



POLICY MEMO

Europe Against Kleptocracy: A Plan to Combat Corruption and Illicit Finance

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Introduction

THE CRISIS: Corruption is Europe's Achilles Heel

Millions of European citizens view the European Union as an enabler, rather than an enemy, of corruption. Populists and strategic competitors have successfully framed EU institutions as opaque and compromised, pointing to cases of abused public funds, hidden offshore wealth, and backdoor influence by private lobbyists in Brussels. The result has been to strengthen the hand of foreign adversaries like Russia and to weaken global confidence in the integrity of the European project.

THE CAUSE: Illicit Finance is Everywhere

The source of the crisis is systemic. Kleptocrats both within and beyond the EU all take advantage of the same architecture of offshore global finance that guarantees them an efficient and anonymous way to move their money. These illicit financial networks amount to a major political and security threat to the EU. Decades of globalization and technological transformation mean these “foreign” threats are deeply intertwined with “domestic” regulatory failures.

THE THREAT: Illicit Finance Empowers Authoritarianism

Strategic competitors are exploiting Europe's open doors to illicit finance and influence for sale in politics. Hostile actors such as Russia and China are laundering illicit financial flows through EU financial institutions, concealing unlawful activities through loopholes in EU law, and establishing lobbying networks in EU capitals to further their strategic interests.

THE SOLUTION: Europe Must Act

Following successive revelations of money laundering and kleptocratic influence in EU democracies, urgent and expansive action is necessary. The EU has unique powers to introduce new norms and institutions to tackle the root causes of corruption in the global economy. By marshalling these powers and building new cleanup authorities, the EU can not only become a global champion of transparent governance, but can regain the trust of the European public and restore confidence in the European project as a whole. Making Europe an effective geopolitical actor abroad requires the same reform agenda necessary to defeat populism at home.



Setting Europe's Anti-Corruption Agendas for 2019-2024

This report offers expansive recommendations for an agenda of “Europe Against Kleptocracy” in the new EU political cycle. It contains three ambitious roadmaps for 1) the European Commission, 2) the European Parliament, and 3) the High Representative of the Union for Foreign Affairs and Security Policy and the European External Action Service. The report offers conclusions on the risk posed to European security of inaction as well as a policy checklist of all its recommendations.

THE EUROPEAN COMMISSION

Analysis

The European Commission is not a transparent institution. It is dogged by significant shortcomings concerning lobbying, conflicts of interest, and the so-called revolving doors between politics and private interests. The Commission lags behind key member states when it comes to transparency. Not only are more than 25,000 lobbyists estimated to be in Brussels (the second highest concentration after Washington, DC), but over 50 percent¹ of former commissioners are working for lobbying organizations. The European Commission must set higher standards for itself and spread them.

The Commission Must Act

The incoming Commission has a unique opportunity to assert leadership in challenging kleptocracy and the root causes of corruption. A new Commission portfolio for anti-corruption and transparency should be created. Creating a visible and roving champion, like the EU has for competition issues, will challenge the public's association of Brussels with corruption and enable reform-minded

leadership. The agenda should be defined broadly and also address excessive lobbying, public ethics, abuse of funds, money laundering, and tax avoidance.

Leading by Example

A Transparent Commission

The new Commission should lead by example and endeavour to become the most transparent political institution in Europe, the gold standard by which other institutions are measured. To achieve this, it should impose a lifetime ban on all commissioners becoming lobbyists. Secondly, it should place all significantly valuable assets belonging to commissioners and officials in a third party “blind trust.” This should include individual stocks and portfolios, which pose a potential conflict of interest. The Commission should also create an independent Commission Ethics Auditor to investigate and enforce a new Commission code of conduct against any potential conflicts of interest. Inspiration should be taken from US Senator Elizabeth Warren's proposed Anticorruption and Public Integrity Act to achieve this objective.

A Mandatory Lobbying Register

Before proposing legislation for other European institutions, the new commissioner should create a mandatory lobbying register for the Commission, as proposed by Transparency International, to replace the existing voluntary register. Not only would all lobbyists be required to register with the EU, but all Commission officials would also be required to disclose key details, minutes, and potential benefits to a newly created independent oversight authority. Additionally, lobbyists operating for authoritarian regimes or their proxies would be required to fill in additional requirements and be barred from meetings with officials working on issues relevant to national security.



End The “Revolving Door”

Populists have made significant mileage framing Commission portfolios as a stepping stone to lucrative careers in the lobbying sector. In addition to a lifetime ban on all commissioners becoming lobbyists, the new commissioner should work to end the so-called “revolving door” between Commission officialdom and lobbying. This could be achieved with a 10-year ban on all EU officials lobbying after leaving office, inspired by suggestions from Transparency International. This ban would be permanent when it concerns national security, authoritarian states, or their proxies.

Transparent Funds

The Commission would build new transparency mechanisms that allow citizens to track and follow the spending and outcomes of EU funds. This would include setting a new gold standard for the public disclosure of expenses of all Commission officials. To achieve this, a new online budget tool should be created in partnership with civil society groups to monitor and report on the dispensation of EU funds.

Beyond the Commission

A Civil Society Conference

The new commissioner would convene a civil society-led conference in Brussels with the goal of proposing ambitious common anti-corruption standards for European institutions and individual member states. The agenda should be defined broadly: limiting corruption, purchased influence, and foreign influence in domestic politics. At the conference, the new anti-corruption commissioner would push for minimum standards for all EU institutions and member states to match those it will have imposed on itself. The aim should be for EU-wide mandatory lobbying registers, lobbying curbs, an end to the “revolving door,” new transparency tools, and reporting requirements.

Partner with Parliament

The new commissioner would work closely with the newly elected European Parliament. After an election campaign in which the leadership of Renew, the European People’s Party, and the Progressive Alliance of Socialists and Democrats all drew attention to Russian foreign funding and abuse of parliamentary funds, the Commission should work to support the leadership of the European Parliament in its stated goal to curb these violations. Making the new European Parliamentary leadership co-sponsors, and inviting all MEPs to attend the civil society conference for EU transparency, will ensure a collaborative atmosphere between the Commission and Parliament on this reform agenda.

Partner with Presidencies

The new commissioner should partner with three presidencies of the European Council from member states known for their exemplary records on corruption. This offers the Commission the chance to work with member states eager to prioritize and support a reform agenda. The German presidency in late 2020, the French presidency in early 2022, and the Swedish presidency in early 2023 could promote a sequence of flagship reforms, setting a precedent for future collaboration on the challenge of corruption.

Partner with the New European Public Prosecutor’s Office

The new commissioner will have the opportunity to partner with the new European Public Prosecutor’s Office (EPPO). The launch of the EPPO in 22 participating member states means that the independent and decentralized prosecution office will have the power to investigate and prosecute crimes against the EU budget, including fraud and corruption. The Commission should partner with the EPPO and establish exemplary information-sharing as they work toward a similar agenda. The Commission should propose strengthening the body’s role in cases of money laundering and violations of the new European regulations in this area.

Institutions of Anti-Corruption

Anti-Money Laundering Agency

To tackle grand corruption, the new commissioner should use his term to oversee the creation of several new European authorities. First among them would be a European Anti-Money Laundering Agency with meaningful powers and substantial resources at its disposal, as outlined by the think tank Bruegel. Currently, enforcement of common European anti-money laundering standards rests with national authorities. This means that the weakest member state sets the Union's minimum standard and hence the entry point for illicit finance. Consequently, as cases like the 2017-18 Danske Bank scandal show, the EU has become a global hub for money laundering on an unprecedented scale. The creation of a new Anti-Money Laundering Agency would allow the EU to recognize this epidemic and move more quickly to address it.

Transnational Payments Database

In order for the European anti-money laundering agency to be effective, the new commissioner should initiate a global payments database, as suggested by the German Marshall Fund. Together with the European Central Bank, it should monitor all cross-border transactions that take place in euros, EU and EEA currency with a system modeled on that used by Canada, allowing instantaneous pick-up of suspicious transactions of large amounts.

AI-Powered European Databases

The new commissioner should commit European funding to the design of new IT systems for the European transparency regime. The oversight of huge registers of ownership, transactions, and suspicious activity will be greatly enhanced by systems combining artificial intelligence, machine learning, and blockchain.

Complete Beneficial Ownership Transparency

The commissioner should take the lead on completing

corporate beneficial ownership registries in Europe. The Fifth Anti-Money Laundering Directive contains major advances for transparency. However, as the deadline for implementation approaches, the project's progress remains uncertain. The Commission should focus on ensuring all EU/EEA sovereign territories—usually colonial territories technically not part of member states—fully comply with EU transparency regulations, or see corporate entities and individuals operating out of these territories lose access to the European market due to money-laundering risks.

Combat Election Interference

The Commission should propose a slate of new institutions to combat election interference and enforce new EU regulations against the foreign funding of political parties. These institutions would provide enhanced oversight of funding vehicles that foreign governments have used to influence the European political debate; think tank funding, media ownership, and sponsors of political advertising should all be made fully transparent. In addition, the Commission should pass a European Authoritarian Agents Act, modeled on the US Foreign Agents Acts, requiring those funded by authoritarian governments to register under a new supervisory system with lobbying curbs concerning national security.

End the Golden Visa System

The golden visa system, which grants residency or citizenship in EU member states in exchange for cash or investments, has become the weak link of the European anti-money laundering system. Such schemes have allowed kleptocrats and money launderers to purchase access to European markets and avoid the scrutiny of European regulators. The Commission should propose to strengthen member states' regulatory capacity by offering centralized background checks. Moving forward, the Commission should also launch a review to end the practice of citizenship-for-sale entirely.



Supporting Member States

Establish an EU Public Integrity Authority

The Commission should collaborate with member states to create a new European Public Integrity Authority to support anti-corruption efforts. This new authority would have the power to investigate and refer violators of European common standards and national regulations to national enforcement agencies. The European Public Integrity Authority would create a special interagency division dedicated to foreign electoral interference and violations.

Reinforce the EU Anti-Fraud Office

The commissioner would dedicate resources to dramatically increase the staff and strength of the European Anti-Fraud Office in order to support investigations of the abuse of public money across the EU. The Commission would also propose new legislation on tougher sanctions and enforcement mechanisms against EU officials and member-state officials found guilty of fraud.

Deepen Tax Solidarity

The Commission would redouble efforts to ensure tax integrity between member states. First, it would launch a review to highlight which tax policies constitute “dumping” in violation of EU principles of solidarity. Secondly—potentially in partnership with the French presidency—the Commission would propose regulations that close down these identified loopholes and renew the proposal for a Common Consolidated Corporate Tax Base (CCCTB) for collective solidarity against corporate tax sheltering.

Strengthen Asset Screening

Europeans lack a centralized mechanism to prevent the hostile takeover of their assets and technology by authoritarian states. The EU needs its own equivalent of the Committee on Foreign Investment in the United States (CFIUS) to screen and block malign investment in

member states. The EU has recently moved toward this with the creation of a new mechanism for member states and Brussels to share information and voice concerns over planned outside investment in critical infrastructure. But more remains to be done: only half of EU member states have national asset screening legislation in place. The new Commission should propose EU-wide regulations and begin to develop a new centralized institution with blocking power to defend Europe’s trade integrity.

Exporting EU Norms

Clamp Down on Tax Havens

The commissioner would redouble efforts to work with member states and the ECB to blacklist secrecy jurisdictions and tax havens globally. The Commission would propose a simple rule: all legal entities or individuals who cannot disclose their financial activities in blacklisted territories will lose the ability to operate or transact in Europe.

Reinforce Neighbourhood States

These norms should be exported as requirements of participation in the Eastern Partnership and all EU Neighbourhood policies. New EU transparency conference standards are required for these agreements.



THE EUROPEAN PARLIAMENT

Analysis

The European Parliament sets a poor example for Europe. The body is far from the most transparent or fiscally accountable parliament and suffers from major shortcomings when it comes to lobbying and expenditure. An estimated 30 percent² of former members are working as lobbyists in Brussels. Critically for its reputation, it has hosted many high-level debates on foreign interference but failed to meaningfully lead. The European Parliament must set higher norms for itself and spread them.

Parliament Must Act

Given growing public concern over the integrity of EU institutions, the European Parliament has an essential role to play in facilitating new legislation that cracks down on corruption within Europe's borders and firewalls its democracies from foreign kleptocrats.

The agenda for the European Parliament consists of:

- collaborating with the Commission to dismantle the architecture of illicit finance;
- pushing for new powers for the European Public Prosecutor's Office, which would allow direct legal actions even in countries where the legal system can be a party to corruption or laundering;
- championing new transparency codes to ensure that EU institutions remain open to public scrutiny; and
- demanding new cleanup institutions to enhance Parliament's oversight of public money.

The European Parliament is well-placed to lead a call for reform. It is also a crucial arena for alliance-building that can form a common political front against corruption.

A More Active Foreign Affairs Committee

There is a clear route to achieving these goals. The Foreign Affairs Committee has the ability to put pressure on the European Commission, and especially the High Representative, to act. The Committee has the power to prioritize issues throughout European institutions by commissioning studies, hosting hearings, and passing motions. The Committee should build on the success of its efforts to address Russian disinformation by promoting the issue of globalized illicit finance as one of its priorities for this cycle.

Reviving the ITCO Intergroup

This work also extends beyond the Committee. The European Parliament should guide and direct the EU's anti-corruption efforts by reviving the Intergroup on Integrity, Transparency, Corruption and Organized Crime (ITCO). Founded at the outset of the last parliamentary mandate in 2015, ITCO has largely gone dormant, and many of its former high-ranking members are no longer sitting in the European Parliament. MEPs should rediscover the powerful potential of the ITCO Intergroup and mobilize it to initiate parliamentary pledges, pass anti-corruption resolutions, host hearings, launch conferences, commission reports, and engage in advocacy across EU institutions.

Setting the ITCO Agenda

MEPs should use the ITCO Intergroup and the Foreign Affairs Committee to push the following:

Commissioning Comprehensive Reports

MEPs must commission reports on the state of corruption and money laundering in the EU and how this empowers Russian interference. These should be held in both the Foreign Affairs Committee and the ITCO. The parliament should hold hearings and ask a network of NGOs to produce the most up-to-date and comprehensive report on the state of corruption and money laundering in the EU.



From this could follow a blacklist of practices that require action. This must be followed up by supportive motions.

Expanding the Prerogatives of the European Public Prosecutor's Office

The European Public Prosecutor's Office is currently restricted to investigating corruption cases that affect the EU budget and the use of EU funds. ITCO should push to expand its role to all corruption crimes, money laundering, and the financing of terrorism. This should be laid down as both a foreign and domestic policy priority by motions calling for action from the Foreign Affairs Committee and ITCO.

Proposing New Cleanup Authorities

Given recent failures in anti-money laundering, Europe needs a new EU Anti-Money Laundering Agency (EUAMLA), a new European Transnational Payments Database, a new European Public Integrity Authority, a new centralized EU Foreign Asset Screening Authority, and new centralization of background checks for "golden visas." Meanwhile, existing institutions must be reinforced. Beneficial ownership registers and their equivalents must be completed, the European Anti-Fraud Office reinforced, and the powers of the European Public Prosecutor's Office extended to money laundering. The link between foreign and domestic policy should be made by motions from the Foreign Affairs Committee and ITCO.

Ensuring Greater Transparency

The Foreign Affairs Committee and ITCO should call for radical transparency reforms in EU budgets, expenses, and lobbying. MEPs must create new tools for budget oversight that allow both the public and the Parliament to understand the destination and purpose of budget spending. Meanwhile, MEPs must call for an end to the "revolving door" with post-service lobbying bans, mandatory lobbying registers, and bans on lobbying for authoritarian states and

their proxies.

Ending Electoral Interference

The Foreign Affairs Committee and ITCO should demand new EU regulations against the foreign funding of political parties, new EU regulations for transparency of media ownership, think tanks, and political advertising, and a new European Authoritarian Agents Act modeled on the US Foreign Agents Act.

Curbing Anonymous Finance

The Foreign Affairs Committee and ITCO should demand the completion of the Fifth Anti-Money Laundering Directive. Motions should also be passed calling for a new anti-money laundering directive that would prevent entities and individuals who cannot disclose their beneficial owners or activities in tax havens from operating in the EU.

Making Anti-Corruption Foreign Policy

The Foreign Affairs Committee and ITCO should call on the High Representative to champion anti-corruption and transparency, and should push for the appointment of a new EU Special Representative for Integrity, Transparency, Corruption, and Organized Crime to promote these norms in international organizations. A new European External Action Service (EEAS) office should be created to analyze global financial networks and new EEAS anti-corruption officers should be deployed to EU delegations in neighbourhood states. There should also be annual EEAS kleptocracy reports on neighbourhood states. Parliament should demand that the EU embed transparency standards in its trade deals, Association Agreements, and international accords.



THE EUROPEAN EXTERNAL ACTION SERVICE

Analysis

The European External Action Service has failed to lead on these issues. The institution has struggled for impact and been dogged by a failure of both leadership and vision since it was founded, having concentrated on a classic geographic- and crisis-based approach. The growing influence of foreign kleptocrats in European politics is eroding public trust in the EU at home and frustrating the EEAS abroad. Anti-kleptocracy initiatives offer the EEAS an opportunity to multiply the strengths of the EU while addressing its weaknesses, thereby undermining a key dimension of authoritarian influence and hybrid warfare.

A New Agenda

New Champions and Capacity

The High Representative of the Union for Foreign Affairs and Security Policy must champion the issue of secrecy jurisdictions and tax havens. For this, additional capacities need to be created. A new kleptocracy department should be established within the EEAS to analyze illicit financial networks abroad and investigate enablers inside the EU. The kleptocracy department would train and deploy anti-corruption officers for EU delegations in all neighbourhood states.

Anti-Kleptocracy Summit

An anti-kleptocracy summit in Brussels provides the appropriate setting to discuss progress and further steps in the fight against kleptocracy and bring further attention to the issue. The EEAS should convene an annual summit with relevant officials from around the world.

New Strategies

A comprehensive anti-kleptocracy strategy is necessary

for the EEAS to address the issue. This includes new strategies to coordinate with member states, as well as a global strategy to reform international institutions such as the IMF. An EEAS diplomatic presence at all major financial crime, corruption, money laundering, and offshore finance conferences is necessary to make the link to foreign policy. The issue should be championed in other regional organizations as well. Additionally, new studies should be commissioned that explore the creation of a European version of the US Office of Foreign Assets Control as well as the potential efficacy of new EU anti-money laundering authorities and transnational payments databases.

New Reporting

Stronger monitoring mechanisms are necessary to map illicit finance and address its root causes. The EEAS should issue annual kleptocracy reports on neighbourhood states, highlighting best practices and shaming those with deficient systems. This would allow Europe to better address the various enabling elements of kleptocracy and lead to more transparency.

Upgraded Delegations

New EEAS anti-corruption officers should be assigned to EU delegations worldwide as experts on the issue. Annual anti-kleptocracy conferences in neighbourhood states are essential platforms for an exchange of insights and cooperation with anti-corruption NGOs, media, and activists. Expanded support for those at the forefront of the fight against kleptocracy is necessary and important in developing coherent anti-kleptocracy strategies.

Working With Other Directorates-General

To export these norms, the new anti-kleptocracy legislation needs to be included in all EU trade deals and Association Agreements. Anti-kleptocracy legislation also has to be championed with regard to Eastern Partnership states. Access to EU markets and financial assistance should



only be granted in exchange for anti-corruption measures taken. In order to achieve this, the EEAS should cooperate with other Directorates-General regarding partnerships, foreign policy, trade, and corruption.

Upgraded International Cooperation

National governments need to coordinate leading anti-kleptocracy initiatives within the EU as well as initiate a trilateral dialogue with the US and UK. Open dialogue on appropriate anti-corruption and anti-money laundering policies and developing a common view of the challenges are crucial, especially since illicit financial flows are usually cross-border payments. An effective anti-money laundering supervisory system, therefore, requires cross-border coordination and cooperation among AML supervisors and other competent authorities.



Conclusion

Defending Europe is no longer as simple as border guards, boats, and drones. To address the European Union’s chief security concerns—rising authoritarianism, strategic rivalries, and kleptocratic influence—the EU must recognize that “foreign” threats are now deeply intertwined with the “domestic” infrastructure of illicit finance.

Europe has strong defenses in air, land, sea, and increasingly cyber. But not when it comes to financial flows. The result of this oversight has been to strengthen the hand of foreign kleptocrats and inflame populist sentiments across Europe. Millions of European citizens see the EU as an enabler, rather than an enemy, of corruption—and for good reasons.

To deliver on its security commitments, Europe needs to follow the money. Transparency is a synonym for security. Unchecked lobbying and the EU’s “revolving door” enable and extend kleptocratic networks in Europe. The flows of illicit finance that run through its Single Market and its institutions, public and private, are the continent’s primary weak link in age of Russian electoral interference, Chinese competition, and democratic backsliding in Central Europe.

Geopolitics begins at home. To secure Europe from rising threats to democracy, the EU must get serious about improving its own, delivering on an agenda of transparency and integrity in its institutions. As long as Europe closes its eyes to illicit finance, it is a political system at risk.



Policy Checklist

The European Commission

Commissioners and Commission Officials

- New Anti-Corruption and Transparency Commissioner
- Lifetime ban on commissioners becoming lobbyists
- 10-year ban on all Commission officials becoming lobbyists
- All large assets of Commission officials to be held in “blind trust”
- Permanent ban on lobbying for authoritarian states and proxies
- A mandatory lobbying register for the Commission
- New Commission code of conduct

Citizen Engagement

- New fully transparent reporting requirements for expenses
- New EU digital budget tool for citizens to track Commission funds
- A panel of civil society actors to monitor Commission spending

Beyond the Commission

Civil society conference to propose common EU rules

- Partner with the new leadership of the European Parliament
- Partner with the French, German and Swedish presidencies
- Partner with the new European Public Prosecutor’s Office in 22 countries

New standards to be proposed by the Commission

- EU-wide lifetime lobbying bans for cabinet-level politicians
- EU-wide 10-year ban on senior officials becoming lobbyists
- EU-wide “blind trusts” for politicians’ major assets
- EU-wide permanent ban on officials lobbying for authoritarian states



- EU-wide minimum transparency standards for expenses
- EU-wide digital budget tools
- EU-wide civil society coalitions to monitor public spending

Proceed with 22-member EPPO advance coalition if necessary

Institutions of Anti-Corruption

New European Cleanup Authorities

- New European Anti-Money Laundering Agency (EUAMLA)
- New European Transnational Payments Database
- New EU Public Integrity Authority
- Centralize background checks for “golden visas”
- Ambitious research project to design AI-powered European AML databases

Reinforce Institutions

- Reinforce the EU Anti-Fraud Office
- Extend powers of EPPO to money laundering
- Launch review on ending EU “citizenship for sale”
- Complete beneficial ownership with extension to all EU sovereign territories
- Prevent entities and individuals in EU sovereign territories from operating in the Single Market due to money-laundering risk until beneficial ownership is complete

Stop Election Interference

- New EU regulation against foreign funding of political parties
- New EU regulation for transparency of media ownership and funding
- New EU transparency regulations for think tanks and political advertising
- European Authoritarian Agents Act modelled on US Foreign Agents Act



Reinforce Tax Solidarity

- Review to highlight “tax dumping” policies in member states
- Propose tax harmonization policies to close down internal “tax dumping”
- Propose policies that encourage collective solidarity against corporate tax sheltering

Reinforce Asset Screening

- Centralized mechanism to screen and block foreign investment, like US CFIUS
- Require all EU member states have national asset screening legislation
- New EU-wide regulations to set minimum standards for asset screening

Stop Tax Havens

- Redouble efforts with ECB to blacklist havens and secrecy jurisdictions
- Prevent entities and individuals who cannot disclose their activities in tax havens from operating in the EU

The European Parliament

MEPs must:

Regularly commission reports on the state of corruption and money laundering in EU and how this empowers Russian interference

- Hold these in both the Foreign Affairs Committee and ITCO
- Ask a network of NGOs to produce reports on the state of corruption and money laundering in the EU

Demand expansion of prerogatives of the European Public Prosecutor’s Office

- Lay this down as a foreign and domestic policy priority by motions calling for action from the Foreign Affairs Committee and ITCO
- Expand role to all corruption crimes, money laundering, and the financing of terrorism

Demand new cleanup authorities

- Advocate for new EU Anti-Money Laundering Agency (EUAMLA), a new European Transnational Payments Database, a new European Public Integrity Authority, a new centralized EU Foreign Asset Screening Authority, and new EU centralization of background checks for “golden visas”
- Reinforce existing institutions: beneficial ownership registers, European Anti-Fraud Office, powers of the EPPO extended to money laundering



- Make the link between foreign and domestic policy by motions from the Foreign Affairs Committee and ITCO

Demand transparency

- Demand European Parliament and EU institutions become the most transparent in Europe
- Create tools for budget oversight that explain the destination and purpose of budget spending
- Call for an end to the “revolving door” with post-service bans, mandatory lobbyist registers, and bans on lobbying for authoritarian states

Demand an end to electoral interference

- Develop new EU regulations against the foreign funding of political parties
- Develop EU regulations for transparency of media ownership, think tanks, and political advertising and a new European Authoritarian Agents Act modelled on the US Foreign Agents Act

Curb anonymous finance

- Foreign Affairs Committee and ITCO should demand the completion of the 5th Anti-Money Laundering Directive
- Motions should be passed calling for a new anti-money laundering directive
- Make anti-corruption a key element of foreign policy
- Foreign Affairs Committee and ITCO should call on the High Representative to champion anti-corruption and transparency and for the appointment of a new EU Special Representative for Integrity, Transparency, Corruption and Organized Crime to champion these norms in international organizations.
- New EEAS office to analyze Russian and Chinese financial networks
- New EEAS anti-corruption officers in EU delegations in neighbourhood states
- Demand annual EEAS kleptocracy reports on neighbourhood states
- Demand the EU embed transparency standards in its trade deals, Association Agreements, and international accords



The European External Action Service

New Champions

- High Representative to champion the anti-corruption and transparency agenda
- A new EU Special Representative for Kleptocracy
- Annual anti-kleptocracy Brussels summit

New Strategies

- A new EEAS anti-kleptocracy strategy
- A new strategy to coordinate with member states
- A new strategy to push the issue at global organizations/summits with EU role
- A new EEAS diplomatic presence at all major financial crime, corruption, money laundering, and offshore finance conferences to make link to foreign policy
- EEAS to champion anti-kleptocracy in other regional organizations
- A new study about the creation of a European version of the US Office of Foreign Assets Control
- A new study exploring how new EU anti-money laundering authorities and transnational payments databases could enhance national security

New Capacity

- New EEAS kleptocracy department
- New EEAS office to analyze illicit Russian and Chinese financial networks
- New EEAS office to analyze Western enablers of kleptocracy

New Reporting

- Annual EEAS anti-kleptocracy reports on neighbourhood states
- Annual EEAS report naming and shaming Western enablers of kleptocracy



Upgraded Delegations

- New EEAS anti-corruption officers assigned to EU delegations worldwide
- EU delegations to name and shame Western enablers
- Annual anti-kleptocracy conferences in neighbourhood states
- Expanded support and cooperation for anti-corruption NGOs, media, activists

Working with Other Directorates-General

- Championing anti-kleptocracy legislation in EU trade deals
- Championing anti-kleptocracy in Association Agreements
- Championing anti-kleptocracy in Eastern Partnership states

Upgraded Cooperation

- Coordination on leading anti-kleptocracy initiatives with national governments
- Trilateral dialogue with US and UK

¹ “EU Money & Politics,” *Transparency International* EU, accessed November 26, 2019, <http://transparency.eu/priority/eu-money-politics/>

² *Ibid.*



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