

## Mozambique: Civil Society Report

An input to the UNCAC Implementation Review Mechanism:  
First year of review of UNCAC Chapters II and V

**21 November 2025**

This is the preliminary executive summary of a civil society parallel report by Centro de Integridade Publica that reviews Mozambique's implementation and enforcement of selected articles in the UN Convention against Corruption (UNCAC) Chapters II (Preventive Measures) and V (Asset Recovery). The report is under development and supported by the Global Civil Society Coalition for the UNCAC.<sup>1</sup> It is intended as a contribution to the UNCAC peer review process of Mozambique covering those two chapters. The full report will be made available on the Coalition's website.<sup>2</sup>

Mozambique has established a legal and institutional framework to prevent and combat corruption, in line with the provisions of UNCAC Chapters II and V. However, implementation gaps particularly persist in accountability for politically exposed persons, asset recovery, transparency in public procurement, political financing, whistleblower protection, and access to information.

### Assessment of the Review Process

|                                                                                  |     |                                                                                                                                      |
|----------------------------------------------------------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------|
| Did the government disclose information about the country's focal point?         | No  |                                                                                                                                      |
| Was the review schedule published somewhere/publicly known?                      | Yes | Published on the UNODC website, <sup>3</sup> but not publicly known or shared domestically or translated, limiting public awareness. |
| Was civil society consulted in the preparation of the self-assessment checklist? | No  |                                                                                                                                      |
| Was the self-assessment checklist published online or provided to civil society? | No  |                                                                                                                                      |
| Did the government agree to a country visit?                                     | Yes | The process was not transparently communicated or publicly announced.                                                                |
| Was a country visit undertaken?                                                  | Yes | May 16-18 May 2017 <sup>4</sup>                                                                                                      |

<sup>1</sup> Has been known as the UNCAC Coalition.

<sup>2</sup> UNCAC Coalition, Civil Society Parallel Report on Mozambique, <https://uncaccoalition.org/uncacparallelreportmozambique/>.

<sup>3</sup> UNODC Country Profile page of Mozambique, <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed on 5 October 2025.

<sup>4</sup> Based on information from the UNODC Country Profile page of Mozambique, <https://www.unodc.org/corruption/en/country-profiles/data/MOZ.html>, accessed on 5 October 2025.

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|----------------------------------------------------------------------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Was civil society invited to provide input to the official reviewers?      | Yes | <input checked="" type="checkbox"/> Anti-corruption and access to information CSOs<br><br>Attended on the invitation of the Ministry of Justice and the Attorney General's Office, without prior instructions on preparation or the consultation format. |
| Was the private sector invited to provide input to the official reviewers? | No  | CIP was the sole anti-corruption group.                                                                                                                                                                                                                  |
| Has the government committed to publishing the full country report?        | Yes | Although the report was published by UNODC, <sup>5</sup> it was never released in Mozambique in Portuguese, preventing the public from accessing and assessing the findings.                                                                             |

## Main Findings and Recommendations (R)

### Preventive Measures against Corruption

Mozambique has adopted a range of preventive policies and practices, including the enactment of anti-corruption legislation and the development of an anti-corruption strategy for public administration. The greatest deficiency of the Public Administration Anti-Corruption Prevention and Combat Strategy (EPCCAP)<sup>6</sup> lies in its implementation, particularly regarding white-collar corruption, the accountability of politically exposed persons, and the search for evidence of corruption.<sup>7</sup> More specifically, over the last 10 years, politically exposed persons in Mozambique have rarely been held accountable.<sup>8</sup> The strategy has also not been meaningfully disseminated, and lacks a clearly allocated funding and a public monitoring framework.

*R: Promote oversight of the implementation and operational effectiveness of policies and practices for preventing and combating corruption.*

### Preventive Anti-Corruption Bodies

Each public institution has its own policies and practices to prevent and combat corruption. Mozambique has a specialized body, the Central Anti-Corruption Office (GCCC), established by Law No. 6/2004 of 17 June<sup>9</sup> and subordinate to the Public Prosecutor's Office, with provincial-level decentralization. However, the GCCC lacks district-level presence, limiting access to justice in remote

<sup>5</sup> Ibid.

<sup>6</sup> Mozambique. Council of Ministers. "Resolução n.º 46/2022 de 1 de Dezembro: Estratégia de Prevenção e Combate à Corrupção na Administração Pública (2023-2032)". Maputo: Boletim da República, 2022. [https://www.cipmoz.org/wp-content/uploads/2023/corruptacao/Resolucao\\_46\\_2022\\_Estrategia\\_Prevencao\\_Combate\\_Corruptacao\\_2023-2032.pdf](https://www.cipmoz.org/wp-content/uploads/2023/corruptacao/Resolucao_46_2022_Estrategia_Prevencao_Combate_Corruptacao_2023-2032.pdf).

<sup>7</sup> Issufo, Nádia. "The Case." DW, August 2021. Accessed 20 October 2025.

<https://www.dw.com/overlay/media/pt-002/julgamento-das-d%C3%ADvidas-ocultas-outras-coisas/58972586/60242176>.

<sup>8</sup> Wall Street Journal. "Behind Credit Suisse's Troubled Deals in Mozambique." Accessed 6 August 2025.

<https://www.wsj.com/articles/behind-credit-suisse-s-soured-mozambique-deals-1467214300>.

<sup>9</sup> Law No. 6/2004 of 17 June (Anti-Corruption Law). [https://www.cipmoz.org/wp-content/uploads/2023/corruptacao/Lei\\_6\\_2004\\_Lei\\_Combate\\_Corruptacao.pdf](https://www.cipmoz.org/wp-content/uploads/2023/corruptacao/Lei_6_2004_Lei_Combate_Corruptacao.pdf).

areas, and its current structure allows political influence over appointments.<sup>10</sup> It is closed to civil society participation, lacks operational autonomy, and has limited public reporting.

**R:** *Strengthen the independence of the judiciary and the Public Prosecutor's Office, limiting the President's powers over them, and expand the operational structure of the GCCC to ensure nationwide access and transparency.*

### **Public Sector Employment**

Mozambique has laws that require merit-based entry into the public administration through competitive exams, yet hiring processes remain vulnerable to corruption. Although the Constitution and civil service statutes guarantee equal access and mandate public competitions, cases of questionable admissions and legal violations have been reported.<sup>11</sup>

**R:** *Create mechanisms to prevent corruption in the entry into the public administration.*

### **Political Financing**

Mozambique does not adequately or specifically regulate private political financing. Public political financing is regulated but has deficiencies, especially regarding the accountability of political parties and presidential candidates.<sup>12</sup> The National Electoral Commission, to which entities must report, lacks sufficient expertise to effectively inspect accounts, a competence that should belong to the Court of Auditors. The law on political parties has been in force for over 30 years without a reform of private political financing.

**R:** *Promote the creation of a private political financing law and establish effective oversight and accountability bodies.*

### **Codes of Conduct, Conflicts of Interest, and Asset Declarations**

Not all public institutions have their own codes of conduct, including those with high corruption risks, even though general public-sector rules are in place. Conflict of interest is regulated by law, but inspection and control mechanisms are weak. The Central Public Ethics Commission (CCEP), an independent body by law, operates in government facilities, including those of the Assembly of the Republic (whose members it must supervise), thus limiting its performance. The law also regulates gifts and bonuses to civil servants. Decisions by the CCEP on cases involving gifts and bonuses are not published, hindering analysis of its performance.

Asset declarations are regulated by law and inspected via an electronic platform, but the platform does not require proof of ownership, leaving the declarations open to misuse. This loophole presents a risk that officials may declare assets before illicit acquisition, later falsely legitimizing them.<sup>13</sup>

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<sup>10</sup> Mozambique Information Agency (AIM). "New Director of GCCC Challenged to Articulate with Public Sectors in the Fight against Corruption", 16 September 2024. Accessed 19 October 2025.

<https://aimnews.org/2024/09/16/nova-directora-do-gccc-desafiada-a-articular-com-setores-publicos-no-combate-a-corrupcao/>.

<sup>11</sup> Jornal Notícias. "Commission Investigates Admission Contest to the Municipal Police," August 2025. Accessed 8 October 2025. <https://www.jornalnoticias.co.mz/2025/09/14/marracuene-investiga-irregularidades-no-concurso-de-apuramento-da-policia-municipal/>.

<sup>12</sup> Lusa (2014). "Timber Smuggling Financed Frelimo's Campaign – NGO." Accessed 20 October 2025. [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).

<sup>13</sup> Muhambe, Luísa. "PGR without mechanisms to assess legality of asset declarations." Accessed 15 September 2025. <https://evidencias.co.mz/2025/05/08/pgr-sem-mecanismos-para-aferir-legalidade-das-declaracoes-de-bens-apresentadas-por-funcionarios-publicos/>.

***Rs:** Promote the production of specific codes of conduct among public bodies and institutions and create internal bodies to oversee their implementation. Introduce efficient mechanisms for monitoring conflicts of interest and declarations of assets.*

### **Reporting Mechanism and the Protection of Whistleblowers**

A whistleblower protection law has existed since 2012, but has been weakly implemented.<sup>14</sup> The Office of the Attorney General cites non-regulation and lack of resources as reasons.<sup>15</sup> Alternative protection measures are little known and of questionable effectiveness. As a result, whistleblowers remain exposed to retaliation, and reporting is discouraged.

***Rs:** Implement the law on the protection of victims, whistleblowers, declarants, witnesses, and experts in criminal proceedings. Adopt mechanisms and channels for reporting corruption in public administration and the justice system through the Whistleblower Protection Act. Regulate the law on the protection of victims and whistleblowers, and establish the Victim Protection Office; and create effective mechanisms for corruption reporting.*

### **Public Procurement**

Public procurement remains one of the sectors most vulnerable to corruption in Mozambique. Although the legal framework has undergone successive reforms, including the introduction of electronic procurement mechanisms,<sup>16</sup> its implementation has not resulted in substantial improvements. The current framework continues to face structural limitations, including insufficient monitoring, weak sanctions for violations, and the absence of an independent oversight body to ensure compliance.

***R:** Create the State Procurement Center to control and mitigate cases of corruption in public procurement.*

### **Access to Information and Participation of Society**

Mozambique approved the Right to Information Law in December 2014, and it has been fully operational since December 2015.<sup>17</sup> Ten years later, access to information remains limited, as public institutions often do not provide information proactively or upon request. A culture of secrecy persists, and public bodies rarely publish information on procurement, budgets, or corruption cases.<sup>18</sup>

***Rs:** Promote compliance with the Right to Information Law and regulations to discourage institutions from failing to publish information of public interest; and create an entity with effective powers to impose sanctions on leaders or employees who refuse or fail to provide information of public interest.*

### **Judiciary and Prosecution Services**

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<sup>14</sup> Law No. 15/2012 on Whistleblower Protection.

<sup>15</sup> AIM. "Scarcity of resources conditions whistleblower protection." Accessed 8 October 2025. <https://aimnews.org/2024/07/11/mocambique-escassez-de-recursos-condiciona-proteccao-dos-denunciantes/>.

<sup>16</sup> Integrity Magazine, "Government Wants to Reduce Corruption in Public Procurement with the Implementation of e-GP". Accessed 1 October 2025. <https://integritymagazine.co.mz/arquivos/40976>.

<sup>17</sup> Law No. 34/2014 on Right to Information.

<sup>18</sup> MISA Mozambique. "Right to Information Monitoring Report" (2020). Accessed 8 August 2025. <https://misa.org.mz/wp-content/uploads/2025/05/Relatorio-Monitoria-Lei-do-Direito-a-Informacao.pdf>.

The judiciary includes the Supreme Court, the Superior Courts of Appeal, the Provincial and District Judicial Courts, and specialized courts. The Supreme Court has national jurisdiction, and the Public Prosecutor's Office is independent and autonomous. However, appointment processes give the President substantial influence, limiting the independence of the judiciary and prosecution services.

Anti-corruption measures have been implemented, including risk assessments, strategic plans, codes of conduct, ethics, training, asset declaration systems, and anti-corruption strategies.<sup>19</sup> Core integrity measures exist but remain undermined by structural vulnerabilities, such as appointment procedures and financial dependence on the executive.

**R:** *Strengthen safeguards that protect judicial and prosecutorial independence by revising appointment procedures, introducing clear term limits for senior posts, and ensuring predictable and autonomous budget allocation for the judiciary and the Public Prosecutor's Office.*

### **Anti-Money Laundering**

The Mozambique Financial Intelligence Office (GFiM) has sufficient anti-money laundering legislation but faces challenges due to limited human, material, and technological resources. Although MoUs exist for international cooperation, there is no evidence of actions resulting in the confiscation and repatriation of assets.

**R:** *Continue to strengthen the operating conditions of GFiM.*

### **International Cooperation for the Purpose of Confiscation**

Mozambique has a legal framework for extended confiscation and international cooperation. The Office of the Attorney General has published only one MOU that demonstrates the confiscation and repatriation of assets.<sup>20</sup> Annual reports provide limited information on the results of international cooperation, and Mozambique lacks a mechanism for transparent management and use of recovered assets.

**R:** *Promote the signing of more bilateral agreements and treaties and publish them promptly on the Attorney General's Office website to ensure transparency.*

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<sup>19</sup> Legislative frameworks reinforce independence and integrity, including the Judiciary Law (Law 7/2009, amended) and the Organic Law of the Public Prosecutor's Office (Law 4/2017).

<sup>20</sup> Attorney General's Office. "Official MoU Publication Page." Accessed 18 September 2025.  
<https://www.pgr.gov.mz/memorandos/>.