

EU NETWORK Against Corruption

Workshop on corruption mitigation measures – Success stories and impact

Technical Report

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Preface

Corruption undermines the rule of law, economic development, and public trust in institutions. No sector or area is free from corruption, but some are more at risk than others. The meetings of the EU Network against corruption allow to further foster collaboration, identify trends and support more effective anti-corruption policies in the EU.

In November 2024, the European Commission published a study that identified public procurement, healthcare, the financial sector, construction and infrastructure, defence and security, and sports as high-risk areas for corruption in the EU.¹ As follow-up, a second external study was launched to look at what measures have been taken in these areas to mitigate the risk of corruption. The study will also assess whether such measures can be replicated at EU level, which will feed into the reflection on a future EU Strategy on combating corruption.

On 11 June 2025, a workshop on corruption mitigation measures hosted under the EU Network Against Corruption took place in Brussels. The aim of the workshop was to gather specific examples of measures that have demonstrably prevented, reduced, sanctioned, or remedied corruption-related crimes. The discussions addressed in particular successful national and sector-specific initiatives, particularly those with a track record of tangible results. The key focus areas of the workshop included legislative reforms, institutional innovations, regulatory and investigative techniques, cooperation frameworks, and public awareness initiatives. The insights gained from the workshop will be harnessed in developing the study further and, more broadly, to the policy work aiming at strengthening anti-corruption efforts in the EU.

The workshop was structured as follows: it began with 1) a panel discussion on effective corruption mitigation measures 2) a panel discussion on sector-specific anti-corruption efforts focusing on public procurement 3) interactive breakout group sessions focusing on sector-specific anti-corruption efforts namely, sports, construction, finance and health 4) reporting on takeaways of the discussions.

1 Opening remarks

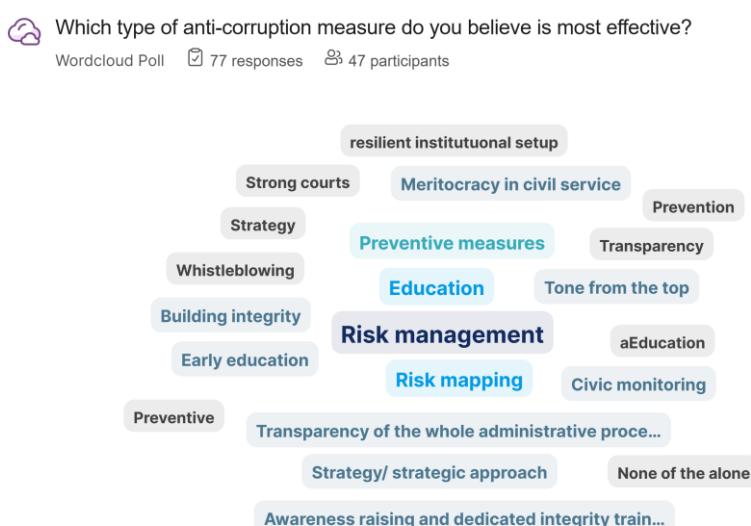
Ms. Marie-Hélène Boulanger, Deputy Director for Rule of Law, Fundamental Rights and Democracy and Head of Unit for Democracy, Anti-Corruption, Union Citizenship and Free Movement, DG JUST, opened the session by welcoming participants to the anti-corruption network meeting. She emphasised the importance of the network as a collaborative forum to identify trends, share challenges, and strengthen anti-corruption efforts across the EU. The European Commission values the network's contributions and sees it as central to shaping effective policies. She underscored that the fight against corruption remains a top priority under the current Commission mandate, with strong links to the Rule of Law Report and EU funding mechanisms. The upcoming edition of the report, based on consultations with Member States and civil society, will soon be published.

She further highlighted the 2023 anti-corruption package, including the proposed Directive that expands the definition of corruption and introduces new tools for law enforcement. Negotiations are in the final stages, and the Directive also includes preventive measures for the first time.

The network's role is also key in shaping the EU's first anti-corruption strategy. She spoke briefly about the study on high-risk areas of corruption, which has identified high-risk sectors—such as public procurement, healthcare, finance, infrastructure, defense, and sport. There is a follow-up study underway to explore mitigation strategies, which the workshop will feed into. Additionally, she reminded participants that the meeting follows Chatham House rules to ensure open and trusted dialogue.

Petra Jeney, a Principal Consultant at Ecorys, further introduced the aims, objectives and format of the workshop. She emphasised the importance of tangible and practical discussions in order to identify and assess existing corruption mitigation measures. A slido poll was launched to set the scene and ask the participants which anti-corruption measure they consider the most effective. The most popular measures were risk management, risk mapping, education and preventive measures. Figure 1 presents an overview of the answers.

Figure 1 Overview of answers to the first Slido poll



2 Session 1: Effective corruption mitigation strategies

The first session focused on discussing effective corruption-mitigation measures from different perspectives. This included insights from theory to enforcement, and from whistleblower protection to institutional prevention. The speakers discussed what has demonstrably worked and what lessons can be scaled or adapted in different contexts.

2.1 Mr. Nicholas Charron, University of Gothenburg

Professor Nicholas Charron from the University of Gothenburg opened the session by exploring what does not work in anti-corruption policy, drawing on decades of research from the Quality of Government Institute. He challenged the effectiveness of traditional approaches such as market liberalisation and democratisation, arguing that these often fail in contexts lacking strong institutions like rule of law and public trust. He highlighted that even in democratic systems, corruption can persist due to voter apathy, lack of clean alternatives, or media polarization.

He contrasted two dominant theoretical models: the **principal-agent theory**, which assumes rational actors and enforceable rules, and the **collective action theory**, which views corruption as a self-reinforcing social norm. He argued that in high-corruption environments, the latter offers a more realistic lens, as it accounts for the difficulty of finding “honest principals” and the need to shift collective expectations.

He presented five institutional features consistently associated with lower corruption:

1. Broad-based taxation systems
2. Universal education
3. Universal welfare programs
4. Meritocratic civil services
5. Gender equality

He emphasised the strong empirical link between gender equality and lower corruption, supported by cross-national and regional studies. He cited research showing that municipalities with more women in leadership roles tend to report lower levels of bribery and procurement-related corruption. He concluded that building a culture of impartiality and universalism—rather than relying solely on punitive measures—is key to sustainable anti-corruption reform.

2.2 Mr. Henry Matthews, Senior Principal Prosecutor, Special Financial Crime Unit, Office of the Director of Public Prosecutions, Ireland

Senior Principal Prosecutor Henry Matthews from Ireland shared a practical case study of national reform following the country’s financial crisis. He described how public outrage over political mismanagement led to the establishment of the **Hamilton Review**, which catalysed sweeping reforms between 2011 and 2018. These included

enhanced prosecutorial powers, whistleblower protections, lobbying laws, and corporate governance reforms.

He emphasised the importance of combining enforcement, education, and prevention. He likened these to ingredients in a well-crafted beer—each essential, but only effective when blended strategically. He also highlighted the creation of the **Advisory Council Against Economic Crime and Corruption**, a multi-stakeholder body responsible for strategy, training, and public awareness.

He discussed two legal tools central to Ireland's common law system:

- **Presumptions**, which allow courts to infer corruption from unexplained wealth or suspicious relationships.
- **Inferences**, which permit juries to consider a suspect's silence or delayed explanations as part of the evidence.

He noted that while these tools challenge traditional notions of due process, they are essential in prosecuting complex financial crimes. He also shared metrics showing Ireland's progress: improved Transparency International rankings, increased asset seizures, and a rise in money laundering convictions. However, he cautioned against complacency, citing emerging threats like cryptocurrency and global power fragmentation.

2.3 Mr. Manuel Villoria, President of the Independent Whistleblower Protection Authority, Spain

Professor Manuel Villoria, newly appointed President of Spain's Independent Whistleblower Protection Authority, reflected on the challenges of building an anti-corruption institution from scratch. Drawing on academic theory and his own research, he presented a model that integrates both supply-side reforms (e.g. laws, independent agencies, merit-based hiring) and demand-side empowerment (e.g. civic participation, whistleblower protection).

Villoria emphasised the importance of identifying leverage points—strategic areas where small changes can yield large systemic effects. He argued that successful anti-corruption strategies must be holistic, combining legal enforcement with cultural change. His model outlines a pathway from short-term outputs (e.g. increased complaints and detection) to long-term outcomes (e.g. institutional trust and reduced corruption perception).

He also shared his agency's six core missions, including protecting whistleblowers, issuing sanctions, developing national strategy, and coordinating with regional authorities. Villoria concluded by stressing the need for a clear vision, strong intent, and adaptive strategies in the face of complex and evolving corruption risks.

2.4 Ms. Isabelle Jegouzo, Director at the French Anticorruption Agency

Director Isabelle Jegouzo of the French Anti-Corruption Agency (AFA) provided a comprehensive overview of France's preventive strategy. AFA was established in response to major corruption scandals and foreign prosecutions of French companies. Its mission is to support both public and private entities in building robust anti-corruption systems.

Jegouzo outlined AFA's three-pillar framework:

1. **Tone from the top** – leadership commitment to integrity
2. **Risk mapping** – identifying and assessing corruption risks
3. **Prevention, detection, and sanctions** – including codes of ethics, training, whistleblowing systems, and internal controls

She emphasised the importance of whistleblowing, noting a sharp increase in alerts received by AFA. She also highlighted the agency's role in monitoring compliance agreements (similar to deferred prosecution agreements) that allow companies to avoid prosecution in exchange for fines and reforms. This mechanism has helped protect French companies from foreign legal actions, particularly in the U.S.

She also identified three major challenges ahead:

- **Understanding corruption better**, through data collection and regional mapping
- **Harmonising anti-corruption standards** across the EU, especially in light of the upcoming directive
- **Combating organised crime**, particularly in high-risk sectors like ports, prisons, and customs

She concluded by stressing the need for transnational cooperation and continuous adaptation to emerging threats.

2.5 Reflection in the audience

During the discussion, participants raised insightful questions that deepened the conversation on anti-corruption. A participant expressed appreciation for the presentations in this panel. However, he raised concerns regarding the methodology used in the previous study to identify high-risk areas of corruption within the EU. In response, the comment was acknowledged and the participant was invited to share his feedback in writing. Another participant highlighted the importance of gender inclusion, referencing recent work on political finance standards that promote the representation of marginalised groups. The speakers acknowledged the strong empirical link between gender equality and lower corruption, noting that while gender quotas—particularly at local levels—can be effective, they are often politically contentious and must be implemented with care. Another participant asked whether transparency in public registers, such as company or land registries, contributes to reducing corruption. The speakers agreed on the importance of transparency, though they acknowledged its complexities. The speakers also described France's efforts to improve transparency in public procurement and beneficial ownership. Similarly, speakers noted that in Spain, the impact of transparency is harder to quantify without broader systemic integration. Further, the speakers emphasised transparency as essential for both prevention and enforcement, and added that while transparency can increase public trust over time, it may initially raise perceptions of corruption as more cases come to light. The panel collectively stressed that transparency, while vital, must be accompanied by political will and institutional support to be truly effective.

3 Session 2: Sector-specific corruption efforts – public procurement edition

The second panel focused on a sector that consistently emerges as one of the most vulnerable to corruption: public procurement. The presentations explored innovative approaches across civil society, government, and data analytics. Speakers presented concrete examples of current efforts and gaps that remain to be addressed to strengthen integrity in this vital area.

3.1 Mr. Mihaly Fazekas, Assistant Professor at the Central European University and Scientific Director & Founder at Government Transparency Institute (online)

Dr Mihaly Fazekas opened the session with a comprehensive overview of global evidence on anti-corruption interventions in public procurement. Drawing from a systematic literature review, he highlighted that while corruption risks in procurement remain high across EU Member States, there is now a robust evidence base to guide reform. He categorised interventions into those targeting specific procurement phases (e.g. notification, contract execution) and those affecting the entire cycle (e.g. meritocracy, rule-bound decision-making).

He emphasised that not all interventions yield equal results. Some, such as smart use of framework agreements and centralised procurement, can deliver substantial savings—up to 50% in some contexts—while others offer only marginal gains. He focused on three high-impact, evidence-backed reforms: strengthening e-procurement systems, empowering civil society through watchdog platforms, and enforcing conflict of interest rules. He noted that while e-procurement improves transparency and efficiency, its success depends on system usability and integration with other databases. He also warned that corruption risks may shift to less transparent stages, such as contract implementation, if reforms are not holistic. Finally, he stressed that conflict of interest rules must be enforceable and context-sensitive, especially in smaller communities.

3.2 Ms. Karina Carvalho, Independent advisor on Governance, Anticorruption & Human Rights, Portugal

Former Transparency International Portugal director Karina Carvalho offered a candid reflection on the challenges and potential of civil society in combating corruption in public procurement. Drawing on her experience with the Integrity Pact initiative, she argued that despite years of legal and procedural reforms, corruption risks remain entrenched and oversight mechanisms often fail to deliver meaningful accountability.

She posed two critical questions: are we losing the fight against corruption in EU procurement, and is there still space to reinforce anti-corruption while reforming procurement rules? Her answer to the first was a sobering yes, citing persistent waste, weak enforcement, and a shift away from rule of law priorities. She warned that the current regulatory climate—focused on deregulation and economic efficiency—risks sidelining transparency and sustainability.

However, she also pointed to promising developments, such as the European Council's 2024 endorsement of a strategic action plan for procurement. She advocated for mainstreaming the "watchdog effect," where civic monitoring not only deters misconduct but also humanises public spending by connecting it to real communities. Using the example of a small Portuguese town's monastery restoration, she illustrated how citizen engagement can foster both accountability and public trust. She concluded with a call for more tangible results from institutions like EPPO and OLAF, warning that public disillusionment with anti-corruption efforts fuels populism and democratic erosion.

3.3 Mr. Jesper Johnson, Deputy Head of Division, Anti-Corruption and Integrity in Government at the OECD and Kenza Khachani, Economist and Policy Analyst, Infrastructure and Public Procurement Division at the OECD

Mr. Jesper Johnson and Kenza Khachani provided a comprehensive overview of the OECD's efforts to strengthen integrity and reduce corruption risks in public procurement. They emphasised the importance of bridging the gap between efficiency and integrity, noting that public procurement officials, like customs or tax officers, are considered "at-risk" roles due to their exposure to potential misconduct. Their work spans both the Anti-Corruption Integrity Division and the community of public procurement officials, reflecting a collaborative approach to tackling systemic vulnerabilities.

Jesper opened by acknowledging the persistent risks in public procurement across EU Member States, despite the abundance of data and tools. He stressed that while procurement is often seen as a mature area of anti-corruption work, the quality of data remains a challenge. He argued that the real value lies not in global figures but in identifying high-risk sectors and procedures at the national level, which can inform targeted interventions and yield a strong return on investment.

Kenza then introduced the OECD's 12 integrated principles for public procurement, highlighting two in particular: integrity and risk management. She explained that integrity requires high standards for all stakeholders—public officials and private suppliers alike—and must be supported by training, internal controls, and compliance mechanisms. Risk management, meanwhile, involves mapping and mitigating risks throughout the entire procurement cycle, including often-overlooked phases such as contract management.

The OECD has developed a comprehensive risk management framework, categorising risks into digital, capacity, economic/contextual, regulatory/compliance, and sustainability. Kenza noted that integrity risks are often interlinked with environmental and social risks, underscoring the need for a holistic approach. She also presented data showing that while most OECD countries have policies in place to manage conflicts of interest and post-employment restrictions, implementation and data collection remain weak—less than 10% of countries track submission rates for conflict of interest declarations.

On the private sector side, Kenza highlighted that fewer countries have robust measures to ensure supplier integrity, such as anti-corruption warranties or training requirements. She stressed the importance of cooperation between public and private actors to build a culture of integrity.

Finally, the presentation turned to the role of data and technology. The OECD is encouraging the integration of e-procurement systems with other government platforms and the use of AI and predictive analytics to detect red flags in real time. However, only a minority of countries have achieved full integration with systems like e-invoicing or beneficial ownership registries. Despite these gaps, there is growing use of technology for transparency, oversight, and risk management.

Jesper concluded with examples from Portugal, Belgium, Greece, and Romania, where OECD-supported projects have helped bridge procurement and anti-corruption efforts. These included predictive analytics for audit targeting, internal audit enhancements, and reforms to conflict-of-interest regulations. The session closed with a reminder that effective anti-corruption in procurement requires collaboration across public institutions, private entities, and civil society—“three to tango,” as Jasper aptly put it.

3.4 Mr. Robert Sumi, Chief Commissioner, Commission for the Prevention of Corruption, Slovenia

Mr. Robert Sumi, representing Slovenia’s independent anti-corruption body, offered an account of the country’s efforts to strengthen integrity and transparency in public procurement. He began by clarifying that while his institution is not a law enforcement or audit body, it plays a critical oversight role—particularly in the preparatory phase of procurement, where many risks originate.

He highlighted several structural challenges specific to Slovenia. As a small country with a limited pool of public procurement experts and suppliers, personal connections are common, and conflicts of interest can arise quickly. Despite a robust legal framework, including safeguards in the Public Procurement Act, he noted that cultural attitudes often downplay the seriousness of conflicts of interest. His commission, however, takes a strict stance, treating even the appearance of such conflicts as a serious concern.

A key issue, he explained, is the lack of transparency in the preparatory phase of procurement—where needs are defined and criteria set. This stage is often opaque, allowing deals to be shaped without scrutiny. He advocated for stronger safeguards, including digital tools and transparency requirements, to ensure accountability before tenders are even launched.

He also discussed the fragmentation of legal provisions on conflicts of interest across different laws, which complicates enforcement. His commission is tasked with assessing potential conflicts and has developed procedures to manage these cases, particularly in smaller-value contracts that fall below the threshold for formal procurement procedures.

He shared findings from a 2023 analysis of procurement in Slovenian healthcare institutions, which revealed recurring issues such as lack of transparency, unequal treatment of bidders, and deliberate fragmentation of contracts to avoid oversight. He described this practice—bypassing regulations while avoiding formal sanctions—as a “national sport,” underscoring the need for cultural as well as institutional change.

To address these challenges, he emphasised the importance of leading by example. He called on senior officials—ministers, parliamentarians, and department heads—to model integrity, as public trust hinges on visible accountability at the top. Recognising that

formal rules alone are insufficient, his commission has shifted focus toward long-term prevention, particularly through education. By engaging young people and raising awareness about the meaning of public service and state property, they hope to foster a new generation that values integrity and transparency.

Robert's presentation offered a reminder that anti-corruption efforts must be tailored to local contexts. In Slovenia, where close-knit networks and limited resources pose unique risks, a combination of legal reform, cultural change, and civic education is essential to building a more transparent procurement system.

3.5 Reflection in the audience

There were no questions from the audience due to exceeding the allocated time.

4 Interactive breakout sessions: sector-specific anti-corruption efforts – sports, construction, finance and health

This session focused on discussions in breakout groups on sector-specific anti-corruption efforts. The participants were divided into four breakout groups: construction, sports, finance and health. Each breakout group was given a specific scenario, where participants were asked to identify corruption risks and red flags as well as, solutions and measures to address them. Each breakout group designated a rapporteur, who shared the main findings of the discussions in plenary.

4.1 Construction

Participants in this breakout group discussed a case scenario involving a €50 million public procurement contract in the construction sector, commissioned by a regional government. The scenario raised several red flags that suggested systemic weaknesses and potential misconduct.

The group noted that the bidding process showed minimal price variation and highly similar technical proposals. The winning firm had secured the majority of major infrastructure contracts in the region over the past five years. Following the award, it subcontracted a significant portion of the work to the two losing bidders, raising concerns about possible collusion.

Further scrutiny by a local investigative journalist revealed close informal ties between the winning company's leadership and the procurement official. These included shared business interests and political donations to the mayor's re-election campaign, uncovered through cross-referencing company registries and donation records.

Participants identified the following key risks:

- Potential high-level corruption
- Conflict of interest
- Undue influence through political finance
- Erosion of public trust
- Underutilisation of public databases by oversight bodies
- Contractual deviations during project execution

To mitigate these risks, the group proposed a range of solutions:

- Reporting the case to national oversight bodies or relevant European authorities
- Strengthening collaboration between regional governments and civil society organisations
- Providing targeted training for public officials
- Systematic collection and verification of declarations of interest, particularly for tender committee members and procurement officials
- Conducting thorough market analysis and continuous monitoring throughout contract execution

- Leveraging public databases, including beneficial ownership registries, both before and after contract award
- Establishing an independent authority at the regional or national level to oversee procurement integrity
- Introducing legislative sanctions for companies engaging in collusive or unethical practices

The group concluded that this scenario illustrates the need for stronger institutional safeguards, proactive transparency measures, and a culture of accountability in public procurement.

4.2 Sports

Participants in this breakout group examined a case involving a major international sports event co-financed by public funds and administered by a national sports authority in a country lacking effective legislation. The discussion focused on a non-competitive procurement process in which a newly formed company with political connections was directly awarded a contract for advertising and sponsorship. The justification cited was time sensitivity, used as an exception to standard competitive procedures.

Subsequent media investigations revealed that board members of the sports body had allegedly received fees or bribes in connection with the contract. Despite these revelations, no internal alarms were raised—largely due to the absence of whistleblower protection, conflict of interest rules for board members, and internal compliance mechanisms.

Participants identified the following key risks:

- Absence of procurement legislation and conflict of interest rules applicable to sports bodies
- Lack of whistleblower protection
- No transparency in procurement processes or outcomes
- Weak or non-existent oversight and compliance structures within the sports federation

The group divided into two subgroups to explore solutions—one focusing on procurement, the other on conflict of interest and oversight. The following measures were proposed:

Legislative and Regulatory Measures

- Introduction of strong procurement legislation and conflict of interest regulations, potentially aligned with corporate governance standards
- Clarification of the applicability of such regulations to sports bodies

Transparency and Digitalisation

- Digitalisation of procurement processes and public access to procurement data
- Enhanced transparency and control mechanisms for the use of public funds

Awareness and Capacity Building

- Awareness-raising initiatives targeting both public and private sector actors involved in sports procurement

Institutional and Organisational Reforms

- Establishment of an independent sports ethics body with oversight responsibilities and independent membership
- Enforcement of conflict of interest rules for board members and senior officials
- Development of internal compliance programmes within sports federations, including:
 - Whistleblower protection mechanisms
 - Codes of conduct
 - Due diligence procedures

Participants also discussed the roles of various stakeholders in implementing these measures, including lawmakers, procurement authorities, sports audit bodies, anti-corruption agencies, and the federations themselves. It was suggested that governments could incentivise compliance through both positive and negative measures.

The group concluded that addressing integrity risks in sports procurement requires a multi-layered approach, combining legal reform, institutional oversight, and cultural change within sports governance.

4.3 Finance

Participants in this breakout group examined a scenario involving the vice-chair of a national financial supervisory authority who failed to disclose ties to a senior executive at a private bank under investigation by the same authority. The case highlighted several systemic weaknesses and prompted a discussion on both individual and institutional risks, as well as potential solutions.

Participants categorised the risks into two levels:

Individual-level risks:

- Absence of revolving door restrictions for senior officials
- Lack of mandatory asset and interest declaration requirements
- No mechanisms for real-time detection and management of conflicts of interest

Institutional-level risks:

- Weak internal and external oversight of the financial supervisory authority
- Inconclusive outcomes from previous investigations into the bank
- Absence of whistleblower protection mechanisms
- Lack of transparency regarding lobbying and influence

The group proposed a two-pronged approach, addressing both individual and institutional vulnerabilities:

At the individual level:

- Introduce transparent appointment procedures for senior officials
- Require security clearance for high-level positions such as vice-chair
- Establish cooling-off periods for former officials transitioning to the private sector
- Implement internal and external integrity checks, potentially through professional ethics bodies
- Enable real-time civil society monitoring, supported by access to asset and income declarations

At the institutional level:

- Create or strengthen an independent oversight authority to monitor the financial supervisory body
- Introduce whistleblower protection frameworks, drawing on examples such as those from Ireland
- Establish a transparency register to track lobbying activities and potential undue influence

Participants emphasised that effective implementation would require coordination among lawmakers, procurement and anti-corruption authorities, audit institutions, and civil society. The group concluded that a combination of legal reform, transparency, and independent oversight is essential to prevent conflicts of interest and restore public trust in financial supervision.

4.4 Health

Participants in this breakout group discussed a case involving a pharmaceutical company operating across multiple EU countries. The company was found to be offering financial and in-kind incentives—such as conference sponsorships, travel reimbursements, and consultancy fees—to hospital procurement officers and senior doctors at a regional public hospital. The aim was to secure preferential use of the company's branded medication over cheaper, equally effective generics.

As a result of these practices, the use of the branded drug increased significantly. This led to delays in treatment and higher out-of-pocket costs for patients with chronic illnesses who relied on generic alternatives.

Participants identified several key risks associated with the case:

- **Lack of transparency** in procurement processes and decision-making
- **Dual role of doctors** in both recommending and influencing the procurement of medical products
- **Insufficient training and awareness** among hospital staff, including both procurement officers and medical professionals
- **Weak enforcement mechanisms**, with little to no consequences when irregularities are discovered

The group proposed a range of measures to address these risks, grouped into preventive, procedural, and enforcement categories:

- **Training and Awareness:** Develop targeted training programmes on conflicts of interest and integrity in healthcare procurement, aimed at both procurement staff and medical professionals.
- **Preventive Measures:**
 - Introduce price caps for medications to limit excessive spending.
 - Monitor prescription patterns to detect irregularities or preferential prescribing.
 - Establish a centralised procurement body to ensure fairness and reduce undue influence.
- **Enforcement and Oversight:**
 - Strengthen sanctions for unethical procurement practices to ensure accountability.

- Introduce patient feedback mechanisms to allow individuals to report concerns about access and affordability.
- Conduct more frequent and thorough audits of procurement and prescribing practices.

The group concluded that addressing integrity risks in pharmaceutical procurement requires a multi-stakeholder approach, involving healthcare institutions, regulatory bodies, and civil society. Emphasis was placed on transparency, accountability, and the protection of patients' rights and access to affordable treatment.

4.5 Reflection in the audience

During the open discussion, participants shared a range of reflections that built on the earlier presentations and breakout group reports.

Several participants noted recurring themes across sectors, including the need for stronger oversight, transparency in procedures, and the potential value of centralised or specialised bodies to manage procurement and integrity risks. One participant questioned whether horizontal measures—such as conflict-of-interest rules—should be applied uniformly across sectors like finance, healthcare, and sport, or whether more tailored, sector-specific approaches were needed.

In response, another participant emphasised that supervisory authorities, particularly in the financial sector, may require stricter integrity standards due to their role in safeguarding independence and resisting undue influence. It was also noted that while sectors like finance are already heavily regulated in areas such as anti-money laundering, integrity and conflict of interest issues still require closer scrutiny.

A participant reflecting on the sports sector raised concerns about the conditions attached to public funding for major events. They questioned whether such funding is sufficiently regulated and suggested that even when no public money is involved, the public nature of sport may justify closer oversight. The need for creativity and open-mindedness in addressing corruption in sport was highlighted.

In the healthcare context, participants pointed out the complexity of systems across countries—some with public healthcare, others with private insurance—and the unique position of doctors, who influence both supply and demand. This dual role was seen as central to conflicts of interest, and participants supported targeted training and education for medical professionals.

Another contribution highlighted the role of self-regulation, with an example from Spain where pharmaceutical companies had voluntarily agreed to avoid unethical practices. This was seen as a promising complement to formal regulation.

Several participants stressed the importance of cross-sector and cross-actor cooperation. Effective anti-corruption efforts, they argued, require engagement from civil society, the private sector, and public institutions alike. Civil society was seen as particularly important in monitoring data and flagging risks early, while private companies were encouraged to adopt clear compliance standards.

One participant noted that political will is often the decisive factor in whether anti-corruption measures are implemented or ignored. They warned that political priorities can override integrity concerns, especially when governments are focused on delivering high-profile projects or pursuing controversial policies.

Finally, a question was raised about the role of the European Public Prosecutor's Office (EPPO) and whether civil society organisations can access information about ongoing investigations. It was clarified that while investigations are bound by confidentiality, civil society can submit information through a public form. If the information falls within EPPO's remit, it is legally obliged to investigate.

These reflections underscored the complexity of anti-corruption work and the need for both systemic reforms and context-sensitive approaches across sectors.

5 Conclusion

In closing, Ms. Marie-Hélène Boulanger extended sincere thanks to the participants, Ecorys and the DG JUST team for the successful workshop. Throughout the session, participants explored a wide range of corruption risk sectors and discussed not only the challenges but also practical solutions, including concrete tools. While many promising ideas were shared, the next step will be to assess which measures can be effectively advanced. At the outset, participants were asked which anti-corruption measures they considered most effective; the same question was posed through a second Slido poll at the end of the workshop. Similarly to the answers received at the beginning of the workshop, risk management, risk mapping, strong enforcement and education emerged as particularly significant. Figure 2 presents the overview of the answers to the Slido poll.

The discussion further touched upon the ongoing development of the anti-corruption package and the rule of law reporting process, with continued input from Member States. It was emphasised that the fight against corruption cannot be achieved through legislation alone; sustained engagement and the sharing of experiences remain essential. Finally, participants were invited to reconvene at the next plenary meeting, scheduled for the second half of October 2025.

Figure 2 Overview of responses to the second Slido poll



About Ecorys

Ecorys is a leading international research and consultancy company, addressing society's key challenges. With world-class research-based consultancy, we help public and private clients make and implement informed decisions leading to positive impact on society. We support our clients with sound analysis and inspiring ideas, practical solutions and delivery of projects for complex market, policy and management issues.

In 1929, businessmen from what is now Erasmus University Rotterdam founded the Netherlands Economic Institute (NEI). Its goal was to bridge the opposing worlds of economic research and business – in 2000, this much respected Institute became Ecorys.

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