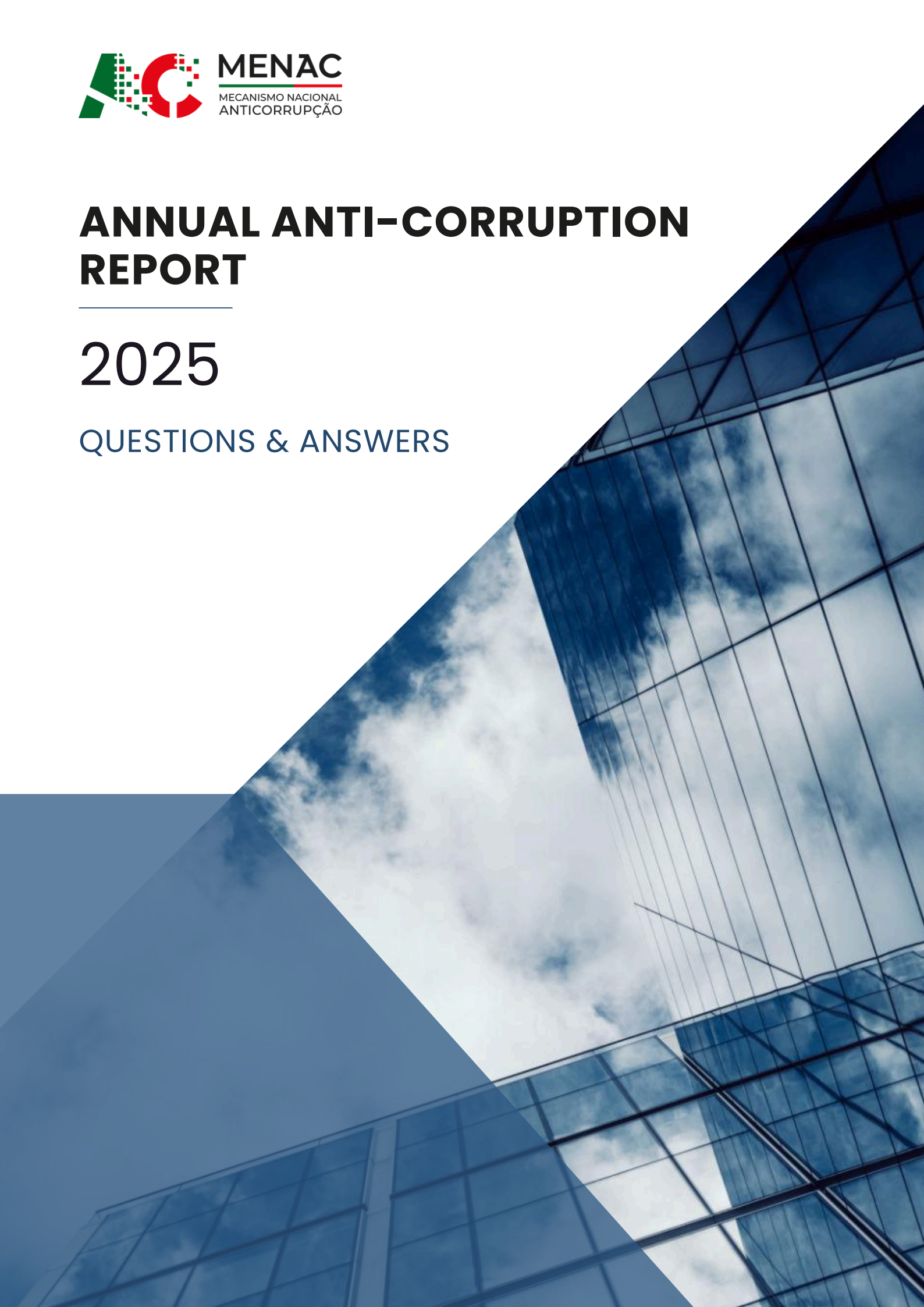


ANNUAL ANTI-CORRUPTION REPORT

2025

QUESTIONS & ANSWERS





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QUESTIONS & ANSWERS

1. What is this report and what is it for?

The Annual Anti-Corruption Report is a strategic document prepared by MENAC, which must be submitted to the Assembly of the Republic and to the Government by 30 April of the year following the one it refers to.

Its central function is to provide the political authorities with factual, systematic, and independent evidence on the issue of corruption and related offences in Portugal, while also supporting the design, evaluation, and adjustment of public policies in this area.

For citizens in general, businesses, academia, civil society organisations, and international partners, it is a document rich in useful information, particularly with a view to improving understanding of this reality and outlining a set of pathways to prevent and combat it.

In this first report, we present **an initial broad overview of the integrated system for the prevention and repression of corruption in Portugal**, with reference to the year 2025.

2. In brief, what does this report contain?

- **A report on MENAC's activity**, fulfilling the purpose expressly set out by the legislator that "the MENAC annual report [should] also be submitted to the Assembly of the Republic, considering the relevance of its activity and with a view to raising awareness of this entity's institutional work and fostering public reflection on its mission."
- **Information on efforts and results in the implementation of the General Anti-Corruption Framework¹** namely regarding the level of implementation of compliance programmes by the public and private entities covered, as well as MENAC's action in the areas of planning, training, and awareness-raising on these matters.
- **Data on supervisory and administrative offence activities**, including information on supervisory actions carried out in coordination with general and regional inspectorates, as well as on administrative offence proceedings initiated in the last four months of 2025.
- **An analysis of judicial and Public Prosecution communications received directly by MENAC**, particularly regarding dismissals, indictments, committals for trial, judgments, and rulings in these matters.
- **An assessment of information obtained from other entities**, enabling an interpretation from different perspectives of the realities observed by each

¹ RGPC: Regime Geral de Prevenção da Corrupção

entity in its own activity, the identification of trends and more vulnerable sectors, and an evaluation of different components of the system.

- **Identification of opportunities for improvement and future actions**, including the formulation of recommendations and the presentation of proposals and suggestions, namely within the scope of MENAC's role in supporting the definition of solutions in these matters, while also taking into account an evolving international regulatory framework.

3. What overall reading can be drawn from the report?

The report is based on recorded data from diverse sources/entities, with different methodologies and methods of collection, processing, and analysis. It therefore constitutes an information base with national scope, but which is still heterogeneous, fragmented, and not fully harmonised. The report reflects, in particular:

- **A strengthening of the institutional framework for the prevention of corruption**, with a more intense focus—namely through MENAC and the expansion of its new architecture—on upstream educational projects, training and awareness-raising, as well as preventive instruments. This is coupled with the streamlining of the use of the RGPC platform, binding obligations and exposure to administrative offence sanctions in relation to the RGPC and the RGPDI, with a view to reinforcing integrity in medium and large organisations, both public and private.
- **Improved empirical knowledge of the phenomenon**, presenting and integrating data from both MENAC and other entities, some of which are disclosed here for the first time. This effort at aggregated analysis is a strong point that enhances the evidence base for the design and implementation of public policies.
- **The persistence of structural risk areas and factors**, including in public procurement, administrative decision-making and discretion, the exercise of delegated public powers, and conflicts of interest, which continue to emerge as areas with higher risk factors. The identification of risk patterns contributes to greater awareness of what should be prioritised in anti-corruption policies and measures, particularly preventive ones.
- **The continuity of structural weaknesses**, including an insufficient culture of integrity and risk management, procedural delays, resource constraints, evidentiary challenges in criminal investigations, and a lack of or ineffective institutional coordination. These factors create difficulties in promoting and implementing integrity systems and in preventing and combating corruption, and may contribute to a perception of impunity and widespread corruption, as well as to a belief in its compensatory effectiveness.

Overall, the data in the report suggest that the integrated system for the prevention and repression of corruption in Portugal appears, broadly speaking, to be on a path towards consolidating its organisation and functioning, but still in need of significant improvements, including in terms of statistical knowledge and the visibility of results. The report already outlines a set of opportunities for improvement and future action.

4. What are the main strengths and weaknesses identified in the integrated system for the prevention and repression of corruption in Portugal?

Some of the **key strengths** worth highlighting include:

- **Institutional development:** without prejudice to other institutions and capacity-building efforts, in 2025 MENAC entered a phase of greater organisational robustness, with a new governance structure, operational units, and reinforced resources and strategic instruments. This enhances its ability to fulfil its legal mission of promoting transparency and integrity in public action and ensuring the effectiveness of policies for the prevention of corruption and related offences.
- **Investment in training, awareness-raising, and a culture of integrity:** the system has strengthened its educational and preventive dimension through training, campaigns, and awareness initiatives aimed at public administration, the private sector, schools, and civil society.
- **Improved empirical knowledge of the phenomenon:** the report represents progress in producing structured knowledge on corruption and related offences by integrating information from multiple entities and institutional sources.
- **Consolidation of the RGPC preventive model:** the implementation of the RGPC has gained scale and reach, with significant growth in the number of registered entities and a greater densification of compliance, alongside the technological modernisation of their management and supervision. This is also reflected in the enforcement actions carried out in the final months of 2025 and continuing into 2026.
- **Focus on integrity instruments:** the system now has a more comprehensive preventive architecture, based on the mandatory implementation of compliance programmes, including risk prevention plans, codes of conduct, whistleblowing channels, training, and designated compliance officers.
- **Technological development and digitalisation:** the creation and expansion of the RGPC platform, along with the use of supporting technological tools, have strengthened the capacity for receiving, processing, screening, and monitoring information.

- **Strengthening of institutional cooperation:** the report highlights closer coordination between MENAC and various entities within the system, particularly sectoral and regional inspectorates, the justice system, and others, improving coordination and the flow of information.
- **Identification of risk areas:** the system shows an increased capacity to recognise recurring patterns of vulnerability, notably in public procurement, administrative decision-making, conflicts of interest, and the exercise of discretionary powers.

The report, when considering the text as a whole, identifies a set of opportunities for improvement and future actions, also arising from aspects that can be identified as **weaknesses**, including:

- Lack of a national strategy and formalised planning.
- Insufficient culture of integrity and risk management.
- Statistical fragmentation and absence of a data-driven culture.
- Evidentiary difficulties.
- Uneven quality of reports (whistleblowing) and low effectiveness.
- Procedural delays.
- Still insufficient resources.
- Erosion of public trust.
- Persistence of classic areas of vulnerability.
- Low visibility of final sanctioning outcomes.

5. Is the integrated system for the prevention and repression of corruption in Portugal improving or deteriorating?

On the preventive and institutional level, progress towards consolidation can be observed, particularly with the strengthening of MENAC, increased operational capacity, upstream action within a consolidating culture of integrity and transparency, the expansion of compliance instruments, and the intensification of training, supervisory, and enforcement activities.

Nevertheless, strengthening the available resources remains structurally necessary in order to improve the system's performance, reduce operational bottlenecks, increase capacity for prevention, supervision, and response, and bring institutional action closer to objectively achievable and socially expected results.

On the enforcement side and in terms of public perception, high proportions of case dismissals persist, along with lengthy average case durations and unfavourable perception indicators. However, the figures relating to increased police activity in this area, as well as convictions and custodial sentences handed down by the courts, are also noteworthy.

Overall, it can be said that the system is improving in both its preventive and enforcement frameworks, but it continues to display weaknesses that can be addressed. In conclusion, the report indicates that while the strengthening of the system's institutionalisation is positive, there remains a level of efficiency, quality, and effectiveness below what is expected and justified, with the institutional response not yet sufficiently swift, visible, or effective.

6. What measures do MENAC propose or recommend to improve the system?

The report identifies a set of opportunities for improvement and future actions, to which reference is made and which, in summary, are structured around four axes:

- Definition of the strategic framework.
- Greater knowledge of the reality.
- Strengthening a culture of integrity and prevention within organisations.
- Improvement of coordination and institutional instruments.

These involve 16 opportunities for improvement and future actions, namely:

- The definition of a national strategic framework.
- Support for the design of evidence-based public policies.
- Strengthening prevention mechanisms in higher-risk areas.
- Enhancing the quality and effectiveness of whistleblowing mechanisms.
- Reinforcing institutional cooperation among entities responsible for the control, prevention, and repression of corruption.
- Promoting early detection within organisations.
- Ensuring transparency in arbitration and dispute resolution.
- Increasing control and transparency safeguards in European funding programmes.
- Enhancing transparency in public procurement.
- Strengthening oversight of conflicts of interest, multiple office-holding, and situations of transitional or substitute appointments.
- Reinforcing national entities operating in the field of prevention.
- Revising the deadline for submitting the Annual Anti-Corruption Report.
- Strengthening education, training, and literacy in this area.
- Improving knowledge and understanding of corruption.
- Support for the design of evidence-based public policies.
- Strengthening prevention mechanisms in higher-risk areas.
- Improving the quality and effectiveness of whistleblowing mechanisms.

- Reinforcing institutional cooperation among entities responsible for the control, prevention, and repression of corruption.
- Promoting early detection within organisations.
- Ensuring transparency in arbitration and dispute resolution.
- Increasing control and transparency safeguards in European funding programmes.
- Enhancing transparency in public procurement.
- Strengthening oversight of conflicts of interest, accumulation of functions, and situations of transitional or substitute appointments.
- Reinforcing national entities operating in the field of prevention.
- Amending the deadline for the submission of the Annual Anti-Corruption Report.

7. What role does MENAC play in this area?

MENAC operates under the principle that “in corruption, prevention is better than cure”, with the mission of promoting transparency and integrity in both public and private action, and ensuring the effectiveness of policies for the prevention of corruption and related offences, positioning itself as the national authority for the prevention of corruption.

The promotion of a culture of integrity and transparency is a structuring pillar of MENAC’s activity, with particular relevance in the educational field as a privileged space for civic education and the consolidation of democratic values.

In this context, throughout 2025 MENAC developed a broad set of initiatives targeting different levels of education, from pre-school to higher education, aimed at strengthening ethical literacy and awareness of the risks and impacts associated with corruption and related offences. These initiatives reached more than 1,700 pupils and students. Within the MENAC-supported programme “RedEscolas AntiCorrupção”, approximately 400 teachers and 8,000 students participated in 2025.

In the implementation of the RGPC² and the RGPDI³, MENAC has also been active, particularly in training and awareness-raising activities, collaborating with the National Institute of Administration (INA) and the UN Global Compact (UNGC) to provide asynchronous courses for the public and private sectors on these topics. The UNGC course “Anti-Corruption and Integrity” already has more than 1,000 registered participants. MENAC has also made available other training initiatives, including webinars and its YouTube channel, reaching over 5,500 people.

² General Anti-Corruption Framework

³ Regime Geral de Proteção de Denunciantes de Infrações/ General Regime for the Protection of Whistleblowers of Offenses

In terms of enforcement of the RGPC and RGPDI, MENAC has also been active in supervising compliance with these regimes. In the last four months of 2025, 16 administrative offence proceedings were initiated, of which 14 relate to alleged breaches of the RGPC and 2 to alleged breaches of the RGPDI.

It is also the responsibility of the MENAC to issue recommendations, guidelines, and directives, including regarding compliance programmes for entities covered by the RGPC, with particular emphasis on Recommendation No. 5/2025 on public procurement and support in the context of emergencies and crisis responses, including responses to the impact of rural wildfires.

MENAC also bases its activity on national and international cooperation, namely through coordination with general and regional inspectorates, and by sharing good practices and initiatives at international level with equivalent bodies.

MENAC also provides and manages a whistleblowing channel accessible through its website.

8. Do we know whether there is more or less corruption in Portugal compared to previous years? How can we measure it?

International discussions on measuring corruption are very intense, as they seek to better understand the phenomenon.

Fraud and corruption have a hidden nature, which essentially means that many occurrences are not subject to any type of proceedings by formal prevention, control, and enforcement bodies.

In this context, it is always difficult to objectively determine whether the problem increases, decreases, or remains constant over time.

Even if there are more reports/investigations, this may be due to factors such as: (i) greater effectiveness of law enforcement action, (ii) greater effectiveness of audit, control, and prevention systems within organisations and in relation to their activities, (iii) the existence of whistleblowing channels and widespread awareness of their existence and of the associated rights and duties, (iv) greater social awareness of the issue, reflected in an increase in the number of reports, (v) higher levels of societal literacy regarding the effects and social, economic, reputational, among other costs of fraud and corruption, leading to increased reporting of unlawful acts.

9. How many complaints were there in 2025 in this area?

Under Article 17 of the RGPDI, authorities with external reporting channels submit to Parliament, by the end of March each year, an annual report on the complaints received through their channels. The report of the Parliament for 2025 has not yet been submitted.

That report includes these cases under the category of violent, especially violent, and highly organised crime, with 127 complaints recorded in this category in 2024.

In the MENAC whistleblowing channel (created in June 2024), during the 2025 calendar year, 266 complaints were recorded, of which 215 concerned public entities and 51 concerned private entities.

From the analysis of the complaints submitted to MENAC, it is possible to conclude that a very significant percentage does not fall within the scope of its competence, as only about 4.8% do. The majority of complaints (66.5%) are not capable of being followed up, as they are manifestly unfounded, implausible, or repetitive.

A total of 3.3% of the complaints submitted to MENAC indicated the possible commission of crimes, and were therefore forwarded to the Public Prosecution's Office.

10. How many criminal proceedings were there in 2025 in this area? Can we identify any trend?

According to data provided by the Judiciary Police (PJ), in 2025 a total of 3,586 investigations were recorded, with the following breakdown:

- 1,218 investigations related to corruption and related offences, representing an overall increase of 12.67% compared to 2024;
- 2,285 investigations related to other economic and financial crime, reflecting an increase of 36.17% compared to the previous year;
- It is also worth highlighting that, specifically regarding corruption crimes — including active and passive corruption, corruption involving holders of public office, among other typologies — 408 investigations were recorded for this type of criminality, representing a growth of 35.54% compared to 2024.

As for data provided by the High Council for the Judiciary (CSM⁴), concerning criminal cases concluded at first instance in 2025, there were 368 cases related in particular to crimes such as money laundering (195 cases), embezzlement (47 cases), active corruption (21 cases), abuse of power (19 cases), favouritism, malfeasance, fraud in obtaining subsidies or grants, denial of justice and malfeasance, embezzlement by public office holders, attempted personal favouritism, passive corruption for an unlawful act, passive corruption in the private sector, misuse of public funds, economic participation in business, among others.

⁴ CSM (Conselho Superior da Magistratura)

It is not possible to compare these data with previous years, as this was the first analysis carried out by MENAC using such data and referring to 2025, which only allows for a global overview of that year.

Data from the Directorate-General for Justice Policy regarding criminal cases at trial stage concluded in first-instance courts, for corruption and related offences between 2022 and 2024, indicated a trend of growth at certain levels.

11. How many convictions were there in 2025? What is the trend compared to previous years?

According to data provided by the Directorate-General for Justice Policy, for the years 2022 to 2024, the following convictions for corruption and related offences⁵ were recorded:

- 318 convicted persons in 2022;
- 360 convicted persons in 2023;
- 427 convicted persons in 2024.

According to data provided by CSM for 2025, decisions issued in the 368 criminal cases concluded at first instance in these matters show that 526 individuals and legal persons were convicted of crimes including abuse of power, money laundering, corruption, favouritism, fraud in obtaining subsidies, embezzlement, misuse of funds, bribery, malfeasance, undue receipt or offering of advantages, influence peddling, and breach of official secrecy.

It should be noted that the crime with the highest number of cases is money laundering, with 195 cases (53%), followed by embezzlement, with 47 cases (12.8%), and active corruption, with 21 cases (5.7%).

12. Are people arrested for these crimes?

According to data provided by the Directorate-General for Reintegration and Prison Services, during 2025:

- The number of inmates serving effective prison sentences for corruption and related offences was 167, of which 116 were for money laundering crimes, 23 for active corruption, 16 for passive corruption, 5 for embezzlement, and 7 for other crimes.
- The number of inmates in pre-trial detention for corruption and related offences was 211, of which 191 were for money laundering crimes, 6 for embezzlement, 6 for active corruption, 3 for abuse of power, and 5 classified as other.
- The number of persons subject to house arrest (a coercive measure involving deprivation of liberty) for this type of crime was 26, of whom

⁵ Including corruption, other crimes against the administration of justice, influence peddling, embezzlement, abuse of authority, other crimes committed in the exercise of public functions, other crimes against the economy, and crimes committed by holders of political office.

22 were for money laundering crimes, with the remaining cases involving corruption or other crimes committed in the exercise of public functions.

13. What are the reasons for such large disparities between the number of complaints and the number of convictions?

Reporting is widely recognised as one of the main ways of uncovering fraud and corruption, which, by their very nature, are typically hidden phenomena.

In many situations, especially those arising from anonymous reports, which are very common in this type of crime, the information provided is unclear and diffuse, lacking indicia or supporting evidence, or any indication of possible leads for locating such evidence.

Situations involving complaints with no valid basis must also be taken into account; after analysis, and precisely because of this characteristic, they are closed and do not give rise to an investigation.

It should also be noted that many investigations are ultimately closed, particularly due to the absence or difficulty in locating and/or accessing evidentiary elements.

MENAC therefore aims to contribute to increasing the evidentiary quality of complaints, namely by seeking to clearly guide whistleblowers on the elements required when submitting reports, through the dissemination of support tools for whistleblowers to enable a factual description of the reported situations and the possible identification and location of evidentiary materials, thereby helping to facilitate subsequent investigative work and the action of the courts.

MENAC also considers that a collective awareness-raising effort is important in this area, bringing together the efforts of public and private entities, as well as academia and civil society, in order to value the role of whistleblowers and reporting as an element that actively contributes to the interests of organisations and society in general.

In 2025, MENAC launched the Whistleblower Guide on Corruption Crimes and Related Offences, a guide for reporting possible violations in a safe and effective manner. This Guide clarifies, in particular:

- What constitutes a report and how it differs from a complaint.
- Which crimes and offences may be reported.
- Who can make a report and what their rights are.
- How internal and external reporting channels work.
- The protection guarantees afforded to whistleblowers.

14. How long do these cases take in court?

Data relating to decisions communicated in 2025 to MENAC by the Courts and the Public Prosecutor's Office indicate a tendency for criminal proceedings of this type to take a relatively long time.

On average, across these 478 decisions, it took 30 months to reach a decision to close the case, 50 months to issue an indictment, and 80 months to reach a conviction judgment.

However, there are naturally exceptions, including cases where decisions to close the case or to indict were issued in the same year the investigation began, as well as cases of the same nature occurring 10 to 14 years after the start of proceedings, and conviction judgments being handed down between 5 and 10 years after the start of the investigation.

Data from the High Council for the Judiciary nevertheless show that, from the beginning of the proceedings to the first-instance decision, cases concluded in 2025 took on average 55 months.

15. What are the main risk areas for the commission of these offences?

Data relating to decisions communicated in 2025 to MENAC by the Courts and the Public Prosecutor's Office show that the main risk areas were public procurement, administrative decision-making procedures, the exercise of delegated public functions and powers, the management of IT systems, as well as financial, treasury, and asset management.

Within these areas, the following risk factors stand out: the existence of conflicts of interest; the exercise of functions involving discretionary powers; and insufficient control over asset management procedures, financial processes, and IT access management.

According to the same information, the main types of crime indicated or proven were embezzlement, money laundering, corruption, abuse of power, and malfeasance.

It is also worth highlighting, in particular, the trend analysis carried out by the Judiciary Police (PJ), which identifies continued priority areas, namely local and regional administration, customs and prison services, healthcare, professional sport and the football industry, the implementation of European funds and the Recovery and Resilience Plan, defence and military procurement, among others.

Overall, this trend analysis shows a concentration of vulnerabilities in sectors characterised by high financial intensity, discretionary decision-making, technical complexity, and time pressure.



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