









Editorial



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For the French Anti-Corruption Agency (AFA), 2024 represented an opportunity to give fresh impetus to both its organisation and its work. The year was also marked by an increase in partnerships, enabling the Agency to reinforce the impact of its actions.

On 1st december 2024, a new AFA organisational chart came into effect, in accordance with the Order of 20 November 2024 signed by the Minister of Justice and the Minister for Public Accounts. This new organisation is the result of a collective reflection process within AFA with the support of the Secretariat General for the Economy and Finance Ministries. It illustrates the Agency's determination to respond more effectively to the mission assigned to it by the legislator, i.e. to help businesses and public-sector entities to prevent and detect corruption.

This new organisation has multiple aims. The first is to take greater account of the respective specificities of public-sector entities and businesses, both in terms of the legal framework and the risks incurred, in order to tailor the Agen-

cy's actions accordingly. Secondly, after eight years of operations, the reorganisation should enable the results of audits to be used in a more complete and systematic way, so that comprehensive lessons may be drawn for the benefit of the advisory activities and so that the relevance of these activities can be further improved for the benefit of all stakeholders. Lastly, the new organisational chart will support the Agency's horizontal activities, in particular the Corruption Observatory, which was established to gain a better understanding of corruption with a view to tackling it more effectively. More generally, this reorganisation aims to provide the Agency with smoother, more agile operating procedures in order to meet the challenges posed by developments in corruption offences.

The profile of corruption in France is changing, and the work of the French Senate Select Committee on the impact of drug trafficking in France¹ has highlighted the growing risk posed by corruption, which is particularly acute in the key central administrations.

In response to these developments, the Agency has continued the work it began in 2023 in leading a working group on "corruption and organised crime", which all key central administrations are participating in. This group is a forum for disseminating general information on the state of the threat, together with best practices. Its work in 2024 focused on protecting files related to key government functions² against attacks facilitated by corruption.

AFA has also been tasked by its supervisory ministers to carry out an analysis of the risks of corruption in port areas. This mission provided the Agency with the opportunity to analyse the port ecosystem by meeting the main public and private stakeholders and by marshalling AFA's audit capabilities to identify the risk posed by corruption in these areas. The recommendations made based on this work were fed into the legislative work that resulted in the "Act aimed at freeing France from the trap of drug trafficking of 13 june 2025".

All the work carried out in the area of "corruption and organised crime" was presented at a conference on 2 december 2024, organised in conjunction with the National School for the Judiciary. The conference provided an opportunity to highlight the growing awareness in the various administrations of the true risk of corruption and the need to step up collective efforts in this area.

¹ Commission d'enquête sur l'impact du narcotrafic en France et les mesures à prendre pour y remédier | Sénat (senat.fr) (in French only).

² Police, judicial or intelligence files that contain sensitive data.

The Agency's work with local and regional government bodies, particularly municipalities, strengthened in 2024. Together with the Association of French Mayors (AMF), AFA has published a guide for elected representatives in local authorities. This guide, which is accompanied by the online "Probicité" self-diagnosis tool, has been designed to give them practical training on the various risks they face, and to implement preventive mechanisms. These tools complement the work already carried out by AFA with the National Centre for Local Civil Service (CNFPT) to support local and regional government bodies in preventing corruption.

Given that the number of referrals received has doubled, AFA has also confirmed its role as an external authority for receiving whistleblower reports. These reports may or may not be anonymous and come from company employees, civil servants or ordinary citizens. They provide an opportunity to involve a large number of administration stakeholders, in particular audit departments and ethics officers. They are also the subject of regular discussions with the French Defender of Rights and serve to identify and obtain information about corruption scenarios, thereby allowing AFA to make progress with its analysis and its efforts to reveal the face of corruption.

Some reports are also passed on to the judicial authorities, with whom our relationships have grown stronger. AFA works closely with public prosecutors, particularly the National Financial Public Prosecutor's Office (PNF), in preparing and auditing compliance remediation programmes ordered when companies sign judicial public interest agreements (CJIPs).

Of course, preventing corruption in businesses remains a major focus of the Agency's work, which has continued to carry out its auditing activities, increasingly favouring a sector-based approach that allows coordinated auditing of public-sector entities and businesses.

The progress made in business compliance seems to be continuing, but the level of the efforts needs to be maintained, particularly given the uncertain international context. Beyond the businesses subject to the Sapin II Act, AFA looks to support businesses of all sizes and, to that end, has produced a series of podcasts to help them to introduce anti-corruption compliance systems.

At an international level, AFA's work is regularly referred to by multilateral organisations such as the OECD, the Council of Europe (GRECO), the G20, the United Nations Office on Drugs and Crime (UNODC) and the European Commission. It is a member of numerous international anti-corruption networks, and has, amongst other things, promoted the action taken by France to ensure the integrity of the Paris 2024 Olympic Games. It has also strengthened its bilateral initiatives to help foreign partners bolster their anti-corruption policies.

AFA would like to thank Jean-François Bohnert, Public Financial Prosecutor (PNF), Magali Caillat, Deputy Director for the Fight against Financial Crime (National Criminal Police Directorate) in charge of the Central Office for the Fight against Corruption and Financial and Tax Crime (OCLCIFF) and Niels Pedersen, Executive Director of the UN Global Compact Network France, who have agreed to attest to the quality of their work with the French Anti-Corruption Agency in this annual report. These institutional relationships and partnerships, which reflect the diversity of its work, are essential to the Agency and crucial to the effectiveness of its actions.

This annual report also provides AFA with an opportunity to pay tribute to the work of all its staff. Their daily commitment to a mission that contributes directly to maintaining a properly functioning democracy is a source of energy and collective pride.

I hope you enjoy reading the report.

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AFA in figures

AFA'S ORGANISATION



67 % established civil servants

33 % contractual staff



members of the strategic council



member institutions of the Corruption Observatory Scientific Board



members of the Sanctions Committee

THE PERCEPTION OF CORRUPTION



68 %

of European citizens think that corruption is widespread in their country³



70 %

of French people believe that corruption is rife in France³



of businesses that responded to AFA's diagnostic survey have encountered one or more cases of bribery or influence peddling in the previous five years

³ Source: Eurobarometer 2024 "Citizens' attitudes towards corruption in the EU in 2024".

AFA'S AUDITING AND SUPPORT ACTIVITIES

PUBLIC-SECTOR ENTITIES



101



audits in 2024

BUSINESSES



165 audits since 2017



initial audits in 2024



121

awareness-raising and training initiatives for universities, businesses and public-sector entities



12

audits in connection with the preparations for the Olympic and Paralympic Games in the construction and public works sector

COMMUNICATIONS BY AFA





podcast episodes available

23 900 followers of AFA's Linkedin page



KEY INFORMATION ABOUT AFA The French Anti-Corruption Agency (AFA) was established by the Transparency, Anti-Corruption and Economic Modernisation Act 2016-1691 of 9 December 2016, known as the Sapin II Act. The Agency has nationwide jurisdiction and is placed under the direct joint authority of the Minister of Justice and the Minister for Public Accounts. Its operations cover the whole of France's territory. Article 2 of the Act ensures that the Director of the Agency has the independence required for the Agency to conduct its audit activities.

1.1 One mission, many areas of work

AFA's main mission⁴ is to provide advisory and audit services to relevant authorities and persons to help them prevent and detect corruption, an umbrella term used to refer to the offences of bribery, influence peddling, extortion by public officials, unlawful taking of interest, misappropriation of public funds and favouritism.

In order to carry out this mission, the legislator has entrusted it with:

- Administrative coordination and steering of the anti-corruption public policy, including knowledge and analysis of corruption
- Audits of the existence, quality and effectiveness of anti-corruption prevention and detection measures and procedures in public-sector entities and businesses with 500 or more employees and a turnover of over €100 million, as required by Articles 3 and 17 of the Sapin II Act, respectively
- Support to businesses and public-sector entities with setting up corruption prevention and detection systems
- Overseeing the implementation of business entities' anti-corruption compliance programmes, particularly in the case of judicial public interest agreements (CJIPs)
- Receiving and processing reports, in particular from whistleblowers
- International action

AFA is an anti-corruption public policy coordination body, an advisory structure and an administrative audit authority for public-sector entities and business entities subject to compliance requirements. These roles make AFA a national leader in preventing and detecting corruption.



FOCUS

The six corruption offences

- Extortion by public officials (Art. 432-10 et seq. of the Criminal Code)
- Bribery (Art. 432-11 et seq., 433-1 1. et seq., 434-9 et seq., 435-1 et seq. and 445-1 et seq. of the Criminal Code): a distinction is made between active and passive bribery
- Misappropriation of public funds (Art. 432-15 and 433-4 of the Criminal Code)
- ▶ Favouritism (Art. 432-14 et seq. of the Criminal Code)
- ▶ Unlawful taking of interest (Art. 432-12 et seq. of the Criminal Code)
- Influence peddling (Art. 432-11, 2° et seq., 433-1, 2° et seq., 434-9-1 et seq. and 435-2 et seq. of the Criminal Code)

⁴ Article 1 of the Transparency, Anti-Corruption and Economic Modernisation Act 2016-1691 of 9 December 2016

1.2 A new organisation promoting more tailored action

The French Anti-Corruption Agency was reorganised on 1 December 2024 to increase its effectiveness in providing support to public-sector entities and businesses. This reorganisation was the subject of a six-month period of collective reflection involving all the Agency's staff, with the support of the Secretariat General for the Economy and Finance Ministries.

A new structure offering a more targeted approach, with advisory and audit services tailored to each sector

Two sub-directorates, one for public-sector entities and the other for businesses, were established by the Order of 20 November 2024. They replace the Audit and Advisory sub-directorates on the previous organisation chart. The aim is to make AFA's work more effective and relevant by adopting a more targeted structure that is tailored to the specific characteristics of these different stakeholders.

This new distribution of tasks removes the existing compartmentalisation between the audit and advisory sections by encouraging a more fluid approach between AFA's various sectors of activity, while continuing to comply with confidentiality rules. The aim is to make more systematic use of audit results in advisory work, by increasing the extent to which operational observations are fed into such work.

However, in order to ensure that AFA is able to continue to work in a trusted partnership with businesses as part of its advisory activities, including the drafting of various methodological guides, the Business Entities sub-directorate will continue to maintain a split between audit and advisory work. **The information exchanged with a view to supporting business entities is never used in audits.**

The Public-sector Entities sub-directorate is now divided into two departments corresponding to the specific characteristics of the relevant entities: one for the "local public sector" and the other for "National public-sector entities and non-profits and foundations recognised as **public-interest** entities". The purpose underlying this structure is to respond as closely as possible to the respective needs of local public-sector entities and state institutions or non-profits. The audit and advisory functions have now been combined to enable AFA to apply its various areas of expertise in the most appropriate way, thereby ensuring that public-sector entities are provided with effective support.

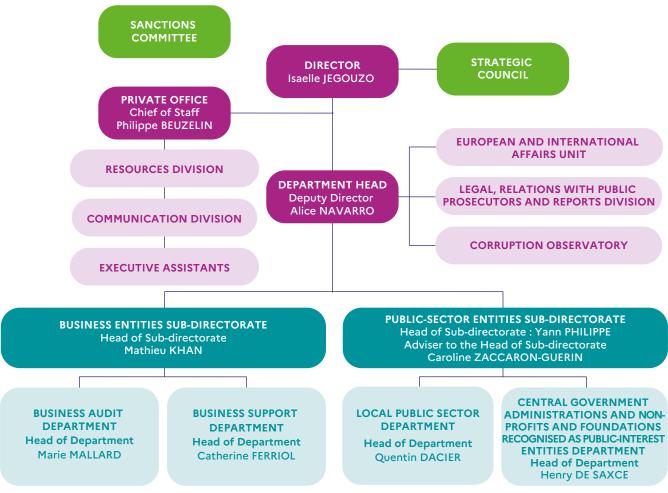
Accordingly, AFA can better tailor its actions based on the legal framework specific to public-sector entities or businesses. This will also allow us to respond more effectively to the priorities of the next multi-year national anti-corruption plan, primarily by involving more public-sector entities.

Enhanced and strengthened cross-functional work

The new structure also seeks to strengthen cross-functional activities such as communication, legal support, international cooperation in tackling corruption and the Corruption Observatory. All of them support and draw on the two sub-directorates.

Within the cross-functional divisions, the Corruption Observatory is responsible for analysing corruption phenomena and promoting best practices. The legal division supports AFA in its relations with public prosecutors, thereby improving the legal support provided by the Agency, including its monitoring of legislative and regulatory work that may be of interest to AFA. The communication division has been strengthened to improve the visibility of AFA's work and, more generally, of anti-corruption public policy. Lastly, a European and international affairs unit remains as AFA is committed, more than ever, to participating in the work of the various European, bilateral and multilateral anti-corruption bodies.

The primary aim of the reorganisation was to strengthen collective work and synergies at the Agency, with a view to making it more agile and effective in carrying out its work.



► AFA organisation chart as at 20 May 2025



FOCUS

AFA's Strategic Council: Providing a comprehensive and open reflection on corruption

Chaired by Isabelle Jegouzo, AFA Director, the Strategic Council meets at least once a year and helps to define the Agency's overall strategy. It also discusses all topics relating to AFA's work, thereby helping to guide corruption prevention and detection actions. This structure provides AFA with a range of expertise and a coordinated approach in its efforts to tackle corruption in France. It has eight members appointed based on their financial and legal skills and their experience in tackling corruption:

- For the Ministry of Finance: a representative of the Directorate General of the Treasury, and a representative of the French Financial Intelligence Unit (TRACFIN)
- For the Ministry of Justice: a representative of the Directorate for Criminal Affairs and Pardons and a representative of the Civil Affairs and Seals Directorate
- For the Ministry of the Interior: a representative of the Directorate General for Local Authorities and a representative of the Directorate General of the National Police;
- For the Ministry of Europe and Foreign Affairs: a representative from the Legal Directorate and a representative from the Directorate for Economic Diplomacy

The Strategic Council was renewed in 2024.

At its meeting held on 17 October 2024, the members held an initial exchange of views on various topical issues.

They were given the chance to provide their opinion on the reorganisation of the Agency, the establishment of the Corruption Observatory and the work it should carry out, and the main

focuses of the draft National Multi-Year Plan to Fight Corruption. Each of the represented administrations also shared their overall priorities in the fight against corruption, which will help guide AFA's activities.





FOCUS

Sanctions Committee

The French Anti-Corruption Agency's Sanctions Committee was established under Article 2 of the Sapin II Act, and has six members appointed for a five-year term: two members from the French Supreme Administrative Court, two members from the French Supreme Court of Appeal, and two members from the French Government Audit Office. The Sanctions Committee is chaired by Paquita Morellet-Steiner, Vice-President of the French Supreme Administrative Court's Public Works Division, who was also a member of the previous committee.

New rules of procedure were adopted in 2024. The main purpose of these new rules was to reflect the Sanctions Committee's desire to provide clarifications to both the entity that is the subject of a statement of complaint and the French Anti-Corruption Agency on the guarantees provided to them as part of the investigation of the cases referred to it. The role of the secretary of the Sanctions Committee has therefore been clarified. These clarifications were also required as the secretary of the Sanctions Committee monitors the adversarial procedure at each of these stages and may, as part of the procedure and under the responsibility of the Chair, discuss matters with the parties.

The committee also puts great emphasis on setting out the obligations of each of its members under their duty of impartiality and honesty. The procedures to be carried out, i.e. either the recusal of a member or the disqualification provided for in Article 6 of the Decree of 14 March 2017, are now clearly set out.

The investigation procedure has not been changed, although the various stages have been clarified. Lastly, the committee sought to retain a high degree of flexibility, while respecting the adversarial principle and the rights of the defence, by providing for the possibility of an oral hearing, at which the parties can be questioned on matters of fact but no questions of law. A pre-hearing meeting can also be organised so that the parties can obtain answers to frequently asked questions (for example, how many employees will be able to attend the public hearing, will they be able to speak, etc.).

>1.3 Resources

As at 31 December 2024, AFA had a team of 52 staff members carrying out its work, including four members of staff seconded from other administrations. This multidisciplinary team is made up mainly of Grade A+ and A executives, including 67% established civil servants and 33% contract staff. AFA also took on up to five apprentices in 2024. The diversity of the profiles and the administrations or professional sectors they come from is a valuable asset for both the Agency and its employees.

To possess the skills needed to perform the wide range of tasks it carries out, AFA prioritises technical profiles from the three branches of the civil service (central government, local government and hospitals) and from the business world. The team therefore includes ordinary judges and prosecutors, financial and administrative court judges, senior civil servants from inter-ministerial bodies, such as civil service executives and senior central government executives, civil servants from the Economy and Finance Ministries (public finance administrators and inspectors) and from the Ministry of Health and the Ministry of the Interior, as well as experts under public service contract, especially from the audit and compliance fields (former auditors, lawyers and compliance officers).

AFA's operating resources are made up of pooled appropriations made under Budget Programme 218, "Conduct and steering of economic and financial policies", of the "Public finance and human resources management" mission overseen by the Ministry for the Economy, Finance and Industrial and Digital Sovereignty.



► AFA's teams (May 2025)



It is difficult to objectively measure a phenomenon that is by definition hidden, as both the corrupting and corrupted parties have a vested interest in concealment. Therefore, it is difficult to draw up an inventory of corruption offences in France for 2024. This means that the number of offences is almost routinely underestimated. As a result, it can only be understood through objective but fragmented indicators (criminal justice response) or more general but subjective indicators (perception surveys).

In fact, the number of penalties imposed is undoubtedly the most objective indicator but only a small proportion of offences committed are actually detected, and an even smaller proportion are punished, which is a far from accurate reflection of the phenomenon.

Indicators based on perception surveys are particularly sensitive to the context of ongoing judicial cases, creating a kind of negative bias, even though the fact that these cases are being tried in court is evidence that effective public action is being taken.

AFA, and more specifically, its Corruption Observatory, has set itself the task of strengthening this objective approach with support from the Ministry of Justice, the courts, other directorates and various statistical departments in analysing court decisions. To that end, AFA has published an initial analysis of the decisions handed down in 2021 and 2022 (see box "The publications of the Corruption Observatory" below).

TESTIMONIAL



Since 2024, the French Anti-Corruption Agency has had its own Corruption Observatory, whose work principally involves developing methods, tools and analyses to provide the best possible objective assessment of the major trends in the field of corruption and the various characteristics of corruption. The Agency decided to recruit a representative from academia, Pierre-Henri Morand, to run this observatory.

You are a University Professor of Economics, seconded to AFA from the University of Avignon, where you were Director of the Legal, Political, Economic and Management Laboratory, after starting your career at the University of Franche-Comté, where you were Dean of the Law, Economics and Management Faculty. Why

did you decide to join AFA'S Observatory in September 2024?

"A large part of my career has involved working at the interface between economics and law, trying to understand the causes of deviant behaviour and the regulations that need to be put in place to prevent such behaviour. Over the last few years, I have been lucky enough to coordinate a research project that brought together lawyers, computer scientists and economists to look at how to detect corruption in public procurement contracts. Corruption issues have therefore been at the heart of my concerns. But although researchers are not disconnected from the real world, the links between academic research and public policy are still too tenuous. The position at the Corruption Observatory was a remarkable opportunity to make the transition from one world to another."

In December, you published an initial ground-breaking analysis brief based on nearly 500 court rulings. What difficulties did you encounter? Which findings surprised you?

"Surprising as it may seem, there is no exhaustive national or international survey of court decisions relating to corruption matters. This is needed by the research community, which could use it as a basis for its analysis, by the public, which is entitled to know more about corruption, and by the public authorities, so that they are able to adapt their response accordingly. This is partly due to the fact that although open data on court decisions is gradually becoming available in France, it is not yet available for this type of offence. This is, however, mainly due to the fact that the task of compiling data on court rulings (which can range from a few dozen to several hundred pages) is extremely time-consuming, and that work can only be automated to a very limited degree, because the value of the analysis lies in its ability to get to the "heart of the story" told by a court ruling. Amongst very general data, this contains useful information on the profile of the defendants, their modus operandi and the nature of any corruption pacts. AFA had carried out all this remarkable extraction work before I arrived, creating a precious mine of information that we can now use. The December 2024 analysis brief allowed me to draw some initial conclusions. I was surprised by the highly specific nature of the six main corruption offences. Each corruption offence has its own specific characteristics, from the type of defendant, the geographical location of the offences prosecuted and the public or private sectors involved. The capacity of the analysis of the court rulings to bring out the complexity of cases and the interdependencies between the public and private spheres was a real surprise for me as a researcher."

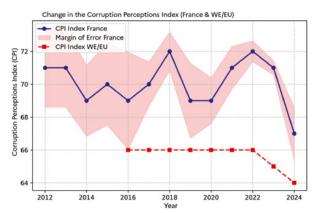
What are the next steps and targets for the Observatory?

"In 2025, the Observatory plans to set up a scientific council to support its development strategy. In particular, we will regularly work with academics to further our understanding of corruption. In addition to the publications it issues in its own name, the Observatory also collaborates regularly with the statistical departments of the Ministries of the Interior and Justice."

>2.1 Perception surveys

Transparency International's public sector Corruption Perceptions Index declined in 2024. France fell five places in the world rankings to 25th, with a score of 67, which is nevertheless better than the average index for Western European countries. Other surveys show a similar downward trend in French public perceptions. The Special Eurobarometer 548 "Citizens' attitudes towards corruption in the EU in 2024", conducted between 7 February and 3 March 2024 on a total of 1,012 interviews in France (out of a total of 26,411 interviews in the 27 EU countries) reveals changes in the perception of corruption over time, and can be used to compare the situation in France to that in the rest of the European Union.

The survey shows that the proportion of French people who believe that corruption is widespread in France is increasing



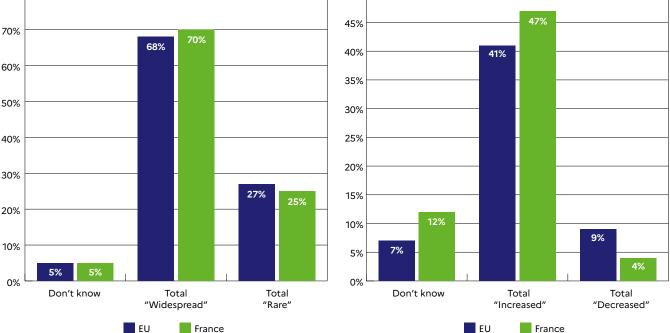
Source: Transparency International, 2024 Perceptions Index

In the past three years, would you say that the level

(+1 percentage point from 2023, +6 percentage points from 2022), while 47% of French people believe that the level of corruption has increased over the last three years in France, which is higher than the European average (41%).

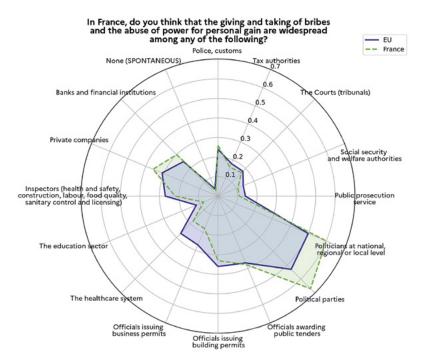
How widespread do you think the problem of corruption is in your country?

of corruption in your country has? 80% 50% 45%



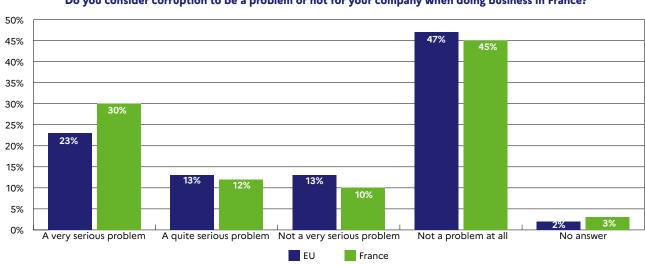
Source: Special Eurobarometer 548 "Citizens' attitudes towards corruption in the EU in 2024" conducted between 7 February and 3 March 2024

The detailed answers provided by respondents offer a more detailed picture of the public's perception of corruption by institutions or persons potentially implicated in corruption offences. While the general pattern of responses from the French panel is relatively consistent with the European average, it nevertheless reveals a more marked distrust of politicians. Recent political cases no doubt partly explain this deterioration in the perception of corruption.



Source: Special Eurobarometer 548 "Citizens' attitudes towards corruption in the EU in 2024" conducted between 7 February and 3 March 2024

The "Businesses and corruption" survey (conducted in April 2024 on a panel of 505 French respondents, out of a total of 12,856 EU respondents) also reveals a slightly higher level of mistrust in France than in the other EU countries, with the proportion of respondents who consider corruption to be a problem for their own business standing 6 percentage points above the EU average⁵.



Do you consider corruption to be a problem or not for your company when doing business in France?

Source: Flash Eurobarometer 543, April 2024: "Businesses' attitudes towards corruption in the EU"

According to the "Experience and Perceptions of Security" 2023 survey⁶, 191,000 people aged 18 and over living in mainland France, or 0.4% of the adult population, encountered corruption at work in 2022. 14% of victims of attempted corruption at work stated that the objective of the corruption was to speed up the process of obtaining a service or a contract (14%), a favourable decision (7%) or a privilege (6%). Less than 1% of the individuals in question said that they had filed a complaint with the police.

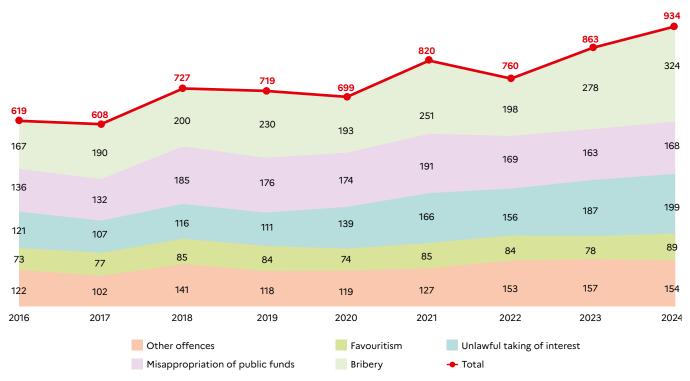
⁵ Flash Eurobarometer 543, April 2024: "Businesses' attitudes towards corruption in the EU".

⁶ Source: SSMSI (Ministerial Statistical Department for Internal Security), Experience and Perceptions of Security (Vécu et ressenti en matière de sécurité – VRS) 2023 survey (questionnaire, online and phone); processed by the SSMSI.

2.2 Police and gendarmerie procedures

Data from the Ministerial Statistical Department for Internal Security (SSMSI) offers another perspective on corruption. Even though the cases in question have not yet been referred to the courts and no court rulings have been handed down, the facts involved in these cases can be studied to see what happens before they go to trial.

In 2024, the number of corruption offences continued to rise (+8.2% in 2024, the same as in 2023). Since 2016, the average annual change in the total number of corruption offences has been around 5.8%.



Key: in proceedings concluded in 2024, the police or gendarmerie recorded 934 corruption offences. Of these, 324 were linked to bribery. Coverage: France, proceedings concluded over the 2016-2024 period.

The increase over the last year was driven by the rise in the number of bribery offences (+46 between 2023 and 2024), unlawful taking of interest (+12) and favouritism (+11). The offences that increased the most in percentage terms are extortion by public officials (+29% between 2023 and 2024), bribery (+16.5%) and favouritism (+14%).

The increase in the number of corruption offences registered at national level between 2016 and 2024 (+50.9%) was not the result of any particular regional dynamic. In the Provence-Alpes-Côte d'Azur region, however, the increase over the period appears to be steadier, with an initial period between 2016 and 2021 in which the annual number of corruption offences was relatively stable at around 70 per year, followed by an increase between 2022 and 2024 to an average of 120 offences per year. This steady increase was significantly (three times) higher than for France as a whole. The increase was also steady in the Île-de-France region, where it was only 20% higher than the national increase.



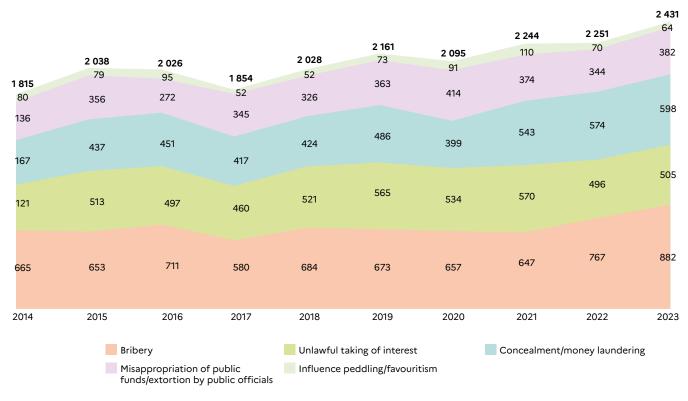
Note: Offences where the département in which the offence was committed was not provided are excluded from this analysis.

Key: In the Var département (83), the average annual number of corruption offences recorded between 2016 and 2024 was between 1.5 and 4.1 per 100,000 inhabitants.

Sources: SSMSI, statistical databases of offences recorded or solved by the police and gendarmerie between 2016 and 2024. Provisional 2024 database

2.3 Judicial proceedings

In 2023, public prosecutors' offices referred⁷ 2,432 charges of corruption against natural or legal persons to the courts. This represents an increase of 34% over ten years. While all offences resulting in referrals to the courts have increased, the increase has been particularly marked in cases of unlawful taking of interest (+59% in ten years), while cases of influence peddling and favouritism have seen a smaller 24% increase in referrals by public prosecutors' offices.



Source : SG-SSER SID/Cassiopée Processing Directorate for Criminal Affairs and Pardons/BEPP

The same person may be charged with more than one category of offence. In 2023, a total of 2,143 people had their cases referred to the courts. Of these persons charged with corruption offences:

- 49% (1,053) were not prosecuted, either because no offence was committed (310, 29%), the evidence submitted was insufficient (683, 65%), or the prosecution was terminated (45, 4%);
- 93.1% (1,015) of the remaining 51% (1,090) were prosecuted for corruption offences (the other 6.9% were the subject of other prosecutions or a non-criminal response, reminders/warnings or corrective action at the request of the public prosecutor's office). This criminal response rate is similar for all offences and has remained unchanged over the last ten years.

⁷ Public prosecutors decide whether or not there is merit in criminal cases being pursued, sometimes after further investigations. They determine the most appropriate course of action (prosecution, alternative measures or a decision not to take any further action for legal reasons or reasons of expediency). The concept of referring a case to the courts is linked to this process.

Table 1: Number of perpetrators who went to trial for corruption offences

Decisions	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total
1. Convictions	323	325	402	429	296	305	284	373	422	424	3,583
2. Acquittals	90	129	115	100	106	92	88	180	153	102	1,155
Total – perpetrators tried	413	454	517	529	402	397	372	553	575	526	4,738

Note: cases dismissed and exemptions from liability are included in acquittals.

Key: 553 people stood trial for one or more corruption offences in 2021. The court handed down convictions for at least one of these offences in 373 cases, while the remaining 180 were acquitted (although they may have been convicted for an offence outside the scope of this report). Coverage: Mainland and overseas France. First instance decisions in criminal matters (criminal courts, children's judges and juvenile courts) from 2014 to 2023 (excluding cases dismissed during preliminary investigations).

Source: Ministry of Justice, SG, SSER, Cassiopée statistical data.

Table 2: Sentences for corruption convictions

Measures	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total
1. Prison sentences	238	250	274	313	227	210	228	261	311	292	2,604
2. Fines	202	196	212	222	164	183	152	234	259	291	2,115
3. Bans	70	94	98	118	120	134	156	193	243	319	1,545
4. Forfeiture	94	88	93	99	76	77	88	85	123	130	953
5. Other penalties	618	906	901	939	681	688	636	737	944	825	7,875

Note: cases dismissed and exemptions from liability are included in acquittals.

Key: 553 people stood trial for one or more corruption offences in 2021. The court handed down convictions for at least one of these offences in 373 cases, while the remaining 180 were acquitted (although they may have been convicted for an offence outside the scope of this report). Coverage: Mainland and overseas France. First instance decisions in criminal matters (criminal courts, children's judges and juvenile courts) from 2014 to 2023 (excluding cases dismissed during preliminary investigations).

Source: Ministry of Justice, SG, SSER, Cassiopée statistical data.

Table 3: Breakdown by type of corruption conviction (%)

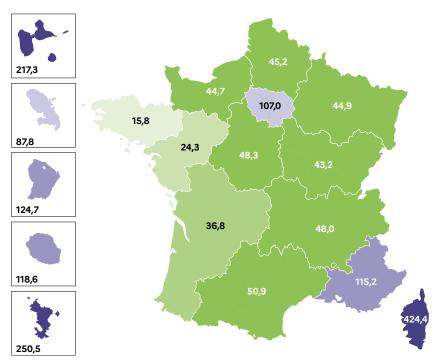
	2	014	2	015	20	16	20)17	20	18	20	19	20	20	20	21	20	22	20	23
	unsuspended or	fully suspended	unsuspended or	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence	unsuspended or partly suspended	fully suspended sentence
1. Prison sentences	22,3	77,7	26,4	73,6	30,7	69,3	28,4	71,6	33,0	67,0	35,2	64,8	28,9	71,1	28,4	71,6	28,9	71,1	28,8	71,2
2. Fines	88,6	11,4	86,2	13,8	86,8	13,2	86,0	14,0	87,2	12,8	85,2	14,8	90,1	9,9	88,9	11,1	90,3	9,7	93,5	6,5

Key: 28.4% of prison sentences handed down in 2021 to offenders convicted of a corruption offence were prison sentences or partly suspended prison sentences.

Coverage: Mainland and overseas France. First instance decisions in criminal matters (criminal courts, children's judges and juvenile courts) from 2014 to 2023 (excluding cases dismissed during preliminary investigations).

Source: Ministry of Justice, SG, SSER, Cassiopée statistical data.

A breakdown of convictions by administrative region shows that convictions for corruption offences vary widely between the regions:

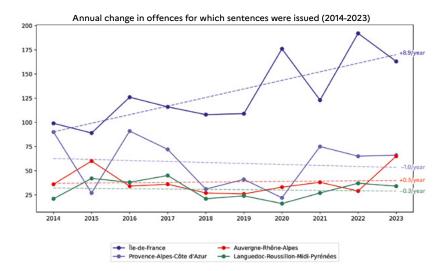


Note: There were 107 corruption convictions per million population in the Île-de-France region between 2014 and 2023.

Source: AFA based on Ministry of Justice (Directorate for Criminal Affairs and Pardons/PEPP – SDSE/Cassiopée statistical data) and INSEE data

This breakdown also shows how the number of offences has changed over time, which reveals a marked disparity. It should be noted that the bias towards the Île-de-France region in the geographical analysis is partly explained by the fact that the National Financial Public Prosecutor's Office (which has jurisdiction for the whole of France and specialises in serious economic and financial crimes) is based within the Paris court. Here, the region does not here mean the region in which the crime was committed. In contrast, the map based on data taken from police and gendarmerie surveys did not show such a marked change in the Île-de-France region.

Annual change in offences for which sentences were issued (2014-2023)



Key: The number of offences for which sentences were issued in the Auvergne-Rhône-Alpes region increased by an average of 0.3 convictions per year between 2014 and 2023.

Source: AFA based on Ministry of Justice/SG/SSER/Cassiopée statistical data.

Chronique jurisprudentielle



Publications by the Corruption Observatory

The Corruption Observatory has published its first *case law reports*, based on decisions handed down at first instance and sometimes on appeal for people charged with the six offences identified as corruption by the Criminal Code (bribery, influence peddling, favouritism, misappropriation of public funds, unlawful taking of interest and extortion by public officials). They illustrate the factual circumstances that can help public-sector entities and businesses to detect and prevent corruption risks.

Based on analysis of 504 first-instance court decisions handed down in 2021 and 2022 relating to corruption offences, **the Corruption Observatory's 2024 analysis brief** provides a unique snapshot of corruption in France as seen by the courts. While this overview confirms trends that have already been documented by other statistical sources (including the dominance of both the active and passive bribery offences among the six corruption offences), the approach taken, which involves analysing each court decision based on all its main characteristics (offences, defendants and proceedings), serves to reveal the face of a number of aspects.

- There are cases involving corruption in both the public and private sectors, although some sectors appear to be more significantly affected (e.g. local authorities in the public sector and construction in the private sector)
- ▶ The geographical breakdown confirms previous studies (Corsica, the French overseas territories and the Provence-Alpes-Côte d'Azur region are more affected than the rest of France), but offers a more nuanced view when the analysis is broken down by type of offence
- The importance of links between the public and private sectors and between categories of people or entities, which help to identify specific areas of risk
- A high rate of acquittals and appeals, and a high rate of supplementary sentences.

In overall terms, the analysis reveals two fairly distinct profiles of corruption offences (firstly those relating to favouritism, unlawful taking of interest and misappropriation of public property or funds, and secondly those relating to bribery or influence peddling on the other), which produce very different results for the different categories used (by region, by type of defendant, by age, etc.).

INTERVIEW



Interview with Magali Caillat, Deputy Director for the Fight against Financial Crime, National Directorate for Criminal Investigations (DNPJ)/Directorate General of the National Police (DGPN)

In 2024, the Central Office for the Fight against Corruption and Financial and Tax Crime (OCLCIFF) celebrated its tenth anniversary. This department of the National Directorate for Criminal Investigations is one of the key departments in tackling corruption, and is therefore one of AFA's key contacts.

Could you briefly describe the role of the OCLCIFF within the National Directorate for Criminal Investigations and, more generally, within the national anti-corruption system?

"The Central Office for the Fight against Corruption and Financial and Tax Crime (OCLCIFF) was established at the end of 20138, at the same time as the National Financial Public Prosecutor's Office (PNF), in the wake of the Cahuzac affair.

The OCLCIFF is an investigative unit whose remit includes:

- Corruption offences and breaches of the rules on political funding⁹;
- ▶ The tax offences listed in Article 28-2 of the Criminal Code and associated money laundering;
- Offences covered by white-collar criminal laws, including the misuse of company assets and market abuse.

In addition, like any central office, the OCLCIFF plays a national role in coordinating law enforcement action and in managing all the investigative units working on areas within its remit in complex cases and/or cases that require international cooperation."

For crime to be tackled effectively, it needs to be accurately identified and measured. How does your department contribute to this?

"As far as detection is concerned, corruption offences are rarely the subject of complaints made by victims. There are, however, numerous detection channels, including reports sent by administrations and local and regional government bodies under Article 40 of the Code of Criminal Procedure; action taken by supervisory bodies (regional audit chambers, AFA, High Authority for Transparency in Public Life and TRACFIN); civil society reports (NGOs, press and individuals); reports from foreign counterparts. The corruption of public officials linked to organised crime is first detected by the investigators themselves, as an incidental part of other ongoing criminal investigations.

OCLCIFF puts a strong emphasis on feedback. In this respect, ongoing dialogue with the French Anti-Corruption Agency is essential, as is sharing experiences with local departments and the organisation of international meetings, particularly under EUROPOL, which feed into the intelligence cycle.

Likewise, it is crucial for the various stakeholders to cooperate, as demonstrated by the working group set up and co-chaired throughout the year by AFA and the OCLCIFF and by the work carried out by this group. The group brings together administrations involved in tackling corruption linked to organised crime. AFA enjoys a cross-cutting view that allows it to understand the context and "logic" of corruption offences. This holistic view is important."

Would you say that 2024 marks a turning point, and what major trends are emerging?

"In 2024, the sub-directorate for the Fight against Financial Crime produced its first report on the state of the threat posed by corruption. It is fair to say that this year has marked a turning point in the fight against corruption linked to organised crime, since all public authorities are now aware of the seriousness of the threat.

Looking ahead to 2025, there are three priorities for the beginning of the year:

- Developing the operational activities of a new investigation group
- Improving mass data processing capabilities, which requires an adequate legal framework and the ongoing development of IT tools
- Strengthening international cooperation with partners in Europe and the UK, in an international environment marked by the reversal of the position taken by a long-standing partner¹⁰."

⁹ Including offences under Articles L. 106 to L. 109 of the Electoral Code.

¹⁰ On 10 February 2025, the President of the United States signed an Executive Order which paused "Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security", suspending the enforcement of the Foreign Corrupt Practices Act (FCPA) for a period of 180 days.



Committed to a risk-based approach to corruption, AFA focuses most of its resources and efforts on events or sectors that are particularly exposed to the risk of corruption. In 2024, AFA therefore prioritised two workstreams: (i) the Paris 2024 Olympic and Paralympic Games and (ii) the risks of corruption in key central administrations due to the increasing power of criminal organisations linked to drug trafficking.

3.1 Preventing corruption in the organisation of the Paris 2024 Olympic Games

The Olympic Act of 26 March 2018 gave AFA specific powers, particularly in terms of auditing, to help stakeholders in the Paris 2024 Olympic and Paralympic Games (JOP 2024) to reduce the risks of corruption to which they could be exposed. Against that backdrop, and given the stakes involved, AFA became heavily involved as from 2019 in the preparations for the 2024 Olympic Games, through audits, specific support roles and an international commitment to bring its vision to sporting venues.

AFA audits

AFA adopted a dedicated audit plan to ensure that appropriate and effective measures were taken to control the risks of corruption within the main entities involved in organising and running the 2024 Olympic Games.

The following audits were carried out:

are exposed.

- Pursuant to Article 30 of the Olympic Act of 26 March 2018 and Article 3 (3) of Act no. 2016-1691 of 9 December 2016:
 - Delivery Authority (SOLIDEO). These audits of the "umbrella" entities involved in the organisation of the Olympic Games served to ensure that ambitious anti-corruption systems had been put in place in entities with a limited lifespan;
 - Audits of public-sector entities acting as contracting authorities on Olympic-related operations (local and regional government bodies and central government agencies).
- Pursuant to Article 3 (3) of Act no. 2016-1691 of 9 December 2016:
 Audits of nine sports federations, highlighting the difficulties that some of these small organisations experience in implementing anti-corruption systems, despite the real risks to which they
- Pursuant to Article 17 (III) of Act no. 2016-1691 of 9 December 2016:

 Audits of the 12 main construction and public works companies involved, directly or indirectly, as contractors, partners, consortium leaders or members and subcontractors in Olympic projects.

In total, some 30 audits of both public-sector entities and businesses were carried out between 2019 and 2023 to provide impetus to the prevention and detection of corruption in the sectors involved in organising the 2024 Olympic and Paralympic Games. As a result of these audits, the various stakeholders were able to better address the risks of corruption they had to face in the organisation of this global event, particularly in terms of conflicts of interest and the management of gifts and hospitality.

AFA's support work

In addition to its recommendations, AFA provided stakeholders in the sports sector with a series of documents to help them step up their efforts to prevent and detect corruption:

Participation in the drafting of the AFNOR SPEC S50-020 standard on integrity of sport and good governance of sports organisations (June 2021)

The publication in July 2022 of guidelines for sports federations

The publication in 2022 of guidelines for Ministry for Sport operators.

These guidelines were produced by working groups involving the Ministry for Sport and various stakeholders.

AFA also works to raise awareness of the risks of corruption among volunteers who take up roles at sports federations and Olympic bodies. These events take place every year as part of the "Leaders of Tomorrow" programme run by the French National Olympic and Sports Committee (CNOSF). The last event was held on 23 September 2024.

An international vision

At a global level, AFA contributes to the activities of the International Partnership Against Corruption in Sport (IPACS). Established in 2017, this network brings together international organisations (Council of Europe, UNODC and OECD), sports organisations (IOC, FIFA, World Athletics, etc.) and governments (of nearly 30 countries). Its main areas of focus are public procurement (infrastructure and services), the exchange of institutional best practices in good governance and tackling corruption in general, and strengthening judicial cooperation between sports organisations and police and judicial authorities.

By drawing on the various levers of action at its disposal and all its resources, AFA became a major stakeholder in promoting the integrity of the Paris Games, and also a long-term promoter of integrity in all sporting activities. The achievements of Paris 2024 will directly benefit the organisation of the 2030 Winter Games.

THE VIEW FROM THE OUTSIDE



Extract from the article "Paris Games herald a new anti-corruption era, but carrying the torch may pose an Olympic challenge for the US", published on 9 August 2024 in The Conversation and written by Andy Spalding, Professor of Law at the University of Richmond (USA)¹¹.

(...)

"From the Olympics bribery scandal of the 1990s – which implicated the hosts of Nagano 1998, Sydney 2000 and Salt Lake City 2002 – we have seen additional corruption scandals in major global sporting events in countries as diverse as Germany, France, South Africa, Brazil, Russia, China and Qatar. But Paris 2024 may mark the advent of a new era. The Paris Olympics have been characterized

by a relative absence of the scandals that often plague the Games. (...)

After 25 years of repeated violations – and the dramatic plummeting of the Olympics brand – both France and the International Olympic Committee adopted a number of reforms in 2017. In combination, these reforms quietly produced a "French Revolution" of megasport governance.

The IOC amended its "omnibus host city" contract to include, for the first time in history, a clause obligating the host city to adopt leading anti-corruption measures.

That same year, completely independently, France found itself in the midst of an anti-corruption reform movement. Spurred by multiple embarrassing public- and private-sector scandals, France implemented a landmark anti-corruption Act, Sapin II. The law has two highly innovative features. First, it requires a broad swath of public- and private-sector entities to adopt mandatory anti-corruption systems. Second, it created a dedicated anti-corruption compliance agency, the Agence Francaise Anticorruption, whose sole task is to support those entities in implementing anti-corruption best practices.

As prudent as these measures sound, neither exists in the U.S. or in most of the rest of the world. Then, later in 2017, these forces converged as the IOC awarded the 2024 Summer Olympics to Paris.

It was a fortuitous moment: The first country subject to the IOC's new hosting rules was already undergoing a historic and innovative anti-corruption reform movement – and it happened to be occurring in the birthplace of the modern Olympics.

Seven years on, the signs are that the new system has succeeded not just in reducing corruption, but in leaving a lasting positive impact of improved anti-corruption norms and practices in the public and private sectors.

Agence Francaise Anticorruption conducted a comprehensive audit of the Paris 2024 ecosystem. Concerns identified during the audit were handed to prosecutors, who conducted thorough investigations into any hint of corruption.

When the Paris Games comes to a close on Aug. 11, they will leave behind a new Olympic legacy for France and a blueprint for future hosts: a strengthened series of laws, policies, practices and norms promoting anti-corruption principles that extend beyond the event, the implementation of which is accelerated by hosting the event. Put another way, in several years we will likely say that France is better off, not worse, in its anti-corruption efforts because it hosted the Olympic Games. This would constitute a dramatic paradigm shift."

¹¹ Link to article: https://theconversation.com/paris-games-herald-a-new-anti-corruption-era-but-carrying-the-torch-may-pose-an-olympic-challenge-for-the-us-236024

3.2 Supporting administrations in tackling organised crime

The Senate's inquiry on drug trafficking represented an opportunity to sound the alarm about the risks of corruption linked to the huge sums of money generated by drug trafficking:

The Senate Select Committee considers that one of the most worrying phenomena¹² it has seen in carrying out its work is the rise in corruption, a real plague the extent of which the government does not seem to have yet fully grasped. This development – to which some prefer to turn a blind eye – is both underestimated, as the number of incidents of corruption is not fully reported, and poorly documented, as the risk of corruption has not yet been taken into account by the so-called "general" administrations, despite their significant exposure thereto.

Despite a recent increase in awareness among law enforcement authorities (police, gendarmerie and customs), France has fallen worryingly behind in dealing with the risk of its public and private officials being compromised, leaving the field far too open to traffickers and their accomplices.

Corruption directly facilitates criminal activities by giving them the means to grow their operations (for example by lending passes that provide access to protected areas, providing hiding places in administrative buildings to store drugs or weapons, etc.), by preventing their detection (corruption of surveillance officers to avoid suspicious movements being detected, corruption of public officials to avoid audits, etc.) or by disrupting the work of law enforcement authorities (illicit access to files related to key government functions for information on the status of investigations, corruption in prisons, etc.).

AFA is aware of the particularly acute nature of this threat, and made it one of its priorities for action in 2024.

Tackling corruption risks in port platforms

In February 2024, the Minister for the Economy and Finance and the Minister of Justice entrusted AFA with tackling corruption linked to drug trafficking at French ports. In this context, AFA launched a number of audits targeting major seaports – public establishments responsible for management of a seaport (GPMs) – and businesses in the sector considered to be most exposed to this risk, pursuant to the Sapin II Act. In addition, and in an atypical manner with regard to its usual methods of action centred on an organic approach, AFA produced a global report to Ministers on the risk of corruption in port platforms and how to protect against it.



The work carried out by AFA as part of this assign-

ment saw it meet most port stakeholders, both public (GPMs, police, customs, prefectures, local authorities, etc.) and private (company representatives or employee representatives), and to carry out a benchmarking exercise against other European countries (Belgium and the Netherlands). It revealed that the risk had been significantly underesti-

^{12 &}quot;Un nécessaire sursaut: sortir du piège du narcotrafic", report by the Senate Select Committee, report n° 588 (2023-2024), published on 7 May 2024 (in French only).

mated by the different port stakeholders, and that responsibilities had been considerably diluted due to the number of people involved. Stakeholders in France became aware of the phenomenon and the associated risks later than in Belgium and the Netherlands, resulting in a delay in the introduction of ambitious measures to prevent and detect corruption. In 2024, cocaine seizures in France reached record levels, with the port of Le Havre continuing to be the main entry point. In 2024, the port of Le Havre appeared, for the first time, to be more impacted than the ports of Antwerp and Rotterdam in terms of volumes seized compared with the volume of containers handled.

10 9 8 7 6 5 4 3 2 0 2020 2021 2022 2023 2024 ROTTERDAM -— ANTWERP — LE HAVRE

Cocaine seizures (in tonnes) against TEUs handled (in millions)

The work resulted in a series of proposals that were the subject of in-depth discussions with the main administrations involved.

Some of the proposed measures included proposals that found their way into the Act of 13 June 2025 aimed at freeing France from the trap of drug trafficking, such as:

- addressing the risk of corruption in port safety systems
- applying the French anti-corruption framework to certain highly exposed port stakeholders (port handling companies not subject to the Sapin II Act)
- clarifying whether French security forces can access video surveillance systems used by private operators
- creating the offence of organised private-sector bribery, to better sanction corruption incidents, particularly at ports
- mandatory training for port safety staff on the risk of corruption.

AFA's work also resulted in the ports that were audited adopting robust strategies to strengthen their anti-corruption systems.

This work will have to continue as part of the implementation of the Act of 13 June 2025, and AFA will continue to provide support to port stakeholders to combat the risks of corruption.

TESTIMONIAL Y



Combined audits¹³ within AFA: Claire Védrine and Cristelle Jazzar speak about the report on port areas

Can you describe the benefits of combined audits? Claire Védrine

"At the start of our work on the ports, we quickly identified a number of French GPMs that were particularly exposed to the risk of corruption linked to drug trafficking. However, certain GPMs, because they are public industrial and commercial establishments

(EPICs) with a workforce of at least 500 employees and a turnover of over €100 million, are subject to both Article 3 (relating to the obligations of public-sector entities) and Article 17 (relating to the obligations of businesses) of the Transparency, Anti-Corruption and Economic Modernisation 2016-1691 Act of 9 December 2016. Generally speaking, most of the audits relate to entities that fall under either Article 3 or Article 17.

The "combined" audits of these GPMs (one auditor specialising in business entities and two auditors specialising in public-sector entities) meant that we were able to understand all their public and economic work."

Cristelle Jazzar

"Carrying out the audit with a combined team of auditors is the ideal solution, as it not only ensures that the audit is relevant and complete, but also ensures that the audited entity benefits from auditors with experience in its various business areas.

Each auditor's contribution is based on their experience and expertise in auditing techniques and applicable laws (Articles 3 and 17 of the Sapin II Act): as an auditor of business entities, I do not have an in-depth understanding of the specific features of public-sector entities, and vice versa for my colleagues who specialise in public-sector entities. It also provided me with an opportunity to contribute my knowledge of the audited entity's business sector and activities. We were then able to work collectively with my colleagues on the risks of corruption associated with these businesses and occupations. In my opinion, combined audits provide a guarantee that audits will be of high quality and effective. This is in the public interest and in the interests of the audited entity."

Does this cause you to work differently, and do you personally take from this experience?

Cristelle Jazzar

"This was my first combined audit at AFA. In overall terms, the auditing approach remains similar, since at the Agency, we apply common techniques in audits of public-sector entities and in audits of businesses

However, working with a combined team on the audit of a 'hybrid' entity, both public and private, requires you to adapt your approach: the regulatory constraints to be taken into account are different and there is a wider range of corruption risks. We also had to focus on issues that were different from the issues associated with a traditional Article 3 or Article 17 audit, which required preparatory work so that we could familiarise ourselves with these subjects and identify the relevant audit angles. On a personal level, this experience has allowed me to develop my knowledge of the public sector and identify new best practices. On a human level, this audit gave me the chance to work with high-quality colleagues with whom I wouldn't have had the opportunity to work other than on a combined audit."

Claire Védrine

"This was also my first combined audit. This gave me an insight into the specificities of businesses that I don't usually come across in my other audits. This complementarity has been very enriching both from a professional and personal point of view. In fact, generally speaking, I think that combined audits allow us to develop cross-functional cohesion within the Agency. This collaborative experience was very positive and I'm keen to do it again!"

¹³ On public industrial and commercial establishments which, based on their turnover and number of employees, are also subject to the obligations imposed on businesses under Article 17 of the Sapin II Act.

The working group on tackling organised crime

Established in September 2023, the working group on organised crime continued to meet quarterly in 2024.

This working group, co-chaired by AFA and the Central Office for the Fight against Corruption and Financial and Tax Crime (OCLCIFF), is attended by the key central administrations (police, gendarmerie, customs, courts and prison authorities, etc.) and, depending on the topics on the agenda, other relevant administrations or departments (the Public Finances Directorate General (DGFiP), the Directorate General for Competition Policy, Consumer Affairs and Fraud Control (DGCCRF), the National Information System Security Agency (ANSSI), TRACFIN, etc.). Particular vigilance and enhanced coordination of government departments are an essential part of tackling a threat that is all the more serious since it originates in criminal networks that have considerable financial resources.

The aim of this working group is to share risk analyses and exchange information and best practices in order to improve the resilience of administrations to the increased risk of corruption linked to organised crime.

Firstly, it has served to establish the extent of the threat and an understanding that corruption, even "low-intensity" corruption, should be clearly identified as such, thereby quantitatively and qualitatively measuring a phenomenon that is still largely underestimated.

The topic of strengthening internal whistleblowing systems, allowing the whistleblower to remain anonymous and the report to be systematically processed, was discussed, highlighting the need to increase awareness among staff of such systems.

Given the particularly high risk of corruption of public officials, the general inspectorates of the relevant administrations were involved, with AFA providing methodological assistance on the implementation of anti-corruption plans tailored to specifically identified corruption risks.

The working group also focused on protecting the most sensitive files related to key government functions. Recent cases have highlighted the risk of information contained in these files being passed on to criminal organisations by public officials as part of corrupt pacts, facilitated in particular by the use of social networks and cryptocurrencies. The working group therefore sought to methodically identify areas of risk and draw up recommendations based on the best practices of the participating administrations. Pending the development of technological tools that can automatically detect the illegal use of files, the working group stressed the importance of strengthening hierarchical controls and promoting a broader risk management culture.

The "corruption and organised crime" conference on 2 December 2024: a shared wake-up call

AFA organised a conference on corruption linked to organised crime on 2 December 2024, in partnership with the National School for the Judiciary.

The aim of the conference was to bring together the various stakeholders in order to assess the threat posed by corruption linked to organised crime in central government administrations, and to identify workstreams to counter corruption more effectively.

The conference was opened by Didier Migaud, the Minister of Justice, who warned of the serious risk of criminal groups engaging in corruption to develop and protect their activities, and called for greater action to prevent, detect and punish corruption offences.





➤ Conference on 2 December, (from left to right) Didier Migaud, Minister of Justice and Isabelle Jégouzo, AFA Director. Photo credit: Célia Bonin

In the presence of representatives from the Senate, the Ministries of Justice and the Interior, the courts and civil society, this conference emphasised the importance for the State of increasing the awareness of public officials and providing them with training, together with increased vigilance on the risks of the most sensitive files being misused (also see above), and the need to put effective whistleblowing systems in place. At the same time, the need to bring certain particularly exposed businesses on board, for example in ports, was also discussed.

After a presentation on the measures taken by Italy against the mafia, the discussions highlighted the need to strengthen European and international cooperation to counter organisations with branches in numerous countries.

The difficulty of getting to grips with corruption was mentioned multiple times in the discussions, in particular the fact that the criminal charge of corruption is often not issued in criminal proceedings, even in cases where it appears quite clearly to apply. Difficulties in proving the existence of a corrupt pack often result in perpetrators being charged with criminal offences that are easier to prove, either for procedural reasons (for example, charging an offender with complicity in drug trafficking rather than corruption means that more intrusive investigation methods can be used) or for objective reasons (a charge of unlawful interference with files means that a conviction can be obtained for an objective offence that is easier to establish than corruption). The speakers agreed that this results in corruption being grossly underestimated, meaning that it is more difficult to identify and therefore prevent.

Given the situation, there was agreement on the need to intensify and diversify the anti-corruption enforcement strategy, including the need to bolster enforcement by equipping investigators and judges with more effective investigative tools (through a number of potential changes to the Criminal Code) and by increasing the number of financial seizures

The conference was brought to a close by Laurent Saint-Martin, Minister reporting to the Prime Minister with responsibility for the Budget and Public Accounts, who emphasised the importance of AFA's role in raising awareness and prevention.

The various discussions highlighted the growing awareness among public-sector entities, and particularly key central administrations, of the growing threat posed by corruption to their activities, and their firm commitment to increasing their vigilance in this area by stepping up prevention and detection measures.

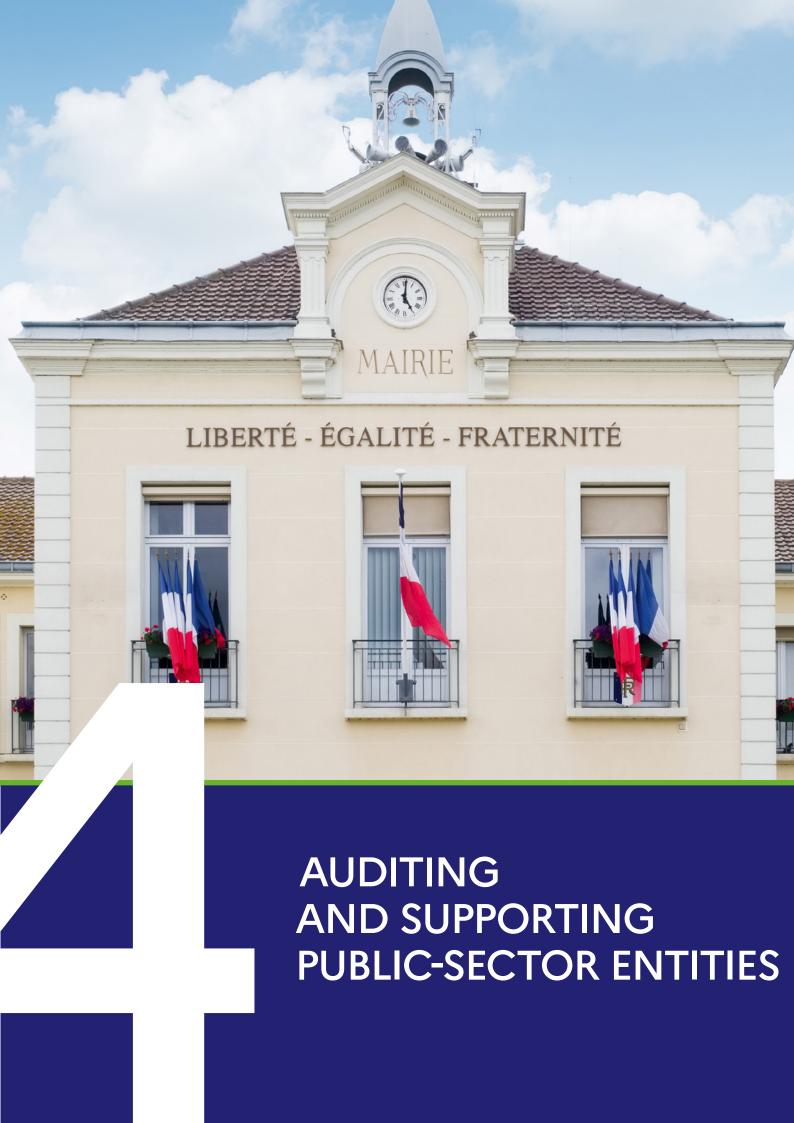
The entire conference is available on AFA's website: www.agence-francaise-anticorruption.gouv.fr





Laurent Saint-Martin, Minister reporting to the Prime Minister, with responsibility for the Budget and Public Accounts, at the conference on 2 December.

Photo credit: Célia Bonin



The audits of public-sector entities provided for in Article 3 (3) and Article 17 (III) of the Sapin II Act are conducted at the initiative of the Director of AFA. Their purpose is to ascertain the existence, quality and effectiveness of measures implemented within central government administrations, local and regional government bodies and their public establishments, semi-public companies and companies governed by Title II of Book V of Part I of the General Local Authorities Code, and non-profits and foundations recognised as public-interest entities (hereinafter referred to as "public-sector entities") to prevent and detect corruption.

In 2024, AFA launched 12 new audits of public-sector entities, three follow-up audits aimed at verifying that recommendations made during initial audits had been implemented and two new "combined" audits (audits of public industrial and commercial establishments within the scope of Article 17 of the Sapin II Act as a result of the size of their turnover and their number of employees).

4.1 Increasing audits on local and regional government bodies

Audits

In order to better identify the risks specific to a given type of stakeholder, to provide an overview of the most relevant corruption prevention systems and to identify the best practices in place, the French Anti-Corruption Agency is increasingly auditing entities of the same type.

With this in mind, AFA carried out eight audits of seven large département councils in 2024 (three in Île-de-France, two in regional France and two in overseas France) and one local public company in overseas France, majority owned by a French département. Three of these entities have undergone an in-depth audit phase on processes considered to be particularly high risk.

These audits have given us a better understanding of the extent to which the département councils have implemented AFA's recommendations. Since 2018, the 15 largest département councils have been audited.

Number of AFA audits – public sector	Local public sector	Central government and agencies	Total
2018-2023	44	40	84
2024	10	7	17
Total	54	47	101

101 audits were undertaken between 2018 and the end of 2024, including:

85 audits on the public-sector entities referred to in Article 3 (3)

13 follow-up audits

3 combined audits

Lessons learned from these audits

The results of these audits, and in particular those carried out since 2022, show that the vast majority of département councils have begun to introduce a corruption prevention and detection system, demonstrating that these government bodies are aware of the risks to which they are exposed and the need to control them.

However, there is still room for improvement. Firstly, risk assessments (risk mapping) and the implementation of internal controls and audits need to be strengthened, both in département councils and in their related entities.

Secondly, AFA found that département councils are highly exposed to corruption risks, particularly in relation to their social welfare responsibilities (payment of financial assistance, allocation of social housing, etc.). These procedures should be better regulated. The same applies to public procurement procedures (the award and performance of public contracts) and human resources management (the recruitment of public officials and the payment of salaries).

The follow-up audits conducted in 2024 in respect of audits carried out between 2019 and 2021 (two regions and one municipality) also show that progress has been made in implementing anti-corruption systems. AFA found that over 40% of its recommendations had been implemented and over 45% were in the process of being implemented.

Based on this work, it appears that the difficulties encountered by local and regional government bodies in implementing anti-corruption systems mainly lie in the development of internal control and audit mechanisms.

4.2 Increasing support for local elected representatives in managing corruption risks

Every year, municipalities and inter-municipal bodies manage almost €105 billion of public money. Through their many areas of responsibility – from spatial planning and the management of local public services to support for community initiatives and awarding public contracts – municipalities play a key role in French life. These responsibilities expose local government bodies to risks of conflicts of interest or embezzlement, which can damage the citizen's confidence in local public action.

To help elected representatives in local government bodies, the Association of French Mayors and AFA have worked together to draw up an operational and practical guide aimed at helping them to develop and implement a corruption prevention system tailored to their risk profile and resources.

This guide, published in November 2024, provides elected representatives with a general assessment of standard corruption risks, thematic factsheets on various topics such as the rules and stakeholders involved in ethics issues, the prevention of conflicts of interest and the main processes at risk in municipal administration (human resources, public procurement, subsidies, town planning, etc.), as well as operational tools facilitating the deployment of a series of measures and procedures aimed at improving the management of these risks.

GUIDE PRATIQUE À L'ATTENTION
DES ÉLUS DU BLOC COMMUNAL :
MIEUX GÉRER LES RISQUES
D'ATTEINTE À LA PROBITÉ

PRACTICAL GLODE
- Nevember 2024 -

In addition, AFA has devised a self-assessment system called "probicités", aimed at elected representatives in local government bodies and their staff, in which they complete a questionnaire to assess the maturity of their municipality in terms of dealing with corruption risks.

Lastly, AFA ran a workshop at the Mayors' Congress, attended by Alain Chrétien, Mayor of Vesoul and Deputy Chairman of the AMF, on the challenges posed by corruption and, more specifically, the risks of corruption for elected representatives, and ways of controlling these risks in order to better prevent and detect them.



4.3 Informing public-sector entities about corruption risks

As part of its general role of supporting central government administrations, local and regional government bodies and the natural and legal persons listed in Article 3 (1) of the Act of 9 December 2016, AFA provides training, awareness-raising courses and assistance on preventing and detecting corruption.

In 2024, AFA carried out 50 awareness-raising campaigns for a wide range of public-sector entities, elected local representatives, hospital staff and civil servants.

AFA works with public-sector entities in the central government and local public sectors, either face-to-face or via webinars, presenting corruption prevention systems and providing training on the French anti-corruption framework. These presentations provide participants with the opportunity to discuss the tools available to them and how to apply them at their organisations, particularly in the areas of public procurement, awarding grants and human resources management.

In 2024, AFA worked, for example, with the employees of:

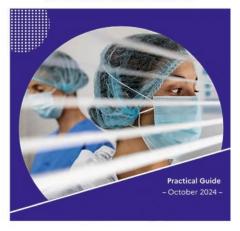
- Greater Paris University Hospitals (AP-HP)
- The Association of Higher Education Purchasing Managers (ADASUP)
- The National Council of Commercial Court Clerks (CNGTC)
- The French National Olympic and Sports Committee (CNOSF)
- The Directorate General of Customs and Excise (DGDDI)
- The National Federation of Local Public Companies (FEPL)

AFA has also run training courses for public training bodies and public service schools, including the French National Institute of Public Service (INSP), the National School for the Judiciary (ENM) and the Institute for Public Management and Economic Development (IGPDE).





PRACTICAL GUIDE FOR PUBLIC HEALTHCARE INSTITUTIONS: ESTABLISHING OR UPDATING AN ANTI-CORRUPTION SYSTEM



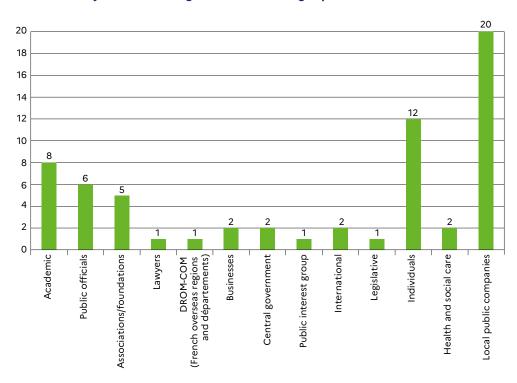
4.4 Answering questions from public-sector entities

AFA provides support to central government administrations, local and regional government bodies and all natural and legal persons, by answering any questions they may have, but without acting as a substitute for the judicial authorities.

In 2024, it processed 63 referrals, including 21 regarding legal matters in a variety of areas, such as favouritism, the scope of the Sapin II Act, gifts and hospitality policies, bribery, conflicts of interest and unlawful taking of interest, misappropriation of public funds, and the content and implementation of an anti-corruption system.

32% of these referrals came from local public-sector entities, while 19% came from individuals and 6% came from public officials.

Breakdown by sector of the origin of referrals relating to public-sector entities sent to AFA





AUDITING AND PROTECTING BUSINESSES With regard to businesses, AFA's auditing activities may be carried out as part of various workstreams:

- As part of the audits conducted at the initiative of the Director of AFA ("ex-ante audits") provided for in Article 17 (III) of Act no. 2016-1691 of 9 December 2016, on companies and public industrial and commercial establishments (EPICs) that exceed the thresholds of 500 employees and a turnover of over €100 million;
- As part of compliance remediation orders issued by AFA's Sanctions Committee;
- As part of the judicial measures introduced by Act no. 2016-1691 of 9 December 2016: judicial public interest agreements (CJIPs) and compliance remediation programmes (CRPs).

Audits at AFA's initiative and remediation audits are intended to ascertain the existence, quality and effectiveness of the anti-corruption systems deployed by the audited entities i.e. the measures and procedures intended to prevent and detect corruption.

On completion of an audit, AFA presents the audited entity's representatives with a report containing its observations regarding the quality of the anti-corruption system, and recommendations to improve the entity's existing procedures.

On completion of a business audit, AFA may observe breaches with respect to incomplete or ineffective implementation of the measures provided for by law. The Director of the Agency may then issue a warning to these entities' representatives, or refer the matter to the Sanctions Committee. This committee is independent of the Agency and can impose administrative sanctions.

Audits initiated by AFA are scheduled based on the public-sector and business entities' environment and risk exposure (risk of bribery of foreign public officials in international business transactions, business sectors and occupations, geographic location, relations with third parties, background, etc.). Audits can also be based on external whistleblower reports received by AFA.

5.1 Understanding and assessing the maturity of anti-corruption systems

AFA's 2024 national diagnostic survey of anti-corruption systems in businesses

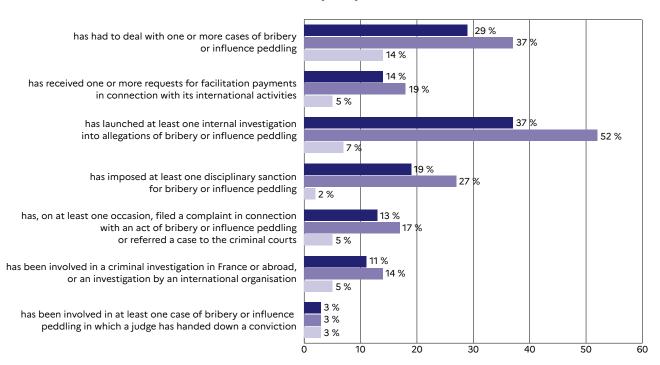
Two years after its second diagnostic survey of anti-corruption systems in businesses, published in 2022, AFA repeated this survey in 2024 with a view to continuing to measure the uptake of anti-corruption systems by businesses.

AFA used an anonymous survey distributed to businesses via trade federations and social networks. This method allowed the AFA to contact a wide audience and to gather testimonies from businesses of various sizes and in different sectors, both subject and not subject to Article 17 of the Sapin II Act.

While the results of this survey cannot fully reflect the extent to which the Sapin II provisions are implemented, they do identify the changes that have occurred since the 2020 and 2022 surveys, and allow any difficulties faced by businesses to be better targeted and the support measures aimed at them to be adapted accordingly.

The results of this survey, published in autumn 2024, show that businesses have raised their level of awareness of the risks of bribery and influence peddling and have in-depth knowledge of these two offences. This sensitivity to the risk may be linked to the fact that a large proportion of the businesses that responded to the survey (nearly 30%) said they had had to deal with a case of bribery or influence peddling in the last five years. Analysis of roles that are particularly exposed to these risks once again pointed to the sensitivity of sales and purchasing functions, and also that of human resources management and mergers and acquisitions, both of which had increased in sensitivity since the last surveys.

Over the last five years, your business



Progress also continues to be made in the deployment of anti-corruption measures, with businesses stating that they rely on the various guidelines and practical factsheets that have been published by AFA since it was established.

Despite these positive factors, the results are less encouraging for businesses not subject to the Sapin II Act, with the issue of size being highlighted by respondents as one of the reasons why prevention measures are not being implemented.

Methodological difficulties also seem to persist in the deployment of certain measures, such as third-party due diligence (see below), anti-corruption accounting controls and risk mapping.

Based on the results of this survey, AFA will continue to improve and clarify the French anti-corruption framework and increase its efforts to raise awareness among businesses, particularly those not subject to Article 17 of the Sapin II Act.

A better understanding of third-party due diligence obligations

Article 17 of the Sapin II Act imposes the obligation to implement "procedures for assessing the situation of customers, leading suppliers and intermediaries with regard to the risk map", also known as third-party due diligence procedures.

The results of the above-mentioned questionnaire show that 49% of respondent businesses believe that third-party due diligence is the most difficult measure of the anti-corruption system to implement. This result is consistent with AFA's audit findings, and is confirmed by the discussions and questions asked by businesses during training courses.

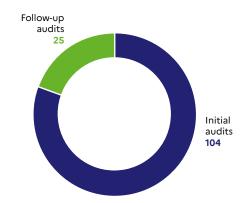
In order to provide the best possible support to the various stakeholders on the implementation of this procedure, AFA undertook to produce a practical guide on third-party due diligence, involving business entities from the outset, who were questioned anonymously about the nature of the difficulties they encountered in carrying out such due diligence, and the best practices that they might share.

The results of this survey, which is part of a co-construction process alongside the private sector, were published at the beginning of 2024. They show that the third-party due diligence method recommended by AFA seemed to be familiar to the respondent businesses and seemed not to pose them any problems. The results were instructive, with a number of areas for improvement and with several best practices shared by businesses.

AFA will publish illustrated practical factsheets on third-party due diligence in 2025, in response to the ongoing difficulties encountered by businesses.

5.2 Sharing feedback from the audits carried out by AFA under Article 17 of the Sapin II Act

Business audits undertaken between 2017 and 2024



AFA notes from the 129 audits undertaken between the end of 2017 and the end of 2024 that the maturity of the anti-corruption systems of businesses subject to Article 17 of the Sapin II Act has improved.

However, businesses can only be protected through clear governance of their anti-corruption system and effective implementation of the measures set out in Article 17 of the Sapin II Act.

The roles and responsibilities need to be clarified

AFA's audits have highlighted the need to define and clarify the governance of corruption prevention and detection systems, particularly in groups of companies. Although Article 17 of the Sapin II Act expressly states that subsidiaries and controlled companies that exceed the thresholds may implement the measures and procedures through the compliance systems put in place by their controlling company, AFA often notes a lack of clarity in the division of roles and responsibilities between the parent company and group entities. More specifically, it is not always easy to measure the leeway given to subsidiaries and controlled companies to tailor the anti-corruption system to their specific characteristics (geographical and sectoral characteristics, etc.). However, since responsibilities are not adequately defined, the commitment of the senior management of these group entities to the deployment and day-to-day implementation of the system is often relatively weak, even though the risks exist at their level. This situation may be even more marked between a foreign parent company and a French subsidiary subject to the Sapin II Act.

lt is essential that senior management is committed to all aspects of the system

By making integrity a priority, the commitment of a company's senior management is key to the implementation of an effective corruption prevention system. AFA has noted from its audits that this commitment, which is often limited to adding a preface to the anti-corruption code of conduct, could be improved and be expanded to the system as a whole.

In practice, the senior management's involvement in the risk mapping exercise is, all too often, limited, preventing it from gaining a complete overview of the risks it faces.

Corruption risk mapping based on risks that are too generic

The corruption scenarios used in risk mapping are often not sufficiently tailored to the company's specific risk profile. These maps must accurately reflect the company's business sector, its geographical locations, the third parties with which it interacts, etc.

This lack of specificity, combined with a lack of granularity, means that it is impossible to define appropriate risk management measures and that employees are unaware of the risks actually faced by their company.

Anti-corruption codes of conduct that lack practical illustrations and are insufficiently included in businesses' rules and regulations

The codes of conduct reviewed by AFA during its audits often lack practical illustrations and sometimes make reference to insufficiently detailed procedures, which makes it difficult for employees to understand them. AFA also still frequently notes that codes of conduct are not appended to businesses' rules and regulations, despite this being an obligation imposed by Article 17 of the Sapin II Act, which means their violation cannot be enforced against employees who do not comply with such obligations.

> Training for managers and staff most exposed to corruption risk need to be better adapted

The training courses provided by the audited businesses are often too generic and insufficiently tailored to the specific corruption risks to which businesses are actually exposed. They rarely have a practical dimension, with the result that employees are unclear about what is expected of them and are left unfamiliar with the business's anti-corruption system.

An internal whistleblowing system that is under-used

Contrary to what businesses often think, the absence of whistleblowing reports is not necessarily an indicator that points to the strength of the anti-corruption system. It may in fact reveal a lack of awareness of an insufficiently publicised system.

In overall terms, therefore, information about whistleblowing systems needs to be better publicised.

Inconsistent third-party due diligence

While progress has been made in the assessment of intermediaries and suppliers, the assessment of customers often remains inadequate. Third parties are also not necessarily identified against the mapped risks, despite the fact that the two exercises should be aligned.

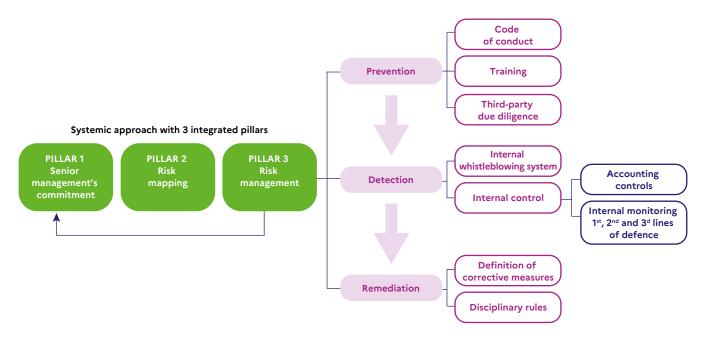
Poorly defined anti-corruption accounting controls

Despite the guide published by AFA on anti-corruption accounting controls, the number of accounting controls that are properly implemented remains insufficient to prevent the corruption risks that are mapped. In addition, since the identification of risk scenarios resulting from accounting transactions is all too often incomplete, the corresponding accounting controls are inadequate.

Internal monitoring and evaluation of anti-corruption system remains inadequate

While the implementation of internal monitoring and evaluation measures is a key step taken by a business in ensuring the quality of its anti-corruption system, the measures adopted very often insufficiently assess the appropriateness and effectiveness of the system. In practice, a lack of monitoring can jeopardise the system's overall ability to prevent and detect corruption risks.

Diagram of the anti-corruption system



5.3 AFA-supervised compliance remediation programmes as part of judicial public

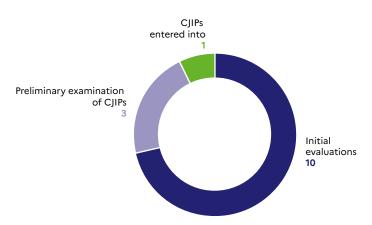
A judicial public interest agreement (CJIP) is an alternative settlement procedure to criminal prosecution established by the Sapin II Act. It applies to legal entities implicated in cases of bribery, influence peddling, tax evasion, money laundering from these offences, and any related offences. It effectively terminates the public prosecution if the implicated legal entity fulfils the obligations which it has committed to in the agreement.

interest agreements (CJIPs)

Under Article 41-1-2 of the Code of Criminal Procedure, the CJIP may require the charged legal entity, for a maximum of three years and under AFA's supervision, to implement a compliance remediation programme aimed at ensuring that the measures and procedures listed in Article 131-39-2 (II) of the Criminal Code are applied by the legal entity.

The CJIP, as proposed by the public prosecutor (or the investigating judge in the case of a judicial investigation) and accepted by the legal entity, must be validated by the presiding judge in an open court hearing.

Audits and CJIPs in 2024



AFA's preliminary examinations as part of negotiations over a CJIP

Prior to entering into a CJIP, AFA may, at the request of the public prosecutor, provide it with assistance in determining the need to implement a compliance remediation programme. In such circumstances and following a preliminary examination of the documents sent by the charged legal entity to the public prosecutor's office, AFA will issue an opinion on the principle, scope and possible duration of the programme. On this basis, it will also assess the maximum cost of carrying out an audit of the programme. AFA's examination focuses on the risk profile of the entity that is charged and the anti-corruption system already in place, in order to define the outlines of the compliance remediation programme as accurately as possible.

In 2024, at the request of public prosecutor's offices, AFA carried out three preliminary examinations prior to the entry into a CJIP, on the conclusion of which a three-year compliance remediation programme was recommended and accepted by the public prosecutor, then approved by the presiding judge of the court of justice.

Audit of the compliance remediation programme

The purpose of an audit by AFA of a compliance remediation programme, pursuant to Article 131-39-2 of the Criminal Code, is to verify the quality and effectiveness of corruption prevention and detection measures similar to the measures required under Article 17 of the Act of 9 December 2016.

2024 was marked by initial evaluations of smaller groups where the parent company was not subject to Article 17 of the Act of 9 December 2016. In such circumstances, businesses must make a special effort to adopt and implement a compliance remediation programme in a timely manner. AFA adapts its requirements and ensures that the programmes put in place by these groups are proportionate to their resources, their exposure to corruption risks and the risk of the incidents that resulted in the agreement being repeated.

The action plan defined following the initial evaluation

Following an initial audit by AFA of the entity's anti-corruption system, the company puts forward an action plan which is then validated. During the implementation of this action plan, the company has the opportunity to hold regular discussions with AFA.

This plan, which may be amended during the course of the programme in the light of actions already carried out and the findings of targeted audits, is an essential document in the company's steering of its programme and is key to AFA being able to determine that the system is being correctly deployed. It is therefore essential that it describes the deliverables to be prepared and the deliverables expected as accurately as possible.

> The duration of compliance remediation programmes

All the CJIPs entered into since June 2022 state that the signatory companies agree to AFA carrying out audits and verifications on their compliance remediation programmes for a period of three years. This is necessary to allow sufficient time for a programme to be initially evaluated, for an action plan to be defined and implemented and for its effectiveness to be monitored.

The end of compliance remediation programmes

The compliance remediation programme audit is closed after a final audit of the anti-corruption system to verify the implementation of the action plan defined following the initial audit and to assess the suitability, proper deployment and effectiveness of the system. The provisional final audit report is discussed by AFA and the audited entity, following which the final report is drawn up and sent to the public prosecutor who ordered the CJIP.

In this respect, the report on the implementation of the compliance remediation programme under the Atalian CJIP was submitted to the Paris Public Prosecutor's Office in 2024 and led to the issue of an opinion to terminate public prosecution in 2025.

A CJIP with a compliance remediation programme entered into in 2024

On 9 December 2024, the presiding judge of the Paris Court of Justice approved the CJIP entered into on 2 December 2024 by the Financial Public Prosecutor with Areva SA and Orano Mining SAS, pursuant to Article 41-1-2 of the Code of Criminal Procedure.

The CJIP provides for the implementation of a three-year compliance remediation programme within the Orano Group under AFA's supervision, the cost of which, capped at €1,500,000, will be borne by Orano Mining SAS. Orano SA, the parent company, will be responsible for implementing the compliance remediation programme. All aspects of this supervision will be carried out in-house by AFA.

INTERVIEW



Interview with Jean-François Bohnert, Financial Public Prosecutor, Head of the National Financial Public Prosecutor's Office (PNF)

AFA: How are talks initiated and conducted prior to entering into negotiations over a judicial public interest agreement? How do you ensure mutual trust and that the good faith required to enter into negotiations is in place?

"Depending on the scenario, either the legal representative or adviser of the legal entity in question, or the National Financial Public Prosecutor's Office (PNF) would initiate talks with a view to reaching a negotiated outcome in corruption or public finance matters. This informal discussion is risk-free for the company since

the discussions are strictly covered by la foi du palais (the principle that communications between lawyers and judges are confidential), regardless of their outcome. Similarly, where documents are produced by the legal entity as part of these discussions, the status of these documents, and whether or not they should be considered to be part of the procedure, is discussed and agreed with the entity's representative or adviser.

The fact that a company cooperates with a view to reaching a negotiated outcome is in itself a sign of its good faith. The impact of this good faith will be all the greater if such willingness is demonstrated early in the criminal proceedings, and ideally even before the National Financial Public Prosecutor's Office is informed that breaches have occurred and before a criminal investigation is opened, as part of a process of self-disclosure.

Good faith will also be assessed in the light of the adequacy of the internal investigations carried out, in accordance with the principles set out in the guide on internal anti-corruption investigations co-authored with AFA and published in March 2023. The PNF pays close attention to the methodology of the internal investigation and the way in which it is documented, so that it can be certain that the expected rigour and objectivity have been applied in carrying out the investigations. The defined scope of the investigations, the extent of the responsibility of line managers and the quality of the collection and storage of relevant digital data are all specifically reviewed. The National Financial Public Prosecutor's Office is also sensitive to links between the internal investigation and the criminal investigation, since the former must not interfere with the latter. Finally, good faith is also verified through the appropriateness of the remedial measures put in place. AFA's role here is key."

How do the PNF and AFA work together during the negotiation of the agreement? What does AFA contribute to this process?

"The negotiation of a CJIP is generally based on the following:

- Determination of the scope of the agreement with regard to the relevant facts
- Calculation of the public interest fine by determining the benefits derived from the breaches, and then determining the factors that may be applied to decrease or increase the punitive portion of the fine
- Analysis of the issues associated with the identified victims
- ▶ The need for a compliance remediation programme and, where relevant, the terms thereof (entities covered, scope, term, foreseeable cost)
- Drafting the text of the agreement.

AFA's principal role is to assess the appropriateness and content of a compliance remediation programme, as part of a preliminary examination based on the company's answers to a specific questionnaire, its knowledge of the company's compliance mechanisms as a result of a previous administrative audit, if any, and any additional information provided by the company on the remedial measures put in place, either following the previous audit or following a decision by a foreign authority or an international financial institution, or an audit at AFA's initiative. Discussions between the company and AFA on these issues may, where necessary, be scheduled with the authorisation of the National Financial Public Prosecutor's Office.

It is essential that AFA becomes involved as early as possible after negotiations begin, as its work will influence the decision over whether or not to impose a compliance remediation programme and its scope, duration, content and cost, parameters that must be taken into account in the overall balance of the CJIP under discussion.

Furthermore, AFA needs to review the corruption prevention and detection system in order to determine any factors that may be applied to increase the fine (inadequacy of the compliance system) or decrease it (corrective measures, effectiveness of the internal whistleblowing system)."

What are the PNF's expectations of AFA in terms of supervising the compliance remediation programme?

"The PNF expects AFA to provide it with regular reports, at least annually, on the progress made in implementing the programme. It is essential that any issues that could compromise the implementation of the programme are identified and communicated to the PNF as soon as possible, so that the PNF may, where necessary, initiate discussions with the company's representative to help to find a solution.

If the implementation of the programme proves to be easier than initially expected, due to the high level of commitment shown by the company's compliance officers or the existence of a more robust compliance system than had been foreseen, the progress review may also represent an opportunity for AFA to propose that the programme be ended early, in accordance with the clause that may have been included to that effect in the CJIP.

Lastly, the PNF expects AFA, when it submits the final implementation report, to provide it with all the comprehensive, objective and reasoned information it needs to assess whether the signatory legal entity has complied with its commitments and whether the implemented corruption prevention system is appropriate.

AFA has always met these expectations, and its supervision work informs the PNF's reflection on practices relating to corruption prevention systems and any requirements it may have in this regard."

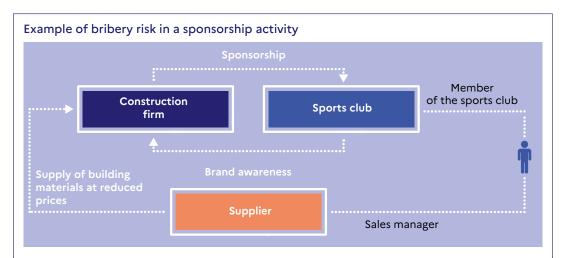
5.4 Issuing new publications

Practical guide on sponsorship and patronage activities

Sponsorship and patronage activities have taken off in the last few years. They allow businesses to support educational, scientific, social, humanitarian, sporting and cultural causes, while at the same time acting as useful communication vehicles to enhance their image and improve their reputation. For the recipient organisations, these activities represent a considerable economic and social benefit, enabling them to diversify their sources of financing.

While these activities are governed by strict legal and tax rules, they may also, in certain circumstances, give rise to bribery or influence peddling risks. Against this backdrop, AFA felt that it was necessary to produce a practical guide on protecting corporate sponsorship and patronage activities from corruption risks, in conjunction with the Ministry for Culture, the Ministry for Sport and the Olympic and Paralympic Games, the Ministry for Primary and Secondary Education and Youth Affairs, the Association for the Development of Industrial and Commercial Patronage (Admical), the French Centre for Funds and Foundations and France Générosités.

This guide describes the high-risk situations and corruption risk factors that businesses may encounter in connection with such activities and suggests prevention and detection measures that may be usefully implemented by businesses. It is illustrated by a number of diagrams depicting risk situations, practical examples and best practices.



While running their business, the director of a construction firm is looking to sign a contract with a supplier of building materials. The supplier's sales manager, who is in charge of contract negotiations, offers to supply the construction firm with materials at reduced prices if, in return, the company agrees to sponsor a sports club of which he is a member.

If the director agrees, both he and the construction firm could be prosecuted for **active private-sector bribery**, while the supplier's sales manager could be charged with **passive private-sector bribery**.

In line with the method used on all its publications, AFA held a wide-ranging public consultation in the summer of 2023 with trade federations and business organisations, businesses, law firms and consultancies, and arranged interviews to enhance its work and ensure that it addressed industry's concerns.

AFA presented this guide at a conference held on 25 March 2024, attended by around 50 representatives from the private and non-profit sectors.



▶ Presentation of the guide on 25 March 2024

Presentation of the anti-corruption indicators contained in the anti-corruption reporting obligations

The CSRD (Corporate Sustainability Reporting Directive) covers the publication of sustainability information by businesses, and imposes new non-financial reporting obligations on businesses that exceed certain thresholds, some of which relate to the prevention and detection of corruption.

AFA has therefore decided to provide tools to help businesses with this process.

From 2028¹⁴, several thousand French businesses will be required to publish the results of their new non-financial reporting obligations. Some of this information relates to corporate governance, including indicators on corruption prevention measures.

Initial report	Businesses affected		
2028 (for 2027)	Businesses that meet two of the following criteria: • They have more than 250 employees • They had turnover in excess of €50 million • They have a balance sheet total in excess of €25 million.		
2029 (for 2028)	Listed SMEs (excluding micro-enterprises) that meet two of the following criteria: • They have between 10 and 250 employees • They had turnover of more than €900,000 but less than €50 million • They have a balance sheet total of more than €450,000 but less than €25 million.		

Source: https://entreprendre.service-public.fr

The collection of this information by businesses already subject to Article 17 of the Sapin II Act is unproblematic insofar as the indicators to be completed correspond to the measures and procedures that they are required to implement under this article. However, this is not the case for businesses that have not introduced anti-corruption systems.

¹⁴ Act of 30 April 2025 containing various provisions aimed at alignment with European Union laws in economic, financial, environmental, energy, transport, healthcare and movement of persons domains (DDADUE5) and amending the CSRD implementation timetable.

This is why AFA has decided to support these businesses, taking the view that, over and above their reporting obligations, they would benefit significantly from adopting a corruption prevention and detection system. These benefits include effective protection against the risks of corruption to which they are exposed, anticipating the application of the Sapin II Act as a result of growth in their business, the streamlining of processes in a context in which the measures comprising an anti-corruption system may increase their performance, protect their reputation and facilitate their evaluation by commercial partners and financiers, etc.

Against this backdrop, AFA has made a document available on its website to help them to establish an anti-corruption system and thereby manage their anti-corruption sustainability indicators. This document sets out the measures that comprise an anti-corruption compliance system, lists the anti-corruption indicators required for CSRD reporting, and describes the links between anti-corruption indicators and the elements of an anti-corruption system that are useful for reporting purposes.

Specific information about this document has also been communicated to trade federations and business organisations, inviting them to disseminate it widely to their members and proposing that AFA organise practical workshops for the businesses in question, where necessary.

5.5 Raising awareness of the risks of corruption offences among businesses, legal professionals, accountants, etc.

Awareness-raising activities for businesses increase the level of their engagement with the issue of countering corruption and their knowledge of prevention and detection measures, in particular through the introduction of anti-corruption systems. These activities are relevant to all businesses, regardless of their size or turnover, and are tailored to the needs of the entities encountered by AFA. They may consist of a general presentation on the French anti-corruption framework or may focus on a specific topic.

In 2024, AFA carried out 35 awareness-raising activities:

- 20 technical workshops held jointly with trade federations and business organisations for their members
- Six presentations at conferences or seminars
- Five technical workshops relating to the UN Global Compact Network France
- A presentation at Transparency International's Forum of Committed Companies
- A workshop for directors of businesses that fall within the scope of the French Government Shareholding Agency
- Two presentations at "compliance" seminars organised by businesses

As in previous years, these events, and particularly the technical workshops, were organised with the logistical support of external organisations, such as trade federations and business organisations and the UN Global Compact¹⁵, with a view to reaching as many businesses and professionals working in compliance, internal monitoring, chartered accountancy, etc. as possible. In 2024, several thousand people in the private sector received this form of training.

In 2024, these events focused on topics relating to AFA's most recent publications, in particular the sponsorship and patronage guide and the internal investigations guide, as well as the various measures of the anti-corruption system.

¹⁵ Launched in July 2000, the United Nations Global Compact is both a set of policies and a practical framework for companies committed to sustainable development and responsible business practices.

INTERVIEW



Interview with Niels Pedersen, Executive Director of the UN Global Compact Network France

Why do you think it is important to raise awareness among SMEs about corruption prevention and detection?

"The UN Global Compact Network France has more than 2,100 member companies committed to environmental and social transition. Over the past three years, we have stepped up our support for SMEs, which account for 60% of our members.

In the course of our work, one thing has become clear: the integration of anti-corruption measures into these businesses' CSR approaches remains inadequate. They do not feel directly impacted and may minimise the risks involved. They underestimate their

vulnerability, either due to a lack of resources or knowledge, or because they are not subject to the Sapin II Act. However, all businesses, large and small, can be exposed to corruption, both internally and in their relations with partners and suppliers. It is therefore in SMEs' interests to introduce anti-corruption systems to reduce the risk of offences with legal, financial and reputational consequences that could jeopardise the business's future, and also to strengthen their business relationships, particularly with their customers subject to the Sapin II Act.

Raising their awareness means training them on identifying risks and implementing appropriate measures."

What is your assessment of the awareness-raising activities carried out jointly by AFA and the UN Global Compact Network France with SMEs over the last three years?

"The awareness-raising activities carried out by AFA and the UN Global Compact Network France with SMEs in recent years have helped to inform and equip the SME members of our network. Our collaboration satisfied a need expressed by these businesses to better understand anti-corruption issues and practices. Our activities have provided benchmarks and recommendations for first steps for a number of member SMEs.

One example of our collaboration is a series of webinars aimed at raising awareness of anti-corruption measures among SME members of the Global Compact. This series was launched in 2023 and repeated in 2024. These sessions, each of which was attended by an average of 60 businesses, covered best practices in a number of key areas, including preventing conflicts of interest, setting up a whistleblowing system and third-party due diligence.

AFA has also been involved in our "SME Accelerator". This online programme was launched by the UN Global Compact Network France and trains SMEs on structuring their CSR approach. In 2024, AFA co-hosted a session on tackling corruption, attended by 50 businesses. The quality of the Agency's educational approach was praised across the board."

How, in your view, can support for SMEs in tackling corruption be improved, and what new initiatives are you planning to meet this challenge?

"A number of findings have resulted from the first joint activities. Firstly, a number of SMEs lacked basic knowledge about corruption. Secondly, these businesses were finding it difficult to fully grasp compliance mechanisms, which were considered to be too complex or inadequate. As a result, the educational and pragmatic approach taken in our joint activities has been particularly well received.

While awareness-raising remains essential, it is our experience that SMEs need practical support to translate these principles into actions tailored to their actual operations. Another challenge is the broad range of maturity levels. Some businesses are already advanced, while others need to get to grips with more fundamental matters. Our priority is therefore to offer formats that allow each SME to progress at its own pace, combining awareness-raising and operational support.

With this in mind, the UN Global Compact will be offering new sessions in 2025, alongside AFA, to raise awareness among SMEs.

Our ambition is to leave no business without solutions to the challenges posed by corruption, by giving them the tools they need to take effective action, regardless of their level of maturity."

Answering questions from citizens and businesses

AFA's mission is also to assist the competent authorities and persons involved in preventing corruption. As part of this role, it receives and processes referrals from both public-sector entities and businesses.

In 2024, AFA processed 93 referrals from businesses, including 45 legal, operational and technical questions on a variety of issues such as the scope of Article 17 of the Sapin II Act, managing gifts and hospitality, managing conflicts of interest, creating a corruption risk map, implementing a third-party due diligence system, implementing a training system and implementing an internal whistleblowing system.

The other referrals comprised invitations to speak at events, conferences or workshops as part of AFA's awareness-raising and training remit, requests for information concerning AFA's news and resources (recommendations, guides, training tools, etc.) and specific requests for support in implementing an anti-corruption system.

The majority of referrals were submitted by businesses (35%), individuals (31%) and consultancies or law firms (16%). Referrals were also made by schools and universities (9%), students (5%) and business organisations and trade federations (3%).

Conflicts of interest 12% Gifts and hospitality 12% 12% Article 17 of the Sapin II Act 9% Third-party due diligence Training system Anti-corruption system Risk mapping Patronage and sponsorship Accounting controls 5% Internal whistleblowing system 5% Facilitation payments 2% Due diligence measures 2% Whistleblower 2% Corruption risks linked to the 2024 Olympic Games 2% 2% Extraterritoriality 2% Internal investigations 2% Sanctions Committee 2% Code of conduct 2% 10% 0% 4% 12%

Breakdown of legal and/or operational questions

Enabling as many people as possible to learn at their own pace: the "Cap intégrité" podcast

To help as many people as possible understand the stakes involved in tackling corruption, AFA has produced a podcast called "Cap intégrité", which is available on its website and is aimed at businesses.

This educational tool represents a new approach to raising awareness in a format that can be accessed by anyone at any time.

Experts from the AFA cover key areas of a corruption prevention and detection system. Informative and illustrated with examples, Cap Intégrité sheds new light on day-to-day questions posed by businesses and their employees, such as the criteria to be applied in defining a gifts and hospitality policy, factors that may give rise to a conflict of interest, the scope of the work of the anti-corruption compliance function, and methods of strengthening anti-corruption accounting controls.

Following its initial launch in Autumn 2024, "Cap intégrité" had already recorded over 5,000 listens by the end of December, demonstrating the interest shown by businesses in this new awareness-raising tool.

In addition to its professional audience, AFA continued its training activities in 2024 with various groups of students in the areas of compliance, law and accountancy. It has provided 36 initial and ongoing training courses to:

- universities in the Greater Paris area and in the regions (e.g. Aix-Marseille, Toulouse, Nancy, Lille and Strasbourg)
- law, business and management schools
- the Paris Bar School (EFB)
- the Institute for Advanced Studies in National Defence (IHEDN)
- Sciences Po









RECEIVING
AND PROCESSING
WHISTLEBLOWER
REPORTS AS AN
EXTERNAL AUTHORITY

Since its creation, AFA has received and processed whistleblower reports of potential corruption and inadequate corruption prevention and detection measures applied by businesses and public-sector entities.

The number of reports received has increased sharply in recent years. Once they have been analysed, these whistleblower reports may (i) result in AFA initiating an audit, (ii) be referred to the judicial authorities, or (iii) be passed on to an administrative body. AFA also uses the whistleblower reports received to paint a clearer picture of the high-risk sectors and activities and generally steer the Agency's audits.

Act no. 2022-401 of 21 March 2022 on improving whistleblower protection and its Implementing Decree 2022-1284 of 3 October 2022 on procedures for receiving and processing whistleblower reports designated AFA as an external authority for receiving whistleblower reports on certain acts of corruption (see focus on whistleblowers).

To facilitate the reception of whistleblower reports, AFA decided to set up a single reception and processing system. Following an overhaul of the whistleblower report handling procedures in 2023, the new procedures were introduced in 2024 with a view to producing more detailed statistical data.

Throughout 2024, AFA regularly liaised with the French Defender of Rights and the other external whistleblower report reception authorities regarding the implementation of the external whistleblowing systems.

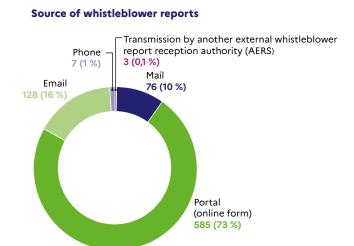
The French Defender of Rights has been responsible for supporting whistleblowers since 2016. Its role was considerably strengthened by Act no. 2022-401 and Constitutional Enactment no. 2022-400 of 21 March 2022. It ensures that the system for protecting whistleblowers in France operates smoothly in overall terms. It is also responsible for advising and providing information to any person reporting a whistleblowing incident and for directing them to the appropriate authorities, and for defending the rights and freedoms of whistleblowers and persons protected under a whistleblowing procedure.

6.1 A fast-growing activity providing effective processing

In 2024, AFA received 802 whistleblower reports, as opposed to 435 in 2023, an increase of 84% (304 in 2022, 216 in 2021, 298 in 2020 and 229 in 2019). Therefore, the number of whistleblower reports received almost doubled from the previous year.

Some of these whistleblower reports were duplicates, i.e. reports relating to identical facts filed multiple times by the same person. 219 duplicates were recorded in 2024.

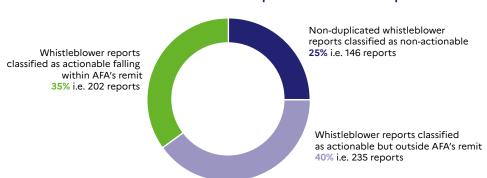
The majority of whistleblower reports (76%) were submitted using the online form available on AFA's website.



Of the whistleblower reports received in 2024, 54% were deemed to be serious and detailed enough to be actionable by AFA (compared with 62% in 2023).

Whistleblower reports that fall outside AFA's remit

AFA received and processed 235 actionable whistleblower reports that fell outside its remit, i.e. 40% of the reports received, excluding duplicates.



AFA's remit in relation to the various non-duplicated whistleblower reports

Where the whistleblower report falls outside its remit, AFA may:

- forward the report to another external whistleblower report reception authority or another administration, or refer it to the judicial authorities if an offence appears to have been committed
- redirect the author of the whistleblower report, stating which body they should contact (e.g. the Transport Ombudsman, SignalConso, Pharos, etc.)
- close the whistleblower report explaining to the submitter the reasons for AFA's lack of jurisdiction

Processing time

On average, AFA's processing time (i.e. the period between receiving and closing the whistleblower report) is 24 days. Excluding duplicates, the processing time is 31 days.

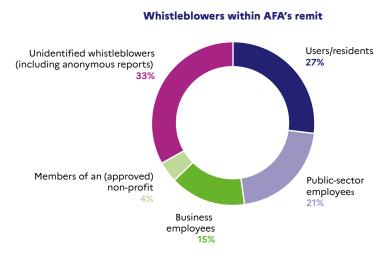
If only persons submitting reports categorisable as whistleblowers are counted, the average total processing time is 56 days. This period is shorter than the period specified in Decree no. 2022-1284 of 3 October 2022, which stipulates that the entity must respond to the person submitting the whistleblower report in writing within a reasonable period not exceeding three months.

The increase in the number of whistleblower reports and the effectiveness of the processing of reports illustrates the key role now played by AFA in tackling corruption. External whistleblower report reception and handling has become a fully-fledged AFA activity.

Miscellaneous whistleblowers and reported entities/persons

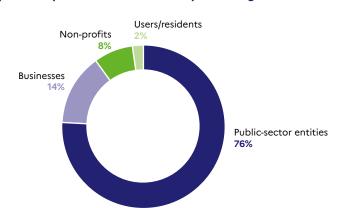
Whistleblowers

Identifiable whistleblowers are primarily users or residents (27%), employees of private businesses (15%), public-sector employees (21%) or non-profit employees (4%). Whistleblowers are unable to be identified in 33% of cases, either because the reports are made anonymously or because they do not provide enough information to identify the whistleblower.



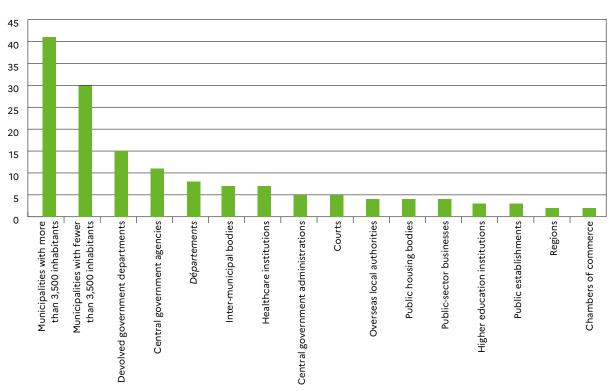
Entities and persons reported

Of the whistleblower reports within AFA's remit in 2024, 76% reported public-sector entities or their employees, 14% businesses or their employees, 8% non-profits or people working for them, and 2% individual users or residents.



Entities and persons reported in whistleblower reports falling within AFA's remit

61% of whistleblower reports on public-sector entities concern local and regional government bodies.



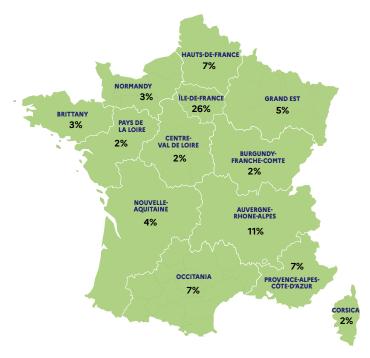
Whistleblower reports on public-sector entities

Reports on local and regional government bodies mainly relate to municipalities (41 reports on municipalities with more than 3,500 inhabitants, and 30 reports on municipalities with fewer than 3,500 inhabitants), followed by départements (8 reports), inter-municipal bodies (7 reports) and regions (2 reports).

Of the whistleblower reports on businesses, 59% concern businesses subject to the requirements of Article 17 of the Sapin II Act and 26% concern businesses not subject to those requirements.

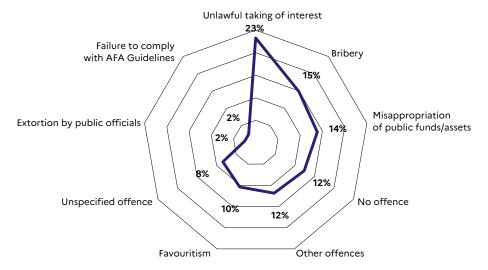
Location of alleged offences

Alleged offences are reported to have been committed mainly in the Île-de-France (26%) and Auvergne-Rhône-Alpes (11%) regions.



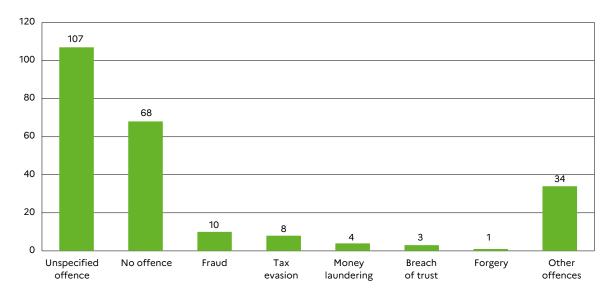
▶ Allegations

23% of the whistleblower reports that fell within AFA's remit in 2024 related to events that could be classified as unlawful taking of interests, while 15% related to bribery, 14% to misappropriation of public funds or assets, 10% to favouritism and only 2% to extortion by public officials.



Fraud and tax evasion are the most frequently mentioned allegations on whistleblower reports that fall outside AFA's remit. 107 whistleblower reports did not clearly identify the offence, while 68 reports did not state any offence.

Offences reported in whistleblower reports falling outside AFA's remit



6.2 Action taken on whistleblower reports

AFA endeavours to take the most appropriate action in dealing with the whistleblower reports it receives. Accordingly, it analyses them, may enhance them by drawing on open sources or may propose a legal classification.

Where the cause of the reported situation is an internal malfunction or a lack of understanding of prevailing laws, AFA may provide assistance to the entity in question to help it to review its internal procedures and increase their effectiveness.

To that end, AFA has forged relationships with administrations and administrative authorities in order to direct each admissible whistleblower report to the most appropriate place, in particular to their conduct and ethics departments.

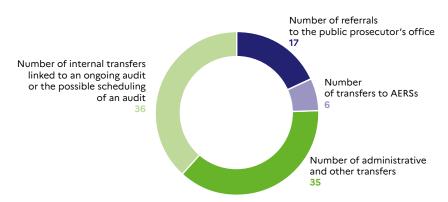
When AFA forwards them the whistleblower reports it receives, it ensures maximum possible protection for the author, including by checking whether they can be categorised as a whistleblower.

When the whistleblower report received contains details of a criminal offence, AFA is obliged to refer it to the public prosecutor with territorial jurisdiction, pursuant to Article 40 of the Code of Criminal Procedure.

A total of 58 of the whistleblower reports received by AFA in 2024 were referred to another body in 2024 or early 2025¹⁶ (compared with 34 in 2023) including:

- 17 whistleblower reports were referred to the public prosecutor with jurisdiction under the terms of Article 40 of the Code of Criminal Procedure for probable corruption offences (compared with 11 in 2023);
- 35 whistleblower reports received by AFA were sent to other authorities and departments for information or corrective action (other external whistleblower report reception authorities, financial courts, the French Financial Intelligence Unit (TRACFIN), ministry whistleblower contacts, ethics officers, general inspectorates, professional bodies, oversight administrations, budgetary and accounting control, etc.). The number of referrals to other bodies, excluding judicial authorities, represents a sharp increase and reflects AFA's determination to refer whistleblower reports to the relevant administrative bodies (23 referrals in 2023). AFA also closely monitors action taken on these whistleblower reports by the authorities receiving them;
- Six whistleblower reports were transferred to other external whistleblower report reception authorities (AERSs);
- 36 whistleblower reports were forwarded internally to be linked to ongoing audits or for the purpose of scheduling audits.

Number of whistleblower reports referred in 2024



Focus on the whistleblower reports received by AFA as an external whistleblower report reception authority

Among the whistleblower reports handled in 2024, 76 appeared to be consistent with the whistleblowing provisions of Act no. 2022-401 of 21 March 2022 on improving the protection of whistleblowers (compared with 60 in 2023). All these whistleblower reports were processed and closed with an average processing time of 56 days.

Although all whistleblower reports received by AFA are processed in the same way in accordance with the terms of Decree no. 2022-1284 of 3 October 2022, irrespective of whether they are external whistleblower reports as defined by the Act of 21 March 2022, AFA decided for statistical purposes to differentiate external whistleblower reports from other reports.

80 76 70 66 60 50 40 30 20 20 11 10 10 0 Whistleblowers Whistleblower Whistleblower **Anonymous** Whistleblowers whistleblower reports falling reports falling suffering or fearing reports within AFA's remit outside AFA's remit retaliation

External whistleblower reports received in 2024

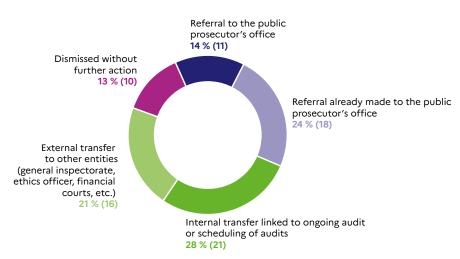
AFA and the French Defender of Rights held discussions throughout 2024 to refine this distinction (case of anonymous whistleblower reports; whistleblower reports by unions, elected officials and constituents; whistleblower reports constituting individual complaints; consideration of the criterion of good faith and non-self-interest, interpretation of the notion of "threat or harm to the public interest", etc.). Discussions also focused on identifying action to be taken on certain whistleblower reports, especially in the case of whistleblowers claiming to be victims of retaliation.

20 of the 76 external whistleblower reports received were submitted entirely anonymously. AFA has chosen to treat anonymous whistleblower reports in the same way as other reports.

This decision is in line with the best practices recently advocated by the French Defender of Rights, who recommended in his biennial report dated 25 September 2024 on "The protection of whistleblowers in France (2022-2023)" that anonymous whistleblower reports should be welcomed.

66 of the 76 whistleblower reports, or 86%, related to possible corruption offences. Following analysis, one quarter of them were referred to the judicial authorities and 15% were sent to an administrative body, including other external whistleblower report reception authorities when the whistleblower reports were not within AFA's remit.





In general, AFA observed a significant number of detailed external whistleblower reports in 2024 sent by individuals in positions of responsibility in large companies and administrations (compliance officers, audit department managers and accountants) who wanted to use the possibility now available to them to report cases of what they believed to be corruption to AFA.



STRATEGY ON THE **INTERNATIONAL STAGE**



7.1 AFA is stepping up its bilateral work with partner institutions in various countries

Over the years, the French Anti-Corruption Agency has signed numerous partnerships with anti-corruption institutions in various countries. The aim of these partnerships is to encourage best practices to be shared and to examine the French system in relation to other frameworks. In 2024, AFA stepped up its bilateral activity by participating in a number of technical cooperation initiatives.

For example, in Paramaribo (Suriname), AFA's International Affairs Unit co-ran a week-long seminar on tackling corruption in July with the National School for the Judiciary (ENM) and the French embassy in Suriname. For the occasion, an interministerial team (AFA, Ministry of Justice, Government Audit Office, Cayenne regional directorate of the National Police) came together to explore the three aspects of this public policy (prevention, detection and enforcement). It also bolstered dialogue with the authorities from Suriname, a country bordering the French overseas département of French Guiana. Organised with funding from AGRASC (Agency for the Management and Recovery of Seized and Confiscated Assets), this seminar was the product of a project launched in 2023 by an AFA/ENM fact-finding mission to the country. The result was that a roadmap and specific objectives for each of the competent authorities were able to be defined.

AFA has also contributed to other projects financed by the French Development Agency (AFD) and implemented by Expertise France. Such an initiative was carried out in November with the Court of Auditors of the Supreme Court of Cameroon as part of a longer-term project aimed at helping with capacity-building at this institution. The week-long workshop provided an opportunity to share views with the Court's auditors on the objectives, procedures and follow-up action to be taken for audits targeting corruption in public institutions.

As part of the Open Government Support Programme in French-speaking Africa (PAGOF), which is also financed by AFD and implemented by Expertise France, AFA organised a study visit to Paris for a delegation from Côte d'Ivoire's High Authority for Good Governance (HABG). As part of this visit, the HABG met the French authorities fighting corruption in the public and private sectors, as well as private-sector representatives involved in business integrity and institutions offering a master's degree course in business ethics. The objective was to gain as complete a picture as possible of the various stakeholders fighting against corruption in France. The visit concluded with the signing of a memorandum of understanding between the HAGB and AFA, which should lead to more joint activities (study visits and training workshops) in 2025.

Lastly, AFA regularly hosts delegations for shorter visits (of one day). These visits are an opportunity to give a general overview of the various national corruption prevention institutions and to discuss more specific and technical aspects. Delegations from the anti-corruption authorities of Uzbekistan, Kazakhstan, Turkey, South Africa, Ukraine and the United Arab Emirates all visited AFA in 2024. The Quebec Public Procurement Authority also visited the AFA offices to discuss cross-checks between institutions to tackle corruption in public procurement, as well as auditing procedures and access to public procurement contracts for businesses.



▶ The Uzbek and Kazakh delegation visiting the AFA offices (April 2024)

Under "France's Anti-Corruption Strategy in its Cooperation Action (2021-2030)", overseen by the Ministry for Europe and Foreign Affairs, France is committed to leading international efforts against corruption through its bilateral and multilateral cooperation initiatives. Through this work, AFA contributes to the implementation of France's anti-corruption strategy in an effort to turn the fight against corruption into a driver for economic development and strengthen the rule of law.



▶ UNODC seminar in Côte d'Ivoire on the Regional Anti-Corruption Platform for West Africa (May 2024)

7.2 AFA works on an ongoing basis with international organisations, providing technical expertise

Increasing numbers of anti-corruption instruments since the 1990s reflect the international community's growing awareness of the far-reaching impact of corruption on politics, the economy and society, and of the need to combat it by combining prevention, enforcement and cooperative measures.

AFA closely monitors major international conventions

Under the three main conventions – the United Nations Convention, the OECD Convention and the Council of Europe Convention – States Parties have access to evaluation mechanisms which give them the opportunity to present, detail and explain their national systems and to receive recommendations. Within this framework, AFA assists the competent French authorities at summits, meetings and events, helping to ensure that international norms and best standards and practices are effectively applied and promoted both within and outside France.

In 2024, France was reviewed as part of Phase 4 of the OECD Convention and the Fifth evaluation round of the Council of Europe Convention. AFA assisted the "lead" ministries, respectively the Ministry of Justice and the Ministry for the Economy and Finance for the OECD Convention, and the Ministry for Europe and Foreign Affairs for the Council of Europe Convention, in carrying out the in-depth work required to defend the French system. This work was presented at the plenary sessions concerning the evaluation reports on France at the OECD and the Council of Europe. More specifically, the follow-up report adopted by the OECD on 6 March 2024 praised France's efforts and, in relation to AFA and its work, the guarantees of independence provided in its audits and the close cooperation between AFA and the National Financial Public Prosecutor's Office (PNF) in CJIPs (judicial public interest agreements).

The international organisations acting as the secretariat for the anti-corruption conventions also organise a variety of events to make implementing the conventions easier, such as training and discussion seminars on specific topics and methodologies. AFA is regularly asked to provide its expertise for these events, and also attends meetings to garner an expert insight from its peers.

In 2024, AFA attended a number of events at the request of the secretariat of the Council of Europe's Group of States against Corruption (GRECO), including:

- A risk mapping workshop in January
- A workshop on integrity in the private sector in April

And, at the request of the secretariat of the UN Convention:

A workshop on the protection of whistleblowers as part of the Regional Platform for West Africa in June

Expertise in tackling corruption in the private sector

The "Group of 20" (G20), an intergovernmental forum of the world's major developed and developing economies, is chaired by a rotating annual presidency and organises working group meetings on a variety of public policy issues with a view to adopting joint statements. Brazil, which held the presidency in 2024, offered to co-chair the Anti-Corruption Working Group with the French authorities. This work, led by the Ministry for Europe and Foreign Affairs and the Ministry for the Economy and Finance, culminated in the adoption of a high-level declaration on tackling corruption in the private sector. AFA has been working throughout the year to provide its technical expertise and support to these two ministries. AFA's Director also spoke at a panel organised as part of a "joint session" between the G20 Anti-Corruption Working Group and the OECD Working Group on Bribery to discuss incentives for the private sector, alongside

the Brazilian Office of the Comptroller General, the Indonesian Corruption Eradication Commission and the Chair of the B20 Integrity and Compliance Task Force¹⁷. This joint session highlighted the need for synergy between the working projects of various international governance bodies.



G20 meeting at the Quai d'Orsay in June 2024

Active participation in the Global Anti-Corruption and Integrity Forum (GACIF)

Other events organised by international organisations also invite private stakeholders (businesses and civil society) to allow for a broad range of discussions and insights. One such event is the annual Global Anti-Corruption and Integrity Forum organised by the secretariat of the OECD Convention, which was held in March in 2024. AFA representatives attended a number of events, and AFA Director Isabelle Jegouzo participated in a plenary session on compliance programmes in the private sector and the discussions required between public and private stakeholders to enact them.

AFA's co-chair role in the Business Integrity Network

Finally, at the request of the OECD, AFA co-chaired the "MOBIN" business integrity network (MENA¹⁸-OECD Business Integrity Network) alongside its Moroccan counterpart, the National Authority for Probity, Prevention and the Fight against Corruption (INPPLC). The MOBIN network is a regional platform that works to promote business integrity in MENA countries. The network is designed to bring together public- and private-sector representatives and provide them with a dialogue platform in the form of round tables and seminars. The theme of the 2024 event, held in Morocco in July, was "Inclusive dialogue and collective commitments to fighting corruption while supporting sustainable development". The seminar was an opportunity to discuss and debate incentives, multi-stakeholder approaches and the role of educational programmes.

¹⁷ The Business 20 (B20) is a forum of business representatives that serves as the official G20 dialogue forum with the global business community.

18 The MENA region comprises the Middle East and North Africa.



▶ MOBIN seminar held in Morocco in July 2024

7.3 A critical issue for the future: the European anti-corruption directive

Proposed by the European Commission in May 2023, the directive on combating corruption is designed to harmonise the laws of the European Union (EU) Member States in the areas of prevention, detection and enforcement. In 2024, negotiations on this text continued within the European Parliament and the Council.

During the negotiations, AFA stressed the importance of drafting ambitious legislation, particularly with regard to prevention, given the lingering impact of the political and judicial scandals that rattled European institutions in late 2022.

Alongside its regulatory work, AFA has continued to participate in the EU network against corruption. Coordinated by the European Commission, this network serves as a forum for discussion between the various existing sectoral networks. It will also act as a dialogue platform between Member States' authorities for the directive's implementation once it has been adopted and transposed. Researchers and other stakeholders (including civil society organisations) are invited to attend the network's meetings, who can use the forum to present their work and insights.



Alongside international organisations, there are also unofficial networks formed by anti-corruption authorities. These networks are organised thematically and/or geographically. They act as forums to discuss and reflect on subjects of common interest.

AFA attended the General Assembly of the EPAC/EACN cooperation networks in Bucharest (Romania) in November 2024. Meetings of the European Partners against Corruption (EPAC) network are attended by anti-corruption authorities and internal police oversight bodies in the member States of the Council of Europe. The members of the European contact-point network against corruption (EACN) are anti-corruption authorities in EU Member States. The organisers invited AFA to give a presentation on how the OECD Convention had contributed to shaping anti-corruption institutions in France. Compliance with the requirements of this Convention was partly why France strengthened its legal arsenal – by creating the judicial public interest agreement (CJIP) – and consolidated its institutional landscape – by founding AFA to address the support and audit needs of all stakeholders, including businesses.

AFA also continued to play its part in the Network of Corruption Prevention Authorities (NCPA), which it helped to set up in 2018, by taking on the presidency of the NCPA for 2024. As part of this presidency, it has organised webinars, including on preventing corruption linked to major international sporting events. It has also expanded the network to include new members and partners from the research world to increase the network's cross-disciplinary contributions.

In June 2024, AFA attended the International Anti-Corruption Conference (IACC) in Vilnius (Lithuania), organised by the non-governmental organisation Transparency International. Held every two years over a period of several days, this event is attended by representatives of all anti-corruption stakeholders (governments, civil society organisations, the private sector, journalists and the general public) to discuss and debate the implementation and effectiveness of public policies, the tangible day-to-day work of all non-governmental stakeholders and current and emerging challenges. AFA took part in a round table event at the conference on international standards in prevention, covering both the measures required and the powers to be granted to the competent institutions in this area.

AFA also attended other events in 2024: it was invited by the Basel Institute on Governance to a workshop in June on business integrity and the collaboration between public and private stakeholders required to guarantee it. It also participated in events at the invitation of the International Association of Lawyers in June (in Paris) and the Anti-Money Laundering Prevention (AMLP)¹⁹ Forum in November (in London).

¹⁹ The AMLP Forum is attended by representatives of professionals combating money laundering, anti-corruption and financial crime from a variety of industries.

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