



CENTRO DE INTEGRIDADE PÚBLICA  
Boa Governação · Transparência · Integridade



Global Civil Society  
Coalition  
for the UNCAC

# Civil Society Report

on the implementation of  
Chapter II (Prevention) & Chapter V (Asset Recovery) of the  
United Nations Convention Against Corruption

## Mozambique

### Article 13. Participation of society

(1) Each State Party shall take appropriate measures, within its means and in accordance with fundamental principles of its domestic law, to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations, and community-based organizations, in the prevention of and the fight against corruption and to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption. This participation should be strengthened by such measures as:

- (a) Enhancing the transparency of and promoting the contribution of the public to decision-making processes;
- (b) Ensuring that the public has effective access to information;
- (c) Undertaking public information activities that contribute to the prevention of corruption, as well as public education

(d) Reporting, promoting and protecting the freedom of the press and disseminating information concerning corruption. Freedom of the press and dissemination of information may be subject to certain restrictions, such as are provided for by law and are necessary:

- (i) For respect of the rights or reputations of others;
- (ii) For the protection of national security or order, public health or morals.

(2) Each State Party shall take appropriate measures to ensure that the relevant anti-corruption bodies referred to in this Convention are known to the public and shall provide access to such bodies, where appropriate, for the reporting, including anonymously, of incidents that may be considered to constitute an offence under this Convention, in accordance with this Convention.

By Centro de Integridade Pública

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The information contained in this report is the responsibility of the authors in its entirety and does not reflect the views of the Global Civil Society Coalition for the UNCAC and the donors who have made this report possible.

Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of February 10, 2026.

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The Centre for Public Integrity is a non-profit civil society organisation working in the area of transparency, integrity and combating corruption in the public and private spheres in Mozambique.

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## Abbreviations

ANAMOLA	National Alliance for a Free and Autonomous Mozambique
AR	Assembly of the Republic
BdM	Bank of Mozambique
CC	Constitutional Council
CCEP	Central Public Ethics Commission
CDD	Center for Democracy and Human Rights
CEDIMO	National Documentation and Information Center of Mozambique
CIP	Center for Public Integrity
CNE	National Elections Commission
CRM	Constitution of the Republic of Mozambique
EG	Egmont Group
EGFAE	General Statute for State Officials and Agents
EPCCAP	Strategy to Prevent Combat Corruption in Public Administration
FATF	Financial Action Task Force
Frelimo	Mozambique liberation front
GCCC	Central Office for the Fight against Corruption
GCRA	Central Asset Recovery Office
GIFiM	Mozambique Financial Intelligence Office
IGAP	General Inspection of Public Administration
LOMP	Organic Law of the Public Prosecutor's Office
LPP	Public Probity Law
MAEFP	Ministry of State Administration and Public Service
MOU	Memorandum of Understanding
PC	Penal Code
PGR	Mozambican Attorney-General's Office
PPO	Public Prosecutor's Office
PQG	Government Five-Year Plan
PR	President of the Republic
UNCAC	United Nation Convention Against Corruption
UNODC	United Nations Office for Drugs and Crime

## List of Persons Consulted

Name	Job title	Affiliation	Date of interview
Anonymous	National Documentation and Information Center of Mozambique (CEDIMO)	Ministry of State Administration and Public Service (MAEFP)	28/08/2025
Anonymous	Public Prosecutor	Mozambican Attorney-General's Office (PGR)	18/09/2025
Anonymous	Mozambique Financial Intelligence Office (GIFiM)	Legal and supervisory department	17/10/2025
Anonymous	GIFiM	Department of procedures and monitoring	17/10/2025
Anonymous	General Inspection of Public Administration (IGAP)	Former IGAP employee	16/09/2025

## I. Introduction

The Republic of Mozambique signed the United Nations Convention against Corruption (UNCAC) on May 25, 2004 and ratified it on December 26, 2006.

This parallel report reviews Mozambique's implementation of selected articles of Chapter II (Preventive measures) and Chapter V (Asset recovery) of the UNCAC. The report is intended as a contribution to the UNCAC implementation review process currently underway covering these chapters. Mozambique was selected by the UNCAC Implementation Review Group in July 4, 2016 by a drawing of lots for review in the first year of the second cycle.

**1.1 Scope.** The UNCAC articles and topics that receive particular attention in this report are those covering preventive anti-corruption policies and practices (Article 5), preventive anti-corruption bodies (Article 6), public sector employment (Article 7.1), political financing (Article 7.3), codes of conduct, conflicts of interest and asset declarations (Articles 7, 8 and 12), reporting mechanisms and whistleblower protection (Articles 8.4 and 13.2), public procurement (Article 9.1), the management of public finances (Article 9), access to information and the participation of society (Articles 10 and 13.1), judiciary and prosecution service (Article 11), private sector transparency (Article 12), and measures to prevent money laundering (Art. 14) under Chapter II. Under Chapter V, the UNCAC articles and topics that receive particular attention in this report are those covering anti-money laundering (Articles 52 and 58), and international cooperation for the purpose of confiscation (Articles 51, 54, 55, 56 and 59).

**1.2 Structure.** The report begins with an executive summary, including the condensed findings, conclusions and recommendations about the review process, the availability of information, as well as the implementation and enforcement of selected UNCAC articles. The following part covers the findings of the review process in Mozambique as well as access to information issues in more detail. Subsequently, the implementation of the Convention is reviewed, and examples of good practices and deficiencies are provided. Then, recent developments are discussed and lastly, recommendations for priority actions to improve the implementation of the UNCAC are given.

**1.3 Methodology.** The report was prepared by the Center for Public Integrity (CIP) with technical and financial support from the Global Civil Society Coalition for the UNCAC (formerly known as the UNCAC Coalition). The group made efforts to obtain information for the report from government offices and to engage in dialogue with government officials.

The report was prepared using guidelines and a report template designed by the Coalition for the UNCAC and Transparency International for use by civil society organizations (CSOs). These tools reflected but simplified the United Nations Office on Drugs and Crime (UNODC)'s checklist and called for relatively short assessments as compared to the detailed official self-assessment checklist. The report template included a set of questions about the review process and, in the section on implementation, asked for examples of good practice and areas in need of improvement in articles of UNCAC Chapter II on prevention and Chapter V on asset recovery.

We hope that this report will help address the long-standing deficiency in Mozambique, namely the implementation of anti-corruption legislation already approved, as well as legislation yet to be approved, including future laws considering the country's international commitments to combat corruption effectively.

## II. Executive Summary

Mozambique signed the UNCAC in 2004, subsequently ratifying the convention in 2006. Mozambique's accession to the convention was a significant milestone, as it obliged the country to introduce reforms to its anti-corruption policies and strategies. Perhaps the first and certainly one of the immediate measures introduced after joining the UNCAC was the approval of Law No. 6/2004 of June 17th, the first specific legal framework for combating corruption in Mozambique. This law foresaw and legalized the creation of the first specialized office in Mozambique on the prevention and combating of corruption, even before the country ratified the convention.

The creation of a specific office for the prevention and combating of corruption was a clear demonstration by the Mozambican state at the time that it intended to combat the phenomenon of corruption effectively. Following the creation of this office, other reforms were gradually introduced into the Mozambican legal framework for combating corruption at both the legal and institutional levels.

It is within the context of the reforms that have been introduced into the anti-corruption legal and institutional framework that CIP carried out the evaluation of some selected articles of the UNCAC as part of the second evaluation cycle in Mozambique, which officially began in December 2016. The report assesses Chapters II on preventive measures and V on asset recovery, covering both the legal and institutional framework and its practical application.

In Chapter II, the report evaluates articles 5 (preventive anti-corruption policies and practices), 6 (preventive anti-corruption body or bodies), 7.1 (public sector employment), 7.3 (political financing), 7,8 and 12 (codes of conduct, conflicts of interest, and asset declarations), 8.4 and 13.2 (reporting mechanisms and whistleblower protection), 9.1 (public procurement), 10 and 13.1 (access to information and the participation of society), 11 (judiciary and prosecution services), and 12 (private sector transparency). In Chapter V, it evaluates articles 52 and 58 (anti-money laundering), and 51, 54, 55, 56 and 59 (international cooperation for purpose of confiscation).

### 2.1 Description of the Official Review Process

The UNCAC review of Mozambique for the second review cycle has been completed, and the corresponding Country Review Report has been published on the UNODC website.<sup>1</sup> The review was conducted by Mauritius (same region) and Qatar.

The official review process in Mozambique was carried out with little to no information being available to the public. The entities responsible for conducting the review,

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<sup>1</sup> UNODC, "Mozambique Country Profile," <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed November 25, 2025.

namely the Attorney General's Office and the Ministry of Justice, Constitutional and Religious Affairs, did not publicly share information. For CIP to obtain details of the first and second evaluation cycles, it had to submit a request to the Attorney General's Office under the Right to Information Law (Law no. 34/2014 of 31 December).

## **2.2 Availability of Information**

The research process drew on information held in CIP's archives and on data gathered through its ongoing work in the areas under review. For this assessment, CIP consulted its network of key informants only to verify specific points, particularly to confirm whether changes have occurred in the legal framework or institutional practices. Not all information could be obtained from primary sources, since certain issues, especially those related to ongoing legal proceedings, fall under judicial secrecy, which is protected from disclosure under the Right to Information Law and criminal legislation.

## **2.3 Implementation in Law and in Practice**

Since approximately 2007 Mozambique has been in the process of domesticating the UNCAC, following its ratification in late December 2006. It is important to highlight that after the ratification of the UNCAC there have been significant advances with the creation of a new legal and institutional framework to combat corruption in the country.

However, even with the advances, Mozambique continues to be considered one of the countries with high levels of corruption in the world, according to Transparency International's Corruption Perceptions Index. To illustrate this fact, it should be noted that in the 2024 index, Mozambique occupied the 146th position out of 180 countries evaluated, obtaining 25 points. The perception is that what has failed to effectively combat corruption in Mozambique is the deficient application of existing legislation.

### **Preventive anti-corruption policies and practices (Art. 5)**

Mozambique has adopted many policies and practices to prevent and combat corruption, including the creation of anti-corruption legislation and the adoption of two anti-corruption strategies for public administration (the first was in effect between 2006 and 2010, and the second, currently in effect, covers the period from 2023 to 2032).

The main weakness of the Public Administration Anti-Corruption Prevention and Combat Strategy (EPCCAP) lies in its implementation, especially in relation to white-collar corruption, the accountability of politically exposed persons, and the pursuit of evidence in corruption cases. Over the past 10 years, experience shows that politically exposed persons in Mozambique are not held accountable in an exemplary manner, undermining the strategy's effectiveness.

### **Preventive Anti-Corruption Body or Bodies (Art. 6)**

In Mozambique, each public institution has policies and practices to prevent and combat corruption; however, there is a specialized body for this purpose: the Central Office for the Fight against Corruption (GCCC). Created in 2004, it is an independent and autonomous institution, with a structure integrated into the Public Prosecutor's Office (PPO) and is decentralized in the country's provincial capitals. However, despite the existence of a properly structured office, access to justice in more remote areas is difficult because there are no district delegations in provincial capitals.

Due to the Public Ministry's structure, which appoints the GCCC's leadership, it faces challenges stemming from a lack of independence. The GCCC also remains largely closed to civil society's participation in monitoring corruption cases and in sharing or publicly disclosing information.

### **Public Sector Employment (Art. 7.1)**

Although there is a legal provision about the rules for selecting candidates for entry into the civil service, several cases of fraudulent admissions and violations of the law have been reported. In other words, by law, the hiring of civil servants must be done through competitive examinations, where candidates compete for job openings on equal terms. However, in practice, the law has not been observed, which facilitates fraudulent admissions to the public service. In this regard, the press has reported several cases of bribery for admission to public service, mainly in the police, health and education sectors.

### **Political Financing (Art. 7.3)**

In Mozambique, there is no law regulating private political financing, which creates space for illicit financing. Although public political financing by the State is regulated, it has several deficiencies, especially regarding the accountability of political parties and presidential candidates. The institution to which the entities referred must report is the National Electoral Commission (CNE). However, it lacks sufficient knowledge and technical competence to inspect the accounts of political parties and candidates for political positions that receive public funding. This competence must be attributed to the Court of Auditors (in Mozambique, the 3rd Section of the Administrative Court, which functions in practice as a court of auditors). Furthermore, it is necessary to review the law on political parties, which have been in force for more than 30 years, since 1991, without any known reform regarding private political financing, since public political financing is minimally regulated.

### **Codes of conduct, conflict of interest and declaration of assets (Arts. 7, 8, 12)**

The analysis of codes of conduct, conflict of interest legislation, and asset declaration requirements indicate that these areas are not generally sufficiently regulated.

Currently, existing standards of conduct are largely general in nature and do not address the specific risks and particularities of each sector. In Mozambique, not all public bodies and institutions have specific codes of conduct, especially those most prone to corruption, except in a few cases such as the code of conduct of the national teachers' organization,<sup>2</sup> the Tax Authority,<sup>3</sup> or the regulations of the Police of the Republic of Mozambique,<sup>4</sup> which contain rules of conduct. However, it should be noted that the State has established general rules of conduct.

The law regulates conflicts of interest, including requirements for their prevention. However, the mechanisms for detecting and controlling such situations remain weak. In particular, the Central Public Ethics Commission (CCEP), which by law is tasked with supervising conflicts of interest and is legally independent, operates under significant practical constraints. Since its creation in 2012, the CCEP although it has its own facilities provided by the Government, CCEP does not make use of them, given that it does not have human resources for this purpose, such as a secretariat to receive complaints or reports on suspected cases of conflict of interest. Thus, the CCEP ends up receiving all the work at the parliament's facilities, taking advantage of the respective secretariat on which it depends for its operation. This dependence has the potential to compromise the independence and impartiality required of the CCEP when processing cases suspected of conflict of interest involving members of parliament.

The law also regulates the legal regime of gifts and bonuses to civil servants. The cases of legal violation known to date concern two former presidents of the republic (PR) and the current president, as they have been widely mediatized. Regarding the two former presidents, the first, Armando Guebuza, was forced to return a Mercedes-Benz car he had already received,<sup>5</sup> and the second, Filipe Nyusi, refused to accept a tractor when it was offered to him, as it was an act that violated the law.<sup>6</sup> As for the current president, Daniel Chapo, he agreed to receive goods offered to him during an official visit within the country.<sup>7</sup> In this last case CIP filed a complaint to the CCEP, which ruled in favor of PR, contrary to the Law of Public Probity (LPP), sparking public

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<sup>2</sup> MEPT (2020) Código de Conduta dos Professores, <https://mept.org.mz/wp-content/uploads/2020/02/codigo-de-conduta-dos-professores.pdf>, accessed on December 19, 2025.

<sup>3</sup> TOF Advogados (n.d) O Código de Conduta dos Trabalhadores da Autoridade Tributária e Aduaneira, <https://www.tofadvogados.com/post/o-c%C3%B3digo-de-conduta-dos-trabalhadores-da-autoridade-tribut%C3%A1ria-e-aduaneira>, accessed on December 19, 2025.

<sup>4</sup> Botetim da República, 15º Suplemento, <https://lexlink.eu/FileGet.aspx?FileId=1139398>, accessed on December 19, 2025.

<sup>5</sup> Diário de Notícias (9, 2014) Guebuza refuses luxury car offered by businessman, <https://www.dn.pt/arquivo/diario-de-noticias/guebuza-recusa-carro-de-luxo-oferecido-por-empresario-4153299.html>, accessed on January 2, 2026.

<sup>6</sup> Folha de Maputo (9, 2017) President of Frelimo refuses to receive tractor, <https://www.folhademaputo.co.mz/pt/noticias/nacional/presidente-da-frelimo-recusa-receber-tractor/>, accessed on January 2, 2026.

<sup>7</sup> Evidências (6, 2025) Government: Offers to Chapo in Gaza do not violate Public Probity law, <https://evidencias.co.mz/2025/06/10/governo-ofertas-a-chapo-em-gaza-nao-violam-lei-de-probidade-publica/>, accessed on January 2, 2026.

outrage.<sup>8</sup> This case demonstrates the potential for CCEP to be influenced by operational and material limitations. The law requires that CCEP publish its decisions on cases involving offers and bonuses that constitute conflicts of interest, which currently does not occur, making it difficult to conduct a thorough analysis of the commission's performance in such matters within the Public Administration.

Incompatibilities are regulated by the Constitution of the Republic (CRM), prohibiting certain functions within the organs of sovereignty from being simultaneously exercised by the same person, and by ordinary law, prohibiting public servants within the public administration from engaging in private activities that may conflict with the exercise of public duties. There are difficulties in knowing how the incompatibility regime is monitored. It should be noted that a case of incompatibility has already occurred, involving a public servant who, while still serving as deputy minister, was appointed to a position legally incompatible with that role. The appointment was immediately contested by citizens on social media and other platforms, prompting the Head of State, who had made the appointment, to rectify the situation.

The declaration of assets by public servants is regulated by law, regarding the form of deposit and inspection. Although there has been progress in the inspection mechanism with the introduction of an electronic platform for asset declarations, there is an aspect that needs improvement: the platform does not require the declarant to prove ownership of the declared assets. This loophole can be used to declare assets not yet acquired, allowing the acquisition to occur later through corrupt acts by the public servant, while justifying the assets' origin with the previously made declaration.

### **Reporting Mechanisms and Whistleblower Protection (Arts. 8.4 and 13.2)**

A law has been passed to protect whistleblowers. This law since it was approved in 2012, has never been applied, and the PGR presents several arguments for this not to be effective, from the non-regulation of the law to the lack of resources for the application of the protection measures provided for therein, and at the moment, alternative protection measures of dubious effectiveness and little known are used on an ad hoc basis, which does not provide whistleblowers with effective protection, as these measures differ from those established by law.

### **Public Procurement (Art. 9.1)**

The procurement sector in Mozambique remains largely non-transparent and has been the source for several cases of corruption. Although specific legislation exists to prevent and combat corruption and promote transparency in this sector, these successive reforms have failed to produce meaningful results. The public procurement sector is among the sectors with the highest number of cases of lack of transparency and corruption in Mozambique every year.

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<sup>8</sup> MZNews (6, 2025) CIP demands return of offers to Chapo made in Gaza, <https://mznews.co.mz/cip-exige-devolucao-de-ofertas-a-chapo-feitas-em-gaza/>, accessed on January 2, 2026.

To improve transparency in the procurement process, the Government introduced an electronic platform, and the current head of state has pledged to establish a centralized procurement center with the aim of addressing corruption and the lack of transparency in public contracting. In November 2025, in order to monitor and combat corruption in the public procurement process, a telephone platform for complaints was created to receive, forward, and handle complaints of illegal practices.

### **Access to Information and Participation of Society (Arts. 10 and 13.1)**

Mozambique approved the Right to Information Law in December 2014 (Law No. 34/2014), which became fully operational only after its regulations were adopted in December 2015. Despite being in effect for more than ten years, access to information remains limited, as public institutions continue to withhold information of public interest, whether proactively or in response to citizens' requests, reducing transparency in public administration and state-related business. Access to information in Mozambique remains limited by several factors, among them, the prevalence of a culture of secrecy, centralism, and fear, inherited from the single-party period that lasted between 1975 and 1990. This restricts the participation of citizens, non-governmental organizations, and civil society in efforts to combat corruption.

The EPCCAP in Public Administration (PA) is formally inclusive of civil society, the media and the private sector, but provides little clarity on the mechanisms for civil society and media to participate in monitoring its implementation. In Mozambique, civil society participation in joint actions with state institutions remains limited, as these institutions are often closed and not easily accessible.

### **Judiciary and Prosecution Services (Art. 11)**

The judiciary in Mozambique comprises the Supreme Court, Superior Courts of Appeal, Provincial Judicial Courts, District Judicial Courts, and other specialized courts. The Supreme Court is the highest judicial body and has jurisdiction over the national territory. The PPO, according to the Constitution, is an independent body, autonomous and with its own status.

Several measures related to the judiciary and the PPO have been implemented to strengthen actions to prevent and combat corruption, including enhancing the integrity and independence of the system. These include risk assessment studies in the justice system, strategic plans for the prevention and fight against corruption in the courts and the PPO, codes of conduct, ethics, and professional deontology, training for justice system actors, and a system for the declaration of assets of public servants managed by the PPO. Anti-corruption strategies were also developed (2006-2010) as components of the Global Strategy for the Public Sector 2001-2011, which aimed to improve the delivery of public services to citizens and develop an environment for the growth of the private sector.

The Government's Five-Year Plan 2015-2019 (PQG) reaffirmed the fight against corruption in its Strategic Objective No. 5. There are legislative packages that specifically address integrity issues in the Judiciary. The Judiciary Law (Law 7/2009 of February 12, amended by Law 3/2011 of January 11 and Law 8/2018 of August 27), which includes the Statute of Judicial Magistrates, strongly enshrines the need to grant judges independence. Another important law in this regard specifically addresses the members of the PPO: the Organic Law of the Public Prosecutor's (OLPP) Office (Law 4/2017 of January 18), which approves the Statute of the Public Prosecutor's Magistrates.

In the context of reinforcing the legal framework and justice institutions, Law 6/2004 was also approved, creating the GCCC in Maputo, the country's capital. In 2022, the 2018-2022 Strategic Plan was approved with the slogan "strengthening the fight against corruption."

### **Anti-Money Laundering (Arts. 52 and 58)**

The Mozambique Financial Intelligence Office (GIFiM) has very satisfactory legislation to carry out its anti-money laundering activities. In addition, there is the regulation of matters relating to the identification of the beneficial owner in the financial sector. However, the financial institutions have not complied with the obligation to identify the beneficial owner, which may be happening also because the regulator of the financial system, in this case, the Bank of Mozambique (BdM) in its supervisory activity has encountered difficulties due to insufficient human resources to cover all the financial institutions that exist in Mozambique. The fact that financial institutions do not identify the beneficial owner and the weakness of supervisory mechanisms make the Mozambican financial system vulnerable to money laundering. This is one of the situations that led Mozambique to be integrated into the Grey List of the International Financial Action Task Force (FATF) in 2022. Other factors included the weaknesses in GIFiM's performance, especially in preventing money laundering.

When Mozambique was integrated into the FATF grey list, a process of equipping this office with specialized technicians began, and advanced technology was introduced that makes the operation of the office more efficient. As a result, Mozambique was removed from the grey list on 24 October 2025 for the efforts it made in this regard, with institutional deficiencies in the fight against money laundering noted.<sup>9</sup>

One persisting major problem is the weak retention capacity of GIFiM technicians, since they are attracted by the private sector that offers better remuneration conditions and other better benefits than those that the State can offer to its employees.

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<sup>9</sup> Lusa (10, 2025) - Mozambique removed from international money laundering grey list, [https://www.rtp.pt/noticias/economia/mocambique-retirado-da-lista-cinzenta-internacional-de-branqueamento-de-capitais\\_n1693393](https://www.rtp.pt/noticias/economia/mocambique-retirado-da-lista-cinzenta-internacional-de-branqueamento-de-capitais_n1693393), accessed on October 24, 2025.

Regarding international cooperation, although it has signed Memorandum of Understanding (MOUs) with several countries and jurisdictions, there is no information on GIFiM's participation in actions that led to the confiscation and seizure of assets and their subsequent repatriation. It should be noted that GIFiM has not published an annual report regarding its performance.

### **International Cooperation for the Purpose of Confiscation (Arts. 51, 54, 55, 56, and 59)**

Mozambique has established a legal framework for extended asset confiscation and recovery, and it has enacted a law on international legal and judicial cooperation in criminal matters. It has also created the Central Office for Asset Recovery (GCRA) and passed the Law on International Legal and Judicial Cooperation in Criminal Matters. At the level of the Prosecutor's Office - General of the Republic, the Technical Directorate for International Legal and Judicial Cooperation was set up to deal with requests for mutual legal assistance in criminal matters.

However, to date, the PGR has published only one MOU on its website documenting the confiscation and repatriation of assets.<sup>10</sup> Although the PGR is designated by law as the central authority for international cooperation in asset confiscation and recovery, the Attorney General's annual reports do not record any cases in which such cooperation has led to asset confiscation or recovery for either the Mozambican State or foreign requesting states. The Attorney General of the Republic's annual report<sup>11</sup> only lists agreements signed with foreign countries and jurisdictions, without providing details on whether assets have been actively confiscated and repatriated through international cooperation, or whether foreign states have recovered assets previously hidden in Mozambique.

**Table 1: Implementation and enforcement summary**

<b>UNCAC articles</b>	<b>Status of implementation in law</b>	<b>Status of implementation and enforcement in practice</b>
<b>Art. 5</b> – Preventive anti-corruption policies and practices	Partially implemented	Moderate
<b>Art. 6</b> – Preventive anti-corruption body or bodies	Partially implemented	Moderate

<sup>10</sup> PGR. (2024). memorandum of understanding. <https://www.pgr.gov.mz/memorandos/>. Accessed on February 10, 2026.

<sup>11</sup> PGR. (2024). Annual report from the Attorney General. <https://www.pgr.gov.mz/informacao-anual-do-pgr-a-assembleia-da-republica/>. Accessed on February 10, 2026.

<b>Art. 7.1</b> – Public sector employment	Partially implemented	Poor
<b>Art. 7.3</b> – Political financing	Partially implemented	Poor
<b>Art. 7, 8 and 12</b> – Codes of conduct, conflicts of interest and asset declarations	Partially implemented	Moderated
<b>Art. 8.4 and 13.2</b> – Reporting mechanism and whistleblower protection	Partially implemented	Poor
<b>Art. 9.1</b> – Public procurement	Partially implemented	Moderate
<b>Art. 10 and 13.1</b> – Access to information and the participation of society	Largely implemented	Poor
<b>Art. 11</b> – Judiciary and prosecution services	Partially implemented	Moderate
<b>Art. 12</b> – Private sector transparency	Partially implemented	Moderate
<b>Art. 14</b> – Measures to prevent money-laundering	Fully implemented	moderate
<b>Art. 52 and 58</b> – Anti-money laundering	Partially implemented	Moderate
<b>Art. 53 and 56</b> – Measures for direct recovery of property	Partially implemented	Moderate
<b>Art. 54</b> – Confiscation tools	Partially implemented	Poor
<b>Art. 51, 54, 55, 56 and 59</b> – International cooperation for the purpose of confiscation	Partially Implemented	Moderate
<b>Art. 57</b> – The return and disposal of confiscated property	Not implemented	Poor

**Table 2: Performance of selected key institutions**

<b>Name of institution</b>	<b>Performance in relation to responsibilities covered by the report</b>	<b>Brief comment on performance (for example, inadequate resources, lack of independence, strong expertise)</b>
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The Central Office for the Fight against Corruption and their provincial representations	Moderate	The Central Office for the Fight against Corruption is not an independent or autonomous institution, being integrated within the structure of the PPO. Its director is appointed by the Attorney-General of the Republic, who in turn is appointed by the PR; an eminently political appointment. The office should receive sufficient human and financial resources to enable it to fulfil its mandate effectively.
Central Office for Combating Organized and Transnational Crime	Moderate	It is not an independent entity, being subordinate to the PGR. Its director is also appointed by the Attorney General of the Republic, to whom he reports on the activities of the office. This office is in the process of being equipped in terms of qualified human resources and materials
Asset Management Office	Moderate	This is an agency whose function is to manage assets seized or reverted to the State. It is also not an independent entity, being dependent on the Ministry of Finance. The director of this entity is appointed by the Minister of Finance. This organization also lacks human resources.
E.g., Central Procurement Authority	Poor	Mozambique does not have a central agency that deals with public procurement issues. There are several procurement process management units in public institutions. The president currently in office promised a centralized procurement process, and at for now an acquisition platform has been created.
National Documentation and Information Center of Mozambique (CEDIMO)	Moderate	CEDIMO is an entity dedicated to managing information within public administration. It has existed since 1977, and with the approval of the Right to Information Law, it also acquired the role of guaranteeing the implementation and monitoring of access to information. Therefore, it conducts training sessions for

		<p>public servants on mechanisms for accessing information.</p> <p>Although the law stipulates that CEDIMO should be an autonomous entity in administrative terms, in practice it is not. In addition, it is also financially dependent, further limiting its role.</p> <p>CEDIMO does not have the authority to compel institutions to make information available on their websites. Its activities are limited to awareness-raising campaigns.</p>
Financial Information Office	Moderate	The GIFiM has weaknesses in terms of qualified human resources. It also lacks sufficient financial and technological resources. It is a cabinet that is under the supervision of the Prime Minister, therefore not having organic independence.
Bank of Mozambique (BdM)	Moderate	The regulator of the financial system is the BdM. It has difficulties in supervising all financial institutions because it lacks sufficient human resources.
The Central Asset Recovery Office	Moderate	The GCRA is not an independent institution. It is still in an operative consolidation phase. This office has a purely administrative mandate, since it is responsible for recovering assets but does not conduct criminal proceedings or take part in the judicial processes that lead to the seizure and recovery of assets.
Judiciary and prosecution services	Poor	Materially non-independent bodies; little transparency and little accountability. Although the independence of the judiciary and the PPO is provided for in the CRM, this independence is not observed in practice since these bodies are appointed and dismissed by the PR, leaving the impression of their subordination to political power. Existence of a good legal framework, national and international, but

		<p>not materially independent. The law does not provide for term limits for senior positions in some sectors of the judiciary, nor for the highest positions in the judiciary. There is interference and dependence on political power.</p> <p>Culture of protectionism among members of the judiciary; bodies without financial independence budgets, which further reinforces their dependence on the executive power.</p>
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## 2.4 Recommendations for Priority Actions

1. Promote the development of specific **codes of conduct**, particularly for public institutions most susceptible to corruption, and create mechanisms to monitor their application. This could allow public servants to anticipate the expected conduct, preventing them from becoming involved in corruption and a lack of transparency.
2. Regulate the **whistleblower protection** law for its implementation and create mechanisms to protect whistleblowers in corruption cases, with a view to increasing the number of reports of corruption cases to the judicial authorities.
3. Create effective corruption reporting mechanisms.
4. Create a central state **procurement** body to oversee the entire public procurement process, aiming to promote transparency and combat corruption in procurement.
5. Promote compliance with the law in the **hiring process for new public employees**, to prevent bribery and other forms of corruption in the hiring of new employees at the public administration.
6. Approve the **civil confiscation law** as quickly as possible to ensure a faster recovery process, independent of the defendant's final conviction, considering the risk of recovered assets disappearing due to delays in the adjudication of corruption cases because of their complexity.
7. Introducing effective mechanisms in legislation and practice to ensure more efficient ways of monitoring cases of **conflicts of interest and incompatibilities** in violation of the constitution and laws, as well as guarantee effective oversight of asset declarations to combat the illicit enrichment of public officials who engage in the misappropriation of state assets and financial resources.
8. Strengthening the mechanisms of articulation between the **private business sector** through the respective business associations/associations and the PPO for the identification and reporting of more cases of corruption in the private sector for their subsequent investigation and application of appropriate legal measures.

9. Improve the salary conditions of **GIFiM's specialized technicians** to prevent them from being attracted to the private sector, where they are guaranteed better remuneration and other material benefits, which leads to the weakening of the Mozambican state's fight against money laundering.
10. Promote the creation of a law to regulate **private political financing** in order to oversee the illicit financing of political parties and their candidates with money from corruption, drug trafficking, and other crimes.
11. Institutionalize and enforce the **Right to Information Law** and its respective regulations to discourage institutions from failing to publish information of public interest.
12. Create an entity with effective powers to impose **sanctions** on leaders or employees who refuse or fail to provide information of public interest.
13. Strengthening the **independence of the judiciary** and the Public Prosecutor's Office, limiting the powers of the President of the Republic over them so that they become independent and autonomous.
14. Conduct **systematic oversight** of the implementation and operational effectiveness of policies and practices for preventing and combating corruption.
15. Enhance transparency of information related to the fight against corruption and stop restricting or intimidation measures towards civil society organizations.

### III. Assessment of Review Process for Mozambique

It is important to note that participation in both the first and the second review cycles has not been marked by broad civil society engagement. The evaluation process was neither made public through the media nor online, and participation was limited to direct invitations to a very small number of entities. Civil society participants in both cycles numbered fewer than five organizations in each cycle. This raises the question of why the authorities responsible for the process in Mozambique limited participation in the review. It is also necessary to know the reasons why a public invitation to participate was not issued, given that invitations could have also been sent to entities with a greater interest in or focus on combating corruption.

CIP was invited twice to participate in the consultation process and noted the low level of civil society participation, which led it to question the process's legitimacy. After the consultation meetings with the peer review teams, there was no further sharing of developments on how the process unfolded until its conclusion by the Mozambican authorities. CIP did not receive the report on the first evaluation process conducted by the Dominican Republic and Burkina Faso, nor does it know the recommendations made to the country or the action plan to follow up on them. In other words, this process in Mozambique is too opaque and almost secret, and is therefore only known to official entities, such as the PGR and the Ministry of Justice, Constitutional and Religious Affairs, which are leading the evaluation process internally.

Because CIP was unaware that information on the two evaluation cycles in Mozambique had been made public by UNODC,<sup>12</sup> it requested the relevant documentation from the Office of the Attorney General (PGR). The information on these two evaluation cycles should also be published on official Mozambican Government websites, including that of the PGR, and in widely circulated national newspapers. Publication in Portuguese, the official language of Mozambique, would allow broader public access and understanding. Although the information was available online, it was published only in English on the UNODC website, a language not widely spoken in Mozambique, and many stakeholders were unaware of its availability on an international platform.

Activities related to the dissemination of the UNCAC are not carried out in Mozambique. Most of the population is unaware of the existence of the UNCAC, and there is no effort to organize meetings to disseminate this international legal instrument to combat corruption, or to hold lectures to debate it. Therefore, work must be done to publicize the Convention and explain how it should be interpreted by citizens, so that they can take interest and monitor its application by the State bodies responsible. It should be noted that Information about the second evaluation cycle was not shared

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<sup>12</sup> UNODC, "Mozambique Country Profile," <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed November 25, 2025.

internally and was only published on the UNODC website in English. Because of this lack of awareness and the absence of civil society involvement, it is difficult to explain how the evaluation was conducted and what steps were followed.

### 3.1 Report on the Review Process

**Table 3: Transparency of the government and CSO participation in the UNCAC review process**

Did the government disclose information about the country's focal point?	No	No public information has been provided by the Government on the focal point for the peer review process.
Was the review schedule published somewhere/publicly known?	Yes	The only information available to us is what appears on the UNODC country profile webpage for Mozambique. <sup>13</sup> At the time of the review, there was no publicly accessible source where we could follow the development of the process, including the timeline and any potential changes to the calendar.
Was civil society consulted in the preparation of the self-assessment checklist?	Yes	<input checked="" type="checkbox"/> Anti-corruption and access to information CSOs <input checked="" type="checkbox"/> CSOs working on other issues <input type="checkbox"/> Academia <input type="checkbox"/> Trade unions <input type="checkbox"/> Other (please list)  At the time of consultation until now, CIP is the only organization working in anti-corruption. The other invited organizations worked in other areas.
Was the self-assessment checklist published online or provided to civil society?	No	It has never been published.
Did the government agree to a country visit?	Yes	We have no information on whether the Government agreed or was forced to accept the country visit since the process was never transparent.
Was a country visit undertaken?	Yes	We have no comments. The process was not explained. We were surprised when invited to be auscultated.

<sup>13</sup> UNODC, UNCAC IRM Mozambique Country Profile, <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed November 25, 2025.

		<p>- The first visit took place between July 23rd and 25th, 2013 - First evaluation cycle</p> <p>- The second visit took place between May 16th and 18th, 2017 - Second evaluation cycle</p>
Was civil society invited to provide input to the official reviewers?	Yes	<p><input checked="" type="checkbox"/> Anti-corruption and access to information CSOs</p> <p><input type="checkbox"/> CSOs working on other issues</p> <p><input type="checkbox"/> Academia</p> <p><input type="checkbox"/> Trade unions</p> <p><input checked="" type="checkbox"/> Other (Ministry of Justice)</p> <p>We were invited by the Ministry of Justice, Constitutional and Religious Affairs and the Attorney-General's Office.</p> <p>At the meeting we responded to questions presented on site. We received no prior information on how to prepare for our participation, and no explanatory guidance was provided on how the consultation would be conducted or which methodology would be followed.</p>
Was the private sector invited to provide input to the official reviewers?	No	<p>The process took place some time ago, so our recollection is limited. However, we recall that in both the first and second evaluation cycles, no more than three organizations were present, with the CIP being the only one actively working on anti-corruption.</p>
Has the government committed to publishing the full country report?	Yes	<p>The report was published by UNODC,<sup>14</sup> but it was not made available in Mozambique by the national authorities. It should have been published locally in Portuguese, the official language, so that Mozambicans could access it and draw their own conclusions about the evaluation. Publication only by international bodies and in English is insufficient.</p>

### 3.2 Access to Information

For the present analysis, the latest reports produced by civil society organizations on the assessment of the implementation of the Right to Information Law were consulted;<sup>15</sup> the relevant legislation was reviewed; the latest government report on the

<sup>14</sup> UNODC, "Mozambique Country Profile," <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed November 25, 2025.

<sup>15</sup> CEDIMO. (2014). Law on access to Information, <https://www.cedimo.gov.mz/index.php/documentos-e-arquivos-do-estado/legislacao/lei-de-direito-a-informacao>, accessed on July 6, 2025.

evaluation of the Right to Information Law was requested; and one of the officers responsible for CEDIMO was interviewed. The database of information requests made by the CIP, a civil society organization focused on the fight against corruption and the promotion of integrity and transparency in public administration, was also used for the first six months of 2025.

Unfortunately, in Mozambique, the public lacks access to information about UNCAC, as no public or private platform publishes it. Furthermore, although there is a law on the right to information, it remains difficult for judicial bodies to systematically share information about procedural statistics. All information relating to the corruption proceedings conducted by the PPO is presented in an aggregated form once a year, when the Attorney-General presents his accountability report on the performance of justice to the AR, as required by the Constitution.<sup>16</sup>

Regarding the way in which information for this report was obtained, it is important to note that the authors divided the approach for the subjects by considering their work experience in practice. Anonymous sources with undeniable experience in their jobs were used, as existing CIP and research. The interviews conducted for this report were informal, since government authorities generally view CIP researchers with suspicion, which limits the likelihood of receiving positive responses to formal information requests. This perception comes from the long-standing work of the authors as members of the CIP. This finding is based on the requests the authors made to the PA, which were refused without legal basis, but for issues related to the work of public denunciation of bad governance that ultimately expose public power.

Some reports on the entities surveyed are available online.<sup>17</sup> Regarding legislation, in many cases it is published online, or it can be obtained from the database maintained by the CIP, which has a very significant collection of laws. Other documents were obtained from the files of each author of the report, as they have been researchers for many years and have accumulated experience.

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<sup>16</sup> Office of the Attorney General of the Republic, Annual Report of the Attorney General of the Republic to the Assembly of the Republic, <https://www.pgr.gov.mz/informacao-anual-do-pgr-a-assembleia-da-republica/>, accessed 15 September 2025.

<sup>17</sup> For example, the annual report from the Attorney General of the Republic, the GIFiM strategic analysis report, the annual report from the judicial courts, the Money Laundering and Terrorist Financing risk assessment report, etc.

## **IV. Assessment of Implementation of Chapter II and Chapter V Provisions**

### **4.1 Chapter II**

#### **4.1.1 Art. 5 – Preventive Anti-Corruption Policies and Practice**

Mozambique has adopted various policies and practices to prevent and combat corruption, including the creation of anti-corruption legislation, the strengthening of institutions responsible for law enforcement and corruption prevention, and the promotion of international cooperation to combat the phenomenon.

The Government of Mozambique has developed two strategies to date for the prevention and combating of corruption. The first was in effect from 2006 to 2010, and the second, currently in effect, began in 2023 and will end in 2032, having been approved by Resolution No. 46/2022 of 1 December. To implement this strategy, the respective action plan was approved by Resolution No. 39/2023, dated 5 October. The Anti-Corruption Prevention and Combat Strategy consists of: 1) strategic guidelines, 2) strategic action lines, 3) strategic objectives, 4) strategic actions, 5) results and indicators, 6) integrated action plan, 7) monitoring and evaluation, 8) body responsible for monitoring and evaluation, and 9) general coordination.<sup>18</sup>

It is difficult to assess the advances that the strategy is experiencing in the fight against corruption, as the actions of monitoring, evaluation and results achieved are not published (at least not through the website of the General Inspectorate of Public Administration, the government body responsible for implementing the Anti-Corruption Strategy from 2023 to 2032). This entity is designed to centralize evaluation reports submitted at the local level. Since the implementation of this strategy began, information on its progress has not been publicly shared.

Regarding the participation of civil society in the activities of implementing this strategy, it is noted that, first, the strategy was not sufficiently publicized, except on the day of its launch, because the then PR was present at the event commemorating International Anti-Corruption Day. After that, the EPCAAP was never mentioned again. During the inauguration speech of the current PR, the EPCCAP was not mentioned at any point in his speech when discussing the measures to combat corruption, which may suggest that the current Government has not adopted the existing strategy. No broad dissemination actions of the strategy were carried out, either within public administration bodies and institutions nor among civil society and the general public.

By way of illustration, CIP, the civil society organization responsible for drafting this

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<sup>18</sup> CIP (2023). Approves the Strategy for Prevention and Combating Corruption in Public Administration (2023-2032), abbreviated as EPCCAP, [https://www.cipmoz.org/wp-content/uploads/2023/corruptcao/Resolucao\\_46\\_2022\\_Estrategia\\_Prevenca\\_Combate\\_Corruptcao\\_2023-2032.pdf](https://www.cipmoz.org/wp-content/uploads/2023/corruptcao/Resolucao_46_2022_Estrategia_Prevenca_Combate_Corruptcao_2023-2032.pdf), accessed on August 15, 2025.

parallel report, was invited to coordinate the monitoring and evaluation team for the strategy at the level of the capital city, Maputo, for the activities that should have been carried out in 2024, as set out in the integrated action plan. However, after requesting the sectoral or institutional reports, the monitoring and evaluation team concluded that there were no objective conditions to assess the activities carried out under the strategy, due to a lack of information or too incongruent information unrelated to the anti-corruption strategy.<sup>19</sup>

Furthermore, the monitoring and evaluation team found that the information was shared only after significant pressure was applied, which may indicate that the activities were not being implemented and that these institutions sought any information to share without following a methodology. This, first, meant there was an absence of commitment to the strategy on the part of public servants and a lack of understanding of its principles. It also meant that no groundwork was done to raise awareness of the strategy among public servants, and above all, among those who were supposed to lead its implementation at the sectoral level. In this specific case, the commission declined to carry out the monitoring and evaluation activity without the necessary conditions being in place and ultimately made recommendations for introducing improvements.

Another factor contributing to the non-implementation of the anti-corruption strategy is the lack of financial resources for this purpose. Although the volume of financial resources necessary for its implementation has been defined, the source of these resources has not been determined, that is, where they would come from, in a situation where the country presents a cyclical or annual budget deficit. That is to say, the State Budget does not allocate any item for the implementation of the EPCCAP. Apart from the EPCCAP, the Government has no other policy for the prevention and combating of corruption. What is observed is that, in its actions, the Government relies on occasional political speeches directed at public servants and citizens, urging them to refrain from corruption. In other words, there are no concrete measures to prevent corruption by the Government of Mozambique. The only existing policy was the Public Administration Reform and Development Strategy (2011–2025), which, at its inception, the Government stated, aimed to prevent and combat corruption in public administration. In fact, it was focused on the overall reform of the PA. The PA Reform and Development Strategy highlighted the following areas: 1) Professionalization of state employees and agents, 2) Decentralization and deconcentrating, 3) Improvement of service delivery, 4) Consolidation and coordination of public administration structures, and only in fifth place did it refer to combating corruption through the component of "strengthening integrity in public administration," which means that combating corruption was not a priority for the Government.

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<sup>19</sup> Center for Public Integrity. (2022). Critical analysis of the strategy proposal, <https://www.cipmoz.org/wp-content/uploads/2022/11/Ana%CC%81lise-Cri%CC%81tica-a%CC%80-Proposta-da-Estrate%CC%81qia-.pdf>, accessed on August 15, 2025.

From this, it can be concluded that the Government of Mozambique has no serious commitment to implementing public policies to combat corruption. The current EPCCAP was only produced and approved after much pressure, both from the former Attorney General and CIP, who pressured the Government to produce a new strategy when the previous strategy (2006 – 2010) ended, leading to the extension of the previous one by a year, remaining in force until 2011. Only twelve years later was the current strategy for the prevention and combat of corruption produced, with all the problems and vicissitudes it presents for its non-implementation. In other words, successive governments in Mozambique have never shown a genuine interest in developing concrete policies to combat corruption.

### **Good practices**

- Following pressure from CIP, another anti-corruption strategy was adopted, along with an action plan for implementation.
- Inclusion of civil society, such as CIP, in the monitoring and evaluation.

### **Deficiencies**

- Lack of transparency regarding the level of implementation of the anti-corruption strategy in progress.
- Lack of visibility or awareness-raising of the anti-corruption strategy by the government towards the public, and among public servants.

#### **4.1.2 Art. 6 – Preventive Anti-Corruption Body or Bodies**

In Mozambique, there is an institution specialized in the prevention and fight against corruption: the GCCC. This office is an entity subordinate to the PPO and specifically deals with corruption-related offences, collaborating with various public and private institutions to achieve a more effective fight against corruption. The GCCC was established by Law No. 6/2004, of June 17, which introduced complementary mechanisms to combat corruption, marking 20 years since its establishment.<sup>20</sup>

Law No. 6/2004 established the investigation and prosecution of preparatory instructions for active or passive corruption crimes and illicit economic participation as its competencies. Over the years, with the successive revisions to the OLPM, specifically through Laws No. 22/2007<sup>21</sup>, of 24 August, 14/2012 of 8 February, 4/2017

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<sup>20</sup> Centro de Integridade Pública (CIP), Lei 6/2004 – Law on Combating Corruption, [https://www.cipmoz.org/wpcontent/uploads/2023/corruptcao/Lei\\_6\\_2004\\_Lei\\_Combate\\_Corruptcao.pdf](https://www.cipmoz.org/wpcontent/uploads/2023/corruptcao/Lei_6_2004_Lei_Combate_Corruptcao.pdf), accessed on August 15, 2025.

<sup>21</sup> Procuradoria Geral da República (PGR), Lei 12/2012 – Law on the organization of the Prosecution Office and the Statute on magistrates of the Prosecution Office, <https://www.at.gov.mz/por/Media/Files/Lei-14-2012-de-8-de-Fevereiro>, accessed on 15 August 2025.

of 18 January, and 1/2022 of 12 January, the institution's competencies have changed.<sup>22</sup>

In 2005, another legal instrument was approved to regulate Law No. 6/2004, namely Decree No. 22/2005, dated 22 June. This Decree also created the Provincial Offices for Combating Corruption in Nampula and Sofala, with temporary regional competencies pending the establishment of representations throughout the country. Over the following years, anti-corruption offices were established in the provinces of Maputo, Inhambane, Manica, Tete, Zambezia, and Niassa, bringing the total number of operational anti-corruption offices to nine.

Over the years, the institution's competencies were strengthened in its legal power to act, accompanied by a significant increase in the number of magistrates and other human resources, as well as by its expansion across the country. However, these remained insufficient to meet the needs.

After the last revision of the LOMP in 2022, powers were conferred to the office as a subordinate body of the PPO, specialized and competent in the prevention and combat of crimes such as corruption, embezzlement, extortion, illicit economic participation, influence peddling, illicit enrichment, abuse of office or function, acceptance of offers or promises, illicit activity of receiving deposits and other refundable funds, harmful administration, usury, fraud related to financial investments, unauthorized circulation of currency, misapplication, money laundering, and other related crimes.<sup>23</sup>

The institution is also competent to propose effective measures to the Attorney General for the prevention and combat of these crimes; coordinate prevention and combat actions; promote specialized training activities in the prevention, investigation, and repression of crimes within its competence; participate, with other State bodies, in accordance with its Internal Regulation, in the implementation of strategies for the prevention and repression of crimes; coordinate with state bodies in the collection of data that constitute evidence of the commission of the aforementioned crimes; and carry out the necessary procedures for the continuation of investigations of these crimes in foreign territory, in coordination with the competent authorities of the involved States.

Regarding the structure, the institution comprises a Director, a Deputy Director, technical departments and sections, an Administrative Inspection, administrative departments, and a Registry Office. Among the institution's human resources are

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<sup>22</sup> *Government Gazette of the Republic of Mozambique*, Series I, No.8, 12 January 2022, <https://archive.gazettes.africa/archive/mz/2022/mz-government-gazette-series-i-dated-2022-01-12-no-8.pdf>, accessed on 15 August 2025.

<sup>23</sup> Centre for Democracy and Development and Oxfam, *Illicit Financial Flows in the Extractive Industry in Mozambique* (January 2026), [https://cddmoz.org/wp-content/uploads/2026/01/Fluxos-Financeiros-Illicitos-na-Industria-Extractiva-em-Mocambique\\_CDDOXFAM.pdf](https://cddmoz.org/wp-content/uploads/2026/01/Fluxos-Financeiros-Illicitos-na-Industria-Extractiva-em-Mocambique_CDDOXFAM.pdf), accessed 25 January 2026.

magistrates, National Criminal Investigation Service agents, judicial officers, and general regime career employees.

Regarding its functioning, the institution has three collegiate bodies, namely a Management Collective, a Technical Collective, and a Technical-Administrative Collective. There is sufficient legislation, although it requires occasional revisions, to align the institution's competencies with the need for a more robust intervention.

Law No. 6/2004 of June 17 was the first legal provision to establish the office, aimed at strengthening the existing legal framework for combating corruption. Its norms have been updated and improved over time and incorporated into the LOMP.

In the current reality, the office accesses financial resources through the PGR, as the supervising institution, in accordance with paragraph 4 of Article 8 of Decree No. 3/2024, of January 23.

In practical terms, it is noted that the GCCC is lacking sufficiently modern investigative equipment for the investigation of corruption cases with the necessary effectiveness; it has a limited number of magistrates and investigators to meet the demand for processed cases; the allocation of state financial resources is inadequate and insufficient, which complicates the sophistication of investigative means and may jeopardize the implementation of institutional development programs capable of improving performance in procedural processing.

The GCCC does not have sufficient infrastructure to accommodate magistrates, investigators, judicial officers, and general regime staff. This reality creates various constraints, including a lack of appropriate rooms for forensic evidence analysis. Another point worth mentioning is the poor collaboration between the GCCC and civil society organizations, due to the PPO lack of openness.

Despite the office's organized structure, problems of insufficient transparency in information sharing persist, as does the exclusion of civil society from monitoring corruption cases by treating it as an accomplice in the corruption process, as permitted by the country's current criminal law.

### **Good Practices**

- The existence of the Anti-Corruption Office.
- The existence of single service counters and the development of service charters to facilitate citizens' access to work and public services.
- Creation of local anti-corruption units for conducting lectures and training sessions.
- Training of magistrates and judicial officers to combat corruption.

### **Deficiencies**

- An organization with representations only in provincial capitals, making access to justice difficult in remote areas.
- Poor use of information technology.
- Little procedural initiative and difficulty in holding offenders accountable due to the difficulty in gathering evidence.
- Shortage of human resources assigned to it, with particular emphasis on magistrates and investigators.
- No limitation on the term of office of the Director of the GCCC, the duration of the mandate assigned to the Director and Deputy Director should be established, as well as the limit on the number of terms that can be served, through a specific revision of Article 86 of the LOMP.
- The lack of functional financial and human resources that hinders the work of the GCCC.
- Weak implementation of Memorandums of Understanding with civil society organizations.
- Weak inclusion of civil society in actions to prevent and combat corruption and in the monitoring of processes.

#### **4.1.3 Art. 7.1 – Public Sector Employment**

In Mozambique, the only political office filled by election for which a direct vote for the candidate is required is the PR office.<sup>24</sup> As for the election to join other bodies such as the AR to be a deputy or the local authorities to be a member of the Municipal Assembly, the competing political parties are the ones that present lists with the names of the candidates to the management bodies of the electoral process.

Article 250 of the CRM establishes that "Access to public service and progression in professional careers cannot be impaired on the basis of color, race, sex, religion, ethnic or social origin or political-party option and strictly obeys the requirements of merit and capacity of the interested parties". The principles referred to by the CRM are implemented by the EGFAE, which establishes, as a rule, a regime for entry into the public administration requiring participation in and approval for a public competition.<sup>25</sup>

It turns out that in practice, even with recourse to the public tender, there have been many complaints of cases of corruption in the act of hiring public servants, where it is alleged that for someone to join the public administration they must pay a bribe, especially in the education and health sectors, which are the ones that offer the highest

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<sup>24</sup> *Government Gazette of the Republic of Mozambique*, Series I, No.163, 23 August 2023, <https://archive.gazettes.africa/archive/mz/2023/mz-government-gazette-series-i-dated-2023-08-23-no-163.pdf>, accessed 29 September 2025.

<sup>25</sup> Ministério da Economia e Finanças (MEF), *Lei n.º 4/2022, de 11 de Fevereiro (EGFAE)*, <https://www.mef.gov.mz/index.php/publicacoes/legislacao-dnqrh/recursos-humanos/1623-lei-n-4-2022-de-11-de-fevereiro-egfae/file>, accessed 29 September 2025.

employability rate.<sup>26</sup> However, more recently, the phenomenon of corruption has spread to the recruitment of officers of the Police of the Republic of Mozambique, which led the General Command of the Police of the Republic of Mozambique to warn that there would be greater control in the process of selecting new members of the police by 2025.<sup>27</sup> This means the mechanisms to combat corruption in public servant hiring are inoperative. Another case of suspected payment of bribes to enter, this time the Municipal Police, occurred recently, after complaints of irregularities in the entry, when a commission was created to ascertain responsibilities and ensure transparency in the selection process.<sup>28</sup>

Three people were recently arrested by the police for attempting to fraudulently join the police force, demonstrating the seriousness of the violation of the transparency rules for admission to the PA.<sup>29</sup>

### **Good practices**

- There is legislation that establishes a public exam as a prerequisite for entry into the civil service.
- There is an effort to combat situations involving the payment of bribes for access to public office, especially at the police level.
- The PR is elected by direct vote.

### **Deficiencies**

- Lack of mechanisms to control corruption in access to the Civil Service/PA.
- Members of the AR and municipal bodies are not elected by direct vote.
- There is no visible sign of strong action aimed at combating fraudulent hiring practices in the health and education sectors.

#### **4.1.4 Art. 7.3 – Political Financing**

In Mozambique, there is no law specifically regulating the financing of political parties and electoral campaigns. For this reason, the regulation of political financing is currently dispersed through three legal acts, mainly:

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<sup>26</sup> Baloj, Salvador (6, 2025) - Health and Education are the sectors with the most corruption cases in Cabo Delgado, <https://mznews.co.mz/saude-e-educacao-sao-setores-com-mais-casos-de-corrupcao-em-cabo-delgado/>, accessed on September 15, 2025.

<sup>27</sup> Radio Mozambique (9, 2025) General Command of the Police against any attempt to favor the entry into the ranks of the corporation, <https://www.rm.co.mz/comando-geral-da-policia-contra-qualquer-tentativa-de-favorecimento-no-ingresso-as-fileiras-da-corporacao/>, accessed on September 15, 2025.

<sup>28</sup> Jornal Notícias (8, 2025), edition n.º 32. 656, 09/2025/15 Commission investigates admission contest to the Municipal Police, [www.jornal.co.mz](http://www.jornal.co.mz), co, Pag. 1.

<sup>29</sup> Jornal Notícias (8, 2005), issue no. 32.671, 2/10/2025 Fraudulent ticket leads to three arrests, [www.jornal.co.mz](http://www.jornal.co.mz), Pág. 5.

- Law n.º 7/91 of 23 January,<sup>30</sup> which establishes the legal framework for the formation and activity of political parties. Through Law No. 14/92, of October 14,<sup>31</sup> some articles of Law No. 7/91 were amended.
- Law n.º 2/2019 of 31 May,<sup>32</sup> which establishes the legal framework for the election of the President of the Republic and the deputies to the Assembly of the Republic) and
- Law n.º 3/2019 of 31 May,<sup>33</sup> which establishes the legal framework for the election of the members of the Provincial Assembly and the Provincial Government.

However, the three legal acts mentioned above regulate political financing inadequately. Basically, they focus on regulating public funding, which concerns the management and use of funds that come from the State. It leaves aside the regulation of financing that comes from private sources. In other words, Mozambique lacks concrete rules governing private political financing.

In this regard, the following question should be asked: Who benefits from the full deregulation of private political financing in Mozambique? Why is there no specific legal regime for political financing in Mozambique? Who benefits from the non-revision of Law No.º 7/91 of 23 January, around 32 years after its approval?

It should be noted that legislation in Mozambique has adopted a mixed financing model: private and public. In this case, there is a greater need for the legal framework to provide tighter controls on private financing. Because there is no effective control over this form of financing, there is a greater possibility that political parties and electoral campaigns are financed by funds of illicit origin, arising, for example, from acts of corruption or related crimes, or other forms of crime.

Furthermore, there is a need to establish an independent monitoring body to effectively oversee political funding. In the Mozambican case, this competence is assigned by law to the CNE for the financing of electoral campaigns. However, due to its essential partisan composition, the CNE cannot be considered immune from pressure in the exercise of its functions of supervision and assessment of the accounts of political parties and electoral campaigns. This body should have the power to efficiently

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<sup>30</sup> *Lei n.º 7/91, de 23 de Janeiro* [Law No. 7/91 of 23 January – Legal Framework for Political Parties], <https://pt.scribd.com/document/721524722/Lei-7-1991-Partidos-Politicos>, accessed on June 10, 2025.

<sup>31</sup> *Lei n.º 14/92, de 14 de Outubro* [Law No. 14/92 of 14 October – Amendments to Law No. 7/91], *Government Gazette of the Republic of Mozambique*, Series I Supplement, No. 42, 14 October 1992, <https://archive.gazettes.africa/archive/mz/1992/mz-government-gazette-series-i-supplement-dated-1992-10-14-no-42.pdf>, accessed on June 10, 2025.

<sup>32</sup> *Lei n.º 2/2019, de 31 de Maio* [Law No. 2/2019 of 31 May – Legal Framework for Election of the President and National Assembly Deputies], *Government Gazette of the Republic of Mozambique*, Series I, No. 105, 31 May 2019, <https://archive.gazettes.africa/archive/mz/2019/mz-government-gazette-series-i-dated-2019-05-31-no-105.pdf>, accessed on June 10, 2025.

<sup>33</sup> *Ibid.* [Law No. 3/2019 of 31 May – Legal Framework for Election of Members of the Provincial Assembly and Provincial Government].

monitor, investigate irregular situations and, if necessary, institute legal proceedings and apply appropriate sanctions.

Due to the poor regulation of political party financing in Mozambique, there are no limits to private political funding. This is why there is a high probability that situations involving illicit financing remain unscrutinized. The law of political parties only requires that the origin of funds/revenues be declared, without setting any limit in terms of amount as set out in Law n. 7/91.

The greater openness in the law regarding situations involving illicit financing is evident in paragraph d) of Article 17, which, in addition to the financing forms, it directly references, also refers to "other forms of financing." It is a legal provision that opens space to various interpretations and understandings. It is indicated that financing should be on a closed basis, without ambiguity or multiple interpretations. Thus, the most obvious question is what other forms of financing the law intends to refer to. For example, Article 17 (d), as referred to, could be worded as follows to avoid misunderstandings and prevent recourse to illicit financing: "other forms of financing legally provided for."

The provision made in point d) of article 17, referred to above, is one of the examples that lead to the urgent need for the creation of a specific legal regime on the financing of political parties, which would regulate this matter exhaustively and in this way, could lead to the existence of effective controls on all financial resources raised by political organizations in Mozambique. For example, Egídio Guambe (2025), professor of political science at Eduardo Mondlane University in Mozambique, consultant and academic with over 15 years of experience in research, questions the ambiguous provision of Article 17 d) of the law on political parties which states that the legal framework for financing political parties does not define precisely what it refers to as "other forms of funding" of political parties, which, in their view, can be understood that "other forms of financing" are the "indirect supports".<sup>34</sup> This is an overly ambiguous situation in which there should be no room for doubt or questioning, given the dangers of inefficient controls over political parties' accounts.

In the context of political financing and accountability, weak regulation could be compensated for by a more effective accountability mechanism, both for political parties and electoral campaigns. What is observed is that there is the possibility of greater control over public funding, since it is the State that allocates resources to political parties and electoral campaigns. The funds allocated for election campaigns are published through public announcements by the CNE via the media. The CNE has not used its website or Facebook to disseminate this information, including details on

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<sup>34</sup> Guambe. Egídio (4, 2021) - Who benefits from political parties made possible by political investors?, <https://www.eisa.org/storage/2023/05/policy-brief-2021-quem-benificiam-partidos-politicos-viabilizados-politicos-invesidores-eisa.pdf?x29006>, accessed on July 10, 2025, pg. 6.

allocation of funds to political parties.<sup>35</sup> For example, in 2024 the CNE spokesperson announced the amount of funds allocated to political parties for the electoral campaign through the media.<sup>36</sup> Since the quantities are known, this allows for more effective control over expenses. Under Laws 2/2019 and 3/2019, the State has granted the CNE the power to audit the accounts of electoral campaigns.

Regarding political parties, the relevant law refers to accountability mechanisms in accordance with the general rules of PA, as provided in Law n. 7/91. However, if political parties do not comply with their obligation to present accounts, the law does not establish any sanctioning mechanism, leaving this compliance obligation optional for political parties.

Considering the shortcomings mentioned above, Mozambique's law on private political financing remains porous, full of gaps that undermine effective oversight. It ends up assigning to the CNE the competence to assess the regularity of the accounts of electoral campaigns, as provided by Laws n.º 2/2019 and 3/2019, rather than effectively supervising them. If the CNE had effective supervisory powers, for example, it could be empowered to sanction or initiate a sanctioning procedure for situations in which the submitted accounts contain irregularities or were not presented.

In this regard, Olufunto Akinduro, of the South African non-governmental organization EISA, said that in Mozambique the National Electoral Commission's capacity to control political parties is expected to be very weak.<sup>37</sup> There is significant private funding supporting the parties, but no effective control mechanism to prevent corruption from influencing the electoral process. This situation is quite symptomatic in Mozambique, where entities competing in elections, such as political parties, lack a culture of accountability because the existing control/accountability mechanisms are too weak.

In practice, the CNE is insufficient to effectively control electoral campaign accounts. This function should be entrusted to an independent body that could work with the Administrative Court or the Constitutional Council (CC), as is the case, for example, in Portugal. The CNE is a partisan body and, therefore, it can hardly act with the independence necessary to exercise its control function.

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<sup>35</sup> CIP eleições (9, 2019) 180 million meticaís allocated to the parties: Frelimo, Renamo and MDM raise 34.5 million each, <https://www.cipeleicoes.org/alocados-180-milhoes-d/>, accessed on February 10, 2026.

<sup>36</sup> Aim.news.org (8, 2024) CNE disburses 260 million meticaís for Electoral Campaign, <https://aimnews.org/2024/08/16/cne-desembolsa-260-milhoes-de-meticaís-para-campanha-eleitoral/>, accessed on February 10, 2026.

<sup>37</sup> Schwikowski, Martina (9, 2019) Who finances election campaigns in Africa?, <https://www.dw.com/pt-002/quem-financia-as-campanhas-eleitorais-em-%-C3%A1frica/a-50451428>, accessed on October 7, 2025.

The creation of a specific legal regime for political financing in Mozambique is urgent, as the country has yet to invest in developing legislation that directly addresses this issue. With the advent of democracy, it was already necessary to create a specific legal regime on the subject, with the aim of promoting transparency and equality among political actors in the collection of private funds, since there is some regulation of public funding, but it needs improvement. It is necessary to question, once again, what leads to the non-revision of the law on political parties? All matters relating to the financing of political parties should be removed from this law and incorporated into a separate legal regime, alongside the financing of electoral campaigns. It is only with the approval of a specific legal regime that it would be possible to regulate, in a particular and detailed manner, the rules and limits that political financing should adhere to. For example, there are currently no limits on private/individual funds for political financing. There are no rules regarding the control of donations in kind, which can be difficult to quantify, creating situations of inequality. In short, there is no control over the proof of private or individual funds used for political financing.

In Mozambique, there is a complete deregulation of political financing. The case of private political financing is the most alarming, though public political funding remains a cause for concern because it directly shapes the political competition between the various actors. The problem with current legislation is not that there are gaps in regulation. It is the "almost" total absence of regulation. The Mozambican legislator has not been concerned, over time, to guarantee transparency, legality and equality in the political financing process, leaving the political actors to act in the way that best suits them. That is, there are a few gaps to fill regarding political financing, and yes, the need to create a specific legal regime by the ordinary legislator, a legal regime that must be detailed and go into the smallest details of setting limits on political financing and in creating an effective control and accountability regime. At a time when the fight against terrorism and money laundering are on the agenda of the Government, and society in general, with the country's integration into the FATF grey list and with serious threats of going on the grey list for non-compliance with some recommendations, control over the need to ensure the lawfulness of political financing gains greater importance and there is a need for effective monitoring.

### **Dangers of deregulation of private political financing**

Mozambique has already had suspicious signs that the total deregulation of private political financing may be leading to illicit political financing. However, it is a fact that there is no concern to regulate this area of political financing, especially because it benefits the party that has been in power for more than 50 years, the Mozambique Liberation Front (Frelimo).

By way of illustration, in a statement sent to the London Court regarding the biggest corruption scandal so far in Mozambique, which became popularly known as the

"hidden debts case",<sup>38</sup> the owner of "Privinvest", a company involved in this case, claimed to have paid US\$1 million to Filipe Nyusi, at the time Frelimo's candidate for the presidency and US\$10 million to the Frelimo party<sup>39</sup>. Another case involving illicit political-private financing concerns the embezzlement of funds from the public company Aeroportos de Moçambique, where it was alleged in the trial that part of the funds in question was donated to the Frelimo party.<sup>40</sup> Proceeds from timber smuggling have also funded Frelimo.<sup>41</sup> The former Attorney General of the Republic, Beatriz Buchili had already mentioned that drug trafficking would also have created a link with politics.<sup>42</sup> Related to private political financing, with suspicions of illegality, other cases can be cited, but surprisingly there is no will to debate this issue on the part of the ruling party (the biggest beneficiary) or the opposition parties, aiming to create specific legislation.

At this moment, an opportunity arises to seriously consider regulation of private political financing. The Mozambican authorities recently registered a new party, the National Alliance for a Free and Autonomous Mozambique (ANAMOLA). This party soon began to receive various donations, including land, a building for the operation of its national headquarters,<sup>43</sup> and has survived through a public fundraiser for private fundraising. These donations are made by anonymous donors, which shows that in the future the Frelimo party and ANAMOLA will continue to receive political funding whose origins should already be scrutinized.

### Good practices

- Regulation of public political financing by the State.
- Existence of accountability mechanisms for public political financing.
- The amounts allocated to political parties for the election campaign are published using media releases.

### Deficiencies

- Non-regulation of private political financing.
- Non-revision of the law on political parties (in force since 1991).

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<sup>38</sup> Issufo, Nádia (8, 2021) The case, <https://www.dw.com/overlay/media/pt-002/julgamento-das-d%C3%ADvidas-ocultas-outras-coisas/58972586/60242176>, accessed on October 20, 2025.

<sup>39</sup> Evidências (1, 2021), Hidden Debts: USD 1 million to Nyusi, USD 7 million to Chang and USD 10 million to Frelimo, <https://evidencias.co.mz/2021/01/29/dividas-ocultas-usd-1-milhao-a-nyusi-usd-7-milhoes-a-chang-e-usd-10-milhoes-a-frelimo/>, accessed on October 20, 2025.

<sup>40</sup> A Semana (2, 2009) Frelimo in Court, <https://verdade.co.mz/a-semana-10/>, accessed on 20 October 2025.

<sup>41</sup> Lusa (10, 2014), Timber smuggling financed Frelimo's campaign – NGO, [https://www.rtp.pt/noticias/mundo/contrabando-de-madeira-financiou-campanha-da-frelimo-ong\\_n773209](https://www.rtp.pt/noticias/mundo/contrabando-de-madeira-financiou-campanha-da-frelimo-ong_n773209), accessed on October 20, 2025.

<sup>42</sup> Rádio Moçambique (1, 2024), Drug trafficking in Mozambique has "webs" from police to politics, <https://www.rm.co.mz/trafico-de-droga-em-mocambique-tem-teias-da-policia-a-politica/>, accessed on October 20, 2025.

<sup>43</sup> Integrity – Moçambique (9, 2025) "Businessman" offers property for ANAMOLA's national headquarters in Matola-Rio: Mondlane speaks of "strategic step", but maintains appeal to popular financing, <https://integritymagazine.co.mz/arquivos/48732>, accessed on October 20, 2025.

- Lack of an institutional body with knowledge and technical competence to oversee the accounts of political parties.
- Political parties' law is ambiguous in relation to political financing.
- The amounts allocated to political parties for election campaigns are not published on the CNE website or its Facebook page for wider dissemination.

#### **4.1.5 Arts. 7, 8 and 12 – Codes of Conduct, Conflicts of Interest and Asset Declarations**

The Mozambican PA is endowed with legal instruments that function as codes of conduct for public servants, namely: the EGFAE approved by Law No. 4/2022, of 11 February (establishes the legal rules applicable to the employment relationship between the State and its employees and agents),<sup>44</sup> the Code of Conduct for State Employees and Agents approved by Resolution No. 15/2018, of 24 May (establishes standards of behavior, attitudes and character required of State officials and agents in the exercise of their public functions and in private life)<sup>45</sup> and also, the LPP, approved by Law No. 12/2024, of 18 June (which aims to ensure the integrity, morality, transparency, impartiality and public probity of public servants).<sup>46</sup> At the international level, Mozambique ratified the African Charter on the Values and Principles of Public Function and Administration through Resolution No. 67/2012, of 28 December, which aims, among other objectives, to combat corruption in the PA.

However, it is of fundamental importance that the organs and institutions of the PA produce specific codes of conduct for each sector, especially those most exposed to corruption. In this regard, it should be noted that the Mozambican Tax Authority, one of the sectors considered most corrupt, has issued a specific code of conduct. However, other entities, such as the Protection Police and the Traffic Police, do not have specific codes of conduct to date. This situation leads to the need for the Ministry of State Administration and Public Service to encourage the various sectors of the PA to produce specific codes of conduct, especially taking into account that this ministry has the competence to supervise the implementation of the EGFAE, as established in paragraph d) I. of article 3 of Ministerial Diploma no. 68/2024 of 12 August.

LPP in articles 41 and 42 regulates the regime of admissible and inadmissible gifts and perks, which has already led to concrete consequences for high-ranking officials,

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<sup>44</sup> Law No. 4/2022 of 11 February on the General Statute of the Public Administration (Ministry of Economy and Finance of Mozambique, 2022), <https://www.mef.gov.mz/index.php/publicacoes/legislacao-dnqgrh/recursos-humanos/1623-lei-n-4-2022-de-11-de-fevereiro-egfae/file>, accessed on June 10, 2025.

<sup>45</sup> Mozambique Government Gazette Series I No. 102 of 24 May 2018 (Official Publication of the Republic of Mozambique, 2018) - <https://archive.gazettes.africa/archive/mz/2018/mz-government-gazette-series-i-dated-2018-05-24-no-102.pdf>, accessed on June 10, 2025

<sup>46</sup> Mozambique Government Gazette Series I Supplement No. 118 of 18 June 2024 (Official Publication of the Republic of Mozambique, 2024), <https://archive.gazettes.africa/archive/mz/2024/mz-government-gazette-series-i-supplement-dated-2024-06-18-no-118.pdf>, accessed on June 10, 2025.

including two former presidents. Successively, Armando Guebuza (2005 - 2014) and Filipe Nyusi (2015 - 2024) were affected: the first had to return a Mercedes-Benz vehicle that had been publicly offered to him by a group of businessmen, since the LPP does not allow public servants to receive gifts of very high value<sup>47</sup> for the performance of his duties; and the second former president refused to receive an offer of an agricultural tractor due to the prohibition imposed by the same LPP.<sup>48</sup> More recently, the current PR, Daniel Chapo, was involved in a controversy for having accepted to receive gifts from a governor of a Mozambican province, appointed by him.<sup>49</sup> The CIP submitted a report to the CCEP so that this body can pronounce on the legality of the receipt of the goods by the PR currently in office.<sup>50</sup>

The LPP, in its article 34 and following, regulates the regime/system of conflict of interest in the exercise of public functions. Meanwhile, the Statute of Deputies approved by Law No. 31/2014 of 30 December in Article 23 regulates the need for Members to declare their interests before the start of each parliamentary activity, and this legal provision is not applied, since there is no control mechanism at the level of the AR.

As for the obligation for public servants to declare the exercise of private activities, the EGFAE in article 5 establishes a regime of incompatibilities for public servants, prohibiting them from exercising professional activities that may compromise the public interest and impartiality in the exercise of public functions, or that coincide with the public service they perform or that the general law prohibits.

In the relatively recent past, a group of citizens asked the CC<sup>51</sup> to issue a declaration of unconstitutionality due to the fact that in Mozambique there is a long-standing practice for the presidents of the republic to simultaneously exercise a presidential function that is public, in parallel with the exercise of the function of president of a political party, which is a private function, a private activity. The CC, deciding on this issue, ruled that in the current context, the PR could continue to exercise the functions

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<sup>47</sup> Diário de Notícias (9, 2014) - Guebuza refuses luxury car offered by businessman - <https://www.dn.pt/arquivo/diario-de-noticias/guebuza-recusa-carro-de-luxo-oferecido-por-empresario-4153299.html>, accessed on September 11, 2025.

<sup>48</sup> Marcos, Jorge (9, 2017) - Nyusi refuses tractor offer in Congress - <https://opais.co.mz/nyusi-recusa-oferta-de-tractor-no-congresso/>, accessed on September 11, 2025.

<sup>49</sup> MZNews (6, 2025) - CIP demands return of gifts to Chapo made in Gaza - <https://mznews.co.mz/cip-exige-devolucao-de-ofertas-a-chapo-feitas-em-gaza/>, accessed on September 12, 2025.

<sup>50</sup> Center for Public Integrity (6, 2025) - CIP submits report to the Central Public Ethics Commission on the gifts offered to President Daniel Chapo on his visit to Gaza province - <https://www.cipmoz.org/2025/06/03/cip-submete-participacao-a-comissao-central-de-etica-publica-sobre-os-presentes-oferecidos-ao-presidente-daniel-chapo-na-sua-visita-a-provincia-de-gaza/>, accessed on September 29, 2025.

<sup>51</sup> Government of Mozambique (8, 2023) – Government Gazette, Series I, No. 163 <https://archive.gazettes.africa/archive/mz/2023/mz-government-gazette-series-i-dated-2023-08-23-no-163.pdf>.

of president of a political party, simultaneously with the function of PR,<sup>52</sup> in clear violation of the Constitution which establishes that "The President of the Republic may not, except in the cases expressly provided for in the Constitution, exercise any other public function and, in no case, perform any private functions."<sup>53</sup>

The CRM also establishes a regime of incompatibilities,<sup>54</sup> and there has already been a case in terms of the exercise of political functions in which a public servant who already exercised the functions of vice-minister, was appointed to simultaneously exercise the function of Secretary of State,<sup>55</sup> which led to a challenge by citizens because the act of appointment violated the CRM. The president ultimately exonerated the public servant from the position of deputy minister.<sup>56</sup> In other words, there should have been a supervisory body responsible for declaring this incompatibility. Since such a body did not exist, citizens had to exert pressure to have the issue resolved in line with the CRM.

Therefore, it is often citizens who detect conflicts of interest and incompatibilities and report them. In Mozambique, there is only one entity with the competence to supervise situations of conflict of interest: the CCEP, created under paragraph 1 of article 50 of law 16/2012, of 14 August (partially repealed). Regarding incompatibility issues, no entity conducts its inspection.

In concrete terms, CCEP does not perform its functions independently, although the LPP (Article 49 (1)) establishes that CCEP is an independent body and that it produces mandatory resolutions for all entities to which it is addressed. CCEP also does not have a budget for its operations, which makes this entity dependent on resources from other bodies responsible for supervising the performance of its members, namely the deputies of the AR and the members of the Government.

Currently, asset declarations in Mozambique are regulated by the LPP. This law establishes in paragraph 1 of article 21 that: "The public servant is subject to the duty of declaring assets when exercising the position of management, leadership or trust, in fact or in law, whether by taking office, term of commencement of functions or mere

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<sup>52</sup> Mutemba, Silaide (9, 2025) - CC: Constitution does not prevent accumulation of functions by Chapo - <https://www.dw.com/pt-002/cc-constitui%C3%A7%C3%A3o-n%C3%A3o-impede-accumulates%C3%A7%C3%A3o-de-fun%C3%A7%C3%B5es-per-chapo/a-74070666>, accessed on September 29, 2025.

<sup>53</sup> Government of Mozambique (8, 2023) – Government Gazette, Series I, No. 163 <https://archive.gazettes.africa/archive/mz/2023/mz-government-gazette-series-i-dated-2023-08-23-no-163.pdf>.

<sup>54</sup> *Ibid.*

<sup>55</sup> Evidências (8, 2024) - Another PR gaffe: the position of vice minister and Secretary of State are incompatible - <https://evidencias.co.mz/2024/08/14/mais-uma-gafe-do-pr-cargo-de-vice-ministro-e-secretario-de-estado-sao-incompativeis/>, accessed on September 22, 2025.

<sup>56</sup> Evidências (8, 2024) - PR corrects and exonerates Rolinho Farnela from the position of Deputy Minister of Labor and Social Security - <https://evidencias.co.mz/2024/08/14/pr-corrige-se-e-exonera-rolinho-farnela-do-cargo-de-vice-ministro-de-trabalho-e-seguranca-social/>, accessed on September 22, 2025.

assumption of office, and must declare, under oath, their income and patrimonial interests (...). The legal provision cited above is reinforced by article 56 of the same LPP, which establishes that: "The exercise of public and political office is subject to the declaration of rights, income, securities, shares or any other type of property and value, located in the country or abroad (...)".

In terms of deadlines for filing the income tax return, this must be done at the beginning of the exercise of the respective position or function; when the assets declared at the beginning of the exercise of the office or function are changed by a certain amount provided for in the LPP; in the cessation of the exercise of the respective position or function, and the law also determines the specific deadlines for the process to take place.<sup>57</sup>

The question is whether there is an effective review of asset declarations. It should be noted that there has been significant evolution in inspection practices compared to the previous law that regulated the filing of asset declarations. Under Article 59 of the LPP, public servants are already permitted to make the electronic declaration (e-DB), which may lead to considerable improvements in inspection levels. So far, about 96 thousand employees have been registered on the electronic platform.<sup>58</sup> However, public servants are still allowed to declare assets in physical/paper format, due to the conditions of the country, where in many areas, internet access is still very deficient. In these places, in practice, the inspection will remain ineffective.

In terms of the effectiveness of the electronic platform for the declaration of assets, the spokesman for the Mozambican PGR, Ribeiro Cuna, said that the electronic platform "does not require the person to submit any supporting document at the time of declaration, even for assets located abroad. And, therefore, we understand that this platform assumes that the person will declare what belongs to him".<sup>59</sup> In other words, in practical terms, it is possible for a public servant to declare assets he does not yet own, discover that the inspection mechanism is weak, and, through acts of corruption, acquire assets using public funds, which the initial deposit of the declaration of assets will justify.

There is no public knowledge of any case of corruption that has been shared by the PPO, which refers to a case of corruption that has been initiated through the inspection of the declaration of assets. What happens in practice is that first, a case of corruption is discovered, and only then will the PPO investigate the declaration of assets of the public servant. In other words, the declaration of assets has not served as a preventive

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<sup>57</sup> <https://archive.gazettes.africa/archive/mz/2024/mz-government-gazette-series-i-supplement-dated-2024-06-18-no-118.pdf>.

<sup>58</sup> Muhambe, Luísa (5, 2025) - PGR without mechanisms to assess legality of asset declarations submitted by public officials, <https://evidencias.co.mz/2025/05/08/pgr-sem-mecanismos-para-aferir-legalidade-das-declaracoes-de-bens-apresentadas-por-funcionarios-publicos/>, accessed on September 15, 2025.

<sup>59</sup> *Ibid.*

mechanism for the non-occurrence of corruption cases. The PGR spokesman was also unable to show statistical data on corruption cases, specifically the commission of the crime of illicit enrichment that have been detected through the mechanism for monitoring asset declarations.<sup>60</sup>

There has been an evolution regarding the expansion of the list of entities required to submit the declaration of assets, from the LPP entity to the current one. The new law has currently expanded the number of public servants required to declare their assets and, on the other hand, also obliges public servants assigned to certain specific sectors susceptible to corruption to declare their assets, regardless of whether they hold positions of management, leadership or trust. In practical terms, with the increase in the number of declarants, the main challenge is ensuring greater effectiveness in supervising the declaration of assets. To find an effective mechanism for monitoring asset declarations, a new decree was also approved.<sup>61</sup>

In Mozambique, holders of political/public office, such as the PR, ministers and deputy ministers, deputies/parliamentarians of the AR, among others, must also submit asset declarations.

The fact that asset declarations are not for public consultation<sup>62</sup> in a country like Mozambique, perceived as one of the most corrupt in the world according to Transparency International's 2024 data,<sup>63</sup> also weakens enforcement mechanisms. If asset declarations were made public, citizens could serve as whistleblowers on suspected cases of illicit enrichment by public servants, who often live in the same community and where official entities have difficulty exercising their control.

Another aspect that weakens the mechanism for monitoring asset declarations in Mozambique is that asset registration is not mandatory. In this case, many public servants have unregistered assets or assets registered in the names of third parties to disguise their true ownership. This situation makes it necessary to involve municipalities and asset registry offices in actions to engage citizens to register their assets (both movable and immovable) for proper inspection in case of suspicion of their involvement in corruption.

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<sup>60</sup> Muhambe, Luísa (5, 2025) - PGR without mechanisms to assess legality of asset declarations submitted by public officials - <https://evidencias.co.mz/2025/05/08/pgr-sem-mecanismos-para-aferir-legalidade-das-declaracoes-de-bens-apresentadas-por-funcionarios-publicos/>, accessed on September 15, 2025.

<sup>61</sup> Mozambique Government Gazette Series I No. 143 of 29 July 2025 (Official Publication of the Republic of Mozambique, 2025) - <https://archive.gazettes.africa/archive/mz/2025/mz-government-gazette-series-i-dated-2025-07-29-no-143.pdf>, accessed on September 29, 2025.

<sup>62</sup> Mozambique Government Gazette Series I Supplement No. 118 of 18 June 2024 (Official Publication of the Republic of Mozambique, 2024) - <https://archive.gazettes.africa/archive/mz/2024/mz-government-gazette-series-i-supplement-dated-2024-06-18-no-118.pdf>, accessed on September 29, 2025.

<sup>63</sup> Seda, Ekibal (2, 2025) - Mozambique has not changed, it remains one of the most corrupt countries in the world - <https://integritymagazine.co.mz/arquivos/38368>, accessed on September 21, 2025.

### Good practices

- Existence of generic codes of conduct.
- Existence of legislation regulating conflicts of interest.
- Regulation of the declaration of assets.
- Existence of an entity to oversee the conflict-of-interest system.

### Deficiencies

- There is no incentive to produce specific codes of conduct, especially for the agencies most prone to corruption.
- Lack of mechanisms to monitor cases of conflict of interest.
- Little effectiveness of the declaration of assets for detecting cases of corruption in the public service.
- Electronic filing of the declaration of assets is not yet effective.
- The entity created to monitor conflicts of interest does not have the budgetary conditions to operate.

#### 4.1.6 Arts. 8.4 and 12 – Reporting Mechanisms and Whistleblower Protection

In Mozambique, the legal regime for the protection of whistleblowers was approved through Law No. 15/2012, of 14 August.<sup>64</sup> Since its adoption, the law in question has never been applied, so there is no opportunity to test its effectiveness. One justification for the non-application of the whistleblower protection law is that it has not yet been implemented, in addition to the lack of financial resources to implement the protection measures that require high costs.<sup>65</sup>

The whistleblower protection law created the Central Office for Victim Protection, a fundamental entity for implementing the law, but not yet operational, which further limits the effectiveness of this legal instrument. About 13 years after the law's creation, the justifications for its non-application are no longer acceptable. This year (2025), the PGR said that it knew the law was in the process of being regulated, but that the State, during the time the law is inoperative, continues to use measures to ensure the protection of whistleblowers.<sup>66</sup>

However, it should be noted that if the law were being applied, it would bring greater predictability about the protection measures for whistleblowers so that they would know before reporting that they are protected in case they file any complaint of the

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<sup>64</sup> Law on the Protection of Victims, Whistleblowers and Witnesses (REFORMAR – Research for Mozambique, 2012) - <https://reformat.co.mz/documentos-diversos/lei-protacao-vitimas-denunciante-testemunhas.pdf/view>, accessed on October 1, 2025.

<sup>65</sup> Manhiça, Nelucia (7, 2024) - Mozambique Information Agency (AIM), Mozambique: Scarcity of resources conditions protection of whistleblowers - <https://aimnews.org/2024/07/11/mocambique-escassez-de-recursos-condiciona-protacao-dos-denunciante/>, accessed on October 1, 2025.

<sup>66</sup> Carta (3, 2025) - PGR says protection of victims and whistleblowers is under regulation - <https://cartamz.com/sociedade/41229/pgr-diz-que-protacao-de-vitimas-e-denunciante-esta-em-regulamentacao>, accessed on October 1, 2025.

practice of corruption or other crimes. At this stage, people are afraid to report, so it is imperative that the State create the conditions to begin implementing the whistleblower protection law through legislative measures as soon as possible. The PGR cannot mention that it is applying protection measures that are outside the legal regime approved by law, since such measures are not known to citizens and outside the legal framework, they do not present guarantees of their application and effectiveness.

Regarding knowledge of the entity tasked with combating corruption, the GCCC has publicized its presence at some airports and along the country's borders, but this should be more comprehensive.

Access to the GCCC is open to all citizens to report cases of corruption, and they can report by identifying themselves or also using anonymity or even by telephone, and for this purpose, a free line is available. However, the telephone lines are almost always inoperable, which often does not allow citizens to file complaints in this way.

### **Good Practices**

- Existence of a law for the protection of victims, whistleblowers, witnesses, declarants and experts in criminal proceedings.

### **Deficiencies**

- Whistleblower protection law has not been applied for more than 10 years.
- The whistleblower protection law created the Central Office for Victim Protection, which is also not operational yet.
- Improvisation in the application of protection measures that are not foreseen and that can be easily violated.

#### **4.1.7 Art. 9.1 – Public Procurement**

Mozambique has had a legal regime for public procurement for many years, and over time, it has undergone several reforms to adapt its rules to the present day. However, public procurement is among the sectors with the most corruption cases and the least transparency. To illustrate this point, in his inaugural speech, the current PR, Daniel Chapo, promised to create a central procurement institution to oversee all state purchases, aiming to promote transparency and combat corruption.<sup>67</sup> Decree No. 79/2022 of 30 December is currently in force.<sup>68</sup>

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<sup>67</sup> Chirrizane, Acácio (15, 2025) - Chapo promete criar Central de Aquisições do Estado para acabar corrupção - <https://aimnews.org/2025/01/15/chapo-promete-criar-central-de-aquisicoes-do-estado-para-acabar-corrupcao/>, accessed on October 1, 2025.

<sup>68</sup> Regulation of Public Procurement (Ministry of Economy and Finance of Mozambique, 2025) - <https://www.mef.gov.mz/index.php/publicacoes/legislacao-dnqgrh/1903-br-regulamento-de-contratacao-publica/file>, accessed on October 1, 2025.

To ensure transparency in contracts made by the State, the modality to be followed is the general regime of the public tender,<sup>69</sup> and the decree on public procurement also provides for the special and exceptional regime. Also, regarding transparency in public procurement, the Administrative Court conducts a prior inspection of public contracts and then submits them to the PPO for its opinion. Also, in public contracts of a certain value, the winner is required to present a declaration of beneficial ownership, as is already the case with the publication of the list of beneficial owners by the Ministry of Economy and Finance.<sup>70</sup> All these situations aim to control corruption in public procurement, although this has proved difficult and requires other measures to be taken, since it is clear that those who manipulate public tenders are the public servants who work in the area of public procurement, that is, the main cause of corruption in public procurement is the human factor and not the lack of legislation or other control mechanisms.

In line with efforts to ensure transparency and combat corruption in public procurement, this year (2025), the Government launched the e-GP electronic platform.<sup>71</sup> Upon his inauguration, PR Daniel Francisco Chapo promised to create a State procurement center as a decisive step to combat corruption in public procurement.<sup>72</sup> It is important to note that, in order to monitor and combat corruption in the public procurement process, a telephone platform for complaints was created to receive, forward, and handle complaints of illegal practices through a "green line" in November 2025.<sup>73</sup>

In practical terms, and to demonstrate that corruption in public procurement is an evil that affects all spheres of Mozambican society, a case of corruption became public involving a minister of the current government,<sup>74</sup> in which he was allegedly involved in a conflict of interest situation in a public tender. As a result, the Administrative Court

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<sup>69</sup> *Ibid.*

<sup>70</sup> Beneficial ownership information (2024), <https://ufsa.gov.mz/Docs/BeneficiarioEfectivo07032024.pdf>; and Beneficial ownership Information from January to June 2025 - <https://www.ufsa.gov.mz/Docs/BE%20Janeiro%20a%20Junho%202025.pdf>, accessed on October 1, 2025.

<sup>71</sup> Integrity (4, 2025), Government wants to reduce corruption in public procurement with the implementation of "e-GP" - <https://integritymagazine.co.mz/arquivos/40976>, accessed on October 1, 2025.

<sup>72</sup> Investiture speeches of the 5th President of the Republic of Mozambique, His Excellency Daniel Francisco Chapo (Maputo, 15 January 2025) - [https://macua.blogs.com/files/discurso-de-tomada-de-posse-do-pr-dfc\\_versao-final\\_15.01.2025.pdf](https://macua.blogs.com/files/discurso-de-tomada-de-posse-do-pr-dfc_versao-final_15.01.2025.pdf), accessed on October 1, 2025.

<sup>73</sup> Diário Económico (11, 2025), Mozambique Already Has a "Green Line" for Reporting Corruption and Irregularities in Public Procurement, <https://www.diarioeconomico.co.mz/2025/11/19/negocios/mocambique-ja-tem-uma-linha-verde-para-denuncias-de-corrupcao-e-irregularidades-na-contratacao-publica/>, accessed on February 10, 2026.

<sup>74</sup> Martins, Catarina (9, 2025) - Mozambique: Attorney General investigates minister suspected of favoritism - <https://www.dw.com/pt-002/mo%C3%A7ambique-pgr-investiga-ministro-suspeito-de-favorecimento/a-73900926>, accessed on October 1, 2025.

refused to grant a visa due to sufficient evidence of irregularities.<sup>75</sup> Subsequently, the case concerning the alleged involvement of the leader was submitted to the GCCC, where an investigation is underway to determine their possible involvement in acts of corruption.<sup>76</sup>

### **Good practices**

- A decree regulating procurement was approved.
- Creation of an electronic platform for transparency in procurement processes.
- A dedicated telephone complaints platform (“green line”) was established in November 2025 to receive, forward, and ensure the proper handling of reports concerning illegal practices in the public procurement process.

### **Deficiencies**

- Insufficient effectiveness of the decree regulating procurement in controlling corruption cases.
- Electronic platforms do not guarantee transparency in procurement processes.

### **4.1.8 Arts. 10 and 13.1 – Access to Information and the Participation of Society**

In Mozambique, access to information is regulated by the Right to Information Law (Law No. 34/2014, of December 31)<sup>77</sup> and its respective regulation (Decree No. 35/2015, of December 31).<sup>78</sup> CEDIMO is the state entity responsible for ensuring access to information of public interest. Operating under the Ministry of State Administration and Public Service, CEDIMO is responsible for overseeing access to information in the following areas:

- a) To disclose and provide public interest information about PA.
- b) To promote publicity and marketing actions related to document and archive management activities of the State and access to information in PA.
- c) To monitor compliance with the principles and standards regarding the right to information by public and private entities covered by the Right to Information Law.
- d) To oversee the observance of restrictions and limits on the right to information by public and private entities covered by the Right to Information Law.

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<sup>75</sup> Canal de Moçambique (9, 2025) - Administrative Court denies visa to the Minister of Agriculture's deal with IAOM - <https://canal.co.mz/2025/09/19/tribunal-administrativo-nega-visto-ao-negocio-do-ministro-da-agricultura-com-o-iaom/>, accessed on October 1, 2025.

<sup>76</sup> Carta (9, 2025) Roberto Mito's future waiting for what the GCCC finds out, <https://cartamz.com/textos-de-marcelo-mosse/45932/futuro-de-roberto-mito-a-espera-do-que-o-gccc-apurar/>, accessed on February 10, 2026.

<sup>77</sup> CSCS (2022) Lei de Direito à Informação [Law on the Right to Information], <https://cscs.gov.mz/wp-content/uploads/2022/03/Lei-de-Direito-a-Informacao.pdf>, accessed on February 10, 2026.

<sup>78</sup> CEDIMO, Regulamento da Lei do Direito à Informação [Regulation of the Law on the Right to Information], <https://www.cedimo.gov.mz/index.php/documentos-e-arquivos-do-estado/legislacao/regulamento-da-lei-do-direito>.

- e) To promote and supervise the compliance with the obligation to disclose information as outlined in the Right to Information Law by the entities covered by this Law.
- f) To issue opinions, when requested, on the public or private nature of information held by public entities covered by the Right to Information Law.
- g) To issue opinions, when requested, on the refusal or deficiencies in the way information is made available by public and private entities.
- h) To oversee the conditions for accessing information in public and private entities.
- i) To prepare the annual report on the implementation of the Right to Information Law to be submitted to the Central Director of the National Service of State Administration.
- j) To promote and oversee the use of information dissemination means by public and private entities covered by the Right to Information Law.
- k) To propose models for requests, certificates, or other instruments related to accessing information.
- l) To promote the training of civil servants and state agents on access to information.

The Right to Information Law is guided by several principles, including the principle of *democratic participation* (Article 8 of Law n.º 34/2014 of December 31). According to this principle, access to information of public interest enables citizens to form and express opinions on public affairs, thereby influencing the decision-making processes of public authorities.

Another fundamental principle is that of *open PA*, which establishes that public documents and archives must be accessible to citizens without requiring them to demonstrate a direct and legitimate interest or justify the intended use of the information—except in cases restricted by this Law or other legislation (Article 10, Law n.º 34/2014, of December 31).

In addition, two other important principles of *transparency* and *maximum disclosure* are key to increasing citizen participation in decision-making processes by state authorities. The principle of *transparency* is based on the notion that public entities and private entities entrusted with public power, either by law or contract, carry out their duties in the public interest and, as such, must ensure their activities are accessible to the public (Article 7, Law n.º 34/2014, of December 31). The principle of *maximum disclosure* requires all public and private entities covered by the law to proactively disclose public interest information in their possession, using all legally permitted channels to make such information increasingly accessible to citizens (Article 6, Law no. 34/2014 of December 31).

The Law also outlines the means through which public administration bodies or private companies with state participation must publish information. These include the *Boletim*

*da República* (Official Gazette), print, radio, and television media, websites, and public notice boards within the relevant institutions (Article 6, paragraph 3, Law n.º34/2014 of December 31).

Furthermore, the law mandates that institutions establish information consultation rooms to facilitate public access to information (Article 22 of Decree n.º35/2015 of December 31, which approves the Regulation of Law n.º34/2014).

Despite a favorable legal framework, implementation remains deficient and problematic, making access to information a persistent dilemma. Access to information is a *sine qua non* condition for meaningful public participation in the fight against corruption in Mozambique, whether by civil society organizations, NGOs, or community-based organizations.

Studies by the Media Institute of Southern Africa (MISA) Mozambique (2018 and 2020) reveal the prevalence of a culture of secrecy, fear, information centralization, and closure as obstacles to access to information.<sup>79</sup> In 2020, four civil society organizations, namely MISA Mozambique, the Bar Association of Mozambique (OAM), the Rural Environment Observatory (OMR), the Center for Communication Research and Studies (Sekelekani), PR,<sup>80</sup> the MAEFP,<sup>81</sup> and CEDIMO.<sup>82</sup> None of these portals provide relevant information on corruption, contracts, reports, financial accounts, or public service contract bids, among other documents.

A significant detail is that the GCCC, an entity under the PGR, does not have a website to disclose information about corruption. The studies noted that the management of websites is done randomly, with no clear criteria for open communication with citizens.

The data from CEDIMO does not make it clear whether the information provided was satisfactory. Entities may respond to requests, but they do not provide satisfactory information. It is important to note that in none of the requests does the Ministry claim that the matters were related to corruption.

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<sup>79</sup>

MISA.Report.<https://data.misa.org/en/entity/bdf9tu1mwu4?file=1629105376208qzoooux11.pdf&page=111&searchTerm=Zimbabwe>, accessed on August 8, 2025.

<sup>80</sup> Presidência da República de Moçambique. <https://presidencia.gov.mz/>, accessed on February 10, 2026.

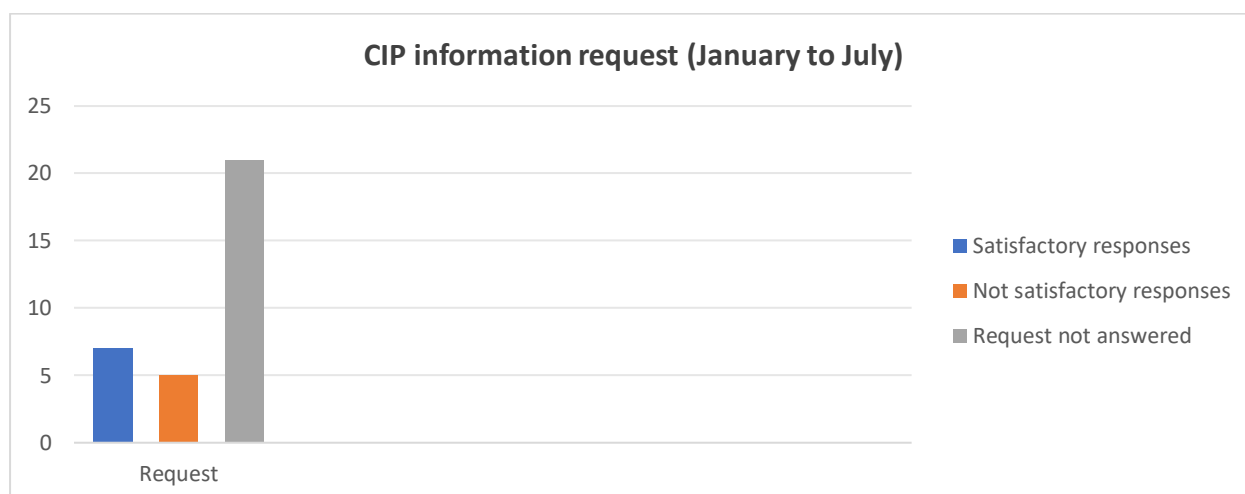
<sup>81</sup> MAEFP.<https://maefp.gov.mz/tecnologico/>, accessed on August 08, 2025.

<sup>82</sup> CEDIMO. <https://www.cedimo.gov.mz/>, accessed on August 8, 2025.

**Table 4: Most Requested Information in 2024<sup>83</sup>**

Level	Type of information	Organization and Functioning	Work Plans	Audit Reports	Environmental Assessment Report	Contract Award Minutes	Contracts for Public Works, Goods Supply, and Service Provision	Other Requests	TOTAL
CENTRAL		10.240	8.098	4.963	6.846	8.387	10.407	3.442	52.383
PROVINCIAL		1.515	173	111	84	481	642	352	3.358
DISTRITAL		537	127	42	39	251	197	55	1.248
MUNICIPAL		800	148	4	0	154	0	23	1.129
TOTAL		13.092	8.546	5.120	6.969	9.273	11.246	3.872	58.118
%		22,5%	14,7%	8,8%	11,9%	15,9%	19,3%	6,6%	100%

In turn, the results of the requests made in the first seven months of 2025 by CIP show that out of 33 requests made, only seven were satisfactorily answered;<sup>84</sup> while 21 were not answered, and five received unsatisfactory responses.<sup>85</sup>



All CIP requests related to suspected corruption or transparency deficiencies.

<sup>83</sup> CEDIMO (2024) Report on the Implementation of the Right to Information Law in Public Administration – 2024, Centro Nacional de Documentação e Informação de Moçambique (CEDIMO), <https://www.cedimo.gov.mz/index.php/acesso-a-informacao/implementacao-da-lei-do-direito-a-informacao>, accessed on February 10, 2026.

<sup>84</sup> A satisfactory response is when the request was answered, and the requested information was provided.

<sup>85</sup> An unsatisfactory response means that the request was answered, but the information was not provided or was only partially provided.

Unfortunately, in Mozambique, the public lacks access to information about UNCAC, as no public or private platform publishes it. Furthermore, although there is a law on the right to information, it remains difficult for judicial bodies to systematically share information about procedural statistics. All information relating to the corruption proceedings conducted by the PPO is presented in an aggregated form once a year, when the Attorney-General presents his accountability report on the performance of justice to the AR, as required by the Constitution.<sup>86</sup>

When it comes to obtaining information about corruption, public bodies close themselves off and avoid sharing any data requested of them. In cases involving requests from the organs of administration of justice (procuratorates and courts), judicial secrecy is always invoked. Later, when the process is played out (without the possibility of filing an appeal) and the judgment becomes final, it is not published or disclosed.

One of the major weaknesses of the Right to Information Law lies in its inadequate enforcement mechanisms for holding officials accountable when they fail to disclose relevant information. The existing legal mechanisms are difficult to activate, particularly against high-level officials.

It is therefore crucial to establish clear mechanisms and an independent agency not only to monitor compliance but also to impose sanctions when public information is unlawfully withheld.

Over the past 15 years, Mozambique has experienced a rise in state authoritarianism and a corresponding shrinking of civic space, particularly after the discovery of the Hidden Debts scandal in 2015, the largest corruption case in the country's history.<sup>87</sup> Civil and political liberties have been severely curtailed. The situation further deteriorated following the post-electoral violence, which lasted three months (from October 21, 2024, to late January 2025), resulting in the death of approximately 400 protesters, most of them shot by the police. These figures are supported by data from CIP, the Electoral Observation Platform (a non-governmental organization based in Beira City, the second-most-important city in Mozambique),<sup>88</sup> the Mozambican Bar Association, Amnesty International, and the CDD.

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<sup>86</sup> Mozambique Government Gazette Series I dated 23 August 2023, <https://archive.gazettes.africa/archive/mz/2023/mz-government-gazette-series-i-dated-2023-08-23-no-163.pdf>, accessed on February, 2026.

<sup>87</sup> Behind Credit Suisse's Soured Mozambique Deals (The Wall Street Journal, 2016) - <https://www.wsj.com/articles/behind-credit-suisse-soured-mozambique-deals-1467214300>, accessed on August 6, 2025.

<sup>88</sup> Post-Electoral Report - [https://pdecide.org/storage/arquivos/1737560922\\_RELATORIO%20POS-ELEITORAL.pdf](https://pdecide.org/storage/arquivos/1737560922_RELATORIO%20POS-ELEITORAL.pdf), accessed on August 6, 2025.

NGOs like CIP have been accused by Polices and FRELIMO, the ruling party since 1975, of financing the protests, alleging electoral fraud.<sup>89</sup> This atmosphere of restricted freedoms, combined with the closing of civic space, significantly inhibits active citizen participation in anti-corruption efforts. According to the CIVICUS Monitor, a global tool monitoring the civic space situation in countries around the world, Mozambique has 27 out of 100 points and has been classified for the past several years as having “repressed” civic space.<sup>90</sup>

### **Good practices**

- The existence of the Right to Information Law and its corresponding regulation.
- Ongoing training of public officials on the Right to Information Law, aimed at raising awareness about the need for proactive disclosure of information of public interest.
- Continued monitoring and technical assistance to PA institutions to track and assess the level of implementation of the Right to Information Law.

### **Deficiencies**

- Lack of information consultation rooms, as stipulated by the Law.
- Failure to use institutional websites to disclose relevant information that could enhance transparency and promote public participation in the fight against corruption.
- A lack of sanctions for not providing information, as stipulated by law.
- The persistence of fear, secrecy, and centralization of information in the figure of the institution’s top official.
- Intimidation of civil society and highly restricted civic space.

#### **4.1.9 Art. 11 – Judiciary and Prosecution Services**

Article 11 of the Convention obliges States Parties to act to “strengthen integrity and prevent opportunities for corruption between members of the judiciary.”

In Mozambique, both the PPO and the courts are independent institutions with functional and administrative autonomy to perform their constitutional duties (Article 134 of the CRM 2004-2018).<sup>91</sup> Unlike the PPO, all courts are on the same level, with no hierarchy among them. The basis for jurisdiction is the principle of specialization,

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<sup>89</sup> “In Mozambique, Police Accuse Civil Society and Bad-Faith Actors of Financing Demonstrations” (Expresso, 2024) - <https://expresso.pt/internacional/2024-11-30-em-mocambique-policia-acusa-sociedade-civil-e-pessoas-de-ma-fe-de-financiaremanifestacoes-3fcd90d9>, accessed on August 6, 2025.

<sup>90</sup> CIVICUS Monitor 2025 - <https://monitor.civicus.org/country/mozambique/>, accessed on January 28, 2026.

<sup>91</sup> Constitution of the Republic of Mozambique, Conselho Constitucional, <https://cconstitucional.org.mz/wp-content/uploads/2023/12/ConstituicaodaRepublicaMocambicana-BR2018.pdf>, accessed on February 10, 2026.

which recognizes the advantage of reserving certain areas of law to different judicial bodies, given the breadth and specificity of the rules that comprise them.<sup>92</sup>

Judges are not considered civil servants, as the independence and impartiality that characterize their judicial function are incompatible with the rules governing the civil service. The position of judge is defined by the Constitution, which, revealing their high level of responsibility as judicial authorities, grants judicial magistrates independence in the exercise of their functions.

However, despite constitutional provisions, the independence of such institutions has often raised significant concerns in practice, where the central point of contention, for example, is the procedure for appointing senior positions in the Judiciary and the PPO.

Although the constitution of the republic establishes the principle of independence of the judiciary and the PPO as the main guiding principles, as well as appropriate limitations on their actions, political interference in the judiciary remains a significant challenge. Appointments based on political criteria do occur, and this independence is challenged by the discretionary power conferred on the PR, since, according to paragraphs h and g) of the CRM, the President is free to appoint any person within the limits of the law, as well as to dismiss them without any explanation. without requiring the approval of the judiciary or the PPO. The President of the Supreme Court and the Attorney General, who are responsible for directing these sectors of justice, raise serious concerns about independence, as there is a high risk that they will serve the executive branch or be subordinate to it.

Political power now can dominate, if not affect, the functioning of the judiciary. The PR will not appoint people he does not know or like to these key positions. Regarding the courts in particular, when appointing the President of the Supreme Court, the PR is not obliged to explain or justify the required profile. Furthermore, the President of the Supreme Court appoints the presidents of the various levels of courts, also without any criteria, and it is they who provide material conditions (housing and vehicles) for judges in the provincial and district sections.<sup>93</sup>

According to an article published by CIP in 2024,<sup>94</sup> there are suspicions in Mozambique that political power has interfered in the actions of the courts/judiciary considering issues related to the appointment of the presiding judges of the Supreme Court, the Administrative Court, and even the Constitutional Council (CC). The same applies to the Attorney General. The study raises the question of the extent to which this form of appointment actually represents interference by the political powers in the judiciary and the extent to which the law establishes a set of guarantees to remove

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<sup>92</sup> TIMBANE, Tomás, *Lessons in Civil Procedure*, I, p. 239.

<sup>93</sup> UCAMA, António David, *The Independence of the Judiciary*, op. cit., p. 156.

<sup>94</sup> Center for Public Integrity (2024). Its urgent and a priority to guarantee the autonomy and independence of the judiciary - <https://www.cipmoz.org/wp-content/uploads/2024/07/E-urgente-e-prioritario-garantir-autonomia.pdf>, accessed on October, 18, 2025.

political influence in the appointment of judges and magistrates of the PPO PPO at the top of their careers and in the positions of chief justices and Attorney General. In this case, the suggestion would be that judges of the higher courts, including the Attorney General, be elected by their peers, with the PR responsible for their appointment, without any interference in the choice.

The lack of limits on term renewal also poses a major challenge to independence and transparency, as there may be cases of incumbents who have held their positions for more than three terms, as is the case with the Chief Justice of the Supreme Court.

The other challenge relates to the bodies' financial independence, as both the PPO and the Judiciary depend on the executive branch for the approval of their budgets. For example, regarding the financial autonomy of the PPO, and the exclusive subjection of PPO magistrates to the directives and orders provided for under the CRM Law. In terms of guarantees of autonomy, the same organic law determines that the PPO is entitled to its own budget, with the limits set under the budget law. However, it is not clear how budgetary autonomy manifests itself in relation to the PPO. Nor is it explained whether it is the Executive that defines and guarantees the PPO own budget through budgetary appropriations. This situation means that this body is treated in the same way as any other PA body, since budgetary appropriations are allocated to all its bodies. It is not known whether the government defines the budget and allocates it to the PPO.<sup>95</sup>

To ensure the credibility of the judicial system, it is essential to guarantee its independence, including, above all, its budgetary independence. It is a fact that the judiciary in Mozambique continues to depend on the executive, which conditions its actions by imposing budgetary constraints. For the courts to act impartially and independently, it is essential that they have, among other measures, the legitimacy to define and execute their own budget, with the executive branch responsible for making it available, without any constraints other than compliance with budgetary law. What we see now is that the executive branch prepares the judiciary's budget and dictates its priority needs. When necessary for its functioning, it must subordinate itself to the state's financial entities, particularly the Ministry of Economy and Finance and the provincial directorates of economy and finance.

To lend credibility to the judicial system, it is essential to guarantee its independence, including, above all, its budgetary independence. It is a fact that the judiciary in Mozambique continues to depend on the executive, which conditions its actions by imposing budgetary constraints. For the courts to act impartially and independently, it is essential that they have, among other measures, the legitimacy to define and execute their own budget, with the executive branch responsible for making it available, without any constraints other than compliance with budgetary law. What we

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<sup>95</sup> Article 159, g) and h) of the Constitution of the Republic of Mozambique, [https://www.masa.gov.mz/wp-content/uploads/2018/01/Constituicao\\_republica\\_mocambique.pdf](https://www.masa.gov.mz/wp-content/uploads/2018/01/Constituicao_republica_mocambique.pdf).

are seeing now is that the executive branch prepares the judiciary's budget and dictates its priority needs. When necessary for their functioning, they must subordinate themselves to the state's financial entities, particularly the Ministry of Economy and Finance and the provincial directorates of economy and finance.

Political interference in the judiciary is, however, a significant challenge. The appointment of judges based on political criteria still occurs, for example, when the PR influences the functioning of the judiciary by appointing the President of the Supreme Court, the President of the CC, the President of the Administrative Court, and the Vice President of the Supreme Court, and by appointing, dismissing, and removing the Attorney General and Deputy Attorney General.<sup>96</sup> Political power now has the full capacity to dominate, if not affect, the functioning of the judiciary. The PR will not appoint to these structural positions anyone he does not know or like. With regard to the courts in particular, it is clear that when appointing the President of the Supreme Court, the PR is not obliged to explain or justify the required profile; Furthermore, the President of the Supreme Court appoints the presidents of the various levels of courts, also without any criteria, and it is they who provide material conditions (housing and vehicles) for judges in the provincial and district sections.

Thus, to ensure that the bodies operate independently, it would be necessary for the judges of the higher courts, including the Attorney General, to be elected by their peers, with the President being responsible for their appointment, without any interference in the choice, reinforcing guarantees of impartiality, irresponsibility, and irrevocability. This is because Mozambican law does not address cases in which sitting judges are called upon to perform executive functions, nor does it set conditions for their return to the judiciary. Judge Helena Kida<sup>97</sup> was called upon to serve as Deputy Minister of the Interior and then Minister of Justice, Constitutional and Religious Affairs.<sup>98</sup> The same happened with the former Judge Counselor of the Constitutional Council, Mateus da Cecília Feniassa Saize, which constitutes interference in the independence of judges.<sup>99</sup> This is the case of former Public Prosecutor Beatriz Buchili, who currently serves as Advisor to the Head of State.<sup>100</sup>

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<sup>96</sup> Center for Public Integrity (2024) - It is urgent and a priority to guarantee the autonomy of the judiciary - <https://www.cipmoz.org/wp-content/uploads/2024/07/E-urgente-e-prioritario-garantir-autonomia.pdf>, accessed on 9 January 2026.

<sup>97</sup> Folha de Maputo. (2017) - The President of the Republic, Filipe Jacinto Nyusi, appointed Helena Mateus Kida to the position of Deputy Minister of the Interior through a Presidential Decree - <https://www.folhademaputo.co.mz/pt/noticias/nacional/pr-nyusi-nomeia-vice-ministros-do-interior-e-da-saude>, accessed on 9 January 2026.

<sup>98</sup> Integrity Magazine (2025) - Former Minister of Justice appointed Advisor to a Supreme Court Judge - <https://integritymagazine.co.mz/arquivos/40786>, accessed on 9 January 2026.

<sup>99</sup> O País (2025) - The President of the Republic appointed Mateus da Cecília Feniassa Saize as Minister of Justice this Thursday - <https://opais.co.mz/mateus-feniassa-saize-e-o-novo-ministro-da-justica-assuntos-constitucionais-e-religiosos/>, accessed on 9 January 2026.

<sup>100</sup> O País (2025) - Beatriz Buchili appointed Advisor to the Head of State - [https://www.google.com/search?q=beatriz+buchili&og=beatriz+buchili&gs\\_lcrp=EqZjaHJvbWUqCqgAEAY4wIYgAQyCqgAEAY4wIYgAQyBwgBEC4YgAQyCAqCEAYFhgeMggIAxAAGBYHjIICAQQ](https://www.google.com/search?q=beatriz+buchili&og=beatriz+buchili&gs_lcrp=EqZjaHJvbWUqCqgAEAY4wIYgAQyCqgAEAY4wIYgAQyBwgBEC4YgAQyCAqCEAYFhgeMggIAxAAGBYHjIICAQQ)

Another well-known case is that of the current Advisor to the Head of State, Bem Vinda Levy, who before taking up this position served as a judge and may return to the same role.<sup>101</sup>

Currently, the Supreme Court consults with the courts to define their budget and priorities. The budget is then sent to the executive, which has the prerogative to evaluate it and adjust, after which it is submitted to the AR, which also evaluates it, and only then is it approved. In other words, the judiciary's budget continues to be surreptitiously conditioned by political power. The solution that can be put forward in this case is to enshrine a minimum percentage of the budget allocated to the judiciary in the CRM and to channel it quarterly, half-yearly, or annually so that the judiciary can manage it. However, because this implies profound legislative changes, the model used for provincial municipal councils could be followed, where the amounts are deferred quarterly, and before the end of the execution of the budget, the remaining part is deferred. This would not be a definitive solution, but rather a short- and medium-term one.

Regarding measures to combat corruption in the judiciary, Mozambique has adopted strong legislation:

- Since 2014, the Penal Code (PC) has established the criminalization of corruption against magistrates and criminal investigation agents, the Anti-Corruption Law (Law No. 3/2004): This was the first specific law to combat corruption and established the GCCC, LPP: these establish principles of integrity and conduct for public officials, Laws on the Protection of Victims, Witnesses, Whistleblowers, and Experts in Criminal Proceedings: Create mechanisms to protect those who cooperate with the justice system, encouraging reporting and participation in criminal proceedings, Strategy for Preventing and Combating Corruption (Resolution No. 46/2022): This is an action plan covering various sectors of the State, including the judiciary, with the aim of strengthening institutions and promoting integrity, and the adoption of international conventions such as the African Union Convention on Preventing and Combating Corruption and the UNCAC: The ratification of these international conventions by the country is essential for the alignment of national policies and laws with international standards for combating corruption.
- Code of ethics and conduct for public servants, approved by Law 3/2023. It is also important to mention the existence of codes of ethics for the judiciary, approved by Resolution No. ° 2/CSMJ/P/2022. The PPO, however, does not

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[ABqWGB4yCAgFEAAyFhqeMggIBhAAGBYHjIICAcQABqWGB4yCAgIEAAyFhqeMggICRAAGBYyHtIBCDM0MjVqMG03gAIAAsAIA&sourceid=chrome&ie=UTF-8#:~:text=Beatriz%20Buchili%20nomeada,%E2%80%BA%20beatriz%2Dbuchi,](https://mznews.co.mz/benvinda-levi-designada-membro-do-conselho-superior-da-magistratura-judicial/) accessed on 9 January 2026.

<sup>101</sup> MZNEWS (2025) - Benvinda Levi appointed member of the superior council of the judicial magistracy. <https://mznews.co.mz/benvinda-levi-designada-membro-do-conselho-superior-da-magistratura-judicial/>, accessed on 9 January 2026.

have its own code of ethics, bound by the general framework. However, in 2024, the Mozambican Association of Magistrates of the Public Prosecutor's Office launched a Code of Ethics and Conduct through an initiative supported by the Spanish Embassy and the European Union, with a view to establishing guidelines for the conduct of its member magistrates.

On the other hand, despite the production of annual reports, such as those from the PGR and the courts, the justice sector in Mozambique faces challenges related to transparency. Justice institutions remain closed, hindering access to relevant public information and contributing to the growth of corruption cases in the justice system, which are now a reality in Mozambique.

### **Good practices**

- Legislation to combat corruption was approved.
- Publication of annual reports related to the activities of the PPO and the Courts.
- Judicial autonomy and independence were established in the republic's constitution.

### **Deficiencies**

- Arbitrary designation of the Chief Justice of the Supreme Court and the Attorney General.
- A lack of term limits for those holding leadership positions in the sectors.
- The judiciary lacks financial independence.
- No limitation on the powers of PR, who may in some ways interfere in decisions.
- Nomination of magistrates for political positions.

#### **4.1.10 Art. 12 – Private Sector Transparency**

Corruption in the Mozambican private sector was only criminalized in 2019,<sup>102</sup> following the PC reform. It should be noted that in Mozambique the State has not prioritized the obligation of private-sector companies to comply with compliance rules. It means that companies in this sector randomly decide whether to create compliance rules for their employees, without any legal obligation. However, this does not mean that corruption in the private sector is not a reality. After the approval of the crime of corruption in the private sector, in 2022 there was an increase in the number of cases registered by the PPO by 38, against 8 that had been registered in 2021. According to the Attorney General of the Republic at the time, Beatriz Buchili, "The low number of cases (...), may be a consequence of the lack of complaints and the weaknesses of the internal control mechanisms, as well as the weak collaboration of associations

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<sup>102</sup> Law No. 24/2019, of 24 December — Revision Law of the Penal Code, <https://reformatar.co.mz/documentos-diversos/lei-24-2019-lei-de-revisao-do-codigo-penal.pdf>.

linked to the economic areas and professional unions”.<sup>103</sup> There is also the perception here that the PPO is concerned with, or has more control over, cases of corruption in the public sector, where, it should be said, statistics show it has consistently presented the greatest number of cases.

The director of the GCCC, Glória da Conceição Adamo said she intends to partner with the private sector to fight corruption.<sup>104</sup> This reinforces the conclusion that the fight against corruption in the private sector still shows significant weaknesses. One example of the State’s lack of rigor can be seen in the former Political Parties Law that was repealed. Law No. 16 of 2012, of 14 August, stated in p. 2 of Article 46 that for a period of two years after leaving public office, a former public official was prohibited from providing any type of service to any natural or legal person with whom they had maintained a relevant relationship due to their previous position or employment. It also provided that the former public servant was prohibited from accepting a position in the governing bodies, as an employee or liberal service provider with an individual or legal entity whose corporate purpose or activity was related to his previous position or employment and that he could not do business for himself or intermediate business in favor of third parties with a public entity in which he provided services. However, the new LPP (Law No. 12/2024, of 18 June) removed paragraph 2 of article 46 of Law No. 16/2012 in force, which allows a public servant to cease performing functions and go to work in a private company with which he has had a relevant relationship, without: At the very least, observe a period of time determined by law between the cessation of public functions and the beginning of professional functions in the private sector. This situation may lead a public servant to use inside information obtained while performing public functions to distort competition in the private sector.

### **Good practice**

- Corruption in the private sector is addressed and punishable under the law.

### **Deficiencies**

- Reduced reporting of corruption cases.
- Lack of coordination between the private sector, professional associations and the enforcement entities to increase the number of reports of corruption cases.

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<sup>103</sup> Carta (4, 2023), Corruption cases in the private sector skyrocket - <https://cartamz.com/politica/5314/13514-disparam-processos-de-corrupcao-no-sector-privado/>, accessed on October 20, 2025.

<sup>104</sup> Mozambique Information Agency - AIM (9, 2024), New Director of GCCC challenged to articulate with public sectors in the fight against corruption - <https://aimnews.org/2024/09/16/nova-directora-do-gccc-desafiada-a-articular-com-sectores-publicos-no-combate-a-corrupcao/>, accessed on October 19, 2025.

## 4.2 Chapter V

### 4.2.1 Arts. 52 and 58 – Anti-Money Laundering

In Mozambique, financial institutions have an obligation to identify their customers. As established in paragraph 1 of article 26 of Notice no. 10/GBM/2024 of 30 August,<sup>105</sup> "Financial institutions should adopt policies on the identification and verification of their customers, regardless of the number of individual transactions." To this end, paragraph 2, in paragraphs a) and b) of the above-mentioned Notice, establishes that financial institutions must adopt the "know your customer policy", which must incorporate, among others, the customer acceptance policy and the customer identification and verification procedures, and in essence, according to paragraph 2 of article 28 of Notice no. 10/GBM/2024, the policy must include:

- a) prohibition on the opening of anonymous or fictitious accounts.
- b) prohibition of opening numbered accounts.
- c) categorization of the client according to the risk assessment carried out.
- d) necessary documentation, additional information to be required and measures applicable to each category of customer, based on the risk assessment carried out.
- e) enhanced due diligence measures for the acceptance of high-risk clients, as shown in Annex II.
- f) prohibition of opening or closing an account when the financial institution is unable to apply due diligence measures.
- g) the circumstances in which the client is allowed to act on behalf of others, whether an individual or a legal entity, in accordance with the legislation in force.
- h) measures to identify the beneficial owners.
- i) procedures for opening accounts in a non-face-to-face manner.
- j) procedures for superior approval in cases of account opening by politically exposed persons as well as other high-risk clients; and
- k) type of necessary investigations, before opening the account, to verify that the customer has no criminal record, is not on the list of terrorists or terrorist organizations.

Article 36 of the same Notice requires financial institutions to identify the beneficial owner. However, the BdM, the regulator of the Mozambican financial system, says that weaknesses persist in complying with enhanced due diligence obligations regarding the verification of the identities of the beneficial owners, the origin of funds and the periodic updating of customer information, and the regulator goes further and states that. This situation exposes the national financial system to high risks of misuse

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<sup>105</sup> Bank of Mozambique Notices Nos. 10 and 11 GBM 2024 of 30 August 2024 (Bank of Mozambique, 2024) - <https://www.bancomoc.mz/media/2xud3l5t/avisos-n%C3%BAmeros-10-e-11-gbm-2024-de-30-de-agosto.pdf>, accessed on September 29, 2025.

by criminal networks.<sup>106</sup> From another perspective, the BdM notes that although clear regulations and updated guidelines are in place, many financial institutions still rely on insufficient practices, with weak or even absent internal procedures. The BdM concludes that these shortcomings undermine the integrity and credibility of the Mozambican financial system, and it calls for immediate improvements in internal controls, staff training, and the use of more advanced tools to detect suspicious transactions.<sup>107</sup>

The weaknesses identified by the BdM have led this institution to impose annual sanctions on commercial banks for violations of prudential rules and for their failure to prevent and fight money laundering.<sup>108</sup> In this regard, the director of GIFiM, Aurélio Matavele Junior, points out that the banking sector stands out as the main source of reports of suspicious transactions, being responsible for 80 to 85% of the cases analyzed.<sup>109</sup>

It should also be noted that under the terms of the approved Commercial Code, Decree-Law No. 1/2022 established the figure of the "beneficial owner" by in its article 99, stating that "(...) business company, the consortium, the representation of a national or foreign entity must maintain, in an appropriate model, approved by specific legislation, updated information regarding the identification of the beneficial owner, through documents confirming its identity, under the terms of the legislation on the prevention and combating of money laundering and terrorist financing".

In public procurement in Mozambique, the identification of the beneficial owner is also required for companies that win public tenders, and even for this purpose lists have already been published.<sup>110</sup> In concrete terms, the debate that has been taking place in Mozambique has to do with the need to create specific legislation on the beneficial owner, given that so far there are only legal diplomas that deal with this matter targeting specific sectors. The CDD, a Mozambican civil society organization, has been organizing a debate in 2023, where the need to produce a specific law on the beneficial owner was raised.<sup>111</sup> The current National Coordinator of the Executive

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<sup>106</sup> Diário Económico (9, 2025) - Money Laundering: BdM Criticizes "Deficient Control" Over High-Risk Customers - <https://www.diarioeconomico.co.mz/2025/09/15/economia/branqueamento-de-capitais-bdm-critica-controlo-deficiente-sobre-clientes-de-alto-risco/>, accessed on September 17, 2025.

<sup>107</sup> *Ibid.*

<sup>108</sup> Alfredo, Esalinha (2, 2025) - Central Bank fines nine financial institutions for violation of rules - <https://opais.co.mz/banco-central-aplica-multas-a-instituicoes-financeiras-por-violacao-de-normas/>, accessed on September 17, 2025.

<sup>109</sup> Diário Económico (8, 2025) - GIFiM: reports reveal suspicious transactions of more than 2 MM\$ - <https://www.diarioeconomico.co.mz/2025/03/10/economia/financas/gifim-relatorios-revelam-movimentacoes-suspeitas-superiores-a-2-mm/>, accessed on September 17, 2025.

<sup>110</sup> Carta (8, 2025) - Government releases another list of effective beneficiaries of three millionaire contracts - <https://cartamz.com/politica/45540/governo-divulga-mais-uma-lista-de-beneficiarios-effectivos-de-tres-contratos-milionarios/>, accessed on September 17, 2025.

<sup>111</sup> Emídio, Beúla (9, 2023) - Mozambique needs specific legislation on beneficial ownership to ensure transparency in business - <https://cddmoz.org/wp-content/uploads/2020/07/Mocambique-precisa-de->

Committee for Policies to Prevent and Combat Money Laundering and Terrorist Financing, Luís Cezerilo, participated in the meeting, who stated that "(...) The FATF demands a specific law and regulation on beneficial ownership in Mozambique. According to Luís Cezerilo, the Government is still working with its partner to produce the law and regulation on the beneficial owner".<sup>112</sup> In other words, according to Luís Cezerilo, one of the causes that may have led Mozambique to be included in the FATF grey list may be the lack of the respective specific law on the identification of the beneficial owner.

About the control of the accounts of people who have performed public functions, their family members and close collaborators, there is no legal provision for this to happen or for it to be complied with by financial institutions. It should also be noted that the legislation does not oblige financial institutions to publicize the identity of the beneficial owners, terms in which the lists have never been disclosed, which we believe is intended to protect issues related to banking secrecy.

GIFiM is a national State entity, created by Law No. 14/2007 (later amended by Law No. 2/2018). The Institution is responsible for ensuring the integrity of data on suspicious financial transactions reported by commercial banks, tracking the information, analyzing the communications received from the commercial banks, and disseminating the financial intelligence reports to the criminal investigation bodies, which have the competence to investigate cases based on the information shared by GIFiM. It is through Law No. 14/2023<sup>113</sup> that GIFiM carries out its tasks and competences.

Within the scope of international cooperation, article 32 of Law 15/2024 on combating Money Laundering and Terrorist Financing states that GIFiM may cooperate with other Financial Intelligence Units through the signing of memoranda of understanding. In this sense, GIFiM at an international level has signed more than 14 MOU's with agencies from around the world.<sup>114</sup> However, the GIFiM website does not highlight the matters on which the MOU's concern/focus. This is quantitative rather than qualitative information in the sense that it does not provide any details.

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[uma-legislacao-especifica-sobre-beneficiario-efetivo-para-garantir-transparencia-nos-negocios-1.pdf](#), accessed on September 17, 2025.

<sup>112</sup> *Ibid.*

<sup>113</sup> Law No. 14/2023, of 28 August 2023 — on the Prevention and Combating of Money Laundering and Terrorist Financing, <https://www.at.gov.mz/por/Media/Files/2023-LEI-14-2023-DO-COMBATE-AO-BRANQUEAMENTO-DE-CAPITAIS-E-FINANCIAMENTO-DO-TERRORISMO2>, accessed on October 1, 2025.

<sup>114</sup> Signed MOU's – International - <https://www.gifim.gov.mz/#> and [Eghttps://reformat.co.mz/documentos-diversos/lei-24-2019-lei-de-revisao-do-codigo-penal.pdf](https://reformat.co.mz/documentos-diversos/lei-24-2019-lei-de-revisao-do-codigo-penal.pdf), accessed on September 17, 2025.

Internationally, GiFiM is already part of the Egmont Group (EG)<sup>115</sup> which is an international network that brings together Financial Intelligence Units from all over the world.<sup>116</sup> The EG is made up of around 177 countries, responsible for international cooperation in the fight against financial crime, in accordance with global standards for preventing and combating money laundering and terrorist financing (AML/CFT). The Eastern and Southern African Anti-Money Laundering Group (ESAAMLG)<sup>117</sup> is a body of the FATF<sup>118</sup> established in 1999. It adopted and published the Mutual Evaluation Report for Mozambique,<sup>119</sup> identifying weaknesses in the country's legal, regulatory, and institutional structures regarding the effectiveness of the Money Laundering and Terrorist Financing regime. After being on the FATF grey list since October 2022, Mozambique was removed from the grey list on 24 October 2025 for the efforts it made in this regard, with institutional deficiencies in the fight against money laundering noted.<sup>120</sup>

It is important to note that in the first mutual evaluation report prepared in 2019, for example, the country did not have any legal provision that required financial and non-financial entities to carry out the assessment of the risks of money laundering and terrorist financing, which only occurred in 2023 with the approval of the regulation<sup>121</sup> of the law<sup>122</sup> which establishes measures to prevent and suppress the use of the financial system and economic activities for the practice of acts of money laundering, terrorist financing and financing of the proliferation of weapons of mass destruction and related crimes.

According to the 2024 report of the Attorney General of the Republic, published in 2025,<sup>123</sup> GiFiM sent 68 financial information reports to the PGR, of which 49 gave rise to criminal proceedings, 19 of which involved money laundering. In addition, in the same year, 81 reports were received from financial and non-financial institutions,

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<sup>115</sup> Ministry of Finance - Financial Information Office of Mozambique – Press Release (6, 2025) - <https://www.gifim.gov.mz/documents/255.pdf>, accessed on October 3, 2025.

<sup>116</sup> Egmont Group - <https://egmontgroup.org/>, accessed on October 3, 2025.

<sup>117</sup> ESSMALAG - <https://www.esaamlg.org/index.php/about>, accessed on October 5, 2025.

<sup>118</sup> FATF/FATF- <https://www.uif.a0/conteudo?id=29&menu=FATF / GAFI>, accessed on Sept 29, 2025.

<sup>119</sup> ESAAMLG, Anti-Money Laundering and Counter-terrorist Financing Measures, Mozambique, Mutual Evaluation Report (5, 2021), accessed on September 29, 2025.

<sup>120</sup> Lusa (10, 2025) - Mozambique removed from international money laundering grey list, [https://www.rtp.pt/noticias/economia/mocambique-retirado-da-lista-cinzenta-internacional-de-branqueamento-de-capitais\\_n1693393](https://www.rtp.pt/noticias/economia/mocambique-retirado-da-lista-cinzenta-internacional-de-branqueamento-de-capitais_n1693393), accessed on October 24, 2025.

<sup>121</sup> Decree No. 53/2023 and Decree No. 54/2023 — Regulations of the Law on Combating Money Laundering, Terrorist Financing, and Terrorism, <https://www.bancomoc.mz/media/znldo2ce/decreto-n-%C2%BA-53-e-54-regulamentos-da-lei-terrorismo-branqueamento-e-financiamento-002.pdf>, accessed on August 10, 2025.

<sup>122</sup> Law No. 14/2023, of 28 August 2023 — Legal Regime and Measures for the Prevention and Combat of Money Laundering and Terrorist Financing, <https://ts.gov.mz/wp-content/uploads/2024/05/Lei-no-14-2023-de-28-de-Agosto-Lei-que-estabelece-o-regime-juridico-e-as-medidas-de-prevencao-e-combate-ao-branqueamento-de-capitais-e-financiamento-ao-terrorismo-.pdf>, accessed August 10, 2025.

<sup>123</sup> Annual Report of the Attorney General of the Republic to the Assembly of the Republic – 2025, <https://www.parlamento.mz/wp-content/uploads/2025/04/Informacao-Anual-do-Procurador-Geral-da-RM-a-AR-2025.pdf>, accessed August 10, 2025.

under the duty to refrain from suspicious transactions, which resulted in the opening of 75 cases related to money laundering. According to PGR data, 191 cases of money laundering were registered in 2024, a significant reduction from the 519 cases recorded in the previous year, representing a 63.2% decrease. Of these, 42 cases were concluded, with 16 formal charges and 26 dismissals. In addition, 81 reports were received from financial and non-financial institutions under the duty to report suspicious transactions, leading to the opening of 75 cases related to money laundering.

Statistical data on the GIFiM refer to its internal performance, and there is no information on actions taken in international cooperation. Therefore, GIFiM is recommended to strengthen its action based on cooperation with other States parties to the UNCAC. Although GIFiM has initiated several agreements, there are no statistics on their performance in international cooperation. On the GIFiM website, the list of those sanctioned by the United Nations Security Council is also published. This list is extremely important for monitoring suspicious persons and taking preventive measures in the fight against money laundering and terrorist financing.<sup>124</sup>

GIFiM has already published five strategic analysis reports on its website<sup>125</sup> which has as its general objective to inform Law Enforcement, Regulation and Supervisory Authorities for decision-making, to provide feedback to entities with the duty to communicate within the scope of articles 4 and 5 of Law No. 14/2023, of 28 August, as amended by Law No. 4/2024, of 22 March (obliged entities), as well as to raise awareness among the general public about the prevention, repression and fight against Terrorism, through its Financing. In the latest strategic analysis report, in this case the fifth, deficiencies are pointed out to the BdM as a regulator of the Mozambican financial system, specifically with regard to the scarcity of human resources to effectively carry out its supervisory activity, since it only has eight employees to supervise all financial institutions operating in Mozambique, according to information that was already included in the sectoral risk assessment report carried out from November 2023 to February 2024.<sup>126</sup>

According to GIFiM technicians interviewed, this financial intelligence entity after entering the FATF grey list and becoming part of international organizations aimed at combating money laundering, strengthened its number in terms of qualified human resources, had an increase in its operating budget and there was also investment in modern technological means to perform its functions effectively as happened with the

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<sup>124</sup> Mozambique's Financial Intelligence Office - <https://www.gifim.gov.mz/documents/92.pdf>, accessed on September 29, 2025.

<sup>125</sup> Mozambique Financial Information Office - <https://www.gifim.gov.mz/>, accessed on October 3, 2025.

<sup>126</sup> Chilengue, Evaristo (9, 2025) Central bank does not have enough resources to supervise money laundering in banking – <https://cartamz.com/economia-e-negocios/46479/banco-central-nao-tem-recursos-suficientes-para-supervisionar-branqueamento-de-capitais-na-banca-diz-relatorio/says>, accessed on January 2, 2026.

goAML platform that was developed in 2011 with the aim of facilitating the transmission of information on suspicious transactions and which was recently revised for updating of its functionalities and operating procedures.<sup>127</sup> The problem with GIFiM at the moment has to do with the lack of ability to retain its staff who are repeatedly enticed to work in the private sector that offers better salaries and other perks.

### **Good practices**

- Satisfactory anti-money laundering legislation passed.
- Existence of a Financial Intelligence Unit.
- Legislation approved to identify the beneficial owner in financial institutions
- Creation of an electronic platform for the transmission of information on suspicious money laundering operations.
- Indication of a list of countries with which the GIFiM initialed MOU.
- Application of the sanctioning regime to financial institutions for non-compliance with anti-money laundering rules.
- Improvement in terms of hiring qualified human resources, investment in technological means and considerable budget reinforcement.

### **Deficiencies**

- Failure by financial institutions to comply with the rules for identifying the beneficial owner.
- Lack of information on GIFiM's performance in international cooperation.
- Absence of a general law on beneficial ownership.
- There is no control of the bank accounts of people who hold public offices, their family members and close collaborators.
- Lack of substantial information on the GIFiM website regarding its operation.
- Lack of supervisory capacity of the financial system regulator.
- GIFiM has difficulties in retaining its staff who are enticed by the private sector that offers better salary conditions and other perks.

## **4.2.2 Arts. 51, 54, 55, 56 and 59 – International Cooperation for the Purpose of Confiscation**

Mozambique has approved a special legal regime for the extended confiscation and recovery of assets through Law No. 13/2020, of 23 December,<sup>128</sup> which established the CGCRA.

In the international field, GCRA has the following tasks (Article 22 of Law No. 13/2020):

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<sup>127</sup> Mozambique Financial Intelligence Office (GIFiM), goAML Platform User Manual and Standard Operating Procedures [https://goaml.gifim.gov.mz/goaml/Public\\_Documents/MANUAL%20DE%20UTILIZADOR%20DA%20PLATAFORMA%20goAML.pdf](https://goaml.gifim.gov.mz/goaml/Public_Documents/MANUAL%20DE%20UTILIZADOR%20DA%20PLATAFORMA%20goAML.pdf), accessed on September 29, 2025.

<sup>128</sup>

[https://anticor.world/assets/upload/153\\_leinoestabeleceoregimejuridicoespecialdeperdaalargadadebenserecuperacaodeativos.pdf](https://anticor.world/assets/upload/153_leinoestabeleceoregimejuridicoespecialdeperdaalargadadebenserecuperacaodeativos.pdf).

- Identify, trace and seize all assets, goods and proceeds related to crime, internationally.
- Ensure cooperation with asset recovery offices of other States or entities with similar attributes.

In parallel with the legal regime of extended loss of assets and recovery of assets, Law No. 21/2019 of 11 November was approved,<sup>129</sup> establishing the principles and procedures of Mozambique's international legal and judicial cooperation with other States, as well as with international entities established within the framework of international treaties and agreements that bind the Mozambican State in criminal matters.

For the purposes of international legal and judicial cooperation, the PGR has been designated through paragraph 1 of Article 5 of Law No. 21/2019 as the central authority to operate the activity of international legal and judicial cooperation in the following matters: requests for legal and judicial cooperation of any nature, transmission of criminal proceedings; the execution of criminal sentences; the transfer of persons sentenced to custodial sentences and measures to the supervision of persons convicted or on probation; mutual legal assistance in criminal matters.

Article 4(1) of Law No. 21/2019 provides that, in the field of agreements and treaties in criminal matters, "[t]he forms of cooperation to which it refers (...) are governed by the Vienna Convention on the Law of Treaties, of 22 May 1964, by bilateral or multilateral international agreements that bind the Mozambican State". It means that the Mozambican State favors the signing of international treaties and agreements in criminal matters, including with regard to the recovery of assets, as established by Law No. 21/2019 by establishing that the aid includes "identification and location of the proceeds of crime, capital, property and instruments, as well as other objects for the purposes of evidence or confiscation" according to the Law on International Legal and Judicial Cooperation in Criminal Matters already mentioned.

The PGR has published matters related to requests for international legal and judicial cooperation through the annual report of the Attorney General of the Republic, which indicates how many requests for legal and judicial cooperation it has made, how many have been signed and those awaiting signatures, as well as how many requests it has received from other countries and international jurisdictions. Although the report of the Attorney General of the Republic is published on the website containing information on legal and judicial cooperation, it would be good if for a better publicity of this activity, the PGR's website should have a specific domain for this purpose, where information

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<sup>129</sup> Mozambique Government Gazette Series I dated 11 November 2019, No. 217, <https://archive.gazettes.africa/archive/mz/2019/mz-government-gazette-series-i-dated-2019-11-11-no-217.pdf>.

on this subject could be shared in greater detail (except for matters in secrecy of justice and safeguarding the presumption of innocence), as well as the respective updating. An aspect that should be introduced on the PGR's website is a list of countries with which this institution has signed bilateral treaties. Now it is difficult to know how many bilateral agreements and treaties have been signed in full so far and with which countries, as there is little information available on this. On the PGR's website, only the MOU that was signed with the Bailiwick of Jersey is published<sup>130</sup>, where the Attorney General of the Republic of Mozambique applied to the Royal Court of Jersey for an order under the Forfeiture of Assets (Civil Proceedings) Act, 2018 for the repatriation of monetary values that had been deposited by a Mozambican public servant, who failed to justify the origin of said money. This is the only case cited on the PGR's website for international legal and judicial cooperation, regarding a request made by the Mozambican authorities that allowed the recovery of expatriate assets.

Recently, the CIP made a request to the PGR to have information on matters relating to a possible agreement signed between the Mozambican state and the former and the Brazilian company Odebrecht currently called Novonor regarding bribes paid in Mozambique by the company in question, based on information it obtained from a Brazilian source. However, so far, the PGR has not responded to the CIP's request for information, although the deadline for providing the information under the right to information law has already been largely exceeded.

In Mozambique, a civil confiscation law is being prepared<sup>131</sup> which, if approved, will help fight transnational organized crime, allowing the loss of assets, even without the existence of a conviction. Currently in the country, only after a conviction with final and unappealable judgment (there is no longer any possibility of appealing) are the seized assets considered forfeited in favor of the State.

In practical terms, the 2025 report of the Attorney General of the Republic states that in 2024, 35 requests for legal and judicial cooperation were issued to various countries, all for mutual legal assistance, compared to 21 in the same previous period (2023). Of these requests, 5 have been answered, and the others are awaiting a response; 12 letters of insistence have been sent to the requested authorities. Also in 2024, the country received 29 requests for international legal and judicial cooperation in criminal matters, from various countries, 25 of which were for mutual legal assistance and 4 for extradition. Of these requests, 11 were answered, 1 was waived by the requesting authority and 17 are in process.

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<sup>130</sup> Attorney General's Office - <https://www.pgr.gov.mz/memorandos/>, accessed on September 18, 2025.

<sup>131</sup> Caetano, José (4, 2025) PGR urges AR to approve Civil Confiscation Law - <https://mznews.co.mz/pgr-insta-ar-a-aprovar-lei-de-confisco-civil/>, accessed on September 18, 2025.

As shown in the data above, the PGR, in addition to issuing requests for legal and judicial cooperation, also responds to requests from other jurisdictions and foreign states.

Regarding requests for international legal and judicial cooperation in civil matters, 10 letters of rogatory were received and sent to the competent courts for compliance. 17 rogatory letters were issued, of which 5 were answered.

Regarding legal and judicial cooperation, it should be noted that the Mozambican state still needs to strengthen itself. According to information shared by a source from the PGR, the Technical Directorate for International Legal and Judicial Cooperation was created, responsible for processing requests for mutual legal assistance in criminal matters, including those from Mozambique abroad and vice versa. The creation of this entity satisfies a claim that has already existed since 2024 to address the growing number of requests from other states in terms of international legal and judicial cooperation.<sup>132</sup>

### **Good practices**

- A specific legal regime on the loss of assets and asset recovery approved.
- An approved law on international legal and judicial cooperation in criminal matters.
- Creation of the Technical Directorate for International Legal and Judicial Cooperation.
- Publication in the report of the Attorney General of the Republic of the information inherent in the signing of bilateral treaties.
- Existence of statistics on requests for legal and judicial cooperation from other countries to Mozambique and vice versa.

### **Deficiencies**

- Existence of a single published case of confiscation and repatriation of assets.
- Lack of a list of countries with which bilateral agreements and treaties have been signed on the PGR's website on matters related to the confiscation and repatriation of assets.
- The information on the number of agreements on international cooperation signed does not refer to the subject matter of these agreements.
- Little public information on international legal and judicial cooperation.

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<sup>132</sup> Aimnews (8, 2023) - PGR intends to speed up international cooperation - <https://aimnews.org/2023/08/28/pgr-pretende-imprimir-maior-celeridade-a-cooperacao-internacional/>, accessed on September 18, 2025.

### 4.3 Statistics<sup>133</sup>

#### Money Laundering

Reporting/Intelligence Phase	Year: 2023	Year: 2024	Year: 2025
Number of Suspicious Transaction Reports (STRs) filed by each category of obliged entities: <ul style="list-style-type: none"> <li>- Banks and financial institutions</li> <li>- Non-financial businesses and professions (NFBPs)</li> </ul>	93	273	267 (June to July)
Number of postponement orders adopted on reported transactions	n/a	n/a	n/a
Number of money laundering investigations carried out independently by law enforcement agencies (without a prior STR)	n/a	n/a	n/a
Number of suspicious cash activities at the border reported to the FIU (including those based on declarations and smuggling)	0	2	2 (Jan to July)
Number of STRs sent to law enforcement and on which further analysis was made	n/a	n/a	n/a
Number of staff dedicated full-time (or full-time equivalent) to money laundering in the FIU	n/a	n/a	n/a

#### 4.4 Short analysis

Statistics on money laundering have been published in the Attorney-General's annual report. However, the published statistics are insufficient to make a more in-depth assessment of this matter. Furthermore, there is no information on institutional performance. There is some data on cases accused of money laundering; however, the information on tried and convicted cases is very scarce or almost non-existent.

On asset recovery, there is also published information; but there are difficulties in assessing the percentage of values recovered vis-a-vis the indicative diverted value, since for some time, the numbers of indicative diverted values are not presented. Furthermore, the GCRA does not have an internet page where it could share more information about asset recovery, whereas only the Asset Management Office has

<sup>133</sup> The tables below follow the format in this Eurostat report: <http://ec.europa.eu/eurostat/documents/3888793/5856465/KS-TC-13-007-EN.PDF/69cde077-3bd9-4d0d-8c19-a6fe3608c2cd>.

one. Detailed information should be published, both on money laundering and asset recovery using various platforms.

#### **4.5 Information on asset recovery cases**

While information on individual cases is generally not published, the following is the only publicly disclosed case in Mozambique involving asset recovery with all the relevant details. The detailed disclosure of this case arose because the authorities of the Bailiwick of Jersey compelled the PGR to publish the MOU signed by both parties. The PGR, in its annual report, only publishes aggregated statistical data and not case-by-case information, making it impossible to obtain more information about it.

Name: MOU<sup>134</sup>

Parties: The Government of The Republic of Mozambique and Bailiwick of Jersey

Matter of proceeding: Regarding Repatriation and management of certain forfeited assets.

Origin of proceedings: Request by the Attorney General of Jersey to confiscate funds deposited in a trust institution in Jersey, which had been deposited by Mozambican citizen, who had received bribe payments in the course of his work in Mozambique. The court found that his assets were the proceeds of bribes paid to him by companies that wanted to secure construction contracts in Mozambique.<sup>135</sup>

Type: Civil

Status of the proceedings: The assets have already been returned to Mozambique, without a trial. It should be noted that there will also be no trial because a few days after the information was published, the accused died and in Mozambique the criminal procedure is extinguished with the death of the accused.

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<sup>134</sup> Memorandos (2025) - <https://www.pgr.gov.mz/memorandos/>, accessed on October 7, 2025.

<sup>135</sup> DW (2024) – Auditor to endorse illicit money returned by Jersey, <https://www.dw.com/pt-002/auditor-independente-vai-avaliar-dinheiro-il%C3%ADcito-devolvido-por-jersey/a-69396387>, accessed on January 29, 2026.

## V. Recent Developments

The Office of the Attorney-General of the Republic has been increasing the number of bilateral agreements and treaties signed with other countries on international legal and judicial cooperation in criminal matters and has published this information in the Prosecutor's Report General of the Republic to the Assembly of the Republic.

The law on the prevention of money laundering and financing of terrorism (Law no.°14/2023, of 28 August) will be submitted to a new revision, and the respective bill has already been approved by the Government to then be submitted to the Assembly of the Republic. This is the fourth revision of this law. It is worth mentioning that the first legal regime on money laundering and terrorist financing was approved by Law no.° 7/2002, of 5 February, which underwent successive revisions in 2013, 2022 and 2023.<sup>136</sup>

A Technical Directorate for Legal and Judicial Cooperation was created by resolution no. 03/2024, of September 11, of the Coordinating Council of the Public Prosecutor's Office, responsible for processing requests for mutual legal assistance in criminal matters.

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<sup>136</sup> Jornal Canal de Moçambique (7, 2025), Maputo, Wednesday, 30 July 2025, year 14 - N.°869- N°830 Seminar - [www.canal.co.mz](http://www.canal.co.mz), p. 23 - back cover.

## VI. Recommendations

1. Promote the production of specific codes of conduct in PA, especially in the institutions most exposed to the occurrence of corruption cases.
2. Implement the whistleblower protection law as a matter of urgency.
3. Create the State procurement center as promised by the President to control corruption in public procurement.
4. Introduce effective and functional control mechanisms to combat corruption in the civil service/PA and admission to the Civil Service/PA.
5. Strengthen mechanisms to control situations of conflict of interest.
6. Strengthen the registration of beneficial owners with financial institutions.
7. Strengthen banks' supervisory arrangements.
8. Strengthen mechanisms for better cooperation between the private sector and law enforcement entities.
9. Make the process of checking the declaration of assets more effective.
10. Publicly share more information regarding confiscation and repatriation of assets.
11. Publicly share more information on international confiscation agreements.
12. Publish on the page of the Office of the Attorney-General of the Republic information about bilateral agreements and treaties signed with other states and update them whenever a new one is signed.
13. Regulate private political financing, which is completely deregulated in Mozambique.
14. Review and update the law on political parties in force since 1991, following best international practice and adhere to the standards agreed upon at the 11<sup>th</sup> Conference of the States Parties to the UNCAC in the Political Financing resolution.<sup>137</sup>
15. Confer powers on the Administrative Court (3rd Section - Materially Court of Auditors) to audit the accounts of political parties.

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<sup>137</sup> Agreed by consensus by all UNCAC States Parties. UNODC, CoSP11 resolutions: Resolution 11/7 on Preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns, [https://track.unodc.org/uploads/documents/UNCAC/COSP/session11/COSP11\\_resolutions\\_unedited.pdf](https://track.unodc.org/uploads/documents/UNCAC/COSP/session11/COSP11_resolutions_unedited.pdf), accessed on 29 January 2026.

16. Strengthen asset recovery mechanisms through international cooperation for the purpose of confiscation, with the continued signing of bilateral agreements and treaties with other countries and jurisdictions.
17. Review of the Law on the Right to Information and its regulations for setting penalties to discourage officials or public officials who refuse or do not provide information of public interest.
18. Provide CEDIMO with the power to investigate and impose sanctions on public or private officials who refuse or do not provide information.
19. Reinforce the independence of the judiciary and the Public Prosecutor's Office, limiting the powers of the President of the Republic over them so that they become independent and autonomous.
20. Prioritize the independence of the judiciary at all levels, with a primary focus on budgetary independence. Legislate on the budgetary independence of the judiciary. Define a specific and exclusive salary scale for each of the magistrates.
21. Strengthen oversight of the implementation and operational effectiveness of policies and practices for the prevention and combat of corruption.
22. Regulate the law on the protection of victims and whistleblowers and the establishment of the Victim Protection Office.
23. Create effective corruption reporting mechanisms.
24. Enhance transparency of information related to the fight against corruption and stop restricting or intimidation measures towards civil society organizations.

## VII. Annex

### 7.1 Table on Freedom of Information Requests

Institution	Date of request	Date of answer	Information requested	Information provided
CIP	17.03.2025	/	Investment under the 7.25% transfer of mining revenues/exploitation rights	No
CIP	17.03.2025	/	Justice Sector Investment in Mocuba	Yes
CIP	24.03.2025	/	Reports on Mining Activities and Environmental Licensing	No
CIP	04.04.2025	/	INM Financial Reports	No
CIP	04.04.2025	/	FARMAC Financial Reports	No
CIP	04.04.2025	/	LAM Financial Reports	Yes
CIP	04.04.2025	/	Aeropostos de Moçambique Financial Reports	Yes
CIP	23.04.2025	/	Environmental Inspection Report	No
CIP	23.04.2025	/	Map of Mineral Products Production and Marketing	No
CIP	29.04.2025	/	Misappropriation of State Office Materials for the Private Residence of a Government Official	No
CIP	06.05.2025	/	Arms Business Involving the Minister of the Interior	No
CIP	10.03.2025	28.03.25	Audit Report on Recoverable Costs in Oil Projects	Yes
CIP	10.03.2025	28.03.25	Basic Social Subsidy Program	Yes
CIP	04.04.2025	17.04.25	Report on Financial Statements and Board of Directors Structure	Yes
CIP	17.03.2025	16.04.25	Investments in the Education Sector	Yes
CIP	20.05.2025	/	Map of Mineral Products Production and trading	No
CIP	20.05.2025	/	Information on Negligence in the Attack on the Ship at High Sea	No

CIP	22.04.2025	/	Information on Large Foreign-Owned Companies in the Country	No
CIP	21.05.2025	/	Request for Award Minutes of Aircraft Procurement Deals	Yes
CIP	21.05.2025	/	Request for Access to the Award Minutes of the STEMA Tender	Yes
CIP	13.05.2025	/	Information on the Origin of Documents Used to Obtain False Nationality for Several Foreigners	No
CIP	13.05.2025	/	Report on the Interministerial Commission on the Sale of Nationality	No
CIP	15.05.2025	/	Request for Poverty Assessment Reports	No
CIP	15.05.2025	/	Request for the General State Account and the Corresponding Report	Yes
CIP	26.05.2025	/	Information on USAID Funding for the Health Sector	Yes
CIP	20.05.2025	/	Information on the Progress of the Decentralization Commission	Yes
CIP	20.05.2025	/	Request for Municipal Management and Balance Reports	No
CIP	13.07.2025	/	Request for Public Tender Award Minutes and Corresponding Contract	No
CIP	11.06.2025	/	Cancellation of Road Construction Due to Lack of Inspector	No
CIP	02.07.2025	/	Environmental Assessment License	No
CIP	02.07.2025	/	Request for Environmental Inspection and Audit Report	No
CIP	24.07.2025	/	Environmental Assessment License	No
CIP	28.07.2025	/	Integrated Transport System	No

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