

# **Corruption sanctions**

## **What governments need to know**

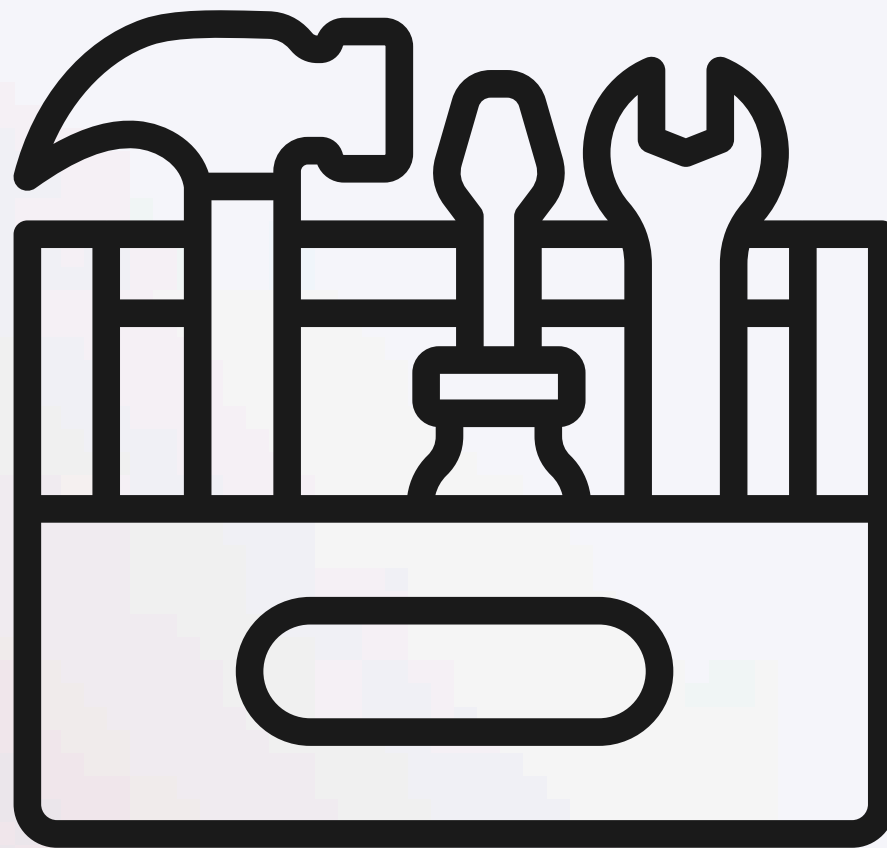
**New Working Paper**

**Dr Anton Moiseienko**

Associate Professor of Law,  
ANU Law School



**Corruption sanctions** can be a useful tool to hold individuals suspected of serious corruption accountable.



Used responsibly, corruption sanctions can **strengthen anti-corruption efforts.**

Used poorly, they risk **undermining trust and legitimacy.**

# Our new Working Paper explores

- **what** corruption sanctions are
- **where** they came from, **who** uses them and **what for**
- **legal frameworks**
- **benefits and concerns**

And offers nine **recommendations**  
for governments





## **Consider introducing corruption sanctions to:**

- **Disrupt** corrupt activity
- **Deter** future corruption
- **Condemn** corruption publicly
- **Impose** consequences on perpetrators
- **Facilitate** asset recovery
- **Support** another state's enforcement actions

# 2

## Inform policy considerations

- Is there a **legal framework** for autonomous sanctions?
- Are there **alternative legal means** to achieve the same objectives?

3

## Decide on regime



**Thematic sanctions?**

*or*

**Within country sanctions regimes?**



**4**

## **Ensure balance**

Flexibility, broad  
powers, wide  
discretion

Evidentiary  
standards,  
judicial review  
rules



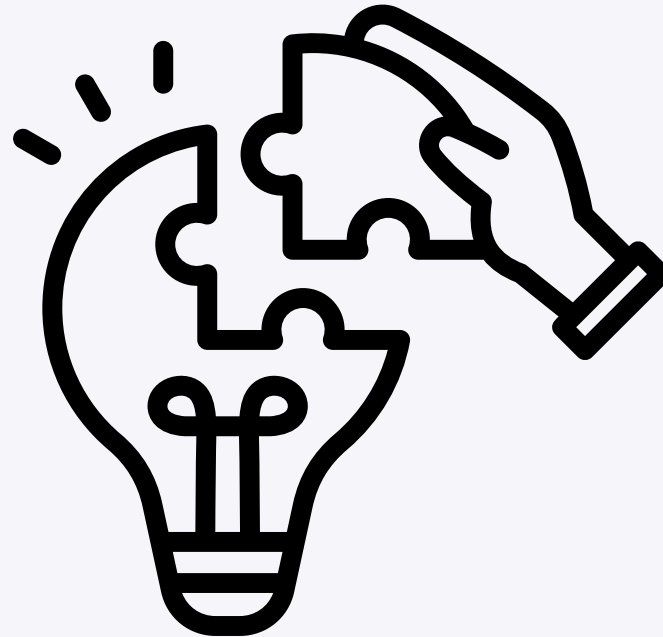
**5**

## **Have a clear post-imposition strategy**

Objectives?

Duration?

How do they interact with traditional enforcement tools?



**6**

## **Publish clear criteria for...**

**... imposing sanctions**

**... granting exemptions**



**And publicly explain  
sanctions delistings.**



## **Define clearly what makes a high-priority target**

This enhances consistency and credibility of corruption sanctions use.



8

## Define civil society involvement

Sanctions dossier submissions from civil society organisations?



More formal channels, e.g. advisory bodies?

9

## Consider sanctioning professional enablers

... including those located in “onshore” jurisdictions such as major Western financial centres!



**Learn more**



## **Corruption sanctions** **What governments need** **to know**

**Dr Anton Moiseienko**  
Foreword by Andrew Dornbierer



[baselgovernance.org/wp-62](https://www.baselgovernance.org/wp-62)