–911.
- Chaudoin, S. (2016), ‘How contestation moderates the effects of international institutions: The international criminal court and kenya’, *The Journal of Politics* **78**(2), 557–571.
- Conconi, P., DeRemer, D. R., Kirchsteiger, G., Trimarchi, L. and Zanardi, M. (2017), ‘Suspiciously timed trade disputes’, *Journal of International Economics* **105**, 57–76.
- Conconi, P., Facchini, G. and Zanardi, M. (2014), ‘Policymakers’ horizon and trade reforms: The protectionist effect of elections’, *Journal of International Economics* **94**(1), 102–118.
- Crescenzi, M. J. (2007), ‘Reputation and interstate conflict’, *American Journal of Political Science* **51**(2), 382–396.
- Dai, X. (2005), ‘Why comply? The domestic constituency mechanism’, *International Organization* **59**(2), 363–398.
- De Vries, C. E., Hobolt, S. B. and Walter, S. (2021), ‘Politicizing international cooperation: The mass public, political entrepreneurs, and political opportunity structures’, *International Organization* **75**(2), 306–332.
- Dellmuth, L. M. and Tallberg, J. (2017), ‘Advocacy strategies in global governance: Inside versus outside lobbying’, *Political Studies* **65**(3), 705–723.
- Doshi, R., Kelley, J. G. and Simmons, B. A. (2019), ‘The power of ranking: The ease of doing business indicator and global regulatory behavior’, *International Organization, Forthcoming, U of Penn Law School, Public Law Research Paper* (19-05).
- Downs, A. et al. (1957), ‘An economic theory of democracy’.
- Fang, S. (2008), ‘The informational role of international institutions and domestic politics’, *American Journal of Political Science* **52**(2), 304–321.
- Gray, J. (2013), *The company states keep: International economic organizations and investor perceptions*, Cambridge University Press.
- Green, J. F. (2013), *Rethinking Private Authority: Agents and Entrepreneurs in Global Environmental Governance*, Princeton University Press, Princeton, N.J.
- Greenhill, B., Mosley, L. and Prakash, A. (2009), ‘Trade-based diffusion of labor rights: A panel study, 1986–2002’, *American Political Science Review* **103**(4), 669–690.
- Gulick, L. (1937), ‘Notes on the theory of organization’, *Classics of organization theory* **3**(1937), 87–95.

- Hafner-Burton, E. M. (2011), *Forced to be Good: Why Trade Agreements Boost Human Rights*, Cornell University Press, Ithaca, N.Y.
- Hafner-Burton, E. M., Mosley, L. and Galantucci, R. (2019), ‘Protecting workers abroad and industries at home: Rights-based conditionality in trade preference programs’, *Journal of Conflict Resolution* **63**(5), 1253–1282.
- Hale, T. N. (2008), ‘Transparency, accountability, and global governance’, *Global governance* pp. 73–94.
- Hawkins, D. G., Lake, D. A., Nielson, D. L. and Tierney, M. J. (2006), *Delegation and agency in international organizations*, Cambridge University Press.
- JCB failed to (2021), ‘Jcb failed to do checks over potential use of equipment in palestine’.  
**URL:** <https://www.theguardian.com/law/2021/nov/12/jcb-failed-do-human-rights-checks-destruction-palestinian-homes-watchdog-finds>
- Johnston, A. I. (2001), ‘Treating international institutions as social environments’, *International Studies Quarterly* **45**(4), 487–515.
- Junge, D., König, T. and Luig, B. (2015), ‘Legislative gridlock and bureaucratic politics in the european union’, *British Journal of Political Science* **45**(4), 777–797.
- Kelley, J. G. and Pevehouse, J. C. (2015), ‘An opportunity cost theory of us treaty behavior’, *International Studies Quarterly* **59**(3), 531–543.
- Khoury, S. and Whyte, D. (2019), ‘Sidelining corporate human rights violations: The failure of the oecd’s regulatory consensus’, *Journal of Human Rights* **18**(4), 363–381.
- Kim, I. S. (2017), ‘Political cleavages within industry: Firm-level lobbying for trade liberalization’, *American Political Science Review* **111**(1), 1–20.
- Lechner, L. (2016), ‘The domestic battle over the design of non-trade issues in preferential trade agreements’, *Review of International Political Economy* **23**(5), 840–871.
- Lupu, Y. (2015), ‘Legislative veto players and the effects of international human rights agreements’, *American Journal of Political Science* **59**(3), 578–594.
- Malesky, E. J. and Mosley, L. (2018), ‘Chains of love? global production and the firm-level diffusion of labor standards’, *American Journal of Political Science* **62**(3), 712–728.
- Malhotra, N., Monin, B. and Tomz, M. (2019), ‘Does private regulation preempt public regulation?’, *American Political Science Review* **113**(1), 19–37.
- Martinelli, C. (2006), ‘Would rational voters acquire costly information?’, *Journal of Economic Theory* **129**(1), 225–251.
- McCarty, N., Poole, K. T. and Rosenthal, H. (2016), *Polarized America: The Dance of Ideology and Unequal Riches*, MIT Press, Cambridge, M.A.

- McCubbins, M. D., Noll, R. G. and Weingast, B. R. (1987), ‘Administrative procedures as instruments of political control’, *JL Econ. & Org.* **3**, 243.
- Morse, J. C. (2019), ‘Blacklists, market enforcement, and the global regime to combat terrorist financing’, *International Organization* **73**(3), 511–545.
- Murdie, A. and Hicks, A. (2013), ‘Can international nongovernmental organizations boost government services? the case of health’, *International Organization* **67**(3), 541–573.
- Naoi, M. and Urata, S. (2013), ‘Free trade agreements and domestic politics: The case of the trans-pacific partnership agreement’, *Asian Economic Policy Review* **8**(2), 326–349.
- NCP Belgium (2014), ‘Statement by the belgian national contact point for the oecd guidelines for multinational enterprises’.
- OECD (2013), ‘Annual report on the oecd guidelines for multinational enterprises 2013 responsible business conduct in action’.  
**URL:** <http://dx.doi.org/10.1787/mne-2013-5-en>
- OECD (2019), ‘Annual report on the OECD guidelines for multinational enterprises 2018’.
- OECD Guidelines (2011), ‘Oecd guidelines for multinational enterprises: 2011 edition’, *OECD*.
- OECD Watch (2022a), ‘Fian and wake up and fight for your rights vs nkg’.  
**URL:** <https://www.oecdwatch.org/complaint/fian-and-wake-up-and-fight-for-your-rights-vs-nkg/>
- OECD Watch (2022b), ‘IDI, EC, and LICADHO v. Bonsucro’.  
**URL:** <https://www.oecdwatch.org/complaint/idi-ec-and-licadho-v-bonsucro/>
- Osgood, I., Tingley, D., Bernauer, T., Kim, I. S., Milner, H. V. and Spilker, G. (2017), ‘The charmed life of superstar exporters: Survey evidence on firms and trade policy’, *The Journal of Politics* **79**(1), 133–152.
- Owen, E. (2017), ‘Exposure to offshoring and the politics of trade liberalization: debate and votes on free trade agreements in the us house of representatives, 2001–2006’, *International Studies Quarterly* **61**(2), 297–311.
- Pelc, K. J. (2013), ‘Googling the wto: what search-engine data tell us about the political economy of institutions’, *International Organization* **67**(3), 629–655.
- Peritz, L. (2020), ‘When are international institutions effective? the impact of domestic veto players on compliance with wto rulings’, *International Studies Quarterly* **64**(1), 220–234.
- Potoski, M. and Prakash, A. (2005), ‘Covenants with weak swords: Iso 14001 and facilities’ environmental performance’, *Journal of Policy Analysis and Management: The Journal of the Association for Public Policy Analysis and Management* **24**(4), 745–769.

- Prakash, A. and Potoski, M. (2006), ‘Racing to the bottom? Trade, environmental governance, and iso 14001’, *American Journal of Political Science* **50**(2), 350–364.
- Rickard, S. J. (2012), ‘Electoral systems, voters’ interests and geographic dispersion’, *British Journal of Political Science* **42**(4), 855–877.
- Rickard, S. J. (2018), *Economic Geography, Electoral Institutions, and the Politics of Redistribution: Political Institutions, Economic Geography, and Government Subsidies*, Cambridge University Press, New York, N.Y.
- Rickard, S. J. (2022), ‘Incumbents beware: The impact of offshoring on elections’, *British Journal of Political Science* **52**(2), 758–780.
- Ruggie, J. G. and Nelson, T. (2015), ‘Human rights and the oecd guidelines for multinational enterprises: Normative innovations and implementations challenges’, *Brown J. World Aff.* **22**, 99.
- Sartori, A. E. (2002), ‘The might of the pen: A reputational theory of communication in international disputes’, *International Organization* **56**(1), 121–149.
- Simmons, B. A. (2009), *Mobilizing for Human Rights: International Law in Domestic Politics*, Cambridge University Press, New York, N.Y.
- Spar, D. L. (1998), ‘The spotlight and the bottom line’, *Foreign Affairs* **77**(2), 7–12.
- Tallberg, J., Dellmuth, L. M., Agné, H. and Duit, A. (2018), ‘NGO influence in international organizations: Information, access and exchange’, *British Journal of Political Science* **48**(1), 213–238.
- Terman, R. L. (2016), *Backlash: Defiance, Human Rights and the Politics of Shame*, PhD thesis, University of California, Berkeley.
- The German NCP (2011), ‘Final declaration by the national contact point for the oecd guidelines for multinational enterprises regarding a complaint by wake up and fight for your rights madudu group and fian deutschland against neumann gruppe gmbh’.  
**URL:** <https://www.oecdwatch.org/complaint/fian-and-wake-up-and-fight-for-your-rights-vs-nkg/>
- The International Foundation for Electoral Systems (2020), ‘IFES election guide’.  
**URL:** <https://www.electionguide.org/elections/type/past/>
- The Japanese NCP (2017), ‘Final statement on a specific instance involving suzuki motor corporation and suzuki motor (thailand) co., ltd. in relation to the oecd guidelines for multinational enterprises’.  
**URL:** <https://www.oecdwatch.org/complaint/trade-unions-vs-suzuki-motor-corporation/>
- Trondal, J. (2012), ‘On bureaucratic centre formation in government institutions: Lessons from the european commission’, *International Review of Administrative Sciences* **78**(3), 425–446.

UK National Contact Point (2022), ‘Decision final statement: Idi, ec and licadho complaint to uk ncp about bonsucro ltd updated 11 january 2022’.

**URL:** <https://www.gov.uk/government/publications/idi-ec-and-licadho-complaint-to-uk-ncp-about-bonsucro-ltd/final-statement-idi-ec-and-licadho-complaint-to-uk-ncp-about-bonsucro-ltd>

Vantaggiato, F. P., Kassim, H. and Connolly, S. (2020), ‘Breaking out of silos: explaining cross-departmental interactions in two european bureaucracies’, *Journal of European Public Policy* pp. 1–21.

Vedung, E. (2015), ‘Autonomy and street-level bureaucrats’ coping strategies’, *Nordic Journal of Studies in Educational Policy* **2015**(2), 28643.

Vogel, D. (1997), ‘Trading up and governing across: Transnational governance and environmental protection’, *Journal of European Public Policy* **4**(4), 556–571.

Weber, M. (1978), *Economy and society: An outline of interpretive sociology*, Vol. 1, Univ of California Press.

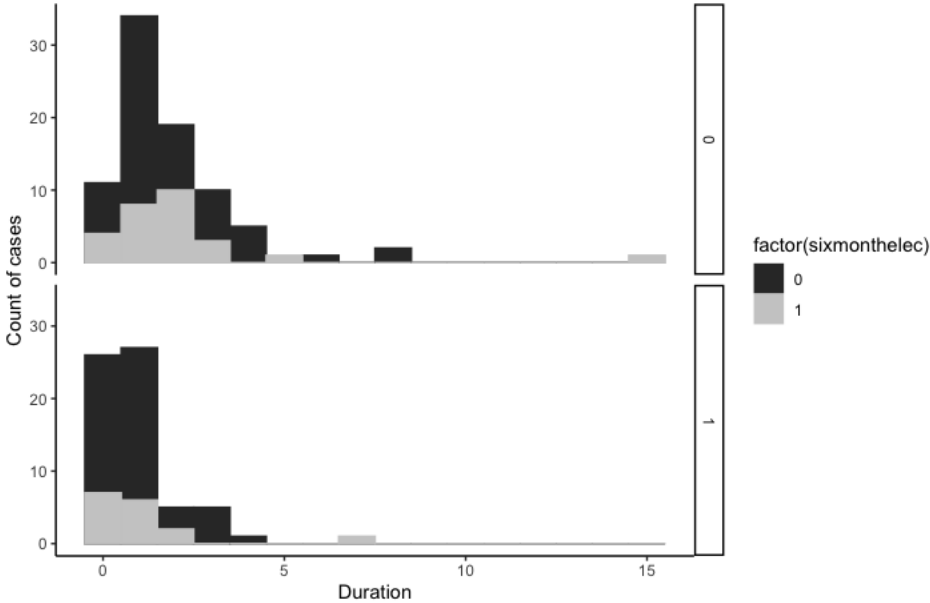
Wellhausen, R. L. (2014), *The shield of nationality: When governments break contracts with foreign firms*, Cambridge University Press.

Winter, S. and Nielsen, V. (2008), ‘Implementering af politik [implementation of politics]’, *Ao rhus: Academica* .

# Appendices

## A Election and Filing Dates

Complainants may wait until an election to file a case to maximize their electoral leverage. In response, a government may stall the procedure until the election is over to avoid a spotlight. Such strategic interactions may have a confounding effect on the relationship between the spotlight effect and coalition characteristics. Figure 6 lends little support for this hypothesis, however. Figure 6 depicts the cases filed closer to an election in grey and otherwise in black, and the rejected cases in the lower panel (1) and the accepted instances in the upper panel (0). The grey bars in the lower panel (1) denote the cases filed closer to an election and then rejected by home government(s). If the above hypothesis is valid, those cases should take longer to conclude—however, the duration of those cases is not systematically longer than the rest.

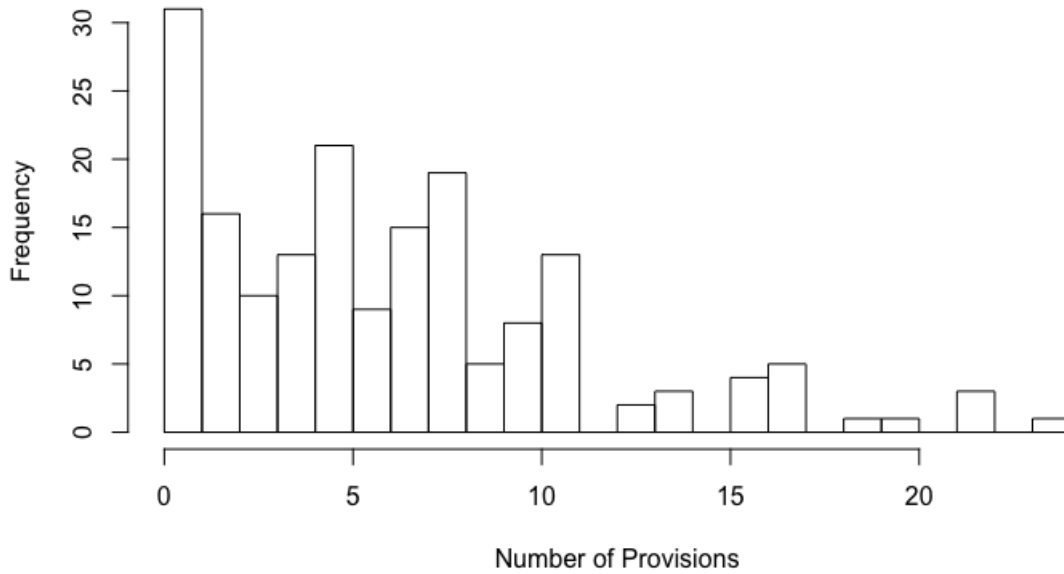


**Figure 6** – Case Duration by Electoral Proximity (1 = A Case Filed within a Six-month Window, 0 = A Case Filed 6 Months Filed Outside of a Six-month Election Window)

## B Cited Provisions

Although most complainants cite five to six articles in the Guidelines in their cases, there are some cases in which more than 10 articles are cited as relevant (See Figure 7). One may argue that cited provisions may not have the same effect on government decisions at the final stage of the procedure as they do in the WTO procedure (Busch and Pelc 2010; Brutger and Morse 2015), because the OECD procedure is non-judicial. To address this concern,





**Figure 7** – Number of cited provisions

I conducted the same analyses without controlling for *Provision*. As Table 3 reports, the results largely hold without the inclusion of *Provision*.

**Table 3** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes Excluding *Provision*

|                         | DV: RECOMMENDATION  |                     |                     |
|-------------------------|---------------------|---------------------|---------------------|
|                         | (1)                 | (2)                 | (3)                 |
| ELECTION                | -0.66**<br>(0.30)   | 0.13<br>(0.28)      | 0.34<br>(0.31)      |
| HOME COALITION          | 0.36<br>(0.39)      |                     |                     |
| HOME COALITION:ELECTION | 1.35***<br>(0.18)   |                     |                     |
| HOST COALITION          |                     | -0.50<br>(0.46)     |                     |
| HOST COALITION:ELECTION |                     | -0.35**<br>(0.14)   |                     |
| STAR COALITION          |                     |                     | -0.12<br>(0.51)     |
| STAR COALITION:ELECTION |                     |                     | -2.31***<br>(0.07)  |
| COALITION SIZE          | 0.01<br>(0.08)      | -0.02<br>(0.08)     | 0.0004<br>(0.07)    |
| YEAR TT                 | 0.06***<br>(0.0002) | 0.06***<br>(0.0002) | 0.05***<br>(0.0002) |
| PEER REVIEW             | 1.57***<br>(0.04)   | 1.74***<br>(0.04)   | 1.40***<br>(0.05)   |

Notes: Clustered SEs

\*\*\*p < .01; \*\*p < .05; \*p < .1

## C Summary Statistics

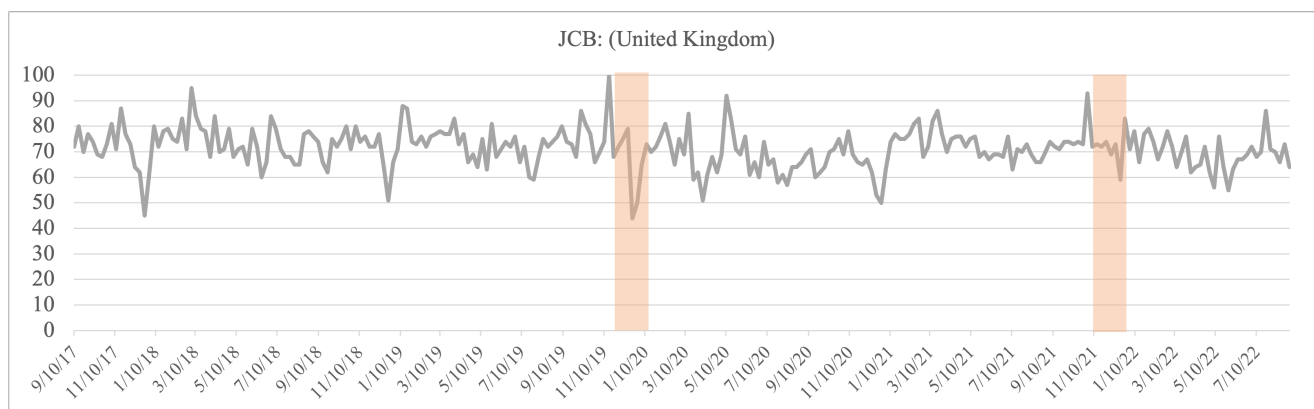
Table 4 reports the summary statistics of the data set.

**Table 4** – Summary Statistics of the Main Data Set

| Statistic             | N   | Mean     | St. Dev. | Min   | Max   |
|-----------------------|-----|----------|----------|-------|-------|
| CASE_ID               | 190 | 264.34   | 163.18   | 8     | 547   |
| STARTYEAR             | 190 | 2,010.14 | 5.10     | 2,000 | 2,018 |
| ELECTION (SIX MONTHS) | 189 | 0.23     | 0.42     | 0     | 1     |
| HOME COALITION        | 181 | 0.43     | 0.42     | 0.00  | 1.00  |
| HOST COALITION        | 181 | 0.26     | 0.36     | 0.00  | 1.00  |
| STAR COALITION        | 181 | 0.30     | 0.39     | 0.00  | 1.00  |
| PEER REVIEW           | 190 | 0.05     | 0.21     | 0     | 1     |
| NGOPRESS              | 190 | 0.41     | 0.50     | 0     | 2     |
| FIRMPRESS             | 190 | 0.02     | 0.12     | 0     | 1     |
| COALITION SIZE        | 190 | 2.40     | 1.95     | 1     | 13    |
| ENVIRONMENT           | 190 | 0.38     | 0.49     | 0     | 1     |
| LABOR                 | 190 | 0.27     | 0.45     | 0     | 1     |
| BUREAUCRACY           | 187 | 2.52     | 1.68     | 1     | 6     |
| PROVISION             | 180 | 6.46     | 5.09     | 0     | 24    |
| PROVISION2            | 180 | 67.46    | 100.39   | 0     | 576   |

## D JCB web search trends

Figure 8 shows the rate at which users searched for *JCB* (a manufacturing company) in the UK. The first shaded area (December 10, 2019) denotes the date on which Lawyers for Palestinian Human Rights, the complainant, filed the complaint with the UK NCP. The second area is when the UK government announced its final decision and released its statement (November 12, 2021). The plot indicates that user interests did not visibly increase around those two milestones. Also, the search terms related to *JCB* indicate that users were mostly looking for the information on JCB’s coronavirus situations, hiring plans, and the possibility that Patrick Bamford, a soccer player, might be related to the owner of JCB.



**Figure 8** – Google Trend Search: JCB

## E Election Proximity

It is possible that the six month window may not be an accurate measure of election proximity. To address this issue, I conducted robustness checks by varying the level of election proximity from 4 months to 10 months. As shown below, the results largely remain the same as the main analysis.

**Table 5** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes With Varying Levels of Election Proximity

| DV: REJECTION - NO POSITION - RECOMMENDATION |          |          |          |          |          |          |
|--|----------|----------|----------|----------|----------|----------|
|  | 4 MONTH  | 5 MONTH  | 7 MONTH  | 8 MONTH  | 9 MONTH  | 10 MONTH |
| ELECTION                                     | -0.49*   | -0.75*** | -0.95*** | -0.88**  | -0.88**  | -0.66**  |
|  | (0.27)   | (0.21)   | (0.33)   | (0.38)   | (0.38)   | (0.31)   |
| HOME COALITION                               | 0.48     | 0.41     | 0.29     | 0.30     | 0.30     | 0.32     |
|  | (0.41)   | (0.40)   | (0.41)   | (0.40)   | (0.40)   | (0.38)   |
| ELECTION:HOME COALITION                      | 1.39***  | 1.46***  | 1.79***  | 1.59***  | 1.59***  | 1.24***  |
|  | (0.17)   | (0.16)   | (0.21)   | (0.23)   | (0.23)   | (0.19)   |
| COALITION SIZE                               | 0.004    | 0.005    | 0.01     | 0.01     | 0.01     | 0.02     |
|  | (0.08)   | (0.08)   | (0.09)   | (0.09)   | (0.09)   | (0.09)   |
| PEER REVIEW                                  | 1.57***  | 1.60***  | 1.61***  | 1.63***  | 1.63***  | 1.60***  |
|  | (0.03)   | (0.03)   | (0.04)   | (0.04)   | (0.04)   | (0.02)   |
| PROVISION                                    | 0.01     | 0.02     | 0.02     | 0.02     | 0.02     | 0.01     |
|  | (0.08)   | (0.08)   | (0.09)   | (0.09)   | (0.09)   | (0.09)   |
| PROVISION2                                   | -0.001   | -0.001   | -0.001   | -0.001   | -0.001   | -0.001   |
|  | (0.004)  | (0.004)  | (0.004)  | (0.005)  | (0.005)  | (0.005)  |
| YEAR TT                                      | 0.08***  | 0.08***  | 0.08***  | 0.08***  | 0.08***  | 0.08***  |
|  | (0.0003) | (0.0003) | (0.0003) | (0.0003) | (0.0003) | (0.0003) |

Notes: Clustered SEs

\*\*\*p < .01; \*\*p < .05; \*p < .1

**Table 6** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes With Varying Levels of Election Proximity

| DV: REJECTION - NO POSITION - RECOMMENDATION |           |           |           |           |           |            |
|--|-----------|-----------|-----------|-----------|-----------|------------|
|  | (4 MONTH) | (5 MONTH) | (7 MONTH) | (8 MONTH) | (9 MONTH) | (10 MONTH) |
| ELECTION                                     | 0.60*     | 0.55*     | 0.44      | 0.43      | 0.43      | 0.35       |
|  | (0.35)    | (0.30)    | (0.35)    | (0.40)    | (0.40)    | (0.33)     |
| STAR COALITION                               | -0.20     | -0.12     | -0.13     | -0.11     | -0.11     | -0.14      |
|  | (0.48)    | (0.49)    | (0.49)    | (0.49)    | (0.49)    | (0.54)     |
| ELECTION:STAR COALITION                      | -3.17***  | -3.61***  | -3.08***  | -3.04***  | -3.04***  | -1.89***   |
|  | (0.05)    | (0.05)    | (0.06)    | (0.07)    | (0.07)    | (0.10)     |
| COALITION SIZE                               | -0.003    | 0.001     | 0.01      | 0.01      | 0.01      | 0.01       |
|  | (0.07)    | (0.07)    | (0.08)    | (0.08)    | (0.08)    | (0.07)     |
| PEER REVIEW                                  | 1.49***   | 1.50***   | 1.33***   | 1.36***   | 1.36***   | 1.41***    |
|  | (0.06)    | (0.06)    | (0.06)    | (0.06)    | (0.06)    | (0.06)     |
| PROVISION                                    | 0.01      | 0.01      | 0.01      | 0.01      | 0.01      | 0.01       |
|  | (0.08)    | (0.08)    | (0.08)    | (0.08)    | (0.08)    | (0.08)     |
| PROVISION2                                   | -0.001    | -0.001    | -0.001    | -0.001    | -0.001    | -0.001     |
|  | (0.004)   | (0.004)   | (0.005)   | (0.005)   | (0.005)   | (0.005)    |
| YEAR TT                                      | 0.05***   | 0.06***   | 0.06***   | 0.06***   | 0.06***   | 0.06***    |
|  | (0.0002)  | (0.0002)  | (0.0002)  | (0.0002)  | (0.0002)  | (0.0002)   |

Notes: Clustered SEs

\*\*\*p < .01; \*\*p < .05; \*p < .1

**Table 7** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes With Varying Levels of Election Proximity

|                    | DV: REJECTION - NO POSITION - RECOMMENDATION |                     |                     |                     |                     |                     |
|--------------------|--|---------------------|---------------------|---------------------|---------------------|---------------------|
|                    | (4 MONTH)                                    | (5 MONTH)           | (7 MONTH)           | (8 MONTH)           | (9 MONTH)           | (10 MONTH)          |
| ELECTION           | 0.09<br>(0.32)                               | -0.01<br>(0.27)     | 0.17<br>(0.33)      | 0.16<br>(0.37)      | 0.16<br>(0.37)      | 0.24<br>(0.32)      |
| HOST COALITION     | -0.69<br>(0.48)                              | -0.48<br>(0.48)     | -0.34<br>(0.48)     | -0.36<br>(0.47)     | -0.36<br>(0.47)     | -0.33<br>(0.46)     |
| ELECTION:HOST PUSH | 0.27**<br>(0.10)                             | 0.06<br>(0.10)      | -0.70***<br>(0.15)  | -0.57***<br>(0.16)  | -0.57***<br>(0.16)  | -0.69***<br>(0.16)  |
| COALITION SIZE     | -0.01<br>(0.09)                              | -0.02<br>(0.08)     | -0.02<br>(0.09)     | -0.02<br>(0.09)     | -0.02<br>(0.09)     | -0.02<br>(0.09)     |
| PEER REVIEW        | 1.69***<br>(0.03)                            | 1.73***<br>(0.04)   | 1.82***<br>(0.05)   | 1.80***<br>(0.06)   | 1.80***<br>(0.06)   | 1.79***<br>(0.06)   |
| PROVISION          | 0.0002<br>(0.08)                             | 0.01<br>(0.09)      | 0.01<br>(0.09)      | 0.01<br>(0.09)      | 0.01<br>(0.09)      | 0.003<br>(0.09)     |
| PROVISION2         | -0.0003<br>(0.005)                           | -0.001<br>(0.005)   | -0.001<br>(0.005)   | -0.001<br>(0.005)   | -0.001<br>(0.005)   | -0.0004<br>(0.005)  |
| YEAR TT            | 0.10***<br>(0.0002)                          | 0.07***<br>(0.0002) | 0.07***<br>(0.0002) | 0.07***<br>(0.0002) | 0.07***<br>(0.0002) | 0.07***<br>(0.0002) |

Notes: Clustered SEs \*\*\*p < .01; \*\*p < .05; \*p < .1

## F Micro-foundations of Bureaucratic Contact Theory

To test the micro-foundations of bureaucratic contact theory, I construct two variables that capture how individual adhering governments delegate their decision-making power to relevant actors as they establish their National Contact Points (NCPs). I employ information on NCP structure from various issues of the OECD Guidelines’ annual reports. The first variable, *Bureaucracy<sub>B</sub>*, is a binary variable that measures whether an NCP is located within a single ministry or spread across more than one agency. Secondly, I use an ordinal variable, *Bureaucracy*, that captures the complexity of NCP structure by identifying it as 1) monopartite, 2) intra-agency, 3) bipartite, 4) tripartite, 5) quadripartite, or 6) an independent third-party committee. Higher values for this variable denote greater complexity in the bureaucratic structure. My theory predicts that home-based activists will be particularly helpful at navigating a complex and novel bureaucratic environment during an election period. This theory also predicts that superstar and host country-based activists experience a disadvantage during elections, particularly when the bureaucracy is complex.

To test this theory, I interact election proximity, the variables that capture coalition attributes, and the bureaucracy variables and estimate ordinal logistic regressions. I expect to find a positive three-way interaction of *Election*, *Home coalition*, and *Bureaucracy*, as my theory argues that a complex bureaucratic structure makes home-country activists more effective at promoting norm enforcement during elections. I expect to find the opposite with regard to star and host country-based coalitions. In some model specifications, I control for *Press*. This variable captures the number of press releases and statements on individual complaints issued by both activists and firms.

The results reported in Table 8 support the theory’s predictions. The coefficient on the three-way interaction term of *Election*, *Home Coalition*, and *Bureaucracy* is positive and significant in Models 1, 2, and 3. This means that home-based activists play a crucial role as guides for norm beneficiaries during elections, especially when enforcement decisions are

made by multiple parties. Model 4 tests the prediction about superstar coalitions. In this case, the results are not conclusive. The interaction term of *Election*, *Star coalition*, and *Bureaucracy* is negative as the theory predicts; however, the coefficient is not statistically significant. Lastly, the results from Model 5 indicate that coalitions dominated by host country-based activists are disadvantaged during election times when the enforcement decision process is complex.

**Table 8** – Ordered Logit Regression Results on the Relationship Between Recommendation and Election Conditional on Coalition Attributes and Bureaucracy Structures

|  | DV: REJECTION - NO POSITION - RECOMMENDATION |                     |                     |                     |                     |
|--|--|---------------------|---------------------|---------------------|---------------------|
|  | (1)  | (2)                 | (3)                 | (4)                 | (5)                 |
| ELECTION   | -1.23***<br>(0.19)                           | -0.43***<br>(0.13)  | -0.45***<br>(0.12)  | 0.01<br>(0.23)      | -2.65***<br>(0.10)  |
| HOME COALITION                                   | -0.03<br>(0.25)                              | -0.58***<br>(0.07)  | -0.64***<br>(0.08)  |                     |                     |
| BUREAUCRACY <sub>B</sub>                         | -1.04***<br>(0.30)                           |                     |                     |                     |                     |
| HOME COALITION:BUREAUCRACY <sub>B</sub>          | 0.81***<br>(0.22)                            |                     |                     |                     |                     |
| ELECTION:BUREAUCRACY <sub>B</sub>                | 0.76***<br>(0.18)                            |                     |                     |                     |                     |
| ELECTION:HOME COALITION                          | 1.09***<br>(0.13)                            | -1.80***<br>(0.07)  | -1.75***<br>(0.08)  |                     |                     |
| ELECTION:HOME COALITION:BUREAUCRACY <sub>B</sub> | 0.25**<br>(0.12)                             |                     |                     |                     |                     |
| BUREAUCRACY                                      |  | -0.34*<br>(0.18)    | -0.35*<br>(0.19)    | 0.07<br>(0.12)      | -0.17<br>(0.17)     |
| ELECTION:BUREAUCRACY                             |  | -0.21<br>(0.18)     | -0.20<br>(0.16)     | 0.25<br>(0.25)      | 1.32***<br>(0.23)   |
| HOME COALITION:BUREAUCRACY                       |  | 0.44***<br>(0.11)   | 0.45***<br>(0.11)   |                     |                     |
| ELECTION:HOME COALITION:BUREAUCRACY              |  | 1.61***<br>(0.19)   | 1.59***<br>(0.20)   |                     |                     |
| STAR COALITION                                   |  |                     |                     | 1.50***<br>(0.13)   |                     |
| STAR COALITION:BUREAUCRACY                       |  |                     |                     | -0.70***<br>(0.11)  |                     |
| ELECTION:STAR COALITION                          |  |                     |                     | -3.11***<br>(0.21)  |                     |
| ELECTION:STAR COALITION:BUREAUCRACY              |  |                     |                     | -0.12<br>(0.28)     |                     |
| HOST COALITION                                   |  |                     |                     |                     | -1.01***<br>(0.15)  |
| HOST COALITION:BUREAUCRACY                       |  |                     |                     |                     | 0.19**<br>(0.09)    |
| ELECTION:HOST COALITION                          |  |                     |                     |                     | 5.18***<br>(0.20)   |
| ELECTION:HOST COALITION:BUREAUCRACY              |  |                     |                     |                     | -2.64***<br>(0.30)  |
| PRESS  |  |                     | 0.09<br>(0.49)      | 0.28<br>(0.46)      | -0.10<br>(0.44)     |
| COALITION SIZE                                   | -0.01<br>(0.10)                              | 0.001<br>(0.10)     | -0.01<br>(0.09)     | -0.04<br>(0.09)     | -0.004<br>(0.09)    |
| PEER REVIEW                                      | 1.46***<br>(0.03)                            | 1.24***<br>(0.03)   | 1.25***<br>(0.03)   | 1.18***<br>(0.30)   | 1.36***<br>(0.12)   |
| PROVISION  | 0.05<br>(0.09)                               | 0.08<br>(0.09)      | 0.08<br>(0.09)      | 0.07<br>(0.09)      | 0.03<br>(0.09)      |
| PROVISION2                                       | -0.002<br>(0.01)                             | -0.004<br>(0.005)   | -0.004<br>(0.005)   | -0.004<br>(0.01)    | -0.001<br>(0.005)   |
| YEAR TT  | 0.10***<br>(0.0003)                          | 0.09***<br>(0.0003) | 0.09***<br>(0.0003) | 0.07***<br>(0.0003) | 0.08***<br>(0.0004) |

Notes: Clustered SEs

\*\*\*p < .01; \*\*p < .05; \*p < .1