

Venezuela: Civil Society Report

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

7 November 2025

This is the executive summary of a civil society parallel report by Transparencia Venezuela¹ and Iniciativa para la Recuperación de los Activos Venezolanos² from October 2024, reviewing Venezuela's implementation and enforcement of selected articles in UN Convention against Corruption (UNCAC) Chapters II (Preventive Measures) and Chapter V (Asset Recovery). The report was supported by the Global Civil Society Coalition for the UNCAC³, and is available on the Coalition's website.⁴

Venezuela lacks transparency in nearly all areas of corruption prevention, with no public access to information on government budgets, tenders, or officials' assets. The judiciary is tightly controlled by the executive. Despite existing laws on asset forfeiture and anti-money laundering, enforcement remains weak, and whistleblowers and civil society face intimidation.

Assessment of the Review Process

Did the government disclose information about the country focal point?	No	–
Was the review schedule published somewhere/ publicly known?	No	–
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?	n/a	–

¹ <https://transparenciave.org/>.

² <https://www.inrav.org/en>.

³ Has been known as the UNCAC Coalition.

⁴ UNCAC Coalition, Civil Society Parallel Report on Venezuela, <https://uncaccoalition.org/uncacparallelreportvenezuela/>, accessed on 17 October 2025.

Was a country visit undertaken?	Yes	7-10 June 2021, virtual ⁵ .
Was civil society invited to provide input to the official reviewers?	No	–
Was the private sector invited to provide input to the official reviewers?	No	–
Has the government committed to publishing the full country report?	No	–

Main Findings and Recommendations (R)

Preventive Anti-Corruption Body

Venezuela's National Anti-Corruption Body, created in 2014, reports directly to the President but operates with no public information on its budget, plans, or leadership criteria, and lacks a known headquarters. The Office of the Comptroller General has similarly failed to publish audits, reports, or sanctions lists since 2018. This opacity leaves major state entities like PDVSA unchecked and undermines public oversight of corruption.

R: *Reform the Anti-Corruption Law to create an anti-corruption body with sufficient capacity and powers to prevent and investigate cases of grand corruption and include rules that require the establishment of systems and sanctions to reduce conflicts of interest, especially nepotism.*

Public Sector Employment

Venezuela's public administration lacks transparency, with no open recruitment processes, undisclosed salaries, and most officials' asset declarations and profiles kept secret. Less than 1% of asset declarations are reviewed annually, while 80% of state-owned enterprise directors remain unidentified. Nepotism and low public sector wages have fostered irregular fund management and illicit payments as survival strategies among public employees.

R: *Implement transparency and accountability in the public administration, implement an open recruitment process, and publish asset declarations.*

Political Financing

The legal framework does not foresee a limit on campaign expenditures. While the law on political financing provides for the publication of information on campaign financing, this is not publicly available. Despite the constitutional prohibition of financing political campaigns with public funds of associations with political purposes, many complaints of improper use of public resources in campaigns of the governing party have been registered⁶.

⁵ Ibid, UNODC Country profile page Venezuela, (Accessed June 20, 2024), <https://www.unodc.org/unodc/en/corruption/country-profile/countryprofile.html#?CountryProfileDetails=%2Funodc%2Fcorruption%2Fcountry-profile%2Fprofiles%2Fven.html>.

⁶ Transparencia Venezuela (accessed August 5, 2024). Available at: https://www.instagram.com/p/C95r2RPsH4r/?img_index=2; Carter Center. Carter Center statement on elections in Venezuela, July 30, 2024 (accessed 4/8/2024). Available at: <https://www.cartercenter.org/news/pr/2024/venezuela-073024.html>.

R: Establish a legal limit on campaign expenses, publish campaign financing information in a transparent manner. Stop the misuse of public funds for electoral campaigns.

Codes of Conduct, Conflicts of Interest, and Asset Declarations

Ministers oversee entities they also lead. There is no obligation to declare conflicts of interest or asset declarations, and no penalties for non-compliance. The Comptroller General has issued administrative sanctions for missing or inconsistent declarations, using them to bar officials from elections – despite the Constitution allowing disqualification only after a criminal conviction.

R: Implement the publication of sworn declarations of assets and interests, ensure they are audited and apply penalties for non-compliance.

Whistleblower Protection

Persons who report corruption in Venezuela have been subjected to reprisals⁷. There are many reports to civil society of *non*-compliance with the respective law.⁸ In many cases where protection measures are requested, they are not granted. In others, protection measures are issued by the jurisdictional bodies but are not executed by the authorities in charge.

R: Adopt measures to promote whistleblowing and guarantee the protection of whistleblowers, witnesses and victims of corruption, ensuring that they are not harassed or persecuted.

Public Procurement

Since 2001, the Public Procurement Law has undergone reforms, increasing the reasons for exclusion from public tenders, competitions, and other forms of open contracting. Procedures for tendering and awarding of contracts, tracking their implementation, and monitoring are not published. In August 2017, access to the National Register of Contractors website was shut down, leaving citizens without information on companies contracting with the State. From 2016 until 2021, the Executive decreed several states of emergency under false pretenses to take advantage of the more flexible contracting processes. There have been numerous cases of grand corruption linked to direct awards.

R: Implement transparency and accountability in public contracting, publish open tenders, allow for monitoring, and stop flexible contracting in states of emergency on false pretenses.

Management of public finances

Since 2010, no public entity has published its budget,⁹ and the majority stopped publishing financial reports in 2016. Almost no information on the management of public finances is published, including the National Budget Law since 2017¹⁰. The list of State-Owned Enterprises is not public, nor are their directors.

⁷ Suprema Injusticia, April 2023, En Venezuela ejercer la contraloría social en Pdvsa se paga caro, <https://supremainjusticia.org/en-venezuela-ejercer-la-contraloria-social-en-pdvsa-se-paga-car0-caso-aryenis-torrealba-y-alfredo-chirinos/>, accessed on August 5, 2024.

⁸ Transparencia Venezuela, ¿Vale la pena denunciar la corrupción en Venezuela?, <https://transparenciave.org/vale-la-pena-denunciar-en-venezuela/>, accessed on August 5, 2024.

⁹ Transparencia Venezuela, Análisis del Presupuesto, 2019, <https://transparenciave.org/project/gobierno-profundiza-la-opacidad-al-recortar-informacion-publica-empresas-contratantes-estado/>, accessed on August 5, 2024.

¹⁰ Transparencia Venezuela, Presupuesto 2022, Una historia que se repita, <https://transparenciave.org/presupuesto-2022-una-historia-que-se-repite/>, accessed on August 5, 2024.

R: *Publish budgets of public entities transparently, and allow for citizen participation in budgetary processes.*

Access to Information and Participation of Society

In 2021, the National Assembly approved the Law of Transparency and Access to Information of Public Interest. It neither includes active transparency nor establishes a body to guarantee access to information or any sanctions and limits access to public information. Several organizations have reported an increase in arbitrary detentions of human rights defenders, trade unionists and journalists, who are not allowed to appoint private legal counsel. In the last few years, discussion of laws and regulations to limit the operation of NGOs have increased.

R: *Adopt a genuine Law of Access to Information in line with the Model Law of the Organization of American States. Repeal and refrain from adopting measures or laws limiting the right to freedom of association, result in undue control over NGOs or interfere in their activities.*

Judiciary and prosecution services

Judicial independence in Venezuela is undermined by non-transparent and irregular appointment of Supreme Court of Justice magistrates.¹¹ Other reasons include a lack of public examinations to enter the judiciary, the provisional nature of more than 80% of the judges and justice operators,¹² the removal of persons in provisional positions without guarantees of due process, the opacity in the administration of justice and the sentences that transgress rights and guarantees.

R: *Guarantee the full independence and impartiality of the judiciary, the Attorney General's Office, and investigative bodies. Ensure corruption allegations are thoroughly investigated, with full reparation for victims.*

Private Sector Transparency

Basic information, such as shareholders or directors, address, and assets of a private company or organization is not accessible electronically. No penalties are known to have been imposed for failure to keep the beneficial ownership information current. Information on contracts between private companies with public entities is not published.

R: *Strengthen due diligence to identify the true beneficiaries and intermediaries of national and international financial transactions, and require banks to monitor accounts of senior officials and politically exposed persons.*

Anti-Money Laundering

Legally and structurally, Venezuela has regulations and institutions that enable the tracing and tracking of illicit funds. However, the lack of independence of the public authorities and of initiative of the Public Prosecutor's Office to investigate alleged corruption crimes reported in instances and

¹¹ Acceso a la Justicia, April 2022, El "nuevo" TSJ designado por la AN de 2020 no tiene nada de nuevo, <https://accesoalajusticia.org/nuevo-tsj-designado-an-2020-no-tiene-nada-nuevo/>, accessed August 5, 2024.

¹² Comisión Internacional de Juristas, June 2021, Jueces en la Cuerda Floja, <https://www.icj.org/wp-content/uploads/2021/06/Venezuela-Judges-on-the-tightrope-Publications-Reports-Thematic-reports-2021-SPA.pdf>, accessed August 5, 2024.

jurisdictions of other States points to a lack of interest of the Venezuelan State in the prosecution of these cases¹³ to trace and confiscate assets.

R: *Guarantee the autonomy and independence of the institutions in charge of supervision and monitoring, so they can fulfill their role in the prevention of money laundering and terrorist financing.*

Asset Recovery

The legal framework in Venezuela allows for the preventive seizure of assets linked to a crime and the freezing of bank accounts. According to Article 271 of the Constitution,¹⁴ a judicial decision is required to confiscate assets related to crimes against public patrimony or drug trafficking. The 2023 Law of Asset Forfeiture¹⁵ established a mechanism to allow for the identification, location, and recovery of assets originating from and destined for illicit activities, and for non-conviction-based forfeiture. Its application has been controversial due to its limited use and the temporary assignment of these powers to existing prosecutors' offices and courts not specialized in the matter, even though the Law ordered the creation of specialized prosecutors' offices and courts.

R: *Establish specific rules that enable direct legal recovery of assets in in rem actions and actions of criminal nature. Strengthen judges' and prosecutors' capacity to apply the Civil Forfeiture Law while safeguarding their autonomy.*

¹³ Transparencia Venezuela, October 2020, Estrategias jurídicas para la recuperación de activos venezolanos product de la corrupción, <https://transparenciave.org/wp-content/uploads/2020/10/Recuperacio%cc%81n-de-activos-Transparencia-Venezuela-oct-2020.pdf>, accessed August 5, 2024.

¹⁴ Constitución de la República Bolivariana de Venezuela, <https://transparenciave.org/wp-content/uploads/2020/10/Recuperacio%cc%81n-de-activos-Transparencia-Venezuela-oct-2020.pdf>, accessed August 5, 2024.

¹⁵ Asamblea Nacional Poder Legislativo, Ley Orgánica de Extinción de Dominio, <https://www.asambleanacional.gob.ve/leyes/sancionadas/ley-organica-de-extincion-de-dominio#:~:text=Esta%20Ley%20tiene%20por%20objeto,il%C3%ADcit%20o%20destinados%20a%20C3%A9stas>, accessed August 5, 2024.