Study Guide

for

Organization for Economic Co-Operation and Development

Topic Area: Strengthening Public Trust: Reinforcing Anti-Corruption Measures in Governance and Business

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1. Welcoming Letter

Esteemed delegates,

We are delighted to welcome you to the 2026 edition of Rhodes MRC, where we will have the utmost privilege of serving as the Board of the Organisation for Economic Co-operation and Development (OECD).

This year's topic of "Strengthening Public Trust: Combating Bribery and Corruption in Governance and Businesses" has become ubiquitous in modern societies. The phenomena of corruption and bribery continue to pose not only a significant threat to our democratic institutions, but also an active contributor to economic instability and the weakening of integrity in competitive markets. When the unethical practices of some, influence the decision-making process of governments and businesses, it ends in heavy economic and public consequences, eroding the citizens' confidence in the systems designed to serve them. So, in an increasingly interconnected global economy, these issues extend beyond national borders and oceans, thus making international cooperation and shared ethical standards essential in addressing those issues in an efficient manner. Your role in this committee will be to examine thoroughly the mechanisms through which corruption can be prevented, detected and addressed, and the use of this study guide will be necessary to help you understand this topic in depth.

And remember, every great leader starts from learning. This is an opportunity for you to not only develop your skills in diplomacy, advocacy, and economic literacy, but to also grow while connecting with your co-delegates in a rich learning environment.

Sincerely,

Theofano Vlagkouli*, Secretary General*

Nikoleta Dimoschaki*, Deputy Secretary General*

2. Introduction to the Committee

The Organisation of Economic Cooperation and Development (OECD) is the continuation of the Organisation for European Economic Co-operation (OEEC), which was created in 1948, with the initial purpose of overseeing the administration of the financial aid that was given under the Marshall Plan for the reconstruction of Europe[1]. This forum, having fulfilled its initial goal, transformed into a forum that now consists of countries from Europe, North and Latin America, Asia and the Pacific[2]. It counts 38 member states, among which we find the strongest economies of the world[3], the majority of European states and several developing economies with promising trajectories[4]. The OECD was officially established as such with the OECD Convention of 1961, which recognised the need for a transformation of the OEEC after it had completed its role and for the creation of a new and more inclusive forum as the need for multilateral cooperation on the economic sector was more present than ever and could fundamentally contribute to the development of all members[5].

The OECD is a forum that conducts research and data analysis, sets international and regional standards, shares successful practices and assists its member states in complying with the above through overseeing and reporting mechanisms[6]. This is crucial when it comes to understanding the mandate of the OECD, the way it operates and how decisions are reached and implemented. The OECD does not usually produce legally binding documents and therefore does not impose

[1] OECD, "Our History," OECD, n.d., https://www.oecd.org/en/about/history.html.
[2] OECD, "Members and Partners," OECD, 2024, https://www.oecd.org/en/about/members-partners.html.
[3] "GDP by Country (2026) - Worldometer," Worldometer, 2026, https://www.worldometers.info/gdp/gdp-by-country/?source=imf&year=2026&metric=nominal&region=worldwide.
[4] "Latin American Economic Outlook," OECD, 2026, https://www.oecd.org/en/publications/serials/latin-american-economic-outlook_g1gha541.html.
[5] OECD, "Convention on the Organisation for Economic Co-Operation and Development," OECD, 1960, https://www.oecd.org/en/about/legal/text-of-the-convention-on-the-organisation-for-economic-co-operation-and-development.html.
[6] OECD, "How We Work," OECD, n.d., https://www.oecd.org/en/about/how-we-work.html.

sanctions in the case of noncompliance, nor does it have enforcement mandates. Implementation is reinforced through peer-pressure, monitoring and oversight mechanisms[7].

Regarding the structure of the Organisation and its decision making process, there are three core pillars. The Secretariat of the OECD works to ensure the operations of the forum, combining the work of numerous specialists (lawyers, economists, political analysts and digital experts) as well as coordinating with the governments of the member states[8]. The OECD also has Substantive Committees each of which addresses a different policy area. In these bodies, specialists from different sectors work in order to set mutual progressive standards and build public policy proposals, including the contribution of academia, business and civil society apart from the representatives of the countries[9]. Lastly but most importantly, the Council of the OECD is the decision-making organ composed by the permanent representatives of the member states, and once a year held at a ministerial level, that provides the forum with strategic direction on all policy areas that occupy its actions and fall under its mandate[10].

3. Introduction to the Topic

Public trust is the cornerstone of democratic governance, as it creates a space where the citizens can feel safe to rely on their institutions, their public officials, and their businesses to uphold the standards of integrity, transparency and accountability. Corruption and bribery threaten those democratic values and put at risk the citizens' trust in their institutions, which is why we can't limit them to just the abuse of trusted power for personal gain. They aren't limited to a particular place or group of people, they exist in any business, government, media, or civil society, from the health sector all the way to education. In recent years, the rise of unethical practices within the

[7] OECD, "The OECD: Better Policies for Better Lives," OECD, n.d., https://www.oecd.org/en/about.html.
[8] "Organisational Structure," OECD, 2024, https://www.oecd.org/en/about/organisational-structure.html#secretariat.
[9] "On-Line Guide to OECD Intergovernmental Activity," Oecd.org, 2026, https://oecdgroups.oecd.org/Default.aspx.
[10] "Organisational Structure," OECD, 2024, https://www.oecd.org/en/about/organisational-structure.html#secretariat.

Organization for Economic Co-operation and Development region has proved the seriousness of this issue, which threatens the fundamental ideas of transparency, accountability, and the rule of law. OECD's broad mandate enables the promotion of democratic values and the enhancement of transparency and accountability, through multiple methods such as peer review monitoring mechanisms, providing all necessary means for its member states to guarantee that stability and democratic integrity is being upheld.

Persistent global challenges, including weak institutional oversight, lack of transparency in governance, and new technological advancements are enabling anonymous cross-border transactions and becoming major root causes of corruption and bribery. When left unchecked, these behaviours continue to undermine fair competition, hollow out the authority of state institutions, thus threatening the democratic norms that sustain modern governance. From the Airbus 2020 incident[11] all the way to the Qatargate 2022 scandal[12], these recent events have proven that citizens' trust to their institutions are not only at stake, but actively in danger due to these phenomena at hand.

4. Key-words and Definitions

Corruption: Based on Transparency International corruption is generally considered the abuse of entrusted power by someone in order to generate personal gain[13]. The OECD and the United Nations define certain aspects of corruption and criminal acts separately but do not offer one

[11]CBS News. "Pakistan International Airlines Grounds 150 Pilots over 'Bogus' Licenses after Deadly Crash of Flight 8303 in Karachi." *Cbsnews.com*, 25 June 2020, www.cbsnews.com/news/pakistan-international-airlines-grounds-150-pilots-bogus-licenses-deadly-crash-flight-8303-karachi/?utm_source

[12] Blenkinsop, Philip. "'Qatargate' Scandal Casts Light on 'Untouchable' EU Lawmakers." *Reuters.com*, 20 Dec. 2022, www.reuters.com/world/qatargate-scandal-casts-light-untouchable-eu-lawmakers-2022-12-20/

[13] Transparency International, "What Is Corruption?," Transparency International, 2025, https://www.transparency.org/en/what-is-corruption.

specific generic definition in terms of criminal law. For policy purposes though the definition that is usually used is the "abuse of public or private office for personal gain"[14].

OECD Working Group on Bribery: The OECD Working Group on Bribery has been operating since 1994 and its main goal and mandate is the monitoring, the implementation and enforcement of the OECD Anti-Bribery Convention, the 2021 Recommendation on Further Combating Bribery of Foreign Bribery in International Business Transactions and related instruments. It entails a monitoring system based on peer-review that operates in successive phases[15].

OECD Public Trust Surveys: They are a large cross-national survey conducted by OECD, in order to help governments identify the challenges and trends in relation to public trust in governments, while also providing objective evidence-based recommendations as well as examples of good international practices which help strengthen the trust in public institutions and democracy[16].

Rule of Law: The rule of law is a foundational principle where all people, institutions, and governments are accountable to publicly promulgated, equally enforced, and independently adjudicated laws. It ensures that no individual, especially high rank public officials, is above the law thus guaranteeing rights, accountability, and fair, transparent legal and institutional processes[17].

***Regulatory Capture[18]*:** One of the most common forms of corruption between the private and public sector. Regulatory capture means that a regulatory agency e.g. a ministry responsible for

[14] "Corruption a GLOSSARY of INTERNATIONAL STANDARDS in CRIMINAL LAW," n.d., https://www.oecd.org/content/dam/oecd/en/publications/reports/2008/03/corruption_aaf2a47f/a71d7115-en.pdf.

[15] "Working Group on Bribery," OECD, 2026, https://www.oecd-ilibrary.org/en/about/committees/working-group-on-bribery.html?

[16] OECD. "OECD Survey on Drivers of Trust in Public Institutions – 2024 Results | Sharing4good." Sharing4good.org, 2024.https://www.sharing4good.org/article/oecd-survey-drivers-trust-public-institutions-%E2%80%93-2024-results

[17] United Nations. "What Is the Rule of Law?" United Nations and the Rule of Law, 2015. https://www.un.org/ruleoflaw/what-is-the-rule-of-law/.

[18] CFA Institute. "Regulatory Capture." *CFA Institute Research and Policy Center*, 29 Oct. 2019, rpc.cfainstitute.org/policy/positions/regulatory-capture

oversight over a specific industry is unable to effectively supervise the industry and is in turn forced to come into agreements with corporations in this industry with less than favorable terms.

Lobbying*[19]*: Due to the nature of the modern day world economy the need arises for close cooperation between the private and the public sector in certain projects. In this cooperation the public sector, namely the state will always have the leading role. However, the private sector, namely corporations have found a way to even the playing field. This happens by lobbying, where agents of corporations try to influence the decisions of elected or appointed officials through mostly unethical means.

***Public Trust*:** Public trust[20], also known as Trust in Government, is a metric that refers to the confidence citizens, communities, and stakeholders have in the integrity, competence, and transparency of institutions, government officials, and public resources. According to OECD documentation this metric has been steadily declining over the past few years leading to a crisis of faith from the public to its elected or appointed officials.

5. Legal Framework

The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions

This legal instrument was put into force in 1999 with its main focus being to combat bribery in international business transactions. The OECD countries deemed the influence of bribery of foreign public officials harmful for the quality of life of citizens and for the fair and competitive environment that boosts developments and economic growth. For that reason the Convention in question is legally binding for the Parties and it essentially urges them to implement in their

[19]Duke Health. "Lobbying Definitions, Exceptions, and Examples | Duke Government Relations." *Govrelations.duke.edu*, govrelations.duke.edu/ethics-and-compliance/lobbying-definitions-exceptions-and-examples

[20]"Trust in Government." *OECD*, 2024, www.oecd.org/en/topics/trust-in-government.html

national judiciary systems laws that aim to promote the prevention, detection and sanctioning of bribery. It is note-worthy that this is the first legal instrument focusing on the criminalisation of such acts for the “supply side”, meaning that it does not only contain provisions regarding the persons who receive a bribe but it targets also the institution and businesses that offer them[21]. The Convention has been reviewed once in 2009 with the adoption of the Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions which was again amended in 2021[22].

The OECD Recommendation on Public Integrity

In 2017 the Council adopted the Recommendation on Public Integrity as an effort to address the issue of corruption through providing a blueprint for public integrity. This Recommendation aims to assist policy makers by giving direction for the drafting and implementation of an integrity strategy. In that way, a habit and culture of integrity is built and ethical conduct in public service is not left to ad hoc policies. The goal of this instrument is to nurture integrity as a tool to combat corruption in all levels of the jurisdiction, meaning that it does not focus only in national governments but also the municipal level and the judicial systems[23].

The OECD Guidelines for Multinational Enterprises

These guidelines include a series of recommendations made by governments and addressing multinational businesses. The guidelines cover a vast area of the business’ operations aiming at promoting fair business conduct in order to have a positive impact on economies and societies. One of the factors that the guidelines focus on is anti-bribery and anti-corruption. This is a non-binding legal instrument that aims to function as a blueprint for enterprises and is an effort to

[21] “OECD Legal Instruments,” Oecd.org, 2025, https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0293#backgroundInformation.
[22] “OECD Legal Instruments,” legalinstruments.oecd.org, n.d., https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0378.
[23] “OECD Legal Instruments,” Oecd.org, 2026, https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0435#backgroundInformation.

coordinate with the private sector in order to eliminate corruption[24]. The Guidelines were last updated in 2023 to include more areas of responsible business conduct recommendations[25].

The OECD Recommendation on Whistleblower Protection[26]

One of the key drivers of public trust is the belief that when a crime or a corruption scandal is witnessed, the witness can come forward and explain the situation. However, this is not always the case as sometimes, corruption runs so deep that the people involved in the scandal get access to these whistleblowers and ensure that the evidence disappears. This is the reason that the OECD has issued a recommendation on whistleblower protection with focus on the establishment of legal frameworks, anti-retaliation, protection of identity and a shift on the burden of truth.

The United Nations Convention against Corruption (UNCAC)

Apart from the OECD-led efforts to combat corruption, it is important to be aware of and keep in mind the broader legal framework that concerns our topic under discussion. The UNCAC is the only international binding anti-corruption instrument signed in Vienna in 2002-2003. Its goal is to globally have an impact on combating corruption and thus it focuses on several aspects of the issue such as the national level, for which it has established anti-corruption reforms and changes to legislative and institutional frameworks, and the international level by promoting cooperation between states in cross-border bribery cases and in assets recovery provisions[27].

The Financial Action Task Force Recommendations[28]

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[24] OECD, "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct," OECD, 2023, https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html.

[25]OECD, "Responsible Business Conduct," OECD, 2024, https://www.oecd.org/en/topics/responsible-business-conduct.html.

[26] OECD. "Committing to Effective Whistleblower Protection." *OECD*, 16 Mar. 2016, www.oecd.org/en/publications/committing-to-effective-whistleblower-protection_9789264252639-en.html

[27] "Learn about UNCAC," United Nations : Office on Drugs and Crime, n.d., https://www.unodc.org/corruption/en/uncac/learn-about-uncac.html.

[28] FATF. "The FATF Recommendations." *Www.fatf-Gafi.org*, Feb. 2025, www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html

A key aspect of corruption is money laundering, as corruption is usually aimed at a financial gain. Thus combating corruption is most effective when a comprehensive framework is set in regards to money laundering. This is exactly what the Financial Action Task Force Recommendations aim to do. These Recommendations recognize the impossibility of harmonization of legal frameworks of different states in regards to money laundering and as such they set an international standard.

6. Main discussion of the Topic

6.1. Repercussions in state economy

Having established the regulatory frameworks that concern the topic of corruption, it is essential to understand in the first place the importance of the issue for the key goals of the OECD. Corruption in its various forms has been proven several times to correspond with the state of the economy of a country and with economic growth[29]. Understanding the different ways and mechanisms with which this correlation takes place is necessary in order to reflect on the issue and find constructive and effective solutions.

When it comes to the state economy, several aspects of it may be negatively influenced when corruption takes place. First and foremost, corruption highly discourages investment as it creates an environment that is not prosperous for businesses who are looking to take up any type of new project. When companies know that a bribe is usually needed in a specific area or sector in order to start an enterprise they are less likely to invest in that sector or area since corruption functions as an extra tax in that case which is also hidden[30]. In addition to this environment, corruption discourages competition and can lead to a state of monopoly or oligopoly in a sector due to corrupt governments that pass legislation and create regulations that favour certain actors in the

[29] Paolo Mauro, "Corruption and Growth," *The Quarterly Journal of Economics* 110, no. 3 (August 1, 1995): 681–712, https://doi.org/10.2307/2946696.
[30] "IMF Research Bulletin -- December 2000," Imf.org, 2025, https://www.imf.org/external/pubs/ft/irb/2000/eng/03/index.htm.

place of others[31]. In that way they distort the laws of the open market and undermine economic growth[32].

An additional sector that is extremely susceptible to corruption is public expenditures. Government spending and the composition of state expenditures can be influenced if government officials are corrupted. The reason why this occurs is the fact that certain sectors of investment are significantly more appealing than others and this results in management of public funds that is not optimal and often may neglect certain areas of public policy[33]. Consequently, not all sectors develop equally and usually the areas neglected are connected with public welfare, such as the education and healthcare sector. For example, when governments are corrupt they usually tend to invest more in infrastructure projects, where there is potential for corruption, bribery and clientelism[34] and so funds are being misallocated and not invested in education. Education is a sector significantly connected to economic growth[35] and thus, when it is being neglected it can in the long term contribute to a slower rate of economic development. Furthermore, the aforementioned practice is also a root cause of extended social inequalities[36].

Another point that we ought to bear in mind is the quality of public services. When major public infrastructure projects for example are given to companies through a corrupt system that does not use criteria based on merit and is willing to turn a blind eye on certain regulations in order to favour said companies, the quality of the end product might not align with the quality standards

[31] Andrei Shleifer and Robert W. Vishny, "Corruption," *The Quarterly Journal of Economics* 108, no. 3 (August 1, 1993): 599–617, https://doi.org/10.2307/2118402.
[32] Paolo Mauro, "Corruption and Growth," *The Quarterly Journal of Economics* 110, no. 3 (August 1, 1995): 681–712, https://doi.org/10.2307/2946696.
[33] "Consequences of Corruption at the Sector Level and Implications for Economic Growth and Development," n.d., https://www.oecd.org/content/dam/oecd/en/publications/reports/2015/03/consequences-of-corruption-at-the-sector-level-and-implications-for-economic-growth-and-development_g1g51392/9789264230781-en.pdf.
[34] "IMF Research Bulletin -- December 2000," Imf.org, 2025, https://www.imf.org/external/pubs/ft/irb/2000/eng/03/index.htm.
[35] Pedro Bermúdez et al., "Effects of Corruption and Informality on Economic Growth through Productivity," *Economies* 12, no. 10 (October 2, 2024): 268–68, https://doi.org/10.3390/economies12100268.
[36] "Consequences of Corruption at the Sector Level and Implications for Economic Growth and Development," n.d., https://www.oecd.org/content/dam/oecd/en/publications/reports/2015/03/consequences-of-corruption-at-the-sector-level-and-implications-for-economic-growth-and-development_g1g51392/9789264230781-en.pd.

that should be upheld[37]. It is clear that such phenomena undermine the prospects of the state for development and global competitiveness[38].

Other than how corruption correlates to specific aspects of the economy, it may even more affect the GDP of a country and cause issues in the monetary policy. Corruption has a way of inserting into almost all the components of the GDP and can usually result in adverse budgetary consequences since it increases public expenses unnecessarily and it can simultaneously decrease tax revenues due to tax evasion practices[39]. Concerning the monetary and financial sector, when corrupt financial institutions lend money with interest rates below the market they alter capital allocation, reduce financial efficiency, and may also negatively affect overall economic performance[40].

To sum up, economic measurements show that corruption has a negative influence in a variety of areas even though it mainly distorts sectors such as healthcare and utilities infrastructure. In the bigger picture, countries with a high corruption index ultimately become less competitive as they do not attract investments and they also hurt public trust[41], which leads to a new circle of economic loss since it causes capital flight and major brain drain due to disappointment and lack of trust to national public institutions[42].

6.2. How corruption affects public trust

Another sector deeply affected by the existence of corruption is public trust. Trust is crucial to societies, and phenomena such as corruption damage the foundations of which it's built, creating

[37] Paolo Mauro, "Economic Issues No. 6 -- Why Worry about Corruption?," Imf.org (International Monetary Fund, February 1997), https://www.imf.org/external/pubs/ft/issues6/index.htm.
[38] "IMF Research Bulletin -- December 2000," Imf.org, 2025, https://www.imf.org/external/pubs/ft/irb/2000/eng/03/index.htm.
[39] Paolo Mauro, "Economic Issues No. 6 -- Why Worry about Corruption?," Imf.org (International Monetary Fund, February 1997), https://www.imf.org/external/pubs/ft/issues6/index.htm.
[40] Paolo Mauro, "Economic Issues No. 6 -- Why Worry about Corruption?," Imf.org (International Monetary Fund, February 1997), https://www.imf.org/external/pubs/ft/issues6/index.htm.
[41] "Anti-Corruption and Integrity," OECD, n.d., https://www.oecd.org/en/topics/policy-issues/anti-corruption-and-integrity.html.
[42] "The Persistence of Corruption and Slow Economic Growth," IMF, November 2002, https://www.imf.org/en/publications/wp/issues/2016/12/30/the-persistence-of-corruption-and-slow-economic-growth-16199.

a bigger chasm between governments and citizens[43]. Just in 2023, only four out of ten people had high or moderately high trust in their country's national government (39%), and an even higher percentage showed little to no trust in the same institution (44%), highlighting the growing influence of unethical practices in public services[44]. According to the OECD Trust Survey Reports[45], Public trust in institutions is measured by key core drivers, most notably of integrity, reliability, responsiveness, openness, transparency, and also fairness. These drivers form the foundation in which public institutions build legitimacy and maintain the confidence of the people, so when corruption takes place, it weakens them simultaneously, creating tensions in the sector of public trust.

The first and most fundamental driver of public trust is integrity, which refers to the ethical behaviour of public officials and the existence of strong safeguards against any possible corruption. The 2025 OECD Governments at Glance report showed that public perception of this driver of trust is currently facing a serious decline. The report finds that only 36% of survey respondents across the OECD region believe that a civil servant would turn down a bribe to speed up access to a public service, a decline from 40% in 2021[46]. This showcases a significant stress regarding conflict of interest safeguards, as well as the tracking of "revolving doors" movement between governments and regulated industries.

The second key driver is reliability, which refers to the ability of institutions to deliver on their promises and provide the necessary services consistently. Citizens evaluate reliability based on the institution's ability to manage complex and long-term challenges in order to protect citizens during emergencies effectively. Closely related to reliability is also responsiveness, which reflects

[43] OECD, "Trust in Government," OECD, 2024, https://www.oecd.org/en/topics/trust-in-government.html.
[44] OECD, "OECD Survey on Drivers of Trust in Public Institutions -2024 Results BUILDING TRUST in a COMPLEX POLICY ENVIRONMENT," 2024. https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/07/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results_eeb36452/9a20554b-en.pdf.
[45] OECD, "OECD Public Governance Reviews Trust and Public Policy How Better Governance Can Help Rebuilt Public Trust," 2017, https://www.oecd.org/content/dam/oecd/en/publications/reports/2017/03/trust-and-public-policy_g1g74ea6/9789264268920-en.pdf.
[46] OECD , "Government at a Glance 2025," n.d., https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/06/government-at-a-glance-2025_70e14c6c/0efd0bcd-en.pdf.

the extent to which governments listen to their citizens and incorporate their needs into decision making processes. The COVID-19 pandemic is a clear example of this dynamic, where governments rapidly mobilised healthcare resources and provided economic relief as well as coordinated vaccination, while taking into consideration the public's needs to face this crisis, thus increasing the levels of public confidence and leaving 53% confident that their government is prepared to deal with such crises[47]. Although, according to recent trust surveys, only around 30% of respondents believe that opinions expressed during public consultations were actually considered in the final decision, suggesting that multiple citizens question the significance of their role in governmental decisions.

Another critical driver of public trust is openness and transparency, which refers to the extent in which governments provide accessibility to all necessary information about their actions and their decision making processes open to the public. It is necessary for governments to communicate clearly with their citizens and provide access to crucial information in order to reduce public suspicion and perceptions of corruption. However, recent reports have shown that only four in ten citizens believe that their governments rely on the best available evidence, research, and statistics to guide their policy decisions. For example, up to 40% of citizens find it unlikely that the government would be capable of clearly explaining how a policy reform would affect them, highlighting a growing gap in openness and transparency in governance[48].

Another core driver of public trust is the press. An important part of the press is the investigative press, where reporters investigate corruption scandals on their own accord by following the money. Although the trust of the public in regards to the press is limited in some countries as there are concerns about the freedom of the press, investigative journalism has always shown the public that even corrupt officials can be exposed.

[47] OECD, "OECD Survey on Drivers of Trust in Public Institutions -2024 Results BUILDING TRUST in a COMPLEX POLICY ENVIRONMENT," 2024. https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/07/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results_eeb36452/9a20554b-en.pdf.
[48] OECD, "OECD Survey on Drivers of Trust in Public Institutions -2024 Results BUILDING TRUST in a COMPLEX POLICY ENVIRONMENT," 2024. https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/07/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results_eeb36452/9a20554b-en.pdf.

The last core driver of public trust, identified as having the greatest impact on trust in national governments is fairness, the belief that the government can balance the needs of current and future generations without any discrimination. Recent reports have shown that only 52% of people are confident that they would face fair treatment when applying for government benefits, although only 45% believe this applies for all people. In particular, individuals belonging in groups that face discrimination assess fair treatment less positively, scoring just 15% lower than those who don't identify in discriminated-against groups[49]. Corruption directly impacts fairness in procedures, by overstepping the need of objective treatment for all individuals, regardless of background and origin, it promotes phenomena such as nepotism and clientelism undermining institutional integrity.

In conclusion, it is clear that when corruption exists it directly influences those key core drivers of public trust, relations between citizens and governments deteriorate, creating systemic problems for society. Corruption scandals appear often in the spotlight (OPEKEPE 2025, Qatargate 2022, Airbus 2020), and when the officials involved face little to no accountability, the rule of law is undermined which fuels society with public frustration and cynicism, encouraging a Normalization of Deviance, thus compromising the legitimacy of state institutions and the trust between citizens and government[50]. The problem is further escalated, due to the formation of a self-escalating cycle where corruption leads to loss of public trust which leads to less regulation, thus allowing for more corruption.

6.3. Institutional malfunction as a result of corruption

Concerning once again the different ways in which corruption distorts various sectors of public policy, we must refer to how institutions are caused to malfunction and fail to serve public interest due to widespread corruption amongst their officials as well as amongst the rules that govern them. In academia, malfunction of institutions due to corrupt practices is usually divided

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[49] OECD, "OECD Survey on Drivers of Trust in Public Institutions -2024 Results BUILDING TRUST in a COMPLEX POLICY ENVIRONMENT," 2024. https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/07/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results_eeb36452/9a20554b-en.pdf.

[50] Katharina Kiener-Manu. "Anti-Corruption Module 1 Key Issues: Effects of Corruption." www.unodc.org, 2024. https://www.unodc.org/e4j/zh/anti-corruption/module-1/key-issues/effects-of-corruption.html.

into two categories, referred to as individual corruption and institutional corruption[51]. In the former, corruption is the cause of the improper behaviour of officeholders who act in favour of personal gain. In the latter, the institution itself is based on rules and mechanisms that allow corruption, that create systemic pressure and incentives for individuals to be corrupt. These two aspects are actually interconnected and correlated and most of the time no matter the direction of the causal connection they appear simultaneously[52]. It is also important to mention that these two categories may intersect when it comes to the revolving door mechanism. This is the worst form of corruption as officials that hold regulatory roles in certain industries move from said roles to positions within the industries they were supposed to regulate. This is also shown in the OECD documentation regarding conflicts of interest[53].

The symptoms of institutional corruption vary and are interconnected as well. Amongst the most common ones lie the important issues of state capture and regulatory capture, meaning the situation in which public institutions cease to operate in favour of public interest and the benefit of society and instead are driven by the economic, political or other types of interests of the private sector[54]. In that case, the phenomenon observed includes rules and regulations being shaped in order to accommodate such interests and thus the whole system is built on unethical motives and allows for similar practices to continue reappearing[55].

This symptom is even more disruptive and difficult to cure than other forms of institutional corruption such as clientelism[56] and nepotism[57], although these practices significantly affect the

[51] David, "On Corrupt Institutions," *Critical Review of International Social and Political Philosophy*, February 15, 2024, 1–22, https://doi.org/10.1080/13698230.2024.2318171.
[52] Emanuela Ceva and Maria Paola Ferretti, "Corruption, Institutional," January 11, 2023, https://doi.org/10.1007/978-94-007-6730-0_1015-1.
[53] OECD. "Conflict of Interest." *OECD*, 2024, www.oecd.org/en/topics/sub-issues/conflict-of-interest.html
[54] State, "State Capture," State Capture, June 19, 2019, https://www.state-capture.org/blog/whatisstatecapture.
[55] Boris Bruce Kriger, "Corrupt by Design: How Institutions Create the Problems They Claim to Fight," Medium, March 6, 2026, https://medium.com/@krigerbruce/corrupt-by-design-how-institutions-create-the-problems-they-claim-to-fight-0e1196fd8fee#_Toc223613374.
[56] Briquet, Jean-Louis. "Clientelism | Social Science." *Encyclopedia Britannica*, 29 Dec. 2015, www.britannica.com/topic/clientelism
[57] Briquet, Jean-Louis. "Clientelism | Social Science." *Encyclopedia Britannica*, 29 Dec. 2015, www.britannica.com/topic/clientelism

proper functioning of organisations and institutions too, as they create what is usually referred to as deviation of purpose[58]. This term explains what happens when institutions subject to corrupt mechanisms or to the actions of corrupt individuals end up not serving the goal they were established to serve in the first place[59]. Clientelism and cronyism are usual causes of this phenomenon as they prioritize the interests of certain "clients" in return for electoral support for example or the interests of one's kin at the cost of public interest[60]. As a result, institutions do not make decisions based on merit or lawfulness and their integrity index significantly declines. Another common result of this is selective implementation of rules and regulations, which further enhances the alienation from the institution's purpose[61]. When the aforementioned practices are applied to monitoring bodies as well, such as those of the judiciary system, the spread of corruption takes a viciously circular form, since proper oversight and law enforcement is weakened and thus prevention of such phenomena becomes progressively harder[62].

In addition to these factors that distort institutions' efficiency in a rather technical way, we must add the repercussions of the erosion of trust. When institutions are proven to be subject to the will of powerful private actors, belief in the system is seriously hurt[63]. Consequently, citizens feel

Ostberg, Rene. "Nepotism | Etymology, Examples, vs. Cronyism, & Nepo Baby | Britannica." *Www.britannica.com*, 29 Aug. 2023, www.britannica.com/topic/nepotism

[58] Briquet, Jean-Louis. "Clientelism | Social Science." *Encyclopedia Britannica*, 29 Dec. 2015, www.britannica.com/topic/clientelism

Qiu, Zhujun, and Sha Wu. "Analysis of the Deviation of Local Government Public Policy Implementation and Its Correction Exploration." *Frontiers in Humanities and Social Sciences*, vol. 4, no. 5, May 2024, pp. 138–44, https://doi.org/10.54691/zqvv8x76

[59] Dennis Thompson, "Theories of Institutional Corruption," 2018, https://doi.org/10.1146/annurev-polisci-120117-.

[60] Gabriela Camacho, "Anti-Corruption Helpdesk Answer Clientelism across the Public Financial Management Cycle," 2025, https://knowledgehub.transparencycdn.org/kproducts/Clientelism-corruption-and-resource-allocation.pdf.

[61] Dennis Thompson, "Theories of Institutional Corruption," 2018, https://doi.org/10.1146/annurev-polisci-120117-.

[62] "Oversight: OECD Public Integrity Handbook," OECD, 2026, https://www.oecd.org/en/publications/oecd-public-integrity-handbook_ac8ed8e8-en/full-report/oversight_cd001404.html.

[63] Katharina Kiener-Manu, "Anti-Corruption Module 1 Key Issues: Effects of Corruption," www.unodc.org, 2024, https://www.unodc.org/e4j/zh/anti-corruption/module-1/key-issues/effects-of-corruption.html.

disappointed and are discouraged from engaging in society and exercising their civil rights, which adds to the inability of the institutions to function efficiently and have a positive impact[64].

6.4. Current Developments

6.4.1. Cross Border Bribery

It's a well-established fact that corruption isn't limited by borders, but extends beyond them. Cross-border bribery is defined as the act of a business or government, offering, promising or providing benefits to a foreign public official or state in order to obtain or retain special privileges[65]. However, it's more than merely engaging in "unethical business practices" in foreign markets. By distorting global competition and by undermining the rule of law, when a company or country employs underhanded methods to secure their interests abroad, it creates a ripple effect damaging not only the host country, but also the integrity and long-term stability of the engaging company or state as well. Of course, this type of bribery isn't always clear to the naked eye, it takes multiple forms in order to be discreet.

A common method found in bribery cases is the use of intermediaries, which are either agents, consultants or even relatives. By using this method, a company or state doesn't have to bribe the foreign official directly, instead they can transfer the money to a third party (such as a shell company or an offshore account), using the intermediary to pass the bribe directly to the foreign official under the guise of a legitimate payment. Intermediaries are used often in order for the bribe-givers to relatively distance themselves from criminal activity as well as evade any possible detection, investigation or prosecution[66]. Thus, by routing illegal payments through third parties,

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[64] Katharina Kiener-Manu, "Anti-Corruption Module 1 Key Issues: Effects of Corruption," www.unodc.org, 2024, https://www.unodc.org/e4j/zh/anti-corruption/module-1/key-issues/effects-of-corruption.html.

[65] Transparency International UK, "Glossary | Anti-Bribery Guidance | Transparency International," Transparency International UK, n.d., https://www.antibriberyguidance.org/glossary.

[66] OECD, "DAF Anti-Corruption Division Working Group on Bribery in International Business Transactions TYPOLOGIES on the ROLE of INTERMEDIARIES in INTERNATIONAL BUSINESS TRANSACTIONS FINAL REPORT," October 9, 2009, https://www.oecd.org/content/dam/oecd/en/publications/reports/2009/10/typologies-on-the-role-of-intermediaries-in-international-business-transactions_1ce9cda7/60588a1d-en.pdf.

the perpetrators create layers of complexity and opacity that effectively blurs the direct link between the source of the bribe and the bribed official.

A Shell company is a non-operational legal entity that has no independent business activities, employees or any significant assets, and typically maintains no physical presence in their jurisdiction of incorporation. Meanwhile, an offshore account refers to bank accounts and assets based in foreign jurisdictions, particularly in Offshore Financial Centres (OFCs) which are commonly favoured by non-residents for their “excessive secrecy”. Both structures are exploited for cross-border bribery by creating a “corporate veil” that helps shield the actual beneficial owner from any legal liability and public disclosure. In order to funnel the bribes, firms mostly use entities such as “off the books” slush funds, distancing their company from any possible suspicion. Then, the illicit funds pass across borders through bank accounts under the name of the shell companies, while also often utilizing international intermediaries to achieve corporate layering, making it difficult for law enforcement to trace the money back to its owner[67].

Lastly, another method commonly found in bribery cases, is the use of sham consulting, advisory or service agreements in order to disguise the bribe as a legitimate business expense, thus providing a legalistic veneer for illicit transfers to offshore accounts. These types of arrangements are often strengthened by the creation of fictitious invoices for services that were never performed, or through the use of alias email accounts to coordinate those secret payments. These funds are later routed through shell companies and intermediaries in secrecy jurisdictions, which effectively hides the beneficial owner and the involvement of the foreign official or their close circle. This method exploits a lack of corporate due diligence and utilises internal “shadow bank” functions to produce a fragmentation of oversight. Consequently, these mechanisms make illicit payments appear as justifiable in accounting records, while also providing a shield of deniability as well[68].

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[67] Phyllis Atkinson, “Quick Guide to Offshore Structures and Beneficial Ownership,” Baselgovernance.org, n.d., https://learn.baselgovernance.org/course/section.php?id=253&lang=sq.

[68] OECD, “Typology of Corruption Risks in Commodity Trading Transactions,” 2021, https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/06/typology-of-corruption-risks-in-commodity-trading-transactions_31a09336/590e80e8-en.pdf.

The fallout of these practices has significant consequences on the engaging companies, states and the overall economy. For starters, they distort markets making them less stable and predictable, directly hurting economic growth. For example, in global revenue losses, it is estimated that public, private and NGO organisations globally lose 5% of their revenue each year due to occupational fraud, which represents approximately 5 trillion USD in annual losses. Such distortions create an uneven playing field, rewarding favouritism instead of merit and leading to massive misallocation of resources, diverting the funds away from their intended uses. This lack of integrity between transactions leads to substantial losses, with estimates suggesting that 8%-25% of global public investment is lost each year to mismanagement and corruption in procurement operations. This directly affects the public trust sector as well, recent reports made by the European Union noted that more than three quarters believe that over-close links between business and politics lead to corruption (77%), as well as around two-thirds believe that favouritism and corruption undermine business competition (65%). However, businesses that actually implement effective and efficient compliance measures to counter bribery can gain a strategic "integrity advantage", and potentially rise up to 15-18% of improved overall performance while upholding their integrity. In the OECD region, enforcement against intentional bribery has remained steady since 1999, it's still uneven across all country states, highlighting the persistent challenge of maintaining a fair global market[69].

6.4.2. Challenges of Digital Innovation

Rapid technological innovation, especially the rise of Artificial Intelligence (A.I), works as a double-edged sword in the 21st century regarding dealing with the phenomena of bribery and corruption. On one hand, the use of AI and technology has provided governments and businesses with strong tools to identify, predict, and mitigate corruption. For instance, the use of AI tools has been used to detect irregularities in public spending and procurements in order to identify fraud through analytical software that reviews asset declarations to flag high-risk cases for

[69]OECD."Anti-Corruption and Integrity Outlook 2026 Harnessing the Integrity Advantage" March 5, 2026 .https://www.oecd.org/content/dam/oecd/en/publications/reports/2026/03/anti-corruption-and-integrity-outlook-2026_d8f55b04/16708b78-en.pdf.

manual verification, at the same time AI has also been used to encode regulations into automated systems thus trying to reduce human error[70]. On the other hand, the increase in technological innovation has not only brought forth tools to fight corruption and bribery, but also developed more subtle and sophisticated methods of committing them.

In modern times, digital financial systems like cryptocurrencies serve as powerful tools for transferring and laundering funds due to their unique characteristics. This method consists of digital tokens that allows people to make payments directly to each other through an online system. The tokens have no legislated value and they are simply worth what people are willing to pay for them in the markets. But due to the fact that transactions are linked to long wallet addresses and not names, individuals can hide their identity and source of the funds behind them. It makes privacy a lot easier and funds can be transferred globally at the touch of a button, enabling bribery through direct transferring with speed and efficiency between individuals, bypassing traditional financial oversight[71]. This currency serves as a sophisticated money laundering method, with individuals using techniques like “blockchain hopping” (converting proceeds into different coins across various blockchains) and “spraying” (spreading stolen assets across multiple addressees) to hide the trail of funds.

Rising alongside AI technology, a new threat has emerged as well, the creation of Deepfakes. A deepfake is a form of a synthetic media, using generative AI models and deep neural networks to create images, videos, audios or text. By learning how to replicate human facial mannerisms and by utilizing voice cloning features, a deepfake creates a strong sense of authenticity, allowing it to bypass biometric verification through impersonation or create massive volumes of convincing text to commit document forgery. From insurance companies facing losses due to illegitimate claims based on deepfake evidence, to the increase of deepfake cloning calls to access personal sensitive information, and ultimately to deepfake disinformation campaigns

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[70] OECD. “Anti-Corruption and Integrity Outlook 2024,” n.d., https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/03/anti-corruption-and-integrity-outlook-2024_6e7ad8ce/968587cd-en.pdf.

[71] Monica Guy and Alexandru Donciu. “Crypto: The Ultimate Enabler of Corruption?,” Basel Institute on Governance, November 27, 2025, https://baselgovernance.org/blog/crypto-ultimate-enabler-corruption.

impacting the integrity of democratic processes, this AI-fueled fraud has become a leading concern in multiple establishments, thus weakening the economy and creating a wider gap between citizens and their institutions[72].

Although unlike deepfakes[73], Synthetic Identities are used not to impersonate, but to create a totally new identity. They are counterfeit identities, formed by a mix of real and fake components, in order to create a completely new persona unrelated to any real individual[74]. Fraudsters[75], by using legitimate components such as existing social security numbers (SSN) and combining them with fake names, dates of birth or addresses, they manage to create a new "Frankenstein" identity. Due to the fact that these fake identities look real to digital identification processes, they can bypass even strict security checks, such as Know Your Customer (KYC) and Ultimate Beneficial Ownership (UBO)[76], thus exploiting the fact that banks put their trust in isolated data points and the latency of credit-building cycles, rather than looking at the whole person[77]. Which is why Synthetic IDs represent a multifaceted technological threat to our society in multiple ways, by blending real and fabricated data, these new identities can get illegal access to accounts and loans, while also simultaneously being served as a tool for regulatory evasion to bypass sanctions and mask illegal transactions, using non-existing identities to funnel bribes. But beyond financial gain, in order to manipulate public opinion and spread misinformation,

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[72] Srini Tummalapenta. "How a New Wave of Deepfake-Driven Cyber Crime Targets Businesses," Ibm.com, May 17, 2024, https://www.ibm.com/think/insights/new-wave-deepfake-cybercrime.

[73] Briquet, Jean-Louis. "Clientelism | Social Science." *Encyclopedia Britannica*, 29 Dec. 2015, www.britannica.com/topic/clientelism

proofpoint. "Deepfake Technology." *Proofpoint*, 26 Aug. 2024, www.proofpoint.com/us/threat-reference/deepfake

[74] CyberArk. "Synthetic Identity," CyberArk, n.d., https://www.cyberark.com/what-is/synthetic-identity/.

[75] "Fraudster: Definition, 4 Types, & Famous Examples." *Unit21.Ai*, 2021, www.unit21.ai/trust-safety-dictionary/fraudster

[76] Swift. "What Is Customer Due Diligence (CDD)? | Swift." *Swift*, 2024, www.swift.com/risk-and-compliance/know-your-customer-kyc/customer-due-diligence-cdd

[77] Fourthline. "What Is Synthetic Identity Fraud?," Fourthline.com, n.d., https://www.fourthline.com/glossary/synthetic-identity-fraud.

Synthetic ID's become a new weapon in influence campaigns in order to achieve political or economic gain[78].

All together, these new technological threats pose a risk to the public trust, enhancing the gap between citizens and their institutions. Analysing these threats through the latest OECD Framework on Drivers of Trust in Public Institutions[79], the implications become clear. For starters, the use of Synthetic IDs to bypass strict KYC and UBO protocols signals a lack of technical state competence, triggering a big reliability gap and leaving only 41% of the public confident that the state is capable of regulating new AI technologies. This issue further evolves into an integrity gap through the use of Anonymous Financial Technology[80]. Techniques such as "blockchain hopping"[81], undermine the OECD's core driver of fairness. Surveys indicate that only 51% of citizens believe civil servants treat everyone equally regardless of background, thus contributing to the belief of a two-tiered system in which elites can bypass common rules. At last, the use of deepfakes creates the biggest impact by undermining Information integrity, blurring the lines between reality and fabrication. By making it increasingly difficult for the citizens to differentiate between genuine governance or AI generated disinformation, it results in only 40% of citizens believing that government decisions are based on the best available evidence, ultimately creating a "perpetual suspicion", forming an unbridgeable chasm between the citizens and their institutions.

[78] Moodys. "Synthetic Identity Fraud & Its Importance in a Digital World," Moodys.com, February 18, 2025, https://www.moodys.com/web/en/us/kyc/resources/insights/synthetic-identities-and-why-they-are-important-in-todays-digital-landscape.html.

[79]OECD."OECD Survey on Drivers of Trust in Public Institutions -2024 Results BUILDING TRUST in a COMPLEX POLICY ENVIRONMENT," 2024, https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/07/oecd-survey-on-drivers-of-trust-in-public-institutions-2024-results_eeb36452/9a20554b-en.pdf.

[80] Holdsworth, Brandon. "AML for Anonymous Transactions: Preventing Financial Crime for NFTs, Cryptocurrency and DeFi." *Featurespace*, 30 Sept. 2022, www.featurespace.com/newsroom/aml-for-anonymous-transactions-preventing-financial-crime-for-nfts-cryptocurrency-and-defi

[81]Merkle Science. "Chain Hopping: The Future of Crypto Money Laundering." *Merklescience.com*, 10 June 2023, www.merklescience.com/blog/chain-hopping-the-future-of-crypto-money-laundering

6.5 Case Studies

In order to further understand how corruption practices work and how they have consequences in the real world we deem it necessary to examine two separate and different cases of big scandals that have shocked the international community during the recent years. The purpose of these two case studies is also to assess the effectiveness of the existing mechanisms that the OECD has adopted for combatting bribery and defending integrity and consequently point out weaknesses in this system.

6.5.1. Qatargate 2022

On December 2nd 2010, FIFA (Fédération Internationale de Football Association) selected Qatar as the venue for the 2022 World Cup. The selection was conducted without the Association checking the proper Human Rights or Environmental due diligence of the country, and without laying down the necessary conditions for the protection of immigrant workers who would be in charge of constructing the needed infrastructure to host over 1.2 million international visitors and their respected teams for the Tournament[82].

After an alarming high number of deaths and reports of workers abuse[83], the European Parliament took an active stance against this violation, through a resolution "Qatar: Situation of migrant workers" in November 21 2013[84], which pressured the Qatari authorities to increase the number of labour inspections, to abolish the kafala system[85], and to formally ratify the International Labour Organisation Conventions of Forced Labour 1930 and of 1974, regarding the forced labour and freedom of association for the worker.

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[82] European Parliament. "Texts Adopted - Situation of Human Rights in the Context of the FIFA World Cup in Qatar - Thursday, 24 November 2022," Europa.eu (n.d, November 24, 2022), https://www.europarl.europa.eu/doceo/document/TA-9-2022-0427_EN.html.

[83] Robert Booth. "Qatar World Cup Construction 'Will Leave 4,000 Migrant Workers Dead,'" the Guardian, September 26, 2013, https://www.theguardian.com/global-development/2013/sep/26/qatar-world-cup-migrant-workers-dead.

[84] European Parliament. "Texts Adopted - Qatar: Situation of Migrant Workers - Thursday, 21 November 2013," Europa.eu, 2022, https://www.europarl.europa.eu/doceo/document/TA-7-2013-0517_EN.html.

[85] Kali Robinson. "What Is the Kafala System? | Council on Foreign Relations," Cfr.org, November 20, 2020, https://www.cfr.org/backgrounders/what-kafala-system.

Following the 2013 Resolution, the European Parliament significantly intensified its scrutiny of Qatar, using the 2022 FIFA World Cup as a global platform to demand systematic human rights reforms, causing tensions between the European Union and the Qatari government. The friction escalated with the 2015 Resolution, which strongly condemned Qatar's failure to uphold their promise for reforms, highlighting the arrest of human rights defender who sought to document the labour conditions[86]. The global scrutiny over migrant labour abuses and the criticism from the European Parliament, while also from NGOs such as Amnesty International[87], caused Qatar to use intermediaries and unethical practices to project a positive image of the country to both the MEP officials and the Public.

This was achieved through an NGO think tank called Fight Impunity[88]. The organisation was founded in 2019 by former MEP Antonio Panzeri and worked in close cooperation with Francesco Giorgi and Eva Kaili, who served as Vice President of the European Parliament[89]. It was established in order to promote human rights and justice against those who violate them. However, Panzeri by assembling an "Honorary Board" of former commissionaires and high-profile officials, created an appearance of legitimacy for the NGO, allowing it to bypass the official EU transparency register[90]. This made it easier for Qatar to channel illicit funds as donations

[86]European Parliament , "Texts Adopted - Recent Revelations of High-Level Corruption Cases in FIFA - Thursday, 11 June 2015," www.europarl.europa.eu, June 11, 2015, https://www.europarl.europa.eu/doceo/document/TA-8-2015-0233_EN.html.

[87] Amnesty International. "Qatar World Cup of Shame," Amnesty.org, March 31, 2016, https://www.amnesty.org/en/latest/campaigns/2016/03/qatar-world-cup-of-shame/.

[88] Mathiesen, Karl. "Inside Fight Impunity, the Brussels NGO at the Heart of the Qatar Corruption Scandal." *POLITICO*, 20 Dec. 2022, www.politico.eu/article/inside-fight-impunity-brussels-ngo-qatar-corruption-scandal-european-parliament-panzeri-kaili-giorgi/

[89] Karl Mathiesen and Jacopo Barigazzi. "Inside Fight Impunity, the Brussels NGO at the Heart of the Qatar Corruption Scandal," POLITICO, December 20, 2022, https://www.politico.eu/article/inside-fight-impunity-brussels-ngo-qatar-corruption-scandal-european-parliament-panzeri-kaili-giorgi/.

[90] Michiel van Hulten. "Transparency International EU Calls for an Independent Inquiry into European Commission Qatargate Links - Transparency International EU," Transparency International EU, December 22, 2022, https://transparency.eu/independent-inquiry-into-commission-qatargate-links/.

through the organisation in order to influence EU policy in its favour, thus improving its international image before the 2022 FIFA World Cup.

This operation came to an end after the FIFA World Cup, on December 9 2022, when the Belgian police launched an investigation into the case and raided multiple properties of those involved in Belgium, seizing more than half a million euros in cash found in suitcases[91]. After the raids, the Greek MEP Eva Kaili was removed from her position as Vice president and alongside Antonio Panzeri and Francesco Giorgi, was charged with corruption[92]. Meanwhile, the scandal triggered a sizable negative impact on the public's trust in the European Parliament, with French and German citizens notably lowering their institutional evaluations after the news. That scandal not only risked causing voter resignation and demobilization among the electorate processes but also risked posing a long term threat to the EU's public legitimacy[93].

OECD sets the "gold standard" for monitoring international bribery, but due to its limited enforcement capabilities, the organisation took a more structural approach rather than being direct. Handling bribery cases through its Working Group on Bribery (WGB), following the arrests of 2022, they used its Phase 4 Monitoring Reports process[94] to pressure the involved member states (Belgium, Greece, and Italy) to ensure that their national legal framework was strong enough to prevent and prosecute such cases. Although OECD does not possess the power to prosecute individuals directly, it handles such scandals by using its working groups to apply "peer-pressure" by highlighting concerns on the involved member states performances while also requiring them to provide detailed updates on the Qatargate criminal investigations during the quarterly meetings in Paris. This wouldn't be possible without the 2021 Recommendations, which

[91] Sven Hegewald and Dominik Schraff. "Corruption and Trust in the European Parliament: Quasi-Experimental Evidence from the Qatargate Scandal," European Journal of Political Research 63, no. 4 (January 16, 2024), https://doi.org/10.1111/1475-6765.12654.
[92] Suzanne Lynch. "Anatomy of a Scandal: How 'Qatargate' Crisis Shook EU to Its Core," POLITICO, December 17, 2022, https://www.politico.eu/article/scandal-qatargate-crisis-european-union-corruption-crisis/.
[93] Sven Hegewald and Dominik Schraff. "Corruption and Trust in the European Parliament: Quasi-Experimental Evidence from the Qatargate Scandal," European Journal of Political Research 63, no. 4 (January 16, 2024), https://doi.org/10.1111/1475-6765.12654.
[94] OECD. "Implementing the OECD Anti-Bribery Convention," OECD, 2025, https://www.oecd.org/en/publications/serials/implementing-the-oecd-anti-bribery-convention_g1gha2ef.html.

shifted the focus from just the bribe-payers to the public officials who accepted them as well, thereby providing the necessary legal and procedural framework to pressure involved member states into investigating and reporting on the MEP's roles in the Qatargate scandal, instead of dismissing it as an external political attack[95].

6.5.2. Airbus 2020

The multinational aircraft manufacturing company has caused one of the scandals with the most publicity in the last few years. The nature of the scandal, the way it got resolved are of significant importance and relevance to the topic under discussion. Airbus had been securing multiple contacts in several countries since the 2010s by using corruption practices. The way they were able to do that for so long was by hiring intermediaries who would act as agents of the company and would get paid by commissions. Their payments were usually much larger than normal and could not be explained by specific services that they offered. In truth, big parts of these payments were offered to foreign public officials in order to close the contracts with Airbus[96]. Consequently, these practices caused a significant distortion in competition in the market and allowed the company to profit off of this[97][98].

This scandal is a case of large scale cross-border bribery that also happened under the framework of the OECD Anti-Bribery Convention. The investigation was carried out by three different bodies in three different states. Specifically, the UK Serious Fraud Office, the French Parquet National Financier, and the U.S. Department of Justice were mobilised in order to bring the case to the light as well as to find a settlement and deal with the tension that it had caused. Ultimately the

95 Basel Institute of Governance. "Recommendation of the Council for OECD Further Combating Bribery of Foreign Public Officials in International Business Transactions (2021 Anti-Bribery Recommendation)," Basel Institute on Governance, November 26, 2021, https://baselgovernance.org/publications/recommendation-council-oecd-further-combating-bribery-foreign-public-officials.

96 Derrick Boakye, Daniel Siaw, and David Sarpong, "The Airbus Bribery Scandal: A Collective Myopia Perspective," *European Management Review* 19, no. 4 (March 2, 2022), https://doi.org/10.1111/emre.12511.

97 "Airbus Agrees to Pay over $3.9 Billion in Global Penalties to Resolve Foreign Bribery and ITAR Case," Justice.gov, January 31, 2020, https://www.justice.gov/archives/opa/pr/airbus-agrees-pay-over-39-billion-global-penalties-resolve-foreign-bribery-and-itar-case?utm_source=chatgpt.com.

98 "Why Don't the Victims of Bribery Share in the Record-Breaking Airbus…," Transparency.org, n.d., https://www.transparency.org/en/news/why-dont-the-victims-of-bribery-share-in-the-record-breaking-airbus-settlem.

case was solved through a deferred prosecution agreement, where Airbus paid 3.6 billion USD in order for the criminal and civil charges to be suspended. This kind of agreement is a very effective yet rather controversial tool at the disposal of persecution agencies around the world in order to solve such problems without decimating important companies. The result of this collaboration was what has so far been the largest bribery settlement in history, with Airbus accepting to pay around 3.6 billion in penalties, most of which were going to be dedicated in order to account for the distortions this corruption had caused[99]. Apart from the significant amount of money to be paid by Airbus the settlement in question has to showcase a high level of intergovernmental coordination and international cooperation for the purpose of combatting foreign bribery. The OECD Anti-Bribery Convention essentially makes states criminalise cross-border bribery and in that way it ensures that different jurisdictions uphold the same level of standards when it comes to such cases[100]. This effectively provides a basis for combatting cross-border crime and eliminating corruption that nowadays goes further than national borders[101].

On the other hand, we must highlight a series of gaps and weaknesses in the existing framework and mechanisms, which the OECD uses, that are demonstrated through the examination of the Airbus scandal[102]. First and foremost, the issue that is being raised is how effective these types of settlements are since non-trial resolutions aim to settle a case without prosecuting the individuals responsible[103]. In fact, the executives that implemented the organisation of this

[99] "Airbus Reaches Agreements with French, U.K. And U.S. Authorities," Airbus, October 28, 2021, https://www.airbus.com/en/newsroom/press-releases/2020-01-airbus-reaches-agreements-with-french-uk-and-us-authorities?utm_source=chatgpt.com.
[100] "Anti-Corruption and Integrity," OECD, n.d., https://www.oecd.org/en/topics/policy-issues/anti-corruption-and-integrity.html.
[101] "Convention on Combating Bribery Of," n.d., https://legalinstruments.oecd.org/public/doc/205/205.en.pdf.
[102] "Implementing the OECD Anti-Bribery Convention Phase 4 Report: France," accessed April 1, 2026, https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/12/implementing-the-oecd-anti-bribery-convention-phase-4-report-france_73058e1a/2c7d8500-en.pdf.
[103] "Resolving Foreign Bribery Cases with Non-Trial Resolutions Settlements and Non-Trial Agreements by Parties to the Anti-Bribery Convention," n.d., https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/fighting-foreign-bribery/Resolving-foreign-bribery-cases-with-non-trial-resolutions.pdf.

bribery system were never punished[104]. This poses serious questions about whether or not big companies such as Airbus are substantially deterred from indulging in corruption practices since they can afford these large fines and continue operations normally, just like it happened with the case at hand[105]. Consequently, there is an evident gap in the existing framework when it comes to corporate sector compliance[106]. Due to the soft-law approach and the peer-pressure based monitoring mechanisms that the OECD has, cooperation of the corporate sector relies majorly on voluntary compliance, which means that when political or economic interests overlap with the set standards, compliance is not guaranteed.

In addition, the OECD Anti-Bribery Convention may have provided the grounds for cross-border cooperation but there is still a long way to go in order to ensure that different jurisdictions cooperate efficiently and are being driven by the same level of standards. This has been apparent in the Airbus case, since only three members of the OECD collaborated and eventually shared the gains from the penalties paid, but the Airbus scandal negatively influenced a number of countries, where the bribes were being given, such as Colombia, Indonesia, Ghana, and Sri Lanka, who never received any compensation[107].

7. Conclusion

To conclude, corruption is not a one-sided topic. It may seem simple at first approach but the analysis presented in this guide shows that it can take multiple forms and its consequences span in a vast spectrum of sectors. Its various aspects affect different levels of public governance and

[104] "Airbus Lands €3.6bn Global Bribery Settlement | BusinessCrimeLinks | Linklaters," Linklaters.com, 2020, https://www.linklaters.com/insights/blogs/businesscrimelinks/2020/february/airbus-lands-global-bribery-settlement.
[105] https://www.facebook.com/airbus, "Airbus Reaches Agreements with French, U.K. And U.S. Authorities," Airbus, October 28, 2021, https://www.airbus.com/en/newsroom/press-releases/2020-01-airbus-reaches-agreements-with-french-uk-and-us-authorities?
[106] OECD, "Fighting Foreign Bribery," OECD, 2024, https://www.oecd.org/en/topics/fighting-foreign-bribery.html.
[107] "Why Don't the Victims of Bribery Share in the Record-Breaking Airbus…," Transparency.org, n.d., https://www.transparency.org/en/news/why-dont-the-victims-of-bribery-share-in-the-record-breaking-airbus-settlem.

usually the causes of these effects are hidden due to the nature of the topic at hand. Being aware of the repercussions of corruption in the economy, public trust and public institutions as well as of the usual correlations between these types of consequences is necessary in order to understand what the goal of the OECD is when discussing possible measures to strengthen public integrity.

The existing framework is the result of rigorous research and intergovernmental efforts to eliminate corrupt behaviour in the face of the shared goal of economic development and prosperity in the OECD area. However, practice has proven that further action is in order. The present guide offers a basis for reflecting on how the Council of the OECD can adopt concrete measures in order to bridge the existing gaps and take into account any weaknesses that still allow for corporate sector non-compliance and integrity decline of public officials and institutions. We shall not forget that the issue of corruption and bribery is also subject to modern challenges, such as cross-border criminal activity, due to the multinational character of businesses and institutions, and digital innovation, which -if misused- further facilitates the spread of corruption practices.

8. Points to be Addressed (PtbA)

1. Are the current mechanisms sufficient? In what ways could they be expanded or reformed in order to better address and prevent corruption behaviour?
2. What measures can be implemented so as to better assess corporate sector liability ?
3. How can the OECD assist in ensuring that corrupt individuals are held accountable for their actions and properly prosecuted?
4. How can the OECD strengthen already existing mechanisms and core public trust drivers in order to counter corruption and bribery before it impacts public trust?
5. How can Artificial Intelligence (AI) be developed and used for the benefit of detecting and preventing bribery, corruption, and financial fraud in public and private institutions?

6. What lessons can be drawn from notable cases of the past (e.g., Qatargate 2022, Airbus 2020), and how should these scandals influence the next steps towards preventing issues of corruption and bribery in governance and businesses?

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