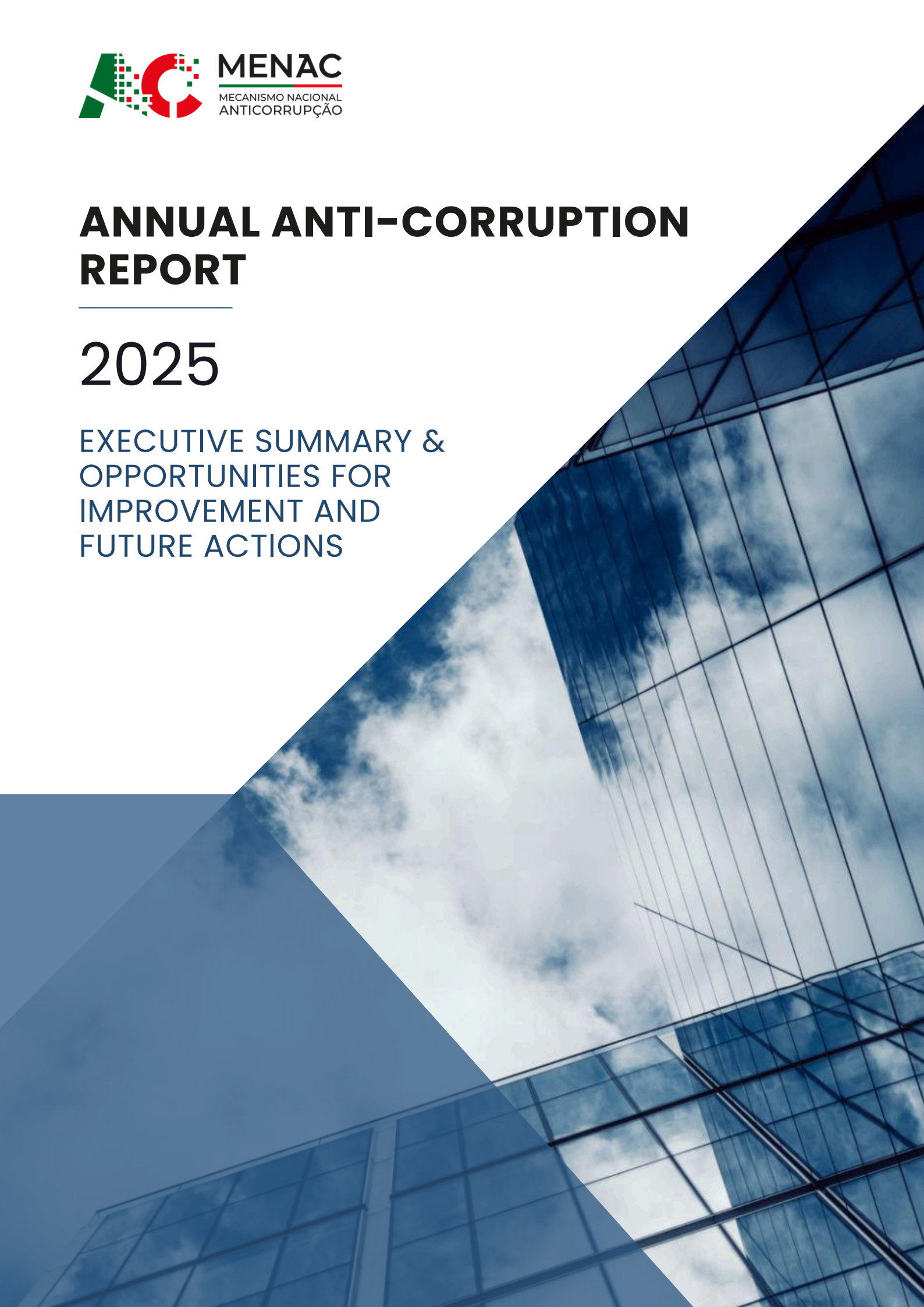


ANNUAL ANTI-CORRUPTION REPORT

2025

EXECUTIVE SUMMARY &
OPPORTUNITIES FOR
IMPROVEMENT AND
FUTURE ACTIONS





ANNUAL ANTI-CORRUPTION REPORT 2025

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EXECUTIVE SUMMARY

The 2025 Annual Anti-Corruption Report fulfills, for the first time, the obligation of simultaneous reporting to the Assembly of the Republic and to the Government, under the terms of Decree-Law No. 109-E/2021, of 9 December, as amended by Decree-Law No. 70/2025, of 29 April.

The document consolidates, in accordance with legal requirements, the MENAC Activity Report and the Annual Anti-Corruption Report, ensuring an integrated overview of the reality of corruption in Portugal and of MENAC's action as an independent administrative authority for the prevention of corruption and related offences.

The report also reflects the effort to structure, consolidate, and operationalise MENAC under its new governance model—resulting from the 2025 reform—and provides an unprecedented and integrated analysis of corruption in Portugal, in coordination with various judicial, police, inspection, supervisory, financial control, arbitral, and administrative entities.

1. The new architecture of MENAC: structure and consolidation

Since August 2025, MENAC has had a collegial leadership structure — the Board of Directors — composed of three members (a Chairman and two Management Board members), ensuring greater stability, autonomy, and operational capacity.

Two operational organizational units were established — the Planning, Prevention and Information Unit (UPPI) and the Inspection and Administrative Offences Unit (UFIC) — replacing the former monitoring and sanctions commissions.

In 2025, there was also a strengthening of the entity's human and technological capacities, namely:

- With an increase in the number of staff and their qualifications, with further expansion expected in 2026;
- With the implementation of the RGPC¹ platform, incorporating an artificial intelligence module, which has since received international recognition within EPAC/EACN.

2. MENAC in action

¹ Regime Geral de Prevenção da Corrupção (General Regime for the Prevention of Corruption)

In 2025, MENAC:

- Issued seven opinions on legislative proposals in areas related to its mandate, as requested by Parliament;
- Issued four recommendations on strengthening transparency and integrity, including one concerning public procurement and support in the context of emergencies and crisis response;
- Issued guidance on the compliance officer role;
- Increased the number of entities registered on the RGPC platform, reaching a total of 6,989 by the end of the year, including 1,509 public entities and 5,480 private entities;
- Initiated MENAC's sanctioning activity for non-compliance with the RGPC and the RGPDI², resulting, within four months, in the opening of 16 administrative offence proceedings, 14 for non-compliance with the RGPC and 2 for non-compliance with the RGPDI;
- Strengthened cooperation with inspectorates-general and equivalent bodies, as well as regional inspectorates, through the analysis of audit reports submitted by these entities to verify compliance with the RGPC and the RGPDI;
- Opened 66 investigation proceedings, 32 of which were initiated following the aforementioned audit reports and 34 based on facts identified by MENAC in the course of its oversight activities;
- Received a total of 266 reports through its external whistleblowing channel, 215 concerning public entities and 51 concerning private entities. Nearly half (44.7%) of these reports were submitted anonymously, while the remaining 147 (55.3%) were submitted by identified whistleblowers;
- Signed two new protocols, with DGAEP³ and the Conselho Superior da Magistratura⁴, strengthening an institutional network that already included All4Integrity, ANMP⁵, CAAD⁶, COP⁷, OBEGEF⁸, PJ⁹, Transparency International Portugal, and UN GCNP¹⁰;

² Regime Geral de Proteção de Denunciantes de Infrações/ General Whistleblower Protection Regime

³ Direção-Geral da Administração e Emprego Público/ Directorate General for Administration and Public Employment

⁴ High Council for the Judiciary

⁵ Associação Nacional dos Municípios Portugueses/ National Association of Portuguese Municipalities

⁶ CAAD - Centro de Arbitragem Administrativa/ Administrative Arbitration Centre

⁷ Comité Olímpico de Portugal/ Portuguese Olympic Committee

⁸ Observatório de Economia e Gestão de Fraude/ Observatory of Economics and Fraud Management

⁹ Polícia Judiciária/ Judiciary Police

¹⁰ UN Global Compact Network Portugal

- Promoted educational, training, and awareness-raising initiatives, particularly during the 2025 Anti-Corruption Month, with strong involvement from various sectors, including schools and universities, public and private entities, civil society, and young people across different regions of the country;
- Organized lectures, awareness sessions, training activities, and webinars on organizational integrity, risk prevention, and the promotion and monitoring of the PCN¹¹ instruments provided for in the RGPC, involving more than 6,000 participants;
- Expanded the dissemination of shared knowledge, notably through its YouTube channel, where various training contents continue to be viewed;
- Launched asynchronous courses on the RGPC (in partnership with INA¹² and CEJ¹³) and on Anti-Corruption and Integrity (in partnership with the UN Global Compact Network Portugal), aimed at universalizing access to basic training on RGPC matters in both the public and private sectors, both made publicly available on 9 December, International Anti-Corruption Day;
- Actively participated in international networks and work within ACINET¹⁴, Council of Europe, EPAC/EACN, IAACA, NEIWA, NCPA, OECD, UN, and EU, while also strengthening bilateral cooperation with counterpart bodies and other entities, including AFA in France, ANAC in Italy, and INTERPOL;
- Was highlighted in flagship documents issued by the G20 Anti-Corruption Working Group, particularly in relation to its work on integrity education and whistleblower protection;
- Increased its public visibility, particularly through the dissemination of events it was associated with, resulting in a significant rise in followers on its social media channels, with a particularly strong impact from initiatives linked to Anti-Corruption Month, which generated over 500,000 impressions.

¹¹ Programa de Cumprimento Normativo/Regulatory Compliance Program

¹² Instituto Nacional de Administração/National Institute of Administration

¹³ Centro de Estudos Judiciários/ Center for Judicial Studies

¹⁴ Arab Anti-Corruption and Integrity Network

3. Get to know the reality of corruption better: MENAC data

The report analyzes the 478 decisions communicated to MENAC by the PGR¹⁵ and the courts concerning corruption-related crimes and associated offenses. These data reveal structural trends:

- A large proportion (386, about 82% of the total) correspond to decisions to close cases.
- The remaining communications mainly consist of indictments (82, about 17% of the total), and, in much smaller numbers, convictions and acquittals (5 cases), decisions to commit a case to trial (2 cases), appeal rulings (2 cases), and 1 decision on provisional suspension of proceedings.
- On average, from the opening of the investigation, it took 35 months (nearly 3 years) to reach the communicated decision across all cases.
- The most prevalent legal categories of crime associated with these criminal proceedings are corruption (31.8%), abuse of power (15.2%), embezzlement (13.3%), money laundering (10.9%), misconduct in office (9.6%), and unlawful participation in business (7.9%), following a trend observed in previous years.
- The entities most frequently associated with the reported decisions are local government (211 communications, about 44% of the total) and central government (123 communications, about 26% of the total), in line with trends seen in previous years.
- 190 communications (about 40% of the total reported to MENAC) are linked to criminal proceedings initiated through anonymous complaints, followed by proceedings initiated through institutional complaints (108 communications, about 23% of the total), and complaints from identified private individuals (105 communications, about 22% of the total). These figures also reflect trends observed in previous years.
- The vast majority (179 out of 190) of communications associated with anonymous complaints were ultimately closed. Only 11 indictments stem from criminal proceedings initiated through anonymous complaints. This is also consistent with trends observed in previous years.
- The crimes with the strongest indications and the greatest evidentiary support (92 in total) were embezzlement and misuse of public funds (23/92), money laundering (17/92), corruption (15/92), and misconduct in office (10/92).
- The main risk areas identified from the analysis of decisions in criminal proceedings with evidentiary elements are the exercise of delegated public functions and powers, public procurement, and administrative decision-making. Within these, the key risk factors identified are

¹⁵ Public Prosecutor's Office

insufficient oversight of entities entrusted with public powers and functions, the existence of conflicts of interest, and the exercise of functions involving discretionary powers.

4. Understanding the reality of corruption better: data from other entities

MENAC sought here to integrate external data in order to strengthen a systemic interpretation, whose different perspectives—particularly statistical ones—should be taken into account.

- Judiciary Police:
 - 3,586 investigations in 2025; a 35.5% increase in corruption crimes compared to 2024.
 - Data on investigations concluded with a proposal for indictment show a prevalence of money laundering, trafficking in prohibited substances and methods, and embezzlement.
 - The data point to the following trends in exposure to corruption-related and associated crimes:
 - Public procurement and urban licensing within local and regional administrations;
 - The control of goods and persons, in customs areas and prisoner management;
 - Urgent procurement of medical equipment, the high complexity of technical specifications, and the limited number of suppliers in the healthcare sector;
 - Fraud and manipulation of results, and bribery involving athletes, coaches, referees, and officials in sports competitions;
 - Strong pressure surrounding the allocation and execution of European funding, particularly under the Recovery and Resilience Plan (RRP);
 - The defense sector, due to the expected increase in public investment in this area.
- Commission for the Coordination of Policies for the Prevention and Combating of Money Laundering and Terrorist Financing:¹⁶
 - The data indicates a correlation between the crime of money laundering and various forms of corruption, including corruption in sports, highlighting the need to strengthen the legislative framework regarding the control of concealment and integration of illicit assets.

¹⁶ Comissão de Coordenação das Políticas de Prevenção e Combate ao Branqueamento de Capitais e ao Financiamento do Terrorismo

- Directorate-General for Justice Policy¹⁷:
 - Data on corruption and related crimes show an increase in the number of concluded cases in this area, a predominance of individual defendants over legal entities, and, notably, a tendency to apply non-custodial sentences in cases of conviction.
- High Council for the Judiciary¹⁸:
 - The data show a predominance of money laundering crimes and a tendency toward lengthy proceedings. The rate of effective imprisonment sentences applied to those convicted of corruption and related offenses is approximately 13%. These elements are consistent with data provided by other entities.
- Directorate-General for Reintegration and Prison Services¹⁹:
 - The data indicate a trend toward suspended sentences in convictions for this type of crime, as well as the prevalence of money laundering compared to other offenses—findings that align with data from other entities. It is noteworthy, however, that the number of inmates serving effective prison sentences in 2025 for corruption and related offenses was 167, of whom 116 were convicted of money laundering, 23 of active corruption, and 16 of passive corruption.
- Administrative Arbitration Centre (CAAD):
 - Data from this key body for dispute resolution, particularly in tax and administrative matters, suggest that the main area exposed to risks of corruption and related offenses is public procurement, as also highlighted by other entities working in this field, including international reports.
- Treasury and Finance Entity (ETF²⁰) and its Technical Unit for Project Monitoring (UTAP)²¹:
 - The data indicates that, within its monitoring activity of Public-Private Partnership (PPP) projects, the main area of exposure to risk is the road sector, due to the higher number of partnership contracts (21 out of a total of 42 PPP contracts recorded in September 2025) and the associated financial value. Strengthening transparency in dispute resolution processes in this area appears essential.
- Supreme Court of Auditors²²:
 - The data point to the need to increase oversight of conflicts of interest in public management, including situations involving the

¹⁷ Direção-Geral da Política de Justiça

¹⁸ Conselho Superior da Magistratura

¹⁹ Direção-Geral de Reinserção e Serviços Prisionais

²⁰ Entidade do Tesouro e Finanças

²¹ Unidade Técnica de Acompanhamento de Projetos

²² Tribunal de Contas

accumulation of functions and compliance with legally established terms for members of management bodies, in order to prevent continuity in office through substitution or accumulation arrangements.

- Entity Transparency²³:
 - The data show that, during 2025, the entity received 6,438 single declarations of income, assets, interests, incompatibilities, and impediments relating to 5,330 officeholders. In addition to clarification requests issued during the analysis and verification of these declarations, cases of non-compliance were identified due to failure to submit the declaration, as well as lack of response to clarification requests or failure to submit replacement declarations. This resulted in 201 notifications to the individuals concerned. Six of these non-compliance cases also led to nine reports being sent to the Public Prosecutor's Office and another competent authority.
- Entity for Political Accounts and Financing²⁴:
 - The data reveals a functioning system for monitoring political financing, but also possible vulnerabilities, particularly delays in assessing party accounts and electoral campaign finances. This may require strengthening technical and human resources, as well as improving risk identification tools and corresponding preventive measures.
- "Recover Portugal" Mission Structure²⁵:
 - The data presents a control model for European funding processes based on a preventive methodology which, among other safeguards, includes mechanisms to control the risk of double funding, risk self-assessments by entities, and the referral of complaints to competent authorities, namely the Public Prosecutor's Office or the European Public Prosecutor's Office.
- Institute for Public Markets, Real Estate and Construction²⁶:
 - The data show that contracts for goods and services are far more numerous (93% of contracts registered on the BASE Portal platform in 2025) than public works contracts. Direct award is the most frequent procedure for goods and services contracts, while public tender and prior consultation are the most common procedures for public works contracts. The data also indicate that both types of contracts tend to show more significant deviations in meeting execution deadlines than in relation to agreed contract values.

²³ Entidade para a Transparência

²⁴ Entidade das Contas e Financiamentos Políticos

²⁵ Estrutura de Missão Recuperar Portugal

²⁶ Instituto para os Mercados Públicos, Imobiliário e da Construção

- Transparency International and Eurobarometer (perception of corruption):
 - The data point, in particular, to:
 - Ongoing weaknesses in control and oversight mechanisms;
 - Shortcomings in political and administrative accountability; and
 - Erosion of trust in public institutions.
 - In light of these elements, MENAC's assessment suggests that anti-corruption policies should be developed, in particular, along four axes: stronger focus on prevention, rejection of generalizations, reduction of delays in the justice system, and enhanced institutional coordination.

5. Conclusions and lines of future action

The overall analysis of the report highlights a national integrity system that is consolidating, but also constrained, namely by limited resources, an insufficient culture of integrity and risk management and procedural delays.

Corruption and related offenses continue to represent a structurally complex phenomenon, difficult to prove and with a strong incidence in the public sector, requiring increased upstream investment in a culture of integrity and transparency, in prevention, in training and in the greater use of technologies to support integrity.

The recommendations issued by MENAC as a result of this report are presented in next chapter, to which reference is made, where measures are detailed that are considered capable of strengthening integrity, transparency, and corruption prevention in Portugal.

MENAC reaffirms that, in the case of corruption, "prevention is better than cure," and that preventing corruption should be seen as a strategic investment for both the public and private sectors, being essential for democratic quality, institutional trust, and sustainable economic development.

OPPORTUNITIES FOR IMPROVEMENT AND FUTURE ACTIONS

Introductory note

Following the analysis of the elements presented, it is possible to identify a set of trends, weaknesses, and areas that warrant reflection oriented toward action.

It is in this context that this chapter aims to present a set of opportunities for improvement and future lines of action, supported by the evidence gathered and the integrated analysis achieved.

These proposals and recommendations therefore emerge not merely from a descriptive exercise, but from an analysis that seeks to actively contribute to strengthening the institutional response to the phenomenon of corruption.

Given MENAC's mission, focused on the prevention of corruption, the proposals set out here are primarily aimed at consolidating a culture of integrity and transparency, promoting an organizational culture—both public and private—based on ethical principles and transparency, as well as anticipating risks.

It should be emphasized that the proposals and recommendations presented correspond to what, at this stage, appears most appropriate to address, taking into account the current state of knowledge and available data.

They therefore constitute a dynamic set of solutions, subject to evolution, which should be progressively adjusted and further developed as new evidence becomes available, particularly during 2026.

1. Definition of a National Strategic Framework

The State Budget Law for 2026 establishes, under Article 233, that in 2026 the Government shall adopt the National Anti-Corruption Strategy and the respective action plan for the period 2025–2028, as well as a corruption risk prevention plan for executive positions. It also ensures their implementation and monitoring, namely through the identification of specific objectives and measures, the definition of the roles of entities responsible for implementing those measures, the establishment of a timeline and deadlines, and the publication of performance indicators.

The action plan must clearly and systematically include measures to strengthen transparency, integrity and corruption prevention. Annual monitoring reports on its implementation must be published and submitted to Parliament.

This represents an opportunity to align efforts, define priorities and ensure the effective implementation of adopted measures. MENAC stands fully available to contribute to this effort.

In this context, it is important to note that the Anti-Corruption Agenda approved in 2024 provided important strategic guidance, including for MENAC. The next step is to define the path for the coming years—an effort that MENAC will also reflect in its own strategic planning.

Within this framework, consideration should also be given to carrying out an integrated review of the National Anti-Fraud Strategy in the context of preventing and combating fraud in the use of European Union budget funds for the 2023–2027 period, ensuring coherence in the approach to these matters.

It is also important to take into account that the Anti-Corruption Directive already approved by the European Parliament and the Council of the European Union provides, among other aspects, that Member States must adopt and publish a national anti-corruption strategy, establishing objectives, priorities, corresponding measures and the means to achieve them.

Finally, in this regard, attention should also be paid to the elements referred to in the *2026 Global Anti-Corruption and Integrity Outlook* report, prepared by the OECD and very recently published²⁷.

1.1. Education and training on ethics, integrity, transparency and corruption prevention

The need and relevance of strengthening and promoting educational and training initiatives is clear, particularly on issues of ethics, integrity, transparency, the RGPC and the RGPDI.

Within various organisations, both public and private, Compliance Programmes have reflected good practices and experiences that can be effectively replicated and further expanded to reach broader target audiences.

MENAC's role in this regard should be further reinforced, particularly in line with its strategic planning.

With respect to children and young people, the objective of universalising access to content on ethics, integrity and transparency—promoting literacy in

²⁷ According to the report, Portugal shows weak performance in the area of anti-corruption strategies, both in terms of the robustness of its strategic framework and its implementation. Specifically, the country meets 20% of the criteria relating to the strength of the strategic framework and 0% of the criteria relating to practice, placing it below the OECD average of 38% and 32%, respectively. This assessment therefore points to shortcomings in design and, above all, a lack of operationalisation, in a context where discontinuity between strategic cycles tends to undermine the consistency, monitoring and effectiveness of public policies in this area. See [Anti-Corruption and Integrity Outlook 2026 \(EN\)](#).

these areas from an early age—aims to act upstream, seeking medium- to long-term but lasting results. In this context, the role of teachers is essential, and their training should also be strengthened.

Accordingly, MENAC's action also focuses on the development of content to be made available for use in schools and within the framework of school sports.

MENAC also highlights the national and international context of these efforts, as well as the value of processes for exchanging experience, knowledge and good practices among institutions working in the fields of corruption, mismanagement (both public and private), auditing and control, including leading organisations such as the OECD, GRECO, the EU and the United Nations, among others.

1.2. Promoting greater literacy in integrity, corruption prevention and related offences

Closely linked to the previous point is the fact that data on the reports received suggest there is still some difficulty in accurately identifying behaviours that may constitute corruption offences or related crimes.

In this context, it is recommended to strengthen education, training and awareness-raising initiatives aimed at public officials, private organisations, employees and citizens in general, with the objective of:

- Improving understanding of the phenomenon and clarifying relevant legal concepts;
- Promoting training and education in ethics and risk management, particularly the early identification of risk situations (red flags) and how to respond to them;
- Encouraging the proper use of reporting channels

These actions contribute to strengthening a culture of integrity and transparency within organisations and society as a whole. MENAC's role in this regard should be further reinforced, particularly in line with its strategic planning.

1.3. Improving knowledge of the reality of corruption

MENAC considers that a better understanding of this reality requires investment across several fronts, including the expansion of sources of information.

One of the aspects highlighted in this report is the existence of different approaches among institutions that hold relevant data for a better understanding of corruption, particularly at the statistical level.

The differentiated recording and processing of this data results from established and structured processes, defined in accordance with the specific missions and mandates of the various entities.

In this context, an important joint effort of reflection and proposal development is needed in order to achieve a better understanding of the existing reality. The retrospective analysis of cases within MENAC's remit may also constitute a relevant input for this work.

Where feasible, these efforts should include the harmonisation of data collection methodologies. To this end, it is necessary to promote the systematisation and sharing of technically and scientifically sound and recognised criteria that would enable the standardisation of the collection, processing and production of statistical information on corruption and related criminal offences.

1.4. Continuing to develop tools for systematic data collection and analysis

Building on the previous point, this report also highlights the usefulness of systematically analysing data from judicial decisions and the Public Prosecutor's Office, in order to deepen knowledge of the subject, at least with regard to the portion that is detected and subject to criminal proceedings.

It is therefore considered essential to continue and further develop the collection and processing of information relating to criminal proceedings associated with corruption offences and related crimes, in particular by expanding the scope and depth of analysis of data received by MENAC. This includes the above-mentioned retrospective analysis of particularly relevant or complex cases, with a view to identifying potential opportunities to improve procedural efficiency.

The progressive development of structured databases that allow for comparison over time will make it possible to more consistently and robustly identify trends, risk patterns and more exposed institutional areas, thereby contributing to the design of more effective and credible public policies for the prevention of this type of crime.

1.5. Preparing and developing evidence-based public policies

Building on the previous point, this report clearly demonstrates the importance of having robust information on the reality of corruption, particularly with a view to designing and implementing public policies in this area.

It is therefore recommended that the development of public policies in this field be based on a systematic and structured evidence-based approach,

involving the collection, analysis and evaluation of data from multiple sources, namely:

- Judicial data;
- Administrative data;
- Contributions from relevant public and private entities;
- Academic studies;
- National and international indicators;
- Others, including civil society.

This type of approach is widely promoted by international organisations such as the OECD (Working Group on Bribery), the Council of Europe (GRECO) and the United Nations (UNODC) and should also ensure the continuous monitoring and evaluation of adopted policies.

1.6. Strengthening prevention mechanisms in higher-risk areas

In light of the high concentration of criminal proceedings associated with certain sectors and specific entities (as seen, for example, in local government), it is recommended that corruption prevention tools be reinforced in organisations operating in areas or sectors with higher exposure to risk.

Such reinforcement should focus, in particular, on the consolidation of Compliance Programmes in general and, specifically, of Corruption and Related Offences Risk Prevention Plans. This includes the systematic identification of sensitive operational areas (notably, in the case of local government, public procurement, urban planning, asset management, civil protection, licensing and inspection), as well as the development of internal mechanisms for training, monitoring and control embedded within the organisation's management and activities.

This approach is also aligned with international recommendations that emphasise the importance of preventive corruption risk management at the organisational level.

1.7. Strengthening the quality and effectiveness of reporting mechanisms

The MENAC data presented in this report show that a very significant proportion of criminal proceedings originate from anonymous reports, with such cases exhibiting a particularly high rate of dismissal.

Without prejudice to the importance of anonymity and its preservation whenever requested by whistleblowers, it is recommended that measures be strengthened to improve the informational basis required for gathering evidentiary elements. These may include solutions such as:

- Increasing transparency in the dissemination and visibility of internal and, where applicable, external reporting platforms within organisations;
- Providing clear guidance and meaningful, effective training on the elements required for submitting a report and its relevance to the organisation and society at large;
- Offering support tools to whistleblowers in the factual description of reported situations and in the possible identification and location of evidentiary materials;
- Improving public communication on the distinction between complaints and reports of wrongdoing;
- Ensuring effectiveness and coherence with appropriate sanctioning mechanisms and other enforcement measures, particularly in the disciplinary domain.

These measures may contribute to increasing the initial evidentiary value of reports, facilitating the development of investigations and subsequent judicial action, and ultimately strengthening the legally intended culture of integrity and transparency.

It is also important to consider, in this context, a collective awareness-raising effort bringing together public and private entities, as well as academia and civil society, in order to enhance the value of whistleblowers and reporting as elements that actively contribute to the interests of organisations and society as a whole.

1.8. Strengthening institutional cooperation between entities responsible for the control, prevention and repression of corruption

The broad reach of corruption prevention, on the one hand, and the complexity of enforcement, on the other, require effective coordination among various institutions.

It is recommended that cooperation mechanisms and information-sharing be strengthened between MENAC, the Public Prosecutor's Office, criminal police bodies, internal control entities and all other relevant authorities involved in the prevention and repression of corruption, such as Inspectorates-General, Regional Inspectorates and the Supreme Court of Auditors—as the external audit body of State action in the public sector—as well as entities representing activities across the private, cooperative and social sectors.

Inter-institutional cooperation is a key factor in enhancing the effectiveness of anti-corruption policies.

The international dimension of many of these phenomena—most notably corruption in international trade—is increasingly recognised and concerning, in which case international cooperation is an essential additional vector.

1.9. Promoting early detection within organisations

Given that many criminal proceedings are initiated only after unlawful conduct has already become established, it is recommended to strengthen early detection mechanisms for illicit activities, namely through measures such as:

- Integrating a culture of risk management and compliance into the various management tools of organisations;
- Implementing robust and effective internal control and audit systems focused on high-risk areas;
- Using technological tools for data analysis.

These measures help reduce the likelihood of illicit practices, enhance the preventive capacity and awareness of organisations—both public and private—and facilitate the early detection of potential wrongdoing.

1.10. Transparency in arbitration and dispute resolution

As highlighted in the report, the analysis of the available data raises a number of concerns in this area, including insufficient transparency regarding the composition of arbitral tribunals, the terms of their establishment and their decisions, particularly in relation to concessions and public-private partnerships (PPPs).

Strengthening transparency in dispute resolution processes in this field is essential, notably to ensure auditability, enable traceability of decision-making processes and reduce information asymmetries, thereby fostering an environment that helps prevent corruption risks and protects the public interest.

It is therefore recommended that dispute resolution models in the context of concessions and PPPs prioritise and reinforce mechanisms of publicity, transparency, integrity and public scrutiny.

1.11. Strengthening control and transparency in European funding programmes

Based on the elements analysed in this report, MENAC recommends, in particular, that:

- All beneficiaries—direct, indirect and intermediary—should be subject to control actions and, at the same time, carry out the necessary self-assessments to identify new risks, as well as implement additional controls to prevent them; and
- Good practices in risk management and in the prevention of fraud and corruption should be identified and shared, with a view to fostering an organisational culture guided by integrity, transparency and probity.

1.12. Enhancing transparency in public procurement, namely through improvements to the BASE Portal²⁸

It is important to recognise the value of a platform such as the BASE Portal for managing public procurement procedures in Portugal, as well as the transparency potential it has brought to an area widely exposed to corruption risks.

However, it is essential to develop solutions that enable more segmented analysis, particularly based on criteria such as:

- Type and sector of administration;
- Type of contract and procedure;
- Categories of explanatory factors for deviations in deadlines and financial amounts.

It is therefore recommended to strengthen transparency in public procurement procedures, notably through the provision of information that allows for a clearer and more detailed identification of risk areas and factors.

Such information is essential for designing more targeted and effective planning, control and prevention measures in a particularly critical area of public management.

Furthermore, it is important to pursue interoperability between the BASE Portal and the data of the Institute of Registries and Notary (IRN)²⁹, so that stakeholders involved in the formation and execution of contracts can assess, in each procedure, the existence of potential conflicts of interest.

Additionally, consideration should be given to using the national State suppliers' portal to obtain information on the beneficial owners of these suppliers, ensuring that such information is up to date, accurate and complete, while fully respecting personal data protection rules.

²⁸ The BASE Portal is the official public platform in Portugal for the centralization, publication, and monitoring of all public contracts concluded under the Public Contracts Code (CCP). Managed by Institute for Public Markets, Real Estate and Construction (IMPIC), it ensures transparency by disclosing data on the formation and execution of contracts.

²⁹ The Institute of Registries and Notary (IRN) is a Portuguese public institute under the supervision of the Ministry of Justice, responsible for implementing policies on civil identification and registries (civil, land, commercial and vehicle). The IRN provides services to citizens and businesses, issuing essential documents such as the Citizen Card and the Passport.

1.13. Strengthening control over situations of conflicts of interest, multiple office-holding and temporary or substitute appointments

In light of the data collected, MENAC highlights the need for entities in general to strengthen mechanisms for the prevention, detection and management of conflicts of interest, as well as the control of situations involving the accumulation of functions, particularly through verifying compliance with the legally established requirements for such cases.

Similarly, it underscores the need for greater safeguards in procedures for appointing individuals to certain functions or positions carried out through mandates, as well as in cases of designation or nomination, in order to avoid the prolonged continuation in office under temporary or substitute arrangements.

1.14. Strengthening national entities operating in the field of prevention

As noted in this report, reinforcing human, financial and technological resources —namely for MENAC, Entity Transparency and Entity for Political Accounts and Financing— would enhance the fulfilment of their respective missions. In particular, for the latter, it would strengthen operational capacity, especially in election years.

In this regard, it is important to highlight that the new European anti-corruption directive provides that Member States must adopt measures to ensure the existence of prevention instruments. These may include, among others, adequate access to information of public interest, rules on the disclosure and management of conflicts of interest in the public sector, measures to ensure transparency in the financing of candidates for elected public office and political parties, rules on asset declarations and their verification, declarations of interests and the regulation of “revolving door” situations by national authorities, rules concerning the failure to disclose relevant assets or interests, as well as rules governing interactions between the private and public sectors.

It further states that Member States must ensure that bodies responsible for prevention have an adequate number of qualified staff, as well as the financial, technical and technological resources necessary for the effective performance of their functions related to the implementation of the directive.

1.15. Change of the deadline for submitting the Annual Anti-Corruption report

The preparation of this report could be substantially improved by taking into account timely contributions from various other institutions, regarding information they hold which, in some cases, is systematised for the purposes of their own annual activity reports and, in others, for the production of reports such as the RASI³⁰, submitted by the end of March each year.

Considering that the deadlines for submitting reports from these entities largely coincide with the deadline available to MENAC for submitting its annual report, it would be advisable to extend this deadline in order to allow full use of the information that may be provided by those entities.

Additionally, such a revised deadline would create conditions to broaden the report preparation process by incorporating a more diverse range of contributions, promoting a more participatory and comprehensive approach.

This adjustment would therefore support a more rigorous and well-founded analysis of the reality of corruption and contribute to strengthening the analytical quality, legitimacy and impact of the report.

Accordingly, it is proposed that consideration be given to setting the deadline for submission of the annual anti-corruption report to 30 June of the year following the one to which it relates, as this would constitute an appropriate and proportionate measure aimed at enhancing the effectiveness of the annual report as a diagnostic and public policy support instrument.

³⁰ The RASI stands for the Annual Internal Security Report. It is an official document published every year by the Government of Portugal, providing an overall overview of the internal security situation in the country. The report compiles data and analysis provided by various security forces and services. In practice, includes: statistics on crime (both general and violent crime), trends and developments in the main types of crime; information on terrorism, cybercrime, and other threats; assessment of the work of security forces; Recommendations and public policy measures. The main entities contributing to the RASI include both police armed forces PSP & GNR, the Judiciary Police and the Security Intelligence Service (SIS). It is an important document because it helps understand how security in Portugal is evolving and serves as a basis for political and strategic decisions in the field of internal security.



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