

Annex [Note verbale reference: CU 2022/264]

1. The secretariat has prepared the following questionnaire as a guide that States parties may wish to use to provide relevant information in line with paragraphs 22 to 24 of resolution 9/1, entitled “Sharm el-Sheikh declaration on strengthening international cooperation in the prevention of and fight against corruption during times of emergencies and crisis response and recovery”, including the provision of information on good practices and challenges concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.
2. States parties may wish to take a broad view of emergencies and crisis response and recovery when responding to this questionnaire. Emergencies and crisis response and recovery may include humanitarian emergencies, natural disasters, conflict and post-conflict contexts, as well as health emergencies such as the COVID-19 pandemic, among others.
3. Collecting the information for this questionnaire may require cooperation by several different agencies/authorities. States parties may wish to send the questionnaire to agencies/authorities particularly involved in response and recovery efforts during times of emergencies, depending on their national system, as it calls for information on preventive anti-corruption measures, law enforcement and international cooperation. Such agencies/authorities may include:
 - Anti-corruption bodies, supreme audit institutions and other oversight bodies, and relevant entities with mandates to prevent and counter corruption;
 - National procurement agencies;
 - National law enforcement authorities;
 - National competent authorities responsible for international cooperation in criminal matters;
 - Development agencies.

Questionnaire

Contact Information

Please provide contact details for potential follow-up questions. Contact details will be treated confidentially.

Country: ITALY

Please describe (cite and summarize) good practices your country has taken (or is planning to take, together with the related appropriate time frame) concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.

States parties are invited to provide information on experiences, good practices and challenges concerning the following:

I. Understanding corruption risks and typologies during times of emergencies and crisis response and recovery, including transnational elements

1. Has your government assessed corruption risks during emergencies or crisis response and recovery, either through formal risk assessments or other informal means? Please provide details, such as key findings and mitigation plans. Please describe whether any other (existing) risk assessment has been carried out that is relevant to the emergency response (such as sectoral risk assessments in procurement, healthcare, infrastructure, etc) and provide details.

The Italian government assessed corruption risks during emergencies or crisis response and recovery. In particular Italy developed initiatives as detailed below.

From the perspective of the International Police Cooperation as a consequence of the change in the criminal behavior during the recent pandemic, the Criminal Police Directorate of the Italian Ministry of Interior (through its IPCS) has organized since September 2021 a forum (namely the Law Enforcement Forum – LEA), co-sponsored by Europol, to gather all the relevant EU-law enforcement agencies and discuss on prevention, identification, investigation and prosecution of crimes in times of emergencies, including corruption, assessing the situation at the time and proposing risk-based solutions.

The first forum took place in Rome on 21-22 September 2021 and the second meeting in The Hague (NL), in the Europol Agency premises, on 31st March 2022. In that particular meeting other corruption-related topics were discussed, like the identification of specific risk indicators to intercept and prevent criminal infiltration in the legal economy.

Link available on the agenda of the Law Enforcement Forum:

1st edition 2021: <https://www.youtube.com/watch?v=oT0ScRpyE0I>

2nd edition 2022: <https://www.europol.europa.eu/media-press/newsroom/news/nextgenerationeu-law-enforcement-forum>

At national level, the Criminal Analysis Service (CAS), depending from the Criminal Police Directorate of the Italian Ministry of Interior, publishes a quarterly periodic assessment of the situation concerning corruption related crimes in Italy (for police forces only).

In addition, the Financial Information Unit issued specific communications to the AML obliged entities to raise their attention on anomalous activities performed during the emergency

and possibly related to criminal activities, to be evaluated in terms of fulfillment of the obligation to report suspicious transactions to the same FIU:

- <https://uif.bancaditalia.it/normativa/norm-indicatori-anomalia/Comunicazione-UIF-Covid-19-e-PNRR-11.04.2022.pdf>
- <https://uif.bancaditalia.it/normativa/norm-indicatori-anomalia/Comunicazione-UIF-Covid-19-110221.pdf>
- <https://uif.bancaditalia.it/normativa/norm-indicatori-anomalia/Comunicazione-UIF-16.04.2020.pdf>

FIU Italy was involved in several studies in the Egmont Group (the international organization that gathers around 165 FIUs all over the world) and it was one of the co-leaders of a report issued in February 2022, aimed at assessing issues and challenges faced by the FIUs during the first period of the pandemic, with a specific reference to the analysis of cases of corruption-related money laundering.

The study is available at the link: <https://egmontgroup.org/news/fius-role-in-the-fight-against-money-laundering-of-corruption-proceeds-within-the-context-of-the-covid-19-pandemic/>

We can also count on additional information by the questionnaire implemented on a national basis, during the G20 ACWG process of the Riyadh initiative in 2020.

[https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Other-Deliverables/2020 Responses to the G20 Survey for the Good Practices Compendium on Combating Corruption in the Response to COVID-19.pdf](https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Other-Deliverables/2020%20Responses%20to%20the%20G20%20Survey%20for%20the%20Good%20Practices%20Compendium%20on%20Combating%20Corruption%20in%20the%20Response%20to%20COVID-19.pdf)

2. Please list the main typologies of corruption (corruption risks) you have identified in your country's emergency or crisis responses and recovery. You may select from the list below, and add any additional risks not listed:

Public Procurement

- ✓ Bribery of procurement officials
- ✓ Excessive use of non-competitive bidding procedures, including by single or limited source tendering, with limited safeguards
- ✓ Improper application of emergency procurement procedures allowing for expedited delivery of goods and services
- ✓ Bid-rigging (e.g. use of inflated prices)

Misappropriation of Emergency Relief Funds

- ✓ Non-eligible beneficiaries circumventing rules and regulations, including through bribes, to obtain access to relief and support
- ✓ Diversion of donations away from intended beneficiaries
- ✓ Exploiting international financial assistance related to emergency relief or other types of support (such as donor funding or technical assistance)
- ✓ Embezzlement of profit gained from the sale and distribution of emergency supplies

- ✓ Manipulation and inflation of claims for economic relief
- ✓ Fraudulent billing for the provision of goods and services
- ✓ Diversion of donated equipment/supplies to the black market
- ✓ Companies hoarding/not discharging support received from the government

Conflicts of Interest

- ✓ Conflicts of interest between suppliers and authorities in procurement processes
- ✓ Political appointees or persons entrusted with prominent public functions involved in, or the beneficial owners of, companies bailed out by the government or companies involved in procurement processes
- Support packages distributed according to ethnicity and/or political affiliation

Misuse of Information

- ✓ Use of social media to spread misinformation, undertake fraudulent activities such as phishing, cyber-criminal fraud

Inadequate Reporting/Protection Mechanisms

- Inadequate reporting/protection mechanisms for whistle-blowers and witnesses
- Restricted ability to report potential corrupt activities

Other Corruption Risks

- Extensive use of government emergency powers and regulations, with insufficient controls, consultations and/or guidance
- ✓ Provision of counterfeit good and supplies
- ✓ Fraudulent or illicit production of goods, including research
- Impeded anti-corruption enforcement actions during emergency and crisis responses due to corruption
- Impeded provision of international cooperation (e.g. mutual legal assistance) due to the emergency or crisis due to corruption
- ✓ Links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering

Please list any other typologies or risks:

From the perspective of the Financial Information Unit other particular typologies of risks emerging from STRs are:

- ✓ undue or improper assignments of tax credits
 - ✓ acquisition of tax credits with funds of illicit origin.

3. Did any of the corruption risks (typologies) identified in question 2 entail an international element? For example, fraudulent or collusive procurement practices involving foreign or international bidders or suppliers, donors or international financial institutions; aspects of

transnational bribery; diversion of resources, assets or persons across borders)? Please be as specific as possible and provide details and examples. If the information is sensitive, please describe the typology or give anonymized examples.

Various Corruption risks listed in the previous question are linked to international aspects; fraudulent or collusive procurement practices involving foreign or international bidders or suppliers did happen in emergency situation (covid-19 pandemic) when – due to the state of emergency – some public procurement rules have been weakened; this led to less controls and to the possibility to boost the false custom declaration of goods related to the healing of the pandemic consequences: Italian LEAs (in particular Guardia di Finanza) have carried on several investigations – also through the newly instituted European Public Prosecutor’s Office (EPPO).

[Link: https://www.eppo.europa.eu/en/news/over-35-million-ffp2-medical-masks-and-over-eu11-million-assets-seized-italy](https://www.eppo.europa.eu/en/news/over-35-million-ffp2-medical-masks-and-over-eu11-million-assets-seized-italy)

Some of corruption risks typologies identify in questions 2 international elements in the field of International Police. Also in this case there are risks related to the crisis international exchanges of information.

These may include online transactions on foreign platforms, price manipulation or scams, frauds in the sale of personal protective equipment or medical supplies. Some of such illicit behaviors were also linked to (or performed through) corruptive schemes.

4. Please describe whether the corruption risks identified in question 2 appear to be longer-term trends. Have they required new or strengthened anti-corruption actions as a result? If so, please elaborate.

In the field of Financial information analysis, the newly emerged corruption risks are faced through the application of specific criteria to select STRs; reinforcement of exchanges with law enforcement counterparts; prioritization in analyses of phenomena linked to the a.m. risks; intensified dialogue with various public sector actors

From the prospective of the International Police Cooperation:

Yes, as long as there will be a difference in the countries’ legal frameworks concerning the prevention, investigation and suppression of those corruption related events. The countermeasures consist in the strengthening of the police and judicial cooperation and the enforcement of the two paramount UN-Conventions on that particular topic (UNCTOC-UNCAC)

5. Please describe any measures taken to support the private sector in identifying and mitigating corruption risks. This may include particular risks associated with supply chains and procurement processes.

In order to raise the attention of the AML obliged entities on possible corruption risks emerging in the supply chains and procurement processes FIU Italy issued the already mentioned communications. Please refer to answer to question I.1.

6. Please provide an overview of efforts taken to understand the particular impact corruption in times of emergencies and crisis response and recovery may have on women and marginalized and vulnerable groups. If possible, please include reference to any research, analyses or assessments undertaken in this regard.

The issue of protecting women and vulnerable groups from the risks deriving from particular situation has been duly taken into consideration by the Italian authorities. An assessment of the position of women and vulnerable groups has been carried out to stress how, as a consequence, weaker actors may be more subject to corruption-related events (e.g.: the risk of losing an employment leads to the need of money, which may weaken the position of a person in front of a corruptive attempt).

Here is a link to a study on that topic:

<https://www.frontiersin.org/articles/10.3389/fhumd.2021.704727/full>

7. Is there a greater need for international cooperation in responding to corruption risks in the context of emergency and crisis responses than in other situations? Why, or why not?

Criminal activities involving foreign or international actors can be boosted in the context of emergency and crisis: this happens as a consequence of the “state of exception” that may lead to less controls in the international trading (speeded-up customs and border controls, etc.) and in the international public procurement (weakened checks, etc.).

II. Addressing corruption during times of emergencies and crisis response and recovery at the domestic level

1. Please describe the anti-corruption controls, safeguards and/or measures put in place to address the corruption risks identified above in question 2. Please highlight any special measures that may have been introduced in response to a particular emergency, and whether those measures may be useful for future crises. These may include anti-corruption task forces, the use of real-time audits, transparency portals and specific reporting channels for reporting corruption in the context of emergencies, including in the areas below.

In the most acute phase of the COVID-19 pandemic, the Italian healthcare sector was exposed to the risks of fraud and corruption, especially regarding the acquisition of emergency-related supplies, such as protective devices, medical equipment, medicines. The need for urgent interventions forced health structures and public administrations to purchase products without systematically checking the reliability of suppliers. Scam schemes also affected the private sector, mainly by offering counterfeit or non-existing health products or soliciting donations for charitable interventions related to the pandemic. Significant risks have also been associated with the illicit acquisition of various forms of public funds in support of citizens and businesses, provided for by national and regional financial schemes. In this context, forms of corruption of public officials, politically exposed persons or companies connected to them could be aimed at ensuring preferential lanes for access to the mentioned financial resources even in the absence of the necessary requirements. The phenomenon of scam against the State, implemented through false certificates of possession of the requirements, also emerged. Organized crime infiltrations in the economy and business, exhausted by a long period of inactivity, represented one of the most serious risks. Companies are also particularly vulnerable to usury, which often becomes the means for a subsequent takeover of the business, facilitated by repayment difficulties. Aside from the pandemic emergency, the Italian legal system is well equipped by strong ordinary measures to counter corruption. It may count, on one hand, on a specific, independent National Anticorruption Authority (ANAC), entrusted with the prevention of corruption and surveillance on public procurement; this asset pairs, on the other hand, with a fully independent public prosecutors’ system that is mandated, under art. 112 of the Constitution, to prosecute any corruption phenomenon hypothesis set out under the Criminal Law Code. Regarding potential risks occurring during the Covid-19 emergency, here follows a survey of the

main analyses and findings developed by the major anti-corruption institutions. The analysis of data and information is pioneering a better knowledge of the new avenues of corruption, during and after an emergency scenario, thus enhancing detection and investigations. On 21 August 2020, ANAC released a vast cognitive survey on the call for tenders related to the pandemic. Taking into account the socio-economic impact of the emergency, the survey focuses on public expenditure nationwide for treating and stemming the contagion during its peak (1 March-30 April) which amounted to 5,8 billion €. More than 40% of it has been contracted by the CPD and the SC. In order to grasp a detailed picture of the public spending related to the emergency, through a specific questionnaire ANAC has collected answers from a sample of 182 contracting bodies that called for bids in the same period, selecting the larger bids from each of these authorities. 101 The survey has exposed some hurdles that are currently under specific ANAC surveillance and oversight. Some of them may steer around administrative inspection or be reported by ANAC to the judicial authority for criminal investigation and prosecution. This can be considered an effective best practice to be shared with G20 partners, according to question 11, since it exposes with a high rate of transparency detailed information on the public expenditure related to the emergency and implements the criteria of public monitoring and surveillance over public resources. The described new modality of detection and appraisal of corruption schemes completes the traditional risk assessment channels. At the following link Covid-19 “Indagine conoscitiva ANAC sugli affidamenti connessi alla pandemia”, it is available the second phase report and relevant attachments (call for tenders, selected sample; census of questions and replies by contracting authorities; price analysis; summary of responses and contracting data). More information is given in n. 8. Between the end of February and mid-June 2020, FIU Italy received approximately 350 Suspicious Transaction Reporting (STRs) directly related to the Covid-19 pandemic. Significant cases also emerged from exchanges with other FIUs. The analysis of the STRs confirms the emergence of all types of risks previously described. Anomalies were found in the supply of personal protective equipment both to private and public clients. Numerous cash movements have also been detected, often related to the restrictions on individual mobility in the acute phase of the pandemic and the measures of social confinement, but could sometimes hide illicit purposes. In some cases, the subjective profile of the names involved and the operating methods suggested the possible involvement of organized crime and forms of usury. The Italian National Anti-Mafia and Counter Terrorism Directorate (hereinafter DNA) during the emergency has developed innovative forms of crime analysis and of coordination among specialized antimafia prosecutors, moving from its already established database SIDNA. The first DNA response to the COVID 19 threat for integrity of public administration and transparency of market and procurements focused on designing strategies to prevent and counter the infiltration of mafias in the economy of the crisis, during and after the pandemic. Moving by two assumptions: a) we can have corruption without the mafia, but no longer have mafia without corruption, b) emergency becomes a source of income for organized crime, DNA has developed a context analysis on COVID 19 and identified three main information channels to monitor: 1) the health goods’ market 2) the financial movements; 3) the quality of the subjects involved. In this framework, for instance, the DNA has cross-checked the national and local Business Registers to ascertain whether ad hoc companies had been created for the import/export of medical supplies. The snapshot highlighted some common features of infiltration flows as: - transnational character of the activities involving more than one Country; - use of technology also providing e-commerce platforms; - lack of a concrete and efficient beneficial ownership transparency. 102 It emerged that criminal organizations

try to offer illicit goods and services based on the demand and use sophisticated mechanisms to manage the supply, also with the help of brokers and brokerage partners. The DNA designed a multilayers strategy with various stages of intervention: the pre-investigation allows to identify suspicious companies and to apply precautionary measures; the intelligence investigative activity, typical of DNA, makes it possible to identify suspicious instruments and operations; the National Antimafia Prosecutor, on the basis of the information collected on reporting suspicious transactions to the FIU Italy, requests formal investigations. Many criminal organizations have created ad hoc companies also abroad for participating in tenders even by modifying the management, excluding people involved in previous investigations. In this regard, the DNA underlined the relevance of reports from the Customs and Monopoly Agency, the FIU, the Financial and Tax Police (Guardia di Finanza). In terms of best practice according to question 11, the resilience and innovative investigation capability set out by the DNA can also be highlighted. These various forms of analysis are being complemented, at policy level, by the activity of a special Committee enshrined in the Antimafia Parliamentary Commission, to assess the risks of Covid-19 criminal infiltrations: “Criminalità e Covid: ecco i nove obiettivi dell’Antimafia a tutela dell’impresa”.

Public procurement and the management of public finances

2. Please describe measures taken to develop and/or further strengthen accountability and transparency in public procurement during times of emergencies and crisis response and recovery. These may include:
 - The development of specific guidelines, circulars or memorandums for procurement in emergency contexts;
 - The development of new codes of conduct or guidelines for procurement personnel during times of emergencies and crisis response and recovery;
 - Requirements to disclose potential and real conflicts of interest;
 - Reforms of legal, regulatory and policy frameworks governing public procurement;
 - Requirements to collect and publish the beneficial ownership information of entities contracting with the government; (*Please see the explanation provided in the following frame*)
 - Requirements to cross-check information available on the ultimate beneficial owners of companies involved in procurement processes;
 - Publication of information on the whole procurement cycle, from tender to delivery (including type and amount of contract, reference information for the awarded company, beneficial ownership information, validation of delivery, etc.);
 - Specific labels or “tags” for procurement contracts to facilitate the monitoring of contracts associated with a particular emergency or crisis;
 - Measures to ensure procurement in emergency contexts have appropriate oversight and sanctions, including the potential disqualification of companies;
 - Measures to help ensure that compliance programmes and safeguards are in place for bidders;
 - The use of online portals that afford opportunities to track procurement contracts through the whole procurement cycle;
 - Feedback mechanisms for monitoring by groups outside the public sector, such as civil society organizations.

In the context of legislative measures to respond to the crisis, article 22 of Regulation (EU) 2021/241 (which establishes the Recovery and Resilience Facility (RRF)), with a view to protecting the financial interests of the Union, posed an obligation on the public

administrations to collect data on the recipients of funds and contractors also acquiring beneficial owner information, as defined by anti-money laundering regulations. Please note that the FATF, in reviewing the AML Recommendation No. 24, also expressly referred to the need for member States to ensure the availability of beneficial owner information in the context of public procurement. In addition, please refer to question I-1. for what concerns the strengthening of LEAs information/intelligence exchange and risk assessment in case of emergency.

3. Please highlight 2-3 good practices and challenges faced when developing, implementing and/or monitoring the measures you have identified in question 2.

1. Creation of a permanent or devoted commission or working group at governmental level to drive all the initiative related to the management of an emergency, put under parliamentary control, to ensure transparency in the allocation, use, distribution and management of the national budget during times of emergencies and crisis response and recovery;
2. Creation of permanent or devoted LEA (or joint-force service or unit) to collect, analyze and evaluate the information/intelligence related to the specific corruption risks;
3. Legal framework which clearly describes tasks and powers to be used, including dedicated budget lines.

4. Were internal audit systems, real-time audit mechanisms and/or other mechanisms used to help monitor and oversee the management of public resources during times of emergencies and crisis response and recovery? If so, please describe. Please provide any information on good practices and/or lessons learned.

Please refer to question II-3.

5. Please describe what measures or initiatives could be used/have been used to help ensure transparency in the allocation, use, distribution and management of the national budget during times of emergencies and crisis response and recovery. These may include dedicated budget lines, measures to present budget items, public hearings or rendering such information accessible to the public.

Please refer to question II-3.

Inter-institutional coordination at the national level

6. Please outline measures which could be taken or have been taken to enhance coordination among institutions at the national level involved in response and recovery efforts, such as Memorandums of Understanding, data sharing agreements, standard operating procedures or other formal and informal mechanisms that enable institutions to share information and respond in a coordinated manner to corruption risks in the context of emergencies.

Italy counts on as regards the domestic Inter-Institutional, cooperation, the UIF is involved in the inter-institutional Anti-corruption Coordinating Committee established by the Ministry of Foreign Affairs, which brings together the main Italian authorities

engaged in combating corruption. This forum enables the participating institutions to share their experiences in preventing and combating corruption and to strengthen the principles of transparency and integrity at national level. The interdisciplinary expertise developed within the Committee was essential to the G20's Anti-Corruption Working Group, chaired by Italy in 2021, which worked, among other things, to develop 'high level principles' on the relations between corruption and organized crime, and on tackling corruption in the context of the economic crisis induced by the pandemic.

https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Principles/2021_G20_High-Level_Principles_on_Corruption_related_to_Organized_Crime.pdf

https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Contributions-by-International-Organizations/2021_Anti-corruption_and_emergency_situations_Background_note.pdf

https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Principles/2021_G20_High-Level_Principles_on_Preventing_and_Combating_Corruption_in_Emergencies.pdf

In additional please refer to question I-1. and II-3.

Transparency measures, including access to information

7. Does the government have specific measures in place to identify individuals who may be involved in, or who help facilitate, corrupt acts? Such measures may include requirements to disclose beneficial ownership information and requirements to make such information accessible to law enforcement or other authorities. For example, information contained in beneficial ownership registries or information contained in open tender portals may be used by supreme audit institutions and other oversight bodies to audit, and inform, response and recovery measures.

Information on the beneficial owner is always part of the information contained in the suspicious transaction reports (STRs), submitted by the obliged entities to be analysed by the FIU.

According to recent legislation implementing the Fourth AML Directive, FIU Italy is among the public institutions having access to the special section of the Italian Business Register where data on the beneficial ownership must be recorded (see Leg.Decree n. 231/2007 as lastly amended by Legislative Decree n. 90/2017 and the inter-ministerial decree n. 55/2022).

8. How does the government ensure that emergency measures are limited in duration and scope? Please describe any measures taken to mitigate the use of broad emergency executive authority, such as legislative oversight, regular reports to committees, and review and monitoring mechanisms.

Any Italian contracting authority shall be compliant to the public procurement procedure set out under Legislative Decree n. 50/2016 (Public Contracts Code) implementing 2014/24/UE Directive. The Special Commissioner for COVID-19 emergency On March 17 the Government set up a Special Commissioner for COVID-19 emergency (Article 122, c. 2, D.L. 17 March 2020, n. 18, which has been converted into law, with amendments, by Article 1, paragraph 1, of 24 April 2020, n. 27). The Commissioner was appointed on March 18. The SC manages any intervention useful to deal with the health emergency, planning and organizing activities, identifying the needs, directing 112 human and instrumental resources and proceeding to the acquisition and distribution of

drugs, medical equipment and devices and individual PPEs, in conjunction with the head of the CPD. It also provides for the expansion of hospital facilities, including through the allocation of infrastructure equipment, with particular reference to intensive and sub-intensive care units, the requisition of mobile and real estate assets and implements useful interventions to preserve and enhance the production chains of the goods needed to the fight and containment of the virus. It can provide for the construction of new factories and the conversion of existing ones for the production of goods, including by organizing the necessary fundraising and defining ways in which private funds for the emergency are acquired and used. The SC is also responsible for organizing and carrying out the preparatory activities for the granting of aid to deal with the health emergency, by the relevant national and European authorities and monitors the implementation of these measures. It then provides for the coordinated management of the European Union Solidarity Fund (EUSF) and the resources of the Development and Cohesion Fund for emergencies. The Commissioner works with the regions and supports them in the exercise of their competences for health protection. At the request of the regions themselves, it can take the necessary measures as a matter of urgency to deal with any kind of emergency. The Commissioner's office is free of charge and ends at the end of the emergency. Please see: CSCovid19 Commissario. The Special Commissioner proceeds to enter into public contracts, through the use of negotiated procedures without publication of the tender call, under article 32 of the 2014/24/UE Directive. The SC, through Invitalia S.p.A. (qualified Contracting Authority and Central Purchasing Body which provides the Commissioner of specific auxiliary services i.e. ICT infrastructures and related services), published also two market surveys and consultations to better understand the intensive therapy market. Following such preliminary consultation, the SC sends an invitation to bid to competitors who had notified their availability to participate in the subsequent phases of the procedures. This specific procedure envisages a prior recognition on how the market is formed in relation to a specific business. Only after the acquisition of the relevant information about the technical characteristics of the products by the competitor which had expressed its interest for the call, and assessed the affordability of interested companies, the competitive phase shall take place. Moreover, to deliver the highest possible degree of transparency in the awarding procedure, as dictated by the anti-corruption Act (Law 190 of 2012), the SC implemented an ICT platform enabling the assessment, among the offers received for each commodities sector, of the most appropriate to match the needs from time to time occurred. Each potential supplier has to register itself to the platform, communicating any kind of company information and relevant data. Only registered entities are entitled to submit an offer. Each contract is bound to a specific tender code (CIG: Codice Identificativo Gara) provided for by ANAC. This code is needed to trace each payment under a contract, as 113 established under Law n. 136/2010 which requests to ensure the traceability of cash flows. In each contract undersigned the supplier acknowledges that, in case of breaching of traceability clause, the contract is immediately terminated and deemed as null and void. The need of speeding up the procedure to face the emergency pairs with the need to ensure compliance with internal rules on anti-corruption, anti-mafia and the traceability of cash flows, through the acquisition, during the contracting, of selfdeclarations under the law (D.P.R. 28 December 2000, n. 445): - on the possession of the affordability and morality requirements to contract and bargain with the Public Administration, in conformity to article 80 of the Public Contracts Code 50/2016; - for the purposes of the census in BDNA (Antimafia National Database) in accordance with the D. Lgs. 159/2011 on anti-mafia. Other controls are carried out on the products purchased, aiming at combating fraud in commerce, in relation to the compliance of such

products to the technical characteristics agreed under the contracts undersigned. These controls are implemented by the Scientific and Technical Committee and by Istituto Nazionale Assicurazione Infortuni sul Lavoro (INAIL), as established under D.L. 17 March 2020, n. 18. Each contract undersigned can be terminated in case of non-compliance to the minimum technical requirements agreed under the contract. In such case, no payments shall be executed, without prejudice for the greatest damage arising in case of breaches.

9. Have your authorities applied or strengthened whistle-blower protection or reporting systems, including those that afford opportunities for confidential and/or anonymous reports, and how to address such reports?

According to specific dispositions contained in the AML legislation, the obligation to report suspicious transactions is covered by a high level of confidentiality and secrecy especially aimed at protecting the reporting subject.

On the whistleblowing front, ANAC supported the advocacy of civil society calling for strengthening the protection of whistleblowers. Such instrument must be preserved in times of emergency, when transparency standards may dim. An example of the civil society initiative is the manifesto “Giustaitalia” patto per la ripartenza”, adopted by Libera and many other CSO entities. The public sector is urged to become proactive and take advantage of reports by whistleblowers since they may help avoiding further prejudices to public health as well as the mismanagement of public resources.

Use of information and communication technology tools

10. Has the government used information and communication technology tools to build, implement and/or maintain resilient emergency response systems? If yes, please explain what types of tools have been used and include relevant links, if possible.

In this context, ANAC launched a study on Using technologies for the prevention of corruption. According to its terms of references, the paper should address new digital-based tools, including apps, as well as innovative use of existing techniques that accelerate, extend, facilitate or otherwise improve corruption-prevention mechanisms (such as increase transparency and accountability; promote citizens and/or wider, deeper or more effective checks) and support for municipalities and local administrations.

The study should focus on data mining and experience sharing; use of blockchain system; use of mobile application for whistleblowing; collaboration platform for anticorruption stakeholders in regard of public policies assessment; electronic connectivity; use of IT tools in corruption risk-management and in election campaigns; e-learning solutions for enhancing anti-corruption training in the local public sector; detecting anomalies in firms’ ownership structure; and the use of open data on public market to detect and prevent corruption.

The pandemic brought ANAC to reassess the relationship between simplification, digitization and transparency, with a view to promoting innovation and efficiency in the management of public purchasing processes. From the existing framework of legislation, it has already identified concrete tools and actions to simplify procurement management, remove obstacles to full digitisation of tenders and increase transparency. The principle of a single submission of data, already provided for by the Code of Public Contracts, streamlining the communication obligations and making more broadly available information on public procurement to institutional bodies and citizens, is an area to address in the near future. Pending the completion of the database of economic

operators referred to by Art. 81 of the Code, a major improvement should come from the significant reduction of the terms to appraise the general requirements in a tender won by an economic operator already positively checked in a previous tender within a predefined time interval.

11. If possible, please describe the benefits and challenges of using the tools identified in 10?

12. Has the government used information and communication technology to help manage and oversee public procurement during times of emergencies? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

13. Has the government used information and communication technology to promote transparency in the management of public finances during times of emergencies and crisis response and recovery? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

Engagement of actors outside the public sector

14. If possible, please provide an overview of how the government has partnered with, or encouraged the participation of, actors outside the public sector to help monitor and support oversight of government actions during times of emergencies and crisis response and recovery. Please also include any future initiatives planned.

The Italian civil society and the media - especially investigative journalists - have been very active during the emergency.

They have presented some example of activities where civil society had an impact:

- as in several other European Countries the right to access information (FOIA) was suspended by the Government. Transparency International Italia and several other CSOs raised the public awareness on the negative impact that this measure could have. The campaign for re-establishing the right to information gathered a lot of attention; the civil society asked the public administration to improve the active transparency efforts during the period of suspension of the right to information in order to allow the public oversight. Some institutions, as the CPD, improved the quality of the published data.
- Transparency International Italia launched a campaign for the publication of open and machine-readable data on the diffusion of the pandemic, mainly targeted to the Regions: Presidenti delle Regioni aprite i dati sul Covid-19. TI-It and the other partners tried to engage the OGP Team of the Ministry for the Public Administration, but the feedback to the campaign was too late - the answer by the Team arrived more than a month after the request by CSOs - and Regions still publish incomplete and non-reusable data.
- Transparency International Italia organized 5 webinars on how to enforce public

oversight. More than 100 people attended the webinars.

- Transparency International Italia published a specific map of the main risks related to the management of the pandemic. The paper had a wide diffusion and was delivered to all public health authorities through the Healthcare Integrity Forum of TI-It.

On the whistleblowing front, ANAC supported the advocacy of civil society calling for strengthening the protection of whistleblowers. Such instrument must be preserved in times of emergency, when transparency standards may dim. An example of the civil society initiative is the manifesto “GiustaItalia” patto per la ripartenza”, adopted by Libera and many other CSO entities. The public sector is urged to become proactive and take advantage of reports by whistleblowers since they may help avoiding further prejudices to public health as well as the mismanagement of public resources.

15. Are there any policies or initiatives that particularly facilitated the engagement of actors outside the public sector in these contexts? If yes, please describe.

III. Responding to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. If possible, please provide examples of detected or suspected instances of domestic or transnational corruption and how these were identified in your country. If the information is sensitive, please describe the typology or give anonymized examples.

As an example of suspicious activity detected by obliged entities and analyzed by FIU Italy please consider the following sanitized case.

A newly established company with minimal capital means, referable to a foreign person of young age and lacking professional experience, receives significant amounts of funds for consulting activity. The said funds, which came from a foreign company winning bidder of public contracts involving medical equipment, were used for the purchase of luxury goods and real estate of prestige, as well as for transfers to various parties. From the verification of the counterparties of these latter transactions, connections emerged with individuals working in the health sector and/or with previous public appointments. In addition, please refer to question I-3.

2. How did the government respond? Has your country taken any steps to identify, investigate or prosecute corruption in emergency and crisis responses and recovery? Examples may include an interagency cooperation taskforce among anti-corruption authorities, analysis of suspicious transaction or financial disclosure reports, greater cooperation across international borders, strengthening investigation and prosecution capacity, etc.

Please refer to question I-1., I-3. and II-3.

3. In its response, did your authorities find it necessary to seek or request international cooperation (e.g. mutual legal assistance or direct law enforcement cooperation)? Please provide details and examples. How effective do you believe the cooperation was, and what were the main challenges? Was the assistance provided, were there any obstacles?

Please refer to question I-3.

In general, mutual legal assistance and direct law enforcement cooperation did not change significantly in quantity, rather in quality: during the pandemic the criminal activity faced a significant increase in the cyberspace (i.e. on-line scams, frauds, illegal e-trading and e-commerce, etc.), therefore the main challenges, as usual, were to be faced in the lack of legal framework in some affected countries or in the differences in the existing one (e.g.: an illegal activity was considered a crime in one country while in another one it was considered a misdemeanor or a simple infringement)

4. Has your government received any requests for international cooperation from other countries seeking to identify, investigate or prosecute corruption during times of emergencies and crisis response and recovery? Please provide details and examples. How effective do you believe your authorities cooperated, and what were the main challenges? Was the assistance provided, were there any obstacles?

No, as far as police cooperation was concerned in the September 2019- June 2022 period.

IV. Mechanisms to respond to corruption during times of emergencies and crisis response and recovery through international cooperation

1. Have your authorities had any practical experience in sharing information, including spontaneously, with authorities in other countries concerning suspected corruption in the context of emergency or crisis responses?

Please refer to question III-3.

The International Police Cooperation Service, as a single point of contact for Italy in matters related to police cooperation, received from abroad various requests for corruption related cases, mainly concerning on-line frauds and/or scams.

In the context of the FIU-to-FIU cooperation, FIU Italy received numerous requests and spontaneous disclosures regarding possible risks, related to money laundering, regarding the emergency and the crisis responses. In this context some exchanges pertained to fraud schemes or bribery activities which were followed by the transfer of proceeds abroad.

The so called “CANAL COVID”, developed in the framework of EU programs as EL PAcCTO and EUROFRONT, created strategic communication channels to exchange experiences on laws and administrative actions to mitigate the risk of corruption in procurement related to the pandemic economy, the management of frontiers and the international cooperation to fight the smuggling of health products.

2. Has your government used electronic communication channels or networks, including those of INTERPOL or the GlobE Network, that enable the prompt exchange of information for the investigation and prosecution of corruption offences in the context of emergency and crisis responses?

Yes, International Police Cooperation Service works on four internationally recognized police cooperation channel: INTERPOL, EUROPOL, Schengen Treaty communication tools and Asset Recovery Office network (formal and informal, like CARIN et alia) Information exchanges between FIUs take place via rapid and secure electronic communication systems. At an international level, the Egmont Group manages and updates its encrypted platform, the Egmont Secure Web. At EU level, a decentralized communications infrastructure called FIU.NET is used for structured bilateral or multilateral information exchange, guaranteeing standardized, immediate and secure data exchange.

3. Are you aware of any examples of joint or parallel investigations or the bilateral sharing of capacity and expertise on investigating and prosecuting corruption in this context?

Yes; please refer to EPPOs press releases: <https://www.eppo.europa.eu/en/news>

4. Have you taken additional measures to analyse asset declarations, financial disclosures and/or suspicious transaction reports during times of emergencies or crisis response and recovery?

From the FIU prospective in the first two years after the pandemic, STRs related to the COVID 19 emergency were 5.365 in 2021 and 2.197 in 2020 (out of a total of 139.524 in 2021 and over 113,000 in 2020).

For further specifications please refer to data published in FIU2021 annual report https://uif.bancaditalia.it/pubblicazioni/rapporto-annuale/2022/annual_report_2021.pdf?language_id=1

5. Have you experienced challenges in accessing adequate, accurate and up-to-date information on the beneficial ownership and control of legal persons in other jurisdictions? In your view, what may be improved to enable effective, timely access to such information?

An additional help to booster the rule of law and the preventive tackling of organized crime's infiltrations is represented by the effective implementation and strengthening of the use of beneficial ownership's databases. Since 2014, at international level, the importance of adopting measures, including legislative ones, and using analytical and investigative instruments that promote the timely identification of beneficial owners of legal persons and legal arrangements has been stressed as an effective tool to prevent and fight corruption and transnational crime illicit activities. Therefore, capital relevance should be put on the adoption of such measures, following the G20 High-Level Principles on Beneficial Ownership Transparency and implementing the FATF Standards effectively, including by ensuring competent authorities have access to adequate, accurate and timely information on the beneficial ownership and control of legal persons and arrangements. Countries could implement this, for example, through central registers of beneficial ownership of legal persons or other appropriate mechanisms. At EU level, such principle has been firstly stated through the Fourth Anti Money laundering Directive (2015/849), that requires information on beneficial ownership for companies to be held in each Member State in a central register, such as a commercial register, a company register or a public register; following Fifth AML

Directive (2018/843) requires those register to be publicly accessible, and obliges entities to provide "adequate, accurate and up-to-date" information on their beneficial owners to ensure accuracy of beneficial ownership registers.

6. Have you experienced challenges in verifying assets beneficially owned by public officials abroad? In your view, what may be improved to enable effective, timely access to such information?

Please refer to question IV-5.

7. Have there been any efforts to support anti-corruption practitioners and law enforcement authorities in your country, including human resources management and opportunities for capacity-building and peer-learning on methods, tools and technologies for countering corruption in the context of emergency and crisis responses?

Please refer to question I-1.

8. In your view, are there any unique aspects of requesting or providing international cooperation in emergency and crises responses as opposed to regular cases?

Not in particular; through the INTERPOL cooperation channel a global covering of the investigative information is always possible.

9. Does your government have any experience in receiving or providing international financial assistance (such as donor funding or technical assistance) to address emergency situations? In your view, what are effective mechanisms to strengthen integrity and prevent corruption in the provision of emergency relief funds? What should be improved?

V. Effectiveness of international frameworks to respond to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. Are there any longer-term trends related to addressing corruption in emergency and crisis responses that require a new or improved anti-corruption approach in the future? Or that require greater international cooperation or new ways of working together? Please explain.

Please refer to question I-1

With particular reference to the crimes related corruption we can underscore that the future Anti Money Laundering European Authority, to be established in the EU, will also act as a Mechanism of support and coordination of the EU FIUs. In such role it will cover a central position to strengthen cooperation among FIUs, to coordinate FIU's joint analyses, to promote operational convergence among FIUs, to enhance IT tools.

It will foster the convergence of FIUs by implementing common standards for detection, analysis and dissemination of suspicious transactions; it will request data and analysis from FIUs for the purpose of supranational risk assessment, collect statistical information on the tasks and activities of FIUs; draft regulatory and implementing technical standards to be proposed to the Commission and guidelines and recommendations addressed to FIUs and obligated entities; provide specialized training and assistance to FIUs

2. Are there any measures or processes that you would consider good practices to facilitate international cooperation and rapid exchange of information in emergency and crisis situations? Examples could include measures to accept electronic copies of mutual legal assistance requests and prioritize requests concerning corruption during times of emergencies and crisis response and recovery. Has your country had any experience in this regard?

Please refer to question I-1 and II-3.

3. How should countries strengthen collaboration to address corruption risks arising in emergency and crisis situations, with respect to international cooperation? Please list up to three measures countries could apply that would strengthen international cooperation in this regard.

Please refer to question I-1 and II-3.

1. create a governmental SPOC for sharing strategies;
2. create a LEAs' SPOC for sharing investigative information/intelligence (when legally possible);
3. implement and enforce the existing international legal tools (UNTOC-UNCAC)

4. Have there been any efforts by your government to enhance cooperation with multilateral, international or regional bodies to address corruption and other forms of crime during times of emergencies and crisis response and recovery?

Please refer to question I-1.

VI. Data collection

1. Have your authorities collected data or statistics to track and analyse trends concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery. Are these publicly available?

On 21 August 2020, ANAC released a vast cognitive survey on the call for tenders related to the pandemic. Taking into account the socio-economic impact of the emergency, the survey focuses on public expenditure nationwide for treating and stemming the contagion during its peak (1 March-30 April) which amounted to 5,8 billion €. More than 40% of it has been contracted by the CPD and the SC. In order to grasp a detailed picture of the public spending related to the emergency, through a specific questionnaire ANAC has collected answers from a sample of 182 contracting bodies that called for bids in the same period, selecting the larger bids from each of these authorities.

The survey has exposed some hurdles that are currently under specific ANAC surveillance and oversight. Some of them may steer around administrative inspection or be reported by ANAC to the judicial authority for criminal investigation and prosecution.

This can be considered an effective best practice to be shared with G20 partners, according to question 11, since it exposes with a high rate of transparency detailed information on the public expenditure related to the emergency and implements the criteria of public monitoring and surveillance over public resources. The described new modality of detection and appraisal of corruption schemes completes the traditional risk assessment channels.

At the following link [Microsoft Word - Indagine Covid19 - 2 fase - Relazione al Consiglio - vers. definitiva per PUBBLICAZIONE 13 8 2020.docx \(anticorruzione.it\)](#), it is available the second phase report and relevant attachments (call for tenders, selected sample; census of questions and replies by contracting authorities; price analysis; summary of responses and contracting data). More information is given in n. 8.

Between the end of February and mid June 2020, FIU Italy received approximately 350 Suspicious Transaction Reporting (STRs) directly related to the Covid-19 pandemic. Significant cases also emerged from exchanges with other FIUs. The analysis of the STRs confirms the emergence of all types of risks previously described. Anomalies were found in the supply of personal protective equipment both to private and public clients.

Numerous cash movements have also been detected, often related to the restrictions on individual mobility in the acute phase of the pandemic and the measures of social confinement, but could sometimes hide illicit purposes. In some cases, the subjective profile of the names involved and the operating methods suggested the possible involvement of organized crime and forms of usury.

The Italian National Anti-Mafia and CounterTerrorism Directorate (hereinafter DNA) during the emergency has developed innovative forms of crime analysis and of coordination among specialized antimafia prosecutors, moving from its already established database SIDNA.

The first DNA response to the COVID 19 threat for integrity of public administration and transparency of market and procurements focused on designing strategies to prevent and counter the infiltration of mafias in the economy of the crisis, during and after the pandemic.

Moving by two assumptions: a) we can have corruption without the mafia, but no longer have mafia without corruption, b) emergency becomes a source of income for organized crime, DNA has developed a context analysis on COVID 19 and identified three main information channels to monitor: 1) the health goods' market 2) the financial movements; 3) the quality of the subjects involved. In this framework, for instance, the DNA has cross-checked the national and local Business Registers to ascertain whether ad hoc companies had been created for the import/export of medical supplies.

The snapshot highlighted some common features of infiltration flows as:

- transnational character of the activities involving more than one Country;
- use of technology also providing e-commerce platforms;
- lack of a concrete and efficient beneficial ownership transparency.

It emerged that criminal organizations try to offer illicit goods and services based on the demand and use sophisticated mechanisms to manage the supply, also with the help of brokers and brokerage partners.

Please refer to question I-1..

At national level, the Criminal Analysis Service (CAS), depending from the Criminal Police Directorate of the Italian Ministry of Interior, publishes a quarterly periodic assessment of the situation concerning corruption related crimes in Italy (for police forces only).

The Anti-Money Laundering working papers issued by the UIF and published on the Unit's website contain Data Statistics and Analysis and Studies on sanitized cases from STRs.

Please refer to the following links in English regarding the UIF's annual report:

<https://uif.bancaditalia.it/pubblicazioni/rapporto-annuale/index.html>

and the said working papers in Italian:

<https://uif.bancaditalia.it/pubblicazioni/quaderni/index.html>

2. Have your authorities collected data or statistics to track and analyse trends and links between corruption and other forms of crime? Are these publicly available?

Please refer to question I-1..

At national level, the Criminal Analysis Service (CAS), depending from the Criminal Police Directorate of the Italian Ministry of Interior, publishes a quarterly periodic assessment of the situation concerning corruption related crimes in Italy (for police forces only).

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 23 of resolution 9/1, as well as any challenges faced or technical assistance required.

Please describe (cite and summarize) measures/steps your country has taken, if any (or is planning to take, together with the related appropriate time frame) to explore and enhance knowledge of the links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering, including during times of emergencies and crisis response.

States parties are invited to respond to the following questions:

I. Analyses and assessments to explore and enhance knowledge of the links between corruption and other forms of crime

1. Has your government undertaken any analyses or assessments to better understand the links between corruption and other forms of crime, including typologies of crime and how corruption may be used to facilitate and enable organized crime?

Please refer to question I-1..

At national level, the Criminal Analysis Service (CAS), depending from the Criminal Police Directorate of the Italian Ministry of Interior, publishes a quarterly periodic assessment of the situation concerning corruption related crimes in Italy (for police forces only).

In addition elements for better assessing and analysing typologies of illicit activities related to organized crime also emerged from FIU Italy's activity. As per the last annual report (please refer to the link provided under response n. VI.1) the STRs with a possible link to organized crime represent about 16 % of the entire volume of reports received.

These mostly relate to tax evasion and transactions with links to foreign countries.

Please note that 5.2 % of these kind of STRs were classified as referable to the pandemic-related risk area.

FIU Italy recently completed a mapping exercise regarding firms in Italy potentially connected to organized crime. The analysis focused on a model of firm characterized by a potential 'proximity' to organized crime, to be verified in the appropriate investigative forms. The exercise started from the analysis of some specific criteria (firms or members of their governance flagged or mentioned in STRs or selected among persons of interest on the basis of information exchanges with the DNAA; persons investigated for mafia crimes who appear in business archives, or named in information requests from the judicial authorities regarding organized crime) to assist the FIU in the analysis of STRs and in analyses and studies on the phenomenon of potentially infiltrated firms.

2. Has your government taken any measures to strengthen legal, regulatory and policy frameworks that recognize how corruption and other forms of crime may be linked and that call for coordinated anti-corruption action?

Please refer to question I-1..

At national level, the Criminal Analysis Service (CAS), depending from the Criminal Police Directorate of the Italian Ministry of Interior, publishes a quarterly periodic assessment of the situation concerning corruption related crimes in Italy (for police forces only).

With the transposition of the 4th EU Anti-Money Laundering Directive 2015/849, the role of the DNAA in the AML national system has been reinforced and clearly defined: by law, the DNAA, in the exercise of its powers and in the performance of the functions of coordinating investigations and triggering new investigations, promptly receives from the FIU, information from STRs necessary for the verification of their possible relevance to ongoing judicial proceedings. The DNAA may also request any other information and analysis elements it deems of interest, including for the purposes of the power of triggering new investigations attributed to the National Prosecutor.

Please consider the press release regarding the MoU between the UIF and the DNAA at the following link:

https://uif.bancaditalia.it/pubblicazioni/comunicati/documenti/Protocollo_DNA-UIF_12_marzo_2021.pdf

3. Does your country's national risk assessment or other policy framework to prevent and combat money-laundering recognize and address the risk of laundering of proceeds of corruption and other economic crime?

In the updated National Risk Assessment (2018), corruption is defined as one of the three major risks currently existing in Italy (please refer to the link below and spec. pp. 13 and 14) https://www.dt.mef.gov.it/export/sites/sitodt/modules/documenti_en/prevenzione_reati_finanziari/prevenzione_reati_finanziari/Italyxs_national_money_laundering_and_terrorist_financing_risks_assessment_Summary_x5x.pdf

II. Specific mitigation measures to address corruption and other forms of crime during times of emergencies and crisis response and recovery

1. Have your country's authorities undertaken any investigations into unfair commercial practices, such as price-gouging and the manipulation of prices of essential goods and services, or bids, or abuse in the allocation, distribution, use and management of relief and recovery funds? Have your country's authorities undertaken any investigations into corruption during times of emergencies and crisis response and recovery, such as bribery of procurement or other public officials, embezzlement of profits, diversion of resources and conflicts of interest? Have any measures been applied to freeze and seize related proceeds of crime?

Yes to all questions. Information can be found on open source tools:

- a. EPPA press release website: <https://www.eppo.europa.eu/en/news>
- b. <https://www.eurojust.europa.eu/news/fraud-scheme-least-eur-440-million-italy-halted>
- c. <https://www.fatf-gafi.org/media/fatf/documents/Update-COVID-19-Related-Money-Laundering-and-Terrorist-Financing-Risks.pdf>

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 22 of resolution 9/1, as well as any challenges faced or technical assistance required.

Italy, inspired to G20 principles and guidelines and implementing the G20 ACWG commitments, is at the forefront of the fight against corruption, organized crime and money laundering. Developing the achievement of G20 ACWG in 2021 we nurture the so-called holistic vision of corruption.

We reconstruct corruption as a tool for the infiltration in the public sector and a driver for accumulating illicit capitals and calibrate capacity building initiatives.

Our capacity building programs in progress, founded by European Union or directly by Italy, are aimed to disseminate the culture of legality to fight corruption and related serious crimes, through the direct testimony of the highest institutional authorities involved in the fight against corruption, organized crime and money laundering.

They also share institutional models of enforcement, whose tried and tested effectiveness in crime prevention and repression is highlighted as an international best practice

The most important challenge of this commitment is to identify the new form of corruption, starting from a preliminary geo-historical analysis of the criminal phenomenon, in order to deepen the most realistic legal, institutional, and regulatory needs.

It responds to a growing demand from a large number of countries, and it is geared, above all, to sharing Anti-Corruption models and protocols already adopted in the international sphere.