July 2026

Submission of the Basel Institute on Governance

European Commission Call for Evidence
In support of the development of the EU Anti-Corruption Strategy

Executive Summary

The Basel Institute on Governance welcomes the initiative of the European Commission to develop the first-ever EU-wide Anti-Corruption Strategy. The initiative helpfully builds on a number of recent legal and policy developments at EU level, including the adoption of the EU Anti-Corruption Directive, and it can helpfully strengthen their effective and coordinated implementation across the member states. At a time when good governance norms are being challenged, the EU's leadership in the fight against corruption promises to give it a long-term competitive advantage, benefitting from the security, economic prosperity, and political stability that come with good governance.

The Basel Institute on Governance is a non-profit centre of expertise, dedicated to combatting corruption and promoting good governance. Founded in 2003, we are headquartered in Basel, Switzerland. We work with public and private partners in over 30 countries in Europe, Asia, Africa, and Latin America, providing support, technical assistance, and capacity building on corruption prevention, enforcement, asset recovery and business integrity. We have been pleased to participate in the consultations of the EU Network Against Corruption, including a recent workshop on the EU Anti-Corruption Strategy.

We offer this supplementary submission to provide additional information and evidence in support of recommendations in four areas that we urge you to address in the prospective Strategy:

- Promoting a whole-of-society approach, including Anti-corruption Collective Action;
- Harnessing data and technology;
- Addressing anti-corruption priorities and high-risk sectors and activities; and
- Committing to an on-going research, innovation, and learning agenda.

In each of these areas, the Strategy can helpfully build on the foundation laid by the Anti-Corruption Directive to strengthen not only legal frameworks against corruption but their implementation and outcomes across the Union.

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Promoting a Whole-of-Society Approach: **Anti-Corruption Collective Action**

The Basel Institute welcomes the Commission's commitment to a "whole-of-society" approach to the fight against corruption and encourages an ambitious reflection of this approach in the Strategy. Specifically, we encourage the Commission to endorse Anti-Corruption Collective Action as a best practice for member states to implement.

Anti-corruption Collective Action is a well-established, internationally recognized methodology for multi-stakeholder anti-corruption initiatives. The Basel Institute has for over two decades championed this methodology for addressing complex corruption challenges. A whole-of-society approach is at the heart of Anti-corruption Collective Action. It involves bringing private sector actors, in an industry or market, together with governments and civil society, to identify corruption risks, develop and commit to standards and best practices, and implement initiatives and accountability mechanisms that incentivize and ensure compliance with those standards.

It has proven successful in addressing such significant challenges as money laundering risk in the financial sector, bribe-paying and extortion in maritime ports, and corrupt practices in the defence industry–big challenges that no one company or government or civil society actor acting alone could tackle.

The Anti-Corruption Collective Action approach has been endorsed and promoted by numerous international organizations, including the OECD, the UNODC, and the UN Global Compact, and many governments and businesses that comprise and engage with these organisations.

A significant milestone in the institutionalisation of Collective Action as an anti-corruption tool came with its inclusion in the **2021 OECD Anti-Bribery Recommendation**. The recommendation encourages member countries to consider Collective Action approaches to support private sector awareness-raising on anti-bribery (Section IV.ii) and to address the demand side of bribery (Section IX.iv).

Importantly, unlike many other international endorsements, the OECD Anti-Bribery Recommendation forms part of the monitoring framework for implementation of the OECD Anti-Bribery Convention. As countries are periodically assessed against the Recommendation, information on the existence of Collective Action initiatives and the extent of government engagement and support is being systematically collected. This creates an expanding evidence base on the uptake and institutionalisation of Collective Action, while also providing insights into how collaboration between the private sector and public institutions is evolving in practice.

Further evidence of growing international recognition is reflected in the commitments made through the G20/B20 process. Building on successive B20 recommendations promoting Collective Action as a mechanism to strengthen business integrity, a dedicated G20 Key Performance Indicator was developed to measure the prevalence of Collective Action initiatives with government engagement across G20 countries. Current monitoring indicates that 45% of G20 countries have Collective Action initiatives involving government participation, providing a measurable benchmark for tracking progress towards greater institutionalisation and public-private collaboration in anti-corruption efforts.

Additional information about more than 350 Collective Action initiatives can be found on the B20 Collective Action Hub, an online resource that the Basel Institute has maintained for over a decade. We have studied and supported these initiatives and seen their impact in practice. This research has yielded resources and best practices that can also be referenced in the Strategy, including a typology of Collective Action initiatives and a book capturing lessons learned over nearly two decades of work in this area. A particularly significant example of the impactful implementation and institutionalisation of Collective Action is found in the European Union's support for Integrity Pacts, implemented by the Commission in partnership with Transparency International in 11 member states. Through this collaboration, 18 major public contracting projects have been designed and implemented to the highest standards of transparency, accountability and efficiency, illustrating the potential of Collective Action as a practical anti-corruption tool for the EU and its member states.

In 2025, the OECD published "Advancing Business Integrity through Collective Action: A Blueprint for Government Support," detailing ways in which governmental bodies, such as the EU or its member states, can implement this proven anti-corruption approach. We encourage the Commission to draw on this compelling evidence base, explicitly endorse Anti-corruption Collective Action in its forthcoming Strategy and encourage member states to do so in their national strategies as well.

Harnessing Data and Technology.

A second priority for the Strategy is the use of technology—and the data it can generate and analyse—in the fight against corruption. This topic is largely omitted from the EU Anti-Corruption Directive and is therefore one on which the Strategy can play a helpful supplementary role, highlighting its importance and providing guidance to ensure its effective and appropriate use.

Over the past decade, governments, international organisations and researchers have been exploring how artificial intelligence, big data analytics, risk indicators, predictive modelling and open-source intelligence can bolster anti-corruption initiatives. Technology has emerged as essential for identifying suspicious procurement patterns, pinpointing conflicts of interest, tracing illicit financial flows and exposing corrupt networks.

Research conducted under the EU-funded FALCON project—of which the Basel Institute is a consortium member—demonstrates that effective anti-corruption systems are increasingly dependent on digital infrastructures, capable of collecting, integrating, analysing and cross-referencing large volumes of information. Without these capabilities, many corruption risks remain invisible until significant damage has occurred.

The Strategy could promote the use of AI to strengthen anti-corruption frameworks, for example, through analysis of asset declarations, conflict-of-interest detection, financial investigations, detection of fraud affecting EU funds or other high risk areas. Some EU institutions have ongoing experiences with AI. However, the EU AI Act provides an opportunity to develop and test such systems through AI regulatory sandboxes. These can be established by member states and by the European Data Protection Supervisor for Union institutions. Under the framework of the Strategy, the EU could support the development of such initiatives both in member states and within institutions such as the European Anti-Fraud Office (OLAF), the European Public Prosecutors Office and the European Court of Auditors. This would enable the development and validation of important anti-corruption AI tools.

Technology and the data that it can make available are also valuable tools in enabling a whole-of-society approach. They can provide diverse stakeholders with the means to monitor official actions and detect corruption as well as to evaluate the effectiveness of anti-corruption initiatives. The Strategy should encourage the use of technology in a manner that enhances such transparency, participation, and accountability.

As important as adopting new technologies is creating the institutional and data infrastructures that allow these technologies to function effectively. Digitisation, interoperability, standardised datasets, machine-readable information and cross-border information sharing are all prerequisites for the next generation of anti-corruption systems. The Strategy offers an important opportunity to commit to developing and implementing such data standards and the interoperability so critical to interstate coordination needed in the fight against corruption.

Anti-Corruption Priorities and High-risk Sectors and Activities.

Basel Institute research highlights four areas as particular priorities for attention in the Strategy: foreign bribery, public procurement, border governance, and financial infrastructure.

Several EU jurisdictions are active in enforcing foreign bribery laws against companies. While this is commendable, practice is uneven and rarely addresses the harm caused by the foreign bribery to the state targeted by the conduct. Affected states are also predominantly left ill-equipped to prevent additional harm from future instances of bribery. As such, this is an area in which the Strategy could drive important progress across the Union.

EU jurisdictions active in enforcing foreign bribery laws (e.g. the Netherlands and France) often resolve these cases using non-trial resolutions that result in significant financial penalties and the disgorgement of all illicitly acquired profits connected to the corrupt conduct. While these enforcement efforts are welcome, especially given the low enforcement rates of this offence globally, the approaches taken to resolve these cases to date pay little attention to the wide range of harms these corrupt acts cause to the states targeted by the foreign bribery schemes, their institutions and their collective populations. Compensation is rarely paid to rectify this damage. Rather, the illicit profits that companies forfeit in settlements of these cases are typically paid into the treasuries of enforcing states.

There is a growing recognition that a more appropriate resolution of these cases would see these illicit proceeds repurposed to benefit the countries in which the bribes were paid, to compensate affected communities and/or strengthen anti-corruption systems that can prevent future such crimes. The United Kingdom, for example, committed in its 2025 Anti-Corruption Strategy to reconsider processes for compensation in foreign bribery cases. Similarly, we urge the Commission in its Strategy to prioritise the fight against foreign bribery and to commit to develop new standards and approaches through which member states can resolve these cases in ways that ensure the harms inflicted are adequately addressed in any resulting settlements.

As a second priority topic, public procurement remains one of the sectors most vulnerable to corruption. This issue is exacerbated by Europe's increased investment in defence, critical infrastructure, energy security, technological innovation and strategic industrial policies. Central priorities should include strengthening transparency, reducing direct awards, improving oversight of sub-threshold contracts, and introducing AI-based risk assessment tools.

These challenges are particularly acute in the defence manufacturing sector, where the secrecy required for national security undermines transparency, while close military-industry relationships raise the risk of conflicts of interest and self-dealing. In the current context, integration with Ukraine's rapidly growing defence sector poses additional integrity challenges. Ukrainian companies willing to provide crucial military know-how struggle to navigate the myriad procurement standards of the EU member state defence procurement agencies, particularly in regards to anti-corruption compliance, sanctions compliance, sourcing of components, and registration requirements. Against this backdrop, the lack of common integrity and compliance standards for the defence manufacturing sector is a significant area of risk and should be a top priority for the Strategy.

Managing borders and customs procedures is another critical challenge, as research at the Port of Rotterdam and the Kapitan Andreevo crossing demonstrates. Corruption at the border facilitates a wide range of criminal activities, including smuggling, trafficking, evasion of sanctions, tax fraud and the movement of illicit goods. This is an area in which the benefits of greater automation, data integration and harmonization noted above are particularly apparent. Specific recommendations stemming from the Basel Institute's FALCON project research are available in this policy brief.

A final area in which we encourage the Strategy to be focused is financial infrastructure—the complex financial networks, shell companies, professional intermediaries, and offshore structures that facilitate corruption and the laundering of ill-gotten gains. Increasingly the challenges posed in this context are exacerbated by the prevalence of virtual assets that accelerate the movement of funds and complicate financial investigations and asset tracing.

The EU has recently undertaken important steps to strengthen its anti-money laundering rules and enforcement capabilities, including through the creation of the Anti-Money Laundering Authority (AMLA). The future of anti-corruption policy will hinge significantly on strengthened links between anti-corruption and anti-money laundering, and the coincidence of the Strategy and the establishment of AMLA provide a valuable opportunity to align these efforts within the EU and its member states. AMLA is expected to serve as a cross-border data hub, producing strategic analysis and typologies on money laundering and associated predicate offences, including corruption. The Strategy should take advantage of and reinforce AMLA's broader objective of providing practitioners with research- and intelligence-based actionable analysis to strengthen the detection, prevention and investigation of financial crimes.

A Research, Innovation and Learning Agenda.

A particularly important aspect of the forthcoming Strategy will be a vision for on-going research, innovation and learning among both scholars and practitioners in the fight against corruption.

Research from the Basel Institute and others has highlighted that while laws and regulations are important, prevailing social norms in a given context also play a significant role in promoting and perpetuating corrupt behaviour. Thus, the effectiveness of the EU Anti-Corruption Directive and Strategy will require complementary insights drawn from behavioural change and social science research, to inform interventions that turn the laws on the books into sustainably changed behaviour.

In a similar vein, studies show that corruption is shaped and supported by complex social, cultural and political dynamics and networks that make it highly resilient and constantly evolving, as corrupt and criminal actors shift strategies to stay one step ahead of enforcement efforts. For example, we have demonstrated this evolutionary dynamic in the Italian context by analysing how the corruption strategies and modus operandi evolved between the early 1990s and the 2010s. This evolution has been the result of changes in the nature of political parties, the focus of law enforcement agencies and the legislative and governance framework.

As this research shows, it is clear that new challenges are always emerging, requiring anticipatory, adaptive and innovative responses. When it comes to this kind of innovation, the European Union is not starting from scratch, but can build upon the wealth of experience, skills and competencies accumulated by research and expertise centres such as the EU Policy Lab and the Joint Research Centre. Both of these centres are engaged in the systematic development of methodologies and strategies for foresight and anticipatory governance that can be applied to the corruption domain.

To take advantage of such existing resources and continue to develop them to respond to new challenges, the EU Anti-Corruption Strategy requires a robust on-going programme of support for cutting-edge research into effective responses to corruption dynamics. It should also contemplate and support platforms for the exchange of learning among researchers, policy-makers, law enforcement, and civil society organisations.

While the Anti-Corruption Directive sets basic standards for anti-corruption offences and sanctions, it leaves enforcement largely in the hands of member states. In a number of areas, it sets only minimum standards or leaves room for national discretion. Moreover, compromises in negotiating the Directive resulted in the omission of certain elements, such as political finance, expanded victims' rights, and non-trial resolutions. While this means that anti-corruption may be less coordinated and effective across the Union, it also offers an opportunity for member states to serve as laboratories to test and evaluate different approaches to enforcement as well as broader prevention efforts and anti-corruption institutional design. Among other things, the research agenda that the Strategy contemplates should make the most of this fragmentation to generate new insights that can inform on-going anti-corruption policy making and strengthen the analytical basis of the EU's Rule of Law Report.

In light of these considerations, we encourage the Commission to make a research and learning agenda a centrepiece of its Strategy and to harness its research funding and the EU Network Against Corruption to pursue it.

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The Basel Institute on Governance appreciates the work of the Commission on the forthcoming EU Anti-Corruption Strategy and the opportunity to share the foregoing insights and recommendations drawn from our research and practice. We look forward to the development of this important Strategy and to supporting its implementation.