# The EU-UNODC Relationship in the Context of Anti-Corruption Efforts

A Collaborative Approach to Global Integrity

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## ABSTRACT

The relationship between the European Union (EU) and the United Nations Office on Drugs and Crime (UNODC) in the context of anti-corruption efforts represents a multi-dimensional and strategic partnership that responds to the complexity of global corruption challenges. This article explores the collaboration between the EU and UNODC, which has recently picked up speed. The article emphasises the shared goals of combating corruption globally, strengthening rule-of-law frameworks, and creating multileveled synergies in response to emerging global contests. It also examines specific milestones, such as the EU-UNODC Anti-Corruption Dialogue and the implications of recent geopolitical shifts, including some State actors' reduced involvement in international anti-corruption initiatives. The author concludes that multilateral collaboration among regional and international actors, involving the participation of relevant national, local, and sectoral stakeholders can provide a robust tool for combating adaptive corruption – one that is both apt and thorough.

# I. Introduction

Corruption remains one of the most pervasive and insidious threats to global development, political stability, and security. Corruption is estimated to cost the European Union between €179 billion and €990 billion per year, amounting to up to 6% of its GDP.[1] The need for coordinated international efforts to combat corruption has never been more urgent, particularly as corruption is becoming increasingly complex and interconnected due to issues such as organised crime, environmental degradation, and the abuse of new technologies, in addition to its impact on human rights[2]. Both the European Union (EU) and the United Nations Office on Drugs and Crime (UNODC) have recognised the importance of addressing corruption as a global challenge and have taken active roles in designing and implementing anti-corruption initiatives worldwide.

This article examines the growing collaboration between the EU and UNODC in the fight against corruption. By focusing on their joint efforts and frameworks for cooperation, we explore how their relationship has recently developed and what specific measures are being undertaken to strengthen global anti-corruption governance. The article presents the different roles and responsibilities of the EU and the UNODC in combating corruption: individually, with each other, and with other significant international and national entities, in a collaborative and inclusive, multilayered framework. An analysis will show that the combined EU-UNODC action has contributed to accelerated and improved response to global corruption, which is both multilateral and comprehensive.

# II. The Development of EU Anti-Corruption Initiatives

At the regional level, the EU has consistently been one of the most proactive entities in the fight against corruption. In 2014, the EU took its first significant step by establishing a more systematic framework for addressing corruption risks within its Member States.[3] In its 2014 EU Anti-Corruption Report, the European Commission sought to identify national corruption risks and capacities. The report provided an overview of the situation regarding corruption frameworks in each EU Member State: anti-corruption measures in place, outstanding issues, policies that were working well, and areas that could be improved. It was not until 2020, however, that the European Commission began publishing an annual Rule of Law Report, which includes a thorough, robust, and consistent assessment of the rule of law in general, including a specifically dedicated pillar on the anti-corruption frameworks in EU Member States.[4] The annual Rule of Law Report serves as a comprehensive evaluation tool that monitors adherence to the rule of law across the 27 EU Member States. Corruption is a key area of concern in the report, as it directly impacts the integrity of the justice system, media pluralism, and institutional checks and balances.

The Rule of Law Report has evolved over time, shifting from a descriptive analysis to a more sophisticated and actionable tool, that offers recommendations for improvement, including on anti-corruption.[5] The European Commission's approach to assessing anti-corruption efforts relies on a diverse set of data sources: meetings and reports with national authorities, non-governmental organisations (NGOs), civil society organisations (CSOs), and international bodies like the UNODC, the Organisation for Economic Co-operation and Development (OECD), and the Group of States Against Corruption (GRECO). These EU reports, which cover both systemic weaknesses and positive developments, play a critical role in ensuring that Member States take the necessary steps to prevent corruption and maintain strong governance.[6]

The year 2023 was pivotal for the European Union in its efforts to combat corruption.[7] First of all, the European Commission submitted the proposal for a Directive on combating corruption through criminal law.[8] This marks a significant effort to move toward modernizing and harmonizing the EU's legal framework in the

fight against corruption. The proposal aims to expand the scope of criminal corruption offenses beyond conventional bribery to include acts such as misappropriation, trading in influence, abuse of functions, obstruction of justice, and illicit enrichment linked to corruption. Additionally, the initiative emphasises the importance of preventive measures, including raising awareness and promoting a culture of integrity. It also proposes the introduction of minimum criminal penalties and sanctions for both individuals and legal entities, ensuring a consistent legal standard across all EU Member States.

Other important elements of the proposal include extending the statute of limitations for corruption-related offenses and equipping law enforcement and prosecutors with the necessary tools and resources for effective investigations. The proposal is explicitly designed to fulfil international commitments under the United Nations Convention Against Corruption (UNCAC). Ongoing trilogue negotiations[9] among the European Parliament, the Council of the European Union, and the European Commission are critical in shaping the final version of the Directive and ensuring it meets or surpasses UNCAC standards within the EU.

Furthermore, in the 2023 Joint Communication on corruption, the Commission and the High Representative announced the creation of an EU-wide anti-corruption network, in addition to a proposal for a regime of sanctions against serious acts of corruption committed *outside* the EU.[10] At the same time, the Commission presented a proposal for establishing an EU ethics body.[11] Also, the implementation of the EU Whistleblower Protection Directive (to ensure stronger protection for individuals reporting violations of EU law, including corruption) continued in 2023. Lastly, several transparency-related initiatives advanced, e.g., developments in lobbying regulation (via the EU Transparency Register)[12], financial markets (through the EBA Transparency Exercise)[13], and environmental claims[14].

# III. The Role of UNODC in Global Anti-Corruption Efforts

UNODC plays a crucial role in the global fight against corruption, acting as the guardian of the United Nations Convention Against Corruption (UNCAC).[15] The Convention, adopted in 2003 and entered into force in 2005, provides a comprehensive framework for addressing corruption on an international scale (see also IV). UNODC's mandate includes assisting contracting parties in implementing the provisions of UNCAC, offering technical assistance, and promoting the principles of transparency, accountability, and integrity. Through its regional programmes and field offices, UNODC has strengthened its presence in key areas like Sub-Saharan Africa, Latin America, and the Caribbean, working closely with governments to build effective anti-corruption frameworks.

The UNODC 2021-2025 Strategy focuses on preventing and countering corruption and economic crime, which further solidifies the organisation's role in shaping global anti-corruption governance. UNODC has also been instrumental in facilitating the UNCAC Implementation Review Mechanism, a process through which signatory parties are peer reviewed on their compliance with the Convention's provisions.[16] This mechanism encourages international cooperation, the exchange of best practices, and the strengthening of anti-corruption laws and policies across countries.

# IV. The European Union's Implementation of the United Nations Convention Against Corruption

The UNCAC remains the most comprehensive international legal instrument to combat corruption, encompassing preventive measures, criminalisation, enforcement, asset recovery, and international cooperation.

With 191 signatory parties to the Convention, including the European Union (EU), the UNCAC serves as a critical framework for global anti-corruption efforts.[17] The EU is the only regional and international organisation that is party to the multilateral UNCAC and, as such, subject to the UNCAC's Implementation Review Mechanism (see III).[18]

In this context, the main steps of the first cycle of the UNCAC implementation review of the EU as non-state actor are notable: In June 2021, at the UN General Assembly Special Session (UNGASS) on corruption, the EU declared its readiness to launch the review under the UNCAC. The Implementation Review Mechanism operates in two phases. The first cycle covers criminalisation (Chapter III of UNCAC) and international cooperation (Chapter IV), while the second cycle focuses on prevention (Chapter II of UNCAC) and asset recovery (Chapter V). In September 2022, the European Commission presented the EU's self-assessment under the first round of the UNCAC's Implementation Review to UNODC.[19] This was followed by a written exchange in September 2023, when the EU responded to detailed questions from the peer reviewers. In November 2023, the EU welcomed representatives from Czechia and Niue, accompanied by the UNODC, for the first on-site visit.[20] This visit marked an important milestone, since the EU is, as mentioned above, not a typical State party but a regional organisation, posing unique challenges for the Implementation Review. During this visit, EU institutions presented their anti-corruption initiatives, focusing particularly on the efforts to comply with Arts. 15-42 (criminalisation and law enforcement) and Arts. 44-50 (international cooperation) of the UNCAC. The visit was also an opportunity for civil society organisations to engage with the reviewers, who offered a critical external perspective on the EU's anti-corruption efforts.[21]

# V. The EU-UNODC Anti-Corruption Dialogue: A Strategic Partnership

The EU-UNODC Anti-Corruption Dialogue represents a cornerstone of their collaboration in the fight against corruption. This high-level exchange is a platform for both organisations to align their strategies, share information, and establish concrete follow-up actions in the anti-corruption domain. The dialogue brings together key representatives from the two institutions and serves as a forum to discuss emerging issues and coordinate efforts in areas such as asset recovery, anti-corruption education, and the role of civil society in promoting transparency.

The first EU-UNODC Anti-Corruption Dialogue, held in October 2022,[22] focused on such critical areas as corruption in times of emergency (notably during the COVID-19 pandemic), the integrity of the sports sector, and the role of youth in anti-corruption efforts. Subsequent dialogues, like the one held in October 2023 in Vienna,[23] expanded the scope of discussion to include corruption linked to organised crime, gender issues in anti-corruption work, and collaboration in crisis regions like Ukraine and Haiti. In November 2024 in Brussels,[24] the dialogue also dealt with crimes that affect the environment, new technologies, and Global Gateway investments. Going forward, the goal is to work together more effectively, e.g., in regions like Sub-Saharan Africa, Latin America and the Caribbean, Asia-Pacific, and the EU's East and South Neighbourhoods. These dialogues not only enhance the operational capacity of the EU and the UNODC but also enable the identification of common priorities and challenges that require coordinated responses.

# VI. EU-UNODC Initiative to Improve Global Anti-Corruption Action

Based on their previous collaboration, which was fostered through their anti-corruption dialogue, in 2023, the EU and the UNODC launched the International Anti-Corruption Partnership Forum, together with their tradi-

tional partners, namely the GRECO and the OECD This was done on the occasion of a special event organised during the 10th Conference of State Parties to the UNCAC, held in Atlanta, USA.[25] The new global anti-corruption partnership, including not only the European Commission, UNODC, Council of Europe/GRECO, and the OECD, but also the World Bank Group (WBG), the International Monetary Fund (IMF), the African Union (AU), the Organization of American States (OAS), and the League of Arab States (LAS), was an achievement that realised the idea (initiated years before) of enhancing synergies between the different organisations committed to prevent and combat corruption.[26] In Atlanta, the concerns of the conference panellists ranged from a lack of collaboration, such as the duplication of efforts, to the benefits of closer cooperation for both international organisations and countries. After identifying some of the solutions already developed, either individually or jointly, all panellists agreed to set up a *jour fixe* among their organisations to work on country reviews and support for policy reforms. The first meeting of the Anti-Corruption Partnership Forum took place online in July 2024, co-hosted by the EU and the UNODC. In two sessions, the participants focused on sharing plans and projects to increase synergies as well as exploring which primary data exist in each organisation, with a view to potential data exchange and sharing.[27]

The EU, UNODC, the Council of Europe/GRECO, and the OECD also collaborate within the framework of the EU network against corruption.[28] Established in September 2023 as an outcome of the Commission's Joint Communication on corruption,[29] this network is meant to be an umbrella forum for all stakeholders (State authorities, experts, academia, NGOs, and other international partners) in which they can exchange good practices, opportunities, ideas, and plans for future work. In addition to plenary sessions, the EU network against corruption meets in thematic workshops and national events.[30] The discussions so far highlighted ongoing efforts to support technological advancements in combating corruption, e.g., the development of digital tools that improve asset declaration submissions[31] and public procurement processes. The EU is also a funder of technological projects across its Member States, including those related to the Recovery and Resilience Facility (RRF) and the Technical Support Instrument (TSI).[32] These initiatives have been designed to modernise corruption detection and prevention mechanisms, improving the EU's ability to track, verify, and report corrupt activities.

UNODC, on the other hand, has incorporated blockchain technology into training programmes for law enforcement and has developed secure communication tools to enhance cross-border collaboration. These technological innovations are particularly crucial in the context of international cooperation, where data sharing and transparency are essential for effective anti-corruption efforts.

# VII. Conclusion

The ongoing collaboration between the EU and UNODC demonstrates the importance of multi-stakeholder approaches in tackling global corruption. However, significant challenges remain. For instance, the shifting geopolitical landscape, marked by some national decisions to steer away from enforcing anti-corruption measures, could lead to a diminished role for traditional anti-corruption powers in global governance. This further underscores the need for robust regional cooperation, where international actors can continue to play leading roles.

Through their coordinated efforts, the EU and UNODC have made significant strides in strengthening anti-corruption frameworks, promoting transparency, and ensuring the rule of law across borders. As global corruption challenges grow, the EU-UNODC collaboration sets a clear example of an inclusive, multilateral, multisectoral, and multilevel framework of collaboration, which includes global institutions *in primis*, but also national agencies, officials, CSOs, NGOs, academia, and experts at large. This composite, modular structure offers a promising approach by which to respond to the complex and adaptive challenges posed by corruption, and could serve as a driving force in shaping international anti-corruption strategies. Translating

discussions, such as the joint dialogues, into actionable outcomes and building enlarged platforms, such as the international anti-corruption partnership forum, will help ensure that the fight against corruption remains a central component of truly global governance.

1. M. Fernandes and L. Jančová, *Stepping up the EU's efforts to tackle corruption – Cost of Non-Europe Report*, European Parliamentary Research Service, PE 734.687, January 2023, <https://www.europarl.europa.eu/RegData/etudes/STUD/2023/734687/EPRS_STU(2023)734687_EN.pdf>. All hyperlinks in this article were last accessed on 15 August 2025.↵

2. See no. 2 of the draft resolution of the UN Human Rights Council (Fifty-ninth session 16 June–9 July 2025), "The negative impact of corruption on the enjoyment of human rights", A/HRC/59/L.6, stating: "Recognizes the negative impact of widespread corruption on the enjoyment of human rights, including by reducing the resources available for all sectors, thereby hampering the realization of all human rights".↵

3. See Report from the Commission to the Council and the European Parliament EU Anti-Corruption Report, COM(2014)038 final.↵

4. Cf. European Commission, "2020 Rule of law report", <https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/rule-law/annual-rule-law-cycle/2020-rule-law-report_en>.↵

5. The objective of the recommendations is to assist Member States in their efforts to take forward reforms, to encourage positive developments, and to identify where improvements or follow-up to recent changes or reforms may be needed, based on continuous dialogue. Cf. European Commission, "2022 Rule of law report", <https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/rule-law/annual-rule-law-cycle/2022-rule-law-report_en>.↵

6. The 2025 Rule of Law Report found that 57% of the recommendations made in 2024 have been followed up by Member States, either fully or partially, see: <https://ec.europa.eu/commission/presscorner/detail/en/qanda_25_1745>. ↵

7. L. Salazar and F. Clementucci, "Per una nuova anti corruzione europea: EU-rbi et orbi", (2023), *sistema penale*, 69-85, <https://www.sistemapenale.it/pdf_contenuti/1689732585_sp-2023-7-8-salazar-clementucci.pdf>.↵

8. Proposal for a Directive of the European Parliament and of the Council on combating corruption, replacing Council Framework Decision 2003/568/JHA and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union and amending Directive (EU) 2017/1371 of the European Parliament and of the Council, COM/2023/234 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A234%3AFIN>. See further F. Clementucci and A. Miekina, "The Commission Proposal for a Directive on Combating Corruption", (2023) *eucrim*, 276-279. See also the news by T. Wahl, *eucrim* 2/2023, 140-141.↵

9. For trilogue negotiations in general, see M. Del Monte, *Briefing "Understanding trilogue – Parliament's rules and practices for reaching provisional agreement on legislation"*, European Parliamentary Research Service, PE 690.614, April 2025, <https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690614/EPRS_BRI(2021)690614_EN.pdf>.↵

10. The decision-making process occurs within the Common Foreign and Security Policy (CFSP) framework, which involves the High Representative, the Council, and the Commission. Decisions regarding sanctions are made by the Council through consensus, based on proposals from the High Representative and the Commission, following discussions in the relevant Council working groups.↵

11. The EU ethics body would establish a unified set of ethical standards and conduct guidelines for members of the institutions, in order to prevent potential corruption-related misconduct, cf: <https://commission.europa.eu/about/service-standards-and-principles/ethics-and-good-administration/interinstitutional-body-ethical-standards-members-institutions-and-advisory-bodies-eu_en>. See also T. Wahl, "New Ethics Body Set Up to Develop Common Ethics Culture in EU Institutions', (2024) *eucrim*, 111-112.↵

12. European Union, Transparency Register, <https://transparency-register.europa.eu/index_en>.↵

13. The Transparency exercise is part of the European Banking Authority's (EBA) ongoing initiatives to promote transparency and strengthen market discipline within the EU financial market, cf <https://www.eba.europa.eu/risk-analysis-and-data/eu-wide-transparency-exercise>.↵

14. European Parliament, "Stopping greenwashing: how the EU regulates green claims", 15 January 2024, <https://www.europarl.europa.eu/topics/en/article/20240111STO16722/stopping-greenwashing-how-the-eu-regulates-green-claims#:~:text=To%20achieve%20that%2C%20the%20EU,the%20producer%20is%20offsetting%20emissions>.↵

15. United Nations Convention against Corruption (UNCAC), available at: <https://www.unodc.org/corruption/en/uncac/learn-about-uncac.html#:~:text=The%20United%20Nations%20Convention%20against%20Corruption%20(UNCAC)%20is%20the%20only,Assembly%20on%2031%20October%202003>.↵

16. For the UNCAC Implementation Review Mechanism, see: <https://www.unodc.org/corruption/en/uncac/implementation-review-mechanism.html>.↵

17. The EU signed and ratified the UNCAC in 2008.↵

18. In 2023, the Conference of the States Parties to the Convention decided at its tenth session (decision 10/2) to extend the duration of the second cycle of the Implementation Review Mechanism until June 2026 and tasked the Implementation Review Group (IRG) with continuing discussions on assessing the Mechanism's performance as well as on the scope, thematic sequence, and details of the next review phase. The aim is to provide recommendations to the Conference at its eleventh session and to launch the new phase of the Review Mechanism as soon as possible. Cf. <https://www.unodc.org/corruption/en/uncac/implementation-review-mechanism-next-phase.html>.↵

19. Commission Staff Working document, "Review of the implementation by the European Union of articles 15 – 42 of Chapter III. "Criminalization and law enforcement" and articles 44 – 50 of Chapter IV. "International cooperation" of the United Nations Convention against Corruption for the first review cycle", SWD(2022) 295 final, available at: <https://home-affairs.ec.europa.eu/commission-staff-working-document-review-implementation-european-union-united-nations-convention_en>.↵

20. See European Commission – Directorate-General for Migration and Home Affairs, "The EU moves forward with its implementation review of the UN Convention against Corruption", news article of 17 November 2023 <https://home-affairs.ec.europa.eu/news/eu-moves-forward-its-implementation-review-un-convention-against-corruption-2023-11-17_en>↵

21. See European Commission – Directorate-General for Migration and Home Affairs, "UNODC, Czechia, and Niue officials' open call for civil society discussion in Brussels", news article of 5 October 2023 <https://home-affairs.ec.europa.eu/news/unodc-czechia-and-niue-officials-open-call-civil-society-discussion-brussels-2023-10-05_en>.↵

22. United Nations – Office on Drugs and Crime, "UNODC and European Union hold first-ever anti-corruption dialogue", <https://www.unodc.org/unodc/en/frontpage/2022/October/unodc-and-european-union-hold-first-ever-anti-corruption-dialogue.html>.↩

23. See European Commission – Directorate-General for Migration and Home Affairs, "EU and UNODC meet for 2nd Anti-Corruption Dialogue", news article of 6 October 2023 <https://home-affairs.ec.europa.eu/news/eu-and-unodc-meet-2nd-anti-corruption-dialogue-2023-10-06_en>.↩

24. European Commission – Directorate-General for Migration and Home Affairs, "EU and UNODC held their third Anti-Corruption Dialogue," news article of 27 November 2024 <https://home-affairs.ec.europa.eu/news/eu-and-unodc-held-their-third-anti-corruption-dialogue-2024-11-27_en>.↩

25. See side event "Walk the Talk: Strengthening Synergies and Coordination", CoSP10 Atlanta. USA – Special Events Summary Report, <https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/special-events/CoSP10_Special_Events_Summary_Report.pdf>, p. 4.↩

26. In 2018, CoE's GRECO submitted a paper at the 9th session of the Implementation Review Group of UNCAC, entitled "Enhancing Synergies among the International Anti-Corruption Monitoring Bodies" (<https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/4-6June2018/V1803681e.pdf>). In 2021, on the occasion of the 9th Session of the Conference of the State Parties to the United Nations Convention against Corruption, the Secretariats of CoE's GRECO, the OECD WGB, and UNODC presented the joint message "Enhancing synergies between anti-corruption peer review mechanisms" (<https://www.coe.int/en/web/greco/-/enhancing-synergies-between-anti-corruption-peer-review-mechanisms-joint-message-by-the-secretariats-of-greco-the-oecd-and-unodc>). Therein, the three Secretariats renewed their commitment to working together in order to achieve their common goals and combine their knowledge and experience so as to further enhance effective synergies, all with the aim of strengthening the implementation of the Conventions and other standards of their respective organisations.↩

27. First meeting of the Anti-corruption Partnership Forum, <https://home-affairs.ec.europa.eu/document/download/faf786d0-fb77-4f5f-8ec2-1d4c343fd325_en?filename=Report%20First%20meeting%20of%20the%20Anticorruption%20Forum.pdf&prefLang=ro>↩

28. European Commission, "EU network against corruption", <https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/democracy-eu-citizenship-anti-corruption/anti-corruption/eu-network-against-corruption_en>.↩

29. European Commission & High Representative of the Unio for Foreign Affairs and Security Policy, Joint Communication to the European Parliament, the Council and the European Economic and Social Committee on the fight against corruption, JOIN(2023) 12 final, available at: <https://commission.europa.eu/document/download/b6888f6a-45ed-4af7-b85a-6712dfe8952c_en?filename=JOIN_2023_12_1_EN.pdf>.↩

30. Workshops were held on Asset Declaration Systems (2024); Fight against Corruption (2023); Future of the fight against corruption (2022); Fight against corruption on lobbying in Europe (2022); Ensuring anti-corruption resilience in times of crisis (2021); whereas national events took place so far in Italy (Rome), the Netherlands (the Hague), Malta (Valletta), Bulgaria (Sofia), Latvia (Riga), Ireland (Dublin), Portugal (Lisbon), Spain (Madrid), Sweden (Stockholm), Croatia (Zagreb), France (Paris), Slovenia (Ljubljana) and Finland (Helsinki): <https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/democracy-eu-citizenship-anti-corruption/anti-corruption/eu-network-against-corruption_en>↩

31. See EU Network against Corruption, Technical Report of the Workshop on Asset Declaration Systems on 25 June 2024, <https://home-affairs.ec.europa.eu/document/download/2404c8d1-8253-487c-a043-955ac2c45c5a_en?filename=Technical%20report%20of%20the%20workshop%20on%20asset%20declaration%20systems_en.pdf>.↩

32. See European Commission, "2024 Flagship Technical Support Project, Technical Support Instrument, Reinforce Democracy and the Rule of Law", <https://reform-support.ec.europa.eu/tsi-2024-flagship-reinforce-democracy-and-rule-law_en>.↩

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