NEST
INSTITUTE

ANALYTICAL FRAMEWORK FOR DETECTING, ASSESSING AND RESPONDING TO STRATEGIC CORRUPTION

G | M | F Transatlantic Foundation
Co-funded by the European Union
NEST INSTITUTE

PREFACE

If you have chosen to read this manual, there is a good chance that you are already familiar with the fight against corruption. There is also a good chance that you have been involved in this fight because you believed that you were doing a good thing: maybe because you wanted to uphold the rule of law, or to eliminate fraud from the government. Perhaps you were ideologically charged, and you believed in small governments that would, by their very size, limit corruption. If this were the case, then you might wonder why we need another conceptualization of corruption and what is so strategic about corruption anyway.

The concept of strategic corruption entered the discourse in the last decade of this century, via American think tanks and researchers. It emerged at a moment when it became apparent that Russian financial flows into European party politics, Chinese state-linked capital in infrastructure, and gas dependency weaponized as a governance tool could lead to the US losing its strategic edge over these two powers, understood as competitors. Here, corruption is understood as a tool for geopolitical competition and a method of interfering in political and economic processes within another country. What has changed since is the degree of institutional visibility, the pace of case accumulation, and, most consequentially, the erosion of the assumption that Western institutional actors are simply targets rather than, at times, participants in strategic corruption dynamics.

Strategic corruption is more than hybrid warfare with a financial face. It is not corrosive capital, which captures a structural dynamic without requiring an actor. It is not foreign interference, which encompasses a range of instruments, of which corruption is only one. Strategic corruption is the deliberate use of corrupt inducements by state-aligned actors to influence decision-makers with an intent to produce effects beyond private enrichment, for example, geopolitical leverage, institutional hollowing, and dependency. The definition requires three concurrent elements: a corrupt inducement, an abuse of entrusted authority, and a strategic effect.

Thus, the manual before you unpacks the black box of foreign interference and malign influence, distinguishing strategic corruption from lookalike concepts. The phenomenon is modeled across two layers: the degree of foreign involvement (ranging from exogenous penetration through proxy and hybrid configurations to endogenous capture and mimetic reproduction) and the operational vector through which influence moves. The authors propose a convergence-evidence methodology built on five analytical tools: Legislative Tracing, Network Analysis, Ownership Mapping, Dependency Metrics, and Narrative Analysis, designed to generate assessable findings even when direct evidence of intent is limited or unavailable. In so doing, the manual takes a step forward in the right direction, as it ambitiously aims to operationalize a very contested concept that borders on several others.

Such an undertaking is not without tensions. The first is the problem of tracing: because strategic intent is rarely documented, analysis must infer it from structural patterns, which creates a methodological vulnerability. The second is that the concept was developed to address Russian or Chinese vectors, reflecting genuine threat prioritization at the time of its induction, but currently risks producing blind spots when influence operates through Western-aligned actors, or private financial intermediaries. The third tension is securitization. When corruption analysis is systematically reframed as a national security question, it gains urgency and resources while losing its grounding in rule of law that gives anti-corruption work its democratic legitimacy. Hopefully, this manual can balance the three tensions, although it must be admitted that this task is not easy.

Because much of the authors' lived experience and expertise comes from central and Eastern Europe, the manual gives these regions special prominence. This is hardly surprising, as the Balkans, Bulgaria, the Visegrad states, and the wider post-communist periphery have long served as operational laboratories for strategic corruption. But I believe this framework is also useful beyond that region's boundaries as an evidence pathway for investigators, civil servants, journalists, and analysts who need to move from suspicion to assessment to documented findings without waiting for the political conditions that made such work easier a decade ago. That pathway will matter more, not less, as the institutional consensus that once anchored international anti-corruption enforcement continues to fragment. The intellectual work that remains is harder: developing longitudinal metrics to track strategic corruption's cumulative effects on democratic institutions and building comparative datasets adequate to test the typologies this volume proposes, rather than merely illustrating them.

Nedim Hogic
Oslo, May 2026

ACKNOWLEDGEMENTS

This publication was developed collaboratively by a multidisciplinary team of researchers and practitioners working on different parts of the analytical framework. The overall concept, structure, and final integration of the publication were led by Veronika Zahorjan, Patrik Haburaj and Domicián Zahorjan.

Substantive contributions to individual chapters were provided by Dr. Nedim Hogic and Dr. Joseph Pozsgai-Alvarez, who contributed significantly on chapters Theory and Definitions, Analytical Tools for Detecting and Assessing Strategic Corruption, and gave important advice on selection and shaping the case studies. Mr. Michal Piško contributed primarily to the chapters on Legal and Institutional Frameworks in Slovakia and Recommendations to Public Administration.

The authors also benefited from expert comments and feedback from Dr. András Rácz, whose insights helped refine the conceptual, legal, and methodological dimensions of the framework.

The final text and all remaining interpretations are the responsibility of the lead authors.

Lead authors

Veronika Zahorjan, Patrik Haburaj, Domicián Zahorjan

Contributing authors

Nedim Hogic (University of Oslo) - Preface, Chapter 1, Chapter 3, Chapter 4

Joseph Pozsgai-Alvarez (University of Osaka) - Introduction, Chapter 1, Chapter 3, Chapter 4

Michal Piško (Transparency International Slovakia) - Chapter 1, Annex 1, Annex 4

Expert review and feedback

András Rácz (Corvinus University of Budapest)

Technical support

Jakub Kotúč

This publication was produced as an output of the PROTEUS (Protecting EU Values and Fundamental Rights through Public Participation and Civil Society Assistance in Central Europe) programme project 031-SK-2025-71400, “Analytical Framework for Monitoring Strategic Corruption in the Context of Hybrid Threats”, supported by the Transatlantic Foundation and the German Marshall Fund of the United States, and co-funded by the European Union.

AI disclosure: ChatGPT-5 was used to assist with language editing, structural clarity, and formatting suggestions during manuscript preparation. All conceptual development, data extraction, analysis, and final revisions were conducted and approved by the authors.

ISBN 978-80-975369-3-0

CONTENTS

INTRODUCTION

Strategic corruption is increasingly recognized as an integral part of hybrid threats. Unlike conventional corruption driven primarily by private gain, strategic corruption can serve as a covert instrument of influence used by a source state or source-aligned actors to shape decision-making in another, target state or institution. Its purpose may be to weaken institutional resilience, distort democratic processes, create long-term dependencies, and undermine trust in the state or in key public bodies. Precisely because it often operates through legal, economic, or political channels that appear ordinary on the surface, it may remain less visible than other forms of hostile influence - yet its cumulative impact on the national security and democratic resilience of the target system can be profound.

Understanding and analysing strategic corruption is therefore essential for strengthening the resilience of states against foreign hybrid interference. By identifying patterns of influence, vulnerabilities, and networks of corrupt relationships early, governments and societies can better detect attempts to exploit institutional weaknesses for strategic purposes. Studying strategic corruption helps bridge the gap between anti-corruption policy, security policy, and counter-intelligence, enabling a more comprehensive response to modern hybrid threats that increasingly rely not only on disinformation, sabotage, or cyber operations, but also on the long-term and systemic silent capture and manipulation of institutions from within.

Why This Framework Matters?

A unified and practical framework helps to identify and analyse threats of strategic corruption in time, track the dynamics of networked relationships, uncover suspicious patterns of behaviour.

It allows practitioners to work with indicators, actor typologies, evidentiary pillars, case studies, and identified vulnerabilities. It serves as a common language for investigators, civil servants, analysts, journalists, and civil society, and it also supports international cooperation.

Even after publication of the first version, this framework must be seen as an open document. Its implementation requires continuous dialogue, data exchange, application of new findings, and interdisciplinary cooperation. Only in this way can we reduce the vulnerability of our countries - and of Europe as a whole - to sophisticated forms of corruption-driven influence.

This framework's original contribution lies in combining four elements that are often treated separately in the existing literature. First, it offers a practical classification rule for distinguishing strategic corruption from ordinary corruption, foreign influence, state capture, and other adjacent phenomena. Second, it introduces a two-layer model that separates direct corruption-based mechanisms from the enabling institutional and political conditions in which they operate. Third, it proposes a convergence-evidence methodology, allowing analysts to assess complex cases through the accumulation and triangulation of indicators rather than relying only on direct proof or a single "smoking gun." Finally, it provides a bridge to practitioner use by translating conceptual insights into an operational framework that can support detection, assessment, prioritisation, and policy response.

Who Is This Framework For?

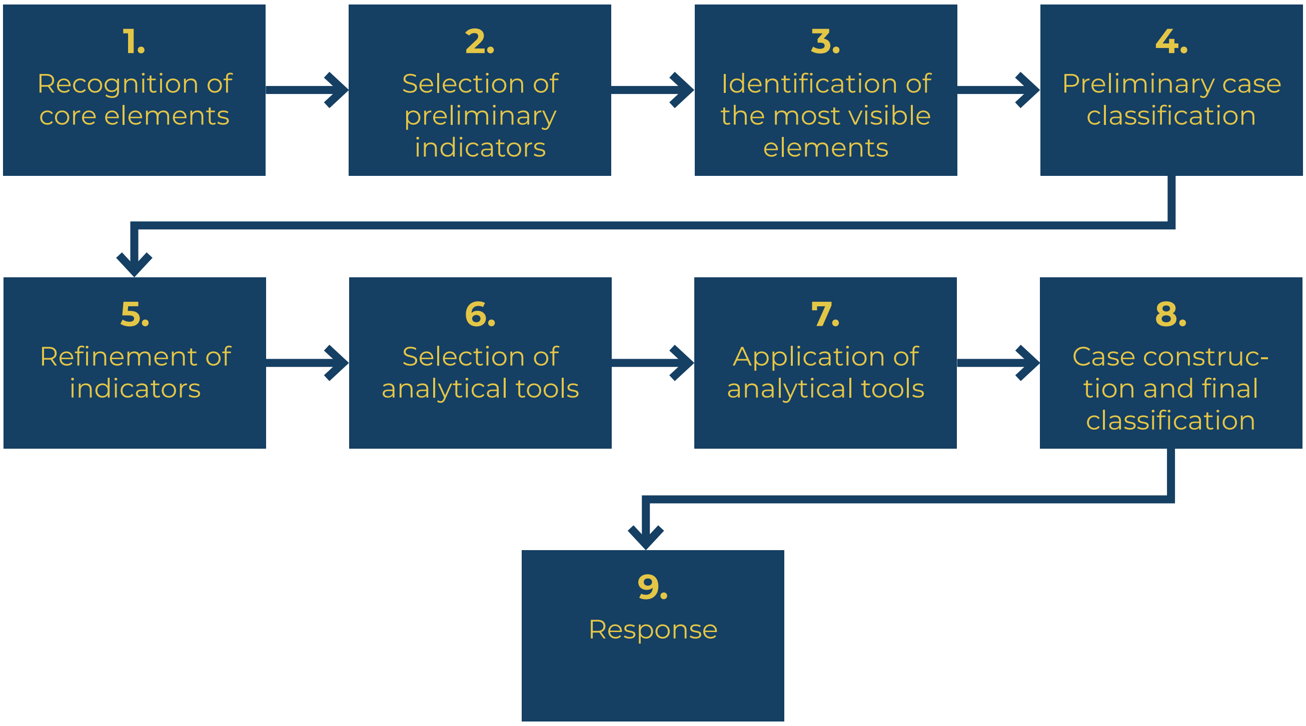
The framework is likely to be most useful for analysts and investigators, as it helps them identify patterns, connect dispersed indicators, and distinguish strategic corruption from adjacent forms of corruption or foreign influence. A close second would be civil servants, especially in high-risk institutions and security or integrity-focused public bodies, because the framework can help them recognize vulnerabilities early and understand when a corruption issue may have broader institutional or strategic significance.

How to Use This Framework?

This framework is designed to help analysts, investigators, policymakers, journalists, and civil society actors identify, assess, and compare cases of strategic corruption. It is not a legal test and does not replace criminal investigation, judicial review, or intelligence assessment. Rather, it provides a structured way to recognise patterns in cases where corruption appears to serve broader political, geopolitical, or strategic objectives. This framework must not be used to label individuals or justify political targeting.

The Framework Should be Used in Nine Steps:

This framework is best applied as an iterative analytical process rather than a rigid linear checklist. A case may first come to attention through a suspicious benefit, an unusual foreign link, a pattern of dependency, or an institutional outcome that appears strategically significant. The steps below are designed to help users move from initial suspicion to more structured case construction and cautious classification.



1. **Recognise one or more core elements of strategic corruption.**
   A case may first appear through any of the framework's core elements: a possible inducement, a possible abuse of entrusted power, a strategic or systemic effect, or an external linkage.
2. **Select indicators for a preliminary review of the available evidence.**
   Choose the most relevant proxy indicators based on what is initially visible in the case. At this stage, the aim is not to prove the case, but to identify which warning signs are present and which lines of inquiry are worth pursuing.
3. **Identify the most visible or analytically relevant elements.**
   After the first review, determine which elements appear strongest: inducement, abuse of entrusted power, strategic effect, or external linkage. This helps define the analytical direction of the case.

4. **Make a preliminary case classification.**
   At this stage, classify the case cautiously and provisionally. It may appear to be a possible strategic corruption case, an enabling environment case, or an adjacent phenomenon such as ordinary corruption, foreign influence, or state capture.
5. **Update and refine the indicators for deeper exploration.**
   Once the case has been provisionally classified, refine the indicator set. Some indicators may become less relevant, while others may need to be added in order to test the most plausible hypotheses more rigorously.
6. **Select the appropriate analytical tools.**
   Choose the tools that best match the target indicators and the nature of the case. Depending on the case, this may include network analysis, ownership mapping, legislative tracing, narrative analysis, or dependency analysis.
7. **Apply the analytical tools.**
   Use the selected tools to examine the case more systematically, connect dispersed evidence, and test whether the observed pattern supports the presence of inducement, abuse of entrusted power, strategic effect, and external linkage.
8. **Construct the case and make a final classification.**
   Bring the evidence together into a structured analytical assessment. The aim is to determine whether the case meets the framework's criteria for strategic corruption, falls into a borderline or enabling category, or should be classified as an adjacent but out-of-scope phenomenon.
9. **Consider the appropriate response.**
   Once the case is assessed, the framework can help identify the next step: deeper investigation, financial scrutiny, institutional safeguards, policy action, sanctions analysis, or preventive measures.

Scope of This Framework

This framework adopts a relatively narrow core definition of strategic corruption. At the same time, it examines a broader enabling environment of foreign-linked influence, dependency, and other enabling conditions that may indicate risk but do not in themselves qualify as strategic corruption.

For the purposes of this framework, two analytical categories should be distinguished:

- **Core strategic corruption:** cases in which corrupt inducement, abuse of entrusted authority (including high-ranking decision-makers), and broader strategic effect are all demonstrable.
- **Borderline or analytically relevant cases:** cases in which one or more of these elements remain indirect, incomplete, or only partially observable, but where further scrutiny is justified.

The framework is therefore designed not only to classify confirmed cases, but also to support structured risk identification and analytical triage.

1 THEORY AND DEFINITIONS

WHY THIS CONCEPT IS NEEDED

Corruption today is not only a moral or economic problem; it is increasingly a fundamental security threat (Chayes, 2015; Rotberg, 2009; Shelley, 2014). It undermines states' defence capacities, erodes the legitimacy of state institutions and political systems, and creates space for organized crime.

In a situation of **state capture**, political elites and their networks progressively erode institutional capacity by reshaping laws, regulatory frameworks, and enforcement mechanisms in ways that concentrate decision-making power within a narrow group. As oversight weakens and accountability mechanisms deteriorate, security and judicial institutions lose their functional autonomy and their ability to serve the public interest. This institutional degradation creates systemic vulnerabilities that can be exploited by domestic or external actors, transforming governance erosion into a potential security risk (Barett and Okamura, 2025).

Strategic corruption should be understood as a distinct but related phenomenon. It refers to the **instrumental use of corrupt inducements by a source state or actors** aligned with its interests to influence public power-holders in another country or international organization in ways that pursue objectives beyond individual or private gain and may reshape institutional capacity, dependency structures, or decision-making autonomy.

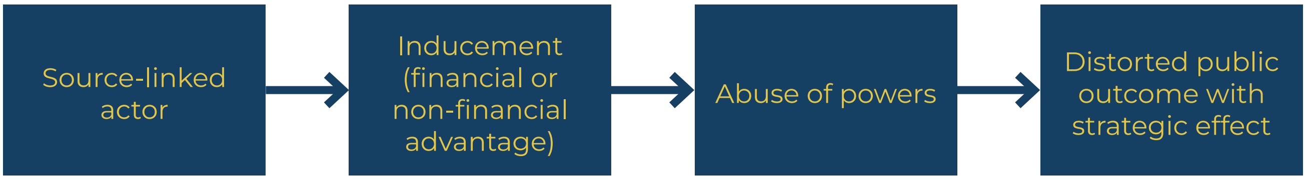
The concept of strategic corruption emerged as an effort to capture a distinct form of transnational corruption that earlier analytical frameworks did not define with sufficient precision. Its added value lies not in redefining corrupt acts themselves, but in **highlighting their geostrategic context**. In this way, the concept bridges corruption studies with international relations and security studies, while responding to the growing recognition that certain forms of corruption have not only economic and legal implications, but also broader political, institutional, and security consequences (Lang, Pozsgai-Alvarez, and Hogić, 2025).

The analytical framework developed here does not by itself prove legal liability, but it provides a **structured way to connect dispersed indicators** - such as inducements, distorted decision-making, source-linked interests, and strategic effects - into a coherent analytical picture. In this way, it helps **distinguish isolated incidents from broader patterns**, clarifies what falls within the concept's scope, and supports more focused detection, case assessment, and evidence-gathering.

CORE DEFINITION

Lang, Pozsgai-Alvarez, and Hogić (2025) describe strategic corruption as an **emerging interdisciplinary field** that connects political science, security studies, international law, public administration, and institutional theory (weakening the state from within).

> **Strategic corruption refers to the instrumental use of corrupt inducements by a source state or actors aligned with its interests to influence public power-holders in another country or international organization in ways that pursue objectives beyond individual or private gain and may reshape institutional capacity, dependency structures, or decision-making autonomy.**



Such objectives may be **geopolitical, economic, security-related, or policy-oriented**. Strategic corruption does not necessarily require full transformation of the entire state apparatus, nor does it always involve the deliberate weakening of the target state. However, it becomes analytically relevant as a security concern when its cumulative effects reshape institutional capacity, reduce resilience, or increase vulnerability to external leverage.

The objective of such inducement may be **strategic, operational, or tactical**. These inducements may be deployed directly by state institutions or indirectly through intermediaries, including state-owned enterprises, oligarchic networks, private corporations, foundations, or other affiliated entities. Strategic corruption becomes analytically relevant when the inducement produces effects that alter decision-making autonomy, reshape dependency structures, shift policy orientation, or generate durable institutional consequences in the target system, rather than producing only isolated or short-term benefits.

A domestic actor may fall within this definition only where there is a demonstrable material, relational, or functional alignment with an identifiable external source of strategic interest. Domestic strategic alignment alone is insufficient.

Strategic Gains

Strategic gains can take the form of assets or alliances. Examples of strategic assets include:

- access to natural resources needed by the source state,
- control over infrastructure, either to extract benefits from it, or to block the delivery of energy to other states, or to threaten such a blockage in order to extort payments (Kassa and Guy, 2025).

Alternatively, a source state may mobilize financial or non-financial inducements as part of strategic competition aimed at influencing the target state's external policy orientation. Such financing falls within the scope of strategic corruption only when it involves the instrumental inducement of a public power-holder to abuse entrusted authority. Absent such abuse, strategic financing or influence efforts do not qualify as strategic corruption under this framework (Pozsgai-Alvarez and Lang, 2025).

Table 1 Key Characteristics of Strategic Corruption – Summary

KEY FEATURE	DESCRIPTION
Intentionality	Strategic corruption involves the deliberate use of corrupt inducements aligned with identifiable external interests. While such efforts may form part of longer-term influence strategies, even single instances can qualify when the inducement serves a broader political, economic, or security objective beyond individual gain.
Networked or mediated operation	Typically (not necessarily) operates through interconnected networks of political actors, economic interests, media, and security services; effects are achieved via collusive ties.
Legal–illegal linkages / grey zone	Strategic corruption may combine corrupt inducements with formally legal mechanisms (e.g., investment vehicles, regulatory arbitrage, structured lobbying) that provide plausible deniability. Offshore structures, opaque financing arrangements, or information operations may function as channels or concealment layers, masking the inducement to abuse entrusted authority rather than constituting corruption in themselves.
Domestic collaboration	Requires at least partial collaboration of domestic elites in target country (politicians, officials, business actors) who enable or profit from the system.
Low legal enforceability	Transactions are complex and often appear “legal”, making direct criminal prosecution difficult.
Transnational dimension	Strategic corruption involves cross-border inducements linked to identifiable external political, economic, security, or policy interests. While such actions may result in weakened institutional resilience or altered dependency structures, deliberate destabilisation of the target state is not a necessary condition
Long-term strategy, potential for cumulative or structural effect	Strategic corruption is typically part of longer-term influence efforts, but duration is not a defining criterion. A single inducement may qualify if it produces potentially lasting institutional, policy, or dependency effects that extend beyond immediate private gain.

CLASSIFICATION TEST

Drawing on the literature above and for the purposes of this framework, a practice qualifies as strategic corruption only where all of the following definitional elements are present:

Corrupt inducement - a financial or non-financial undue advantage is offered, channelled, expected, or exchanged.

Abuse of entrusted authority - a public power-holder, or another actor exercising entrusted decision-making power, uses that authority in response to the corrupt inducement, or in ways aligned with its aims, rather than in accordance with the public purpose of the office or function.

Strategic effect - the outcome serves broader political, economic, security, policy, or dependency-related interests of another state beyond immediate private gain for one or more of its representatives or affiliate actors. Strategic effect may be observed through direct negative institutional or dependency effects at the micro, meso, or macro level, even where broader systemic consequences remain only cumulative or prospective.

In addition, an external source of strategic interest must be demonstrable at least materially, relationally, or structurally, even where direct command-and-control evidence is absent. Where one or more of these elements remains unproven, the case may still fall within the framework’s warning or enabling environment, but should not be classified as confirmed strategic corruption.

RELATION TO ADJACENT CONCEPTS

Several authors (e.g. Pozsgai-Alvarez and Lang, 2025) stress the importance of distinguishing strategic corruption from related terms such as hybrid threats, foreign interference, corrosive capital, state capture, or "ordinary" corruption. This framework therefore adopts a narrow definitional core for strategic corruption while recognizing a broader enabling environment of analytically relevant phenomena.

Table 2 Relation to Adjacent Concepts

CONCEPT	CORE CHARACTERISTICS	DIFFERENCE FROM STRATEGIC CORRUPTION
Strategic corruption	Strategic corruption refers to corrupt inducements in a cross-border context that are materially or structurally driven by identifiable external state interests and produce institutional, regulatory, or dependency effects in the target system. Direct state control is not required; however, mere diplomatic support or general geopolitical ambition is insufficient to qualify.	Baseline concept used in this framework.
Hybrid threats	Coordinated use of military and non-military tools (cyber, economic pressure, information operations, political interference) to exploit systemic vulnerabilities of a target state (Giannopoulos, Smith, and Theocharidou, 2021).	Hybrid threats do not require corrupt inducement.
Corrosive capital	Opaque, politically conditioned investments originating from authoritarian or state-influenced systems, often characterized by weak transparency and governance standards.	Corrosive capital may create dependency or opacity without demonstrable abuse of entrusted authority through corrupt inducement.
Foreign interference	Direct or indirect attempts by external actors to influence political processes, public opinion, or institutional outcomes in another country.	Foreign interference does not necessarily involve corruption or abuse of entrusted authority.
State capture	Political elites and their informal networks systematically abuse law (legislation) and institutional capacities to gain or retain power and wealth (David-Barrett and Okamura, 2025)	State capture may be entirely domestic and does not necessarily require a source-linked inducement or broader strategic external effect.
Ordinary (endemic) corruption	Focus on personal gain, shorter time horizon, no explicit geopolitical planning; at various levels it still undermines the state's ability to serve citizens.	It lacks the strategic dimension beyond private benefit.

A practical challenge lies in distinguishing legitimate lobbying, foreign investment, and corruption, as the boundaries are often blurred. Within this framework, corruption refers to situations in which inducements lead a public power-holder to abuse entrusted authority in ways that serve external interests.

The term "strategic corruption" entered wider use after 2020, particularly in Western think tanks (Pozsgai-Alvarez and Lang, 2025). It also appeared in official policy documents, including "United States Strategy on Countering Corruption" issued by the White House in 2021, reflecting the growing tendency to frame corruption as a national security challenge.

The growing policy uptake of the term has strengthened the link between corruption and national security, but it has also raised concerns about securitisation, selectivity, and conceptual overstretch.

Critics (e.g. Chayes, 2015) warn that this framing may lead to securitisation of anti-corruption policy and to double standards (focus on Russia, China, Iran, while ignoring Western practices). Current debates therefore aim to anchor the concept academically and avoid its political misuse. This requires linking theory and empirical data through case studies and fostering international cooperation between researchers, security experts, and investigative journalists.

DEGREES OF FOREIGN INVOLVEMENT

The degree of foreign involvement in corruption-related activities varies. However, not all levels constitute strategic corruption under the definition adopted in this framework.

- **Exogenous (direct):** a foreign state/agent funds, coordinates, or issues instructions.
  Classification: Clearly within the scope of strategic corruption
- **Proxy / hybrid / mediated:** domestic oligarchs, foundations, companies, criminal proxies, or “advisors” act in line with a foreign state’s interests, but formally without direct orders.
  Classification: may qualify as strategic corruption where inducement, abuse of entrusted authority, and strategic effect are demonstrable).
- **Endogenous (domestic, strategically, externally aligned):** domestic elites use corruption to push through political-economic changes that predictably create external dependence or reorient the country geopolitically – even without proven direct coordination.
  Classification: analytically relevant, but not automatically strategic corruption unless material linkage to an identifiable external source and corrupt inducement can be established)
- **Mimetic:** domestic actors copy a “playbook” (tailor-made laws, media capture, lawfare) whose effects are similar to the exogenous version.
  Classification: outside the scope of strategic corruption and is better understood as domestic state capture or similar internal political processes).

For the purposes of this framework, an external source of strategic interest remains constitutive, even where the inducement is mediated through domestic or third-country actors rather than a direct foreign state official.

ACTORS AND ENABLING ECOSYSTEM

For strategic corruption, it is crucial to distinguish between domestic and foreign actors, because they pursue different goals.

Domestic actors usually act for personal or group gain.

Foreign actors use corruption as a geopolitical, economic, security, or policy instrument.

This distinction helps to better design investigations, legislation, and preventive measures. While domestic actors can generally be prosecuted under national law, foreign actors often operate through intermediaries and remain outside the reach of domestic jurisdictions. Clear separation of these groups also improves responses to hybrid threats and resilience in public administration.

Strategic corruption typically operates across three functional layers: source-aligned actors, intermediaries or facilitators (often located in third jurisdictions), and target-system decision-makers (Kassa and Guy, 2025; Pozsgai-Alvarez and Lang, 2025).

Table 3 Actor Matrix

TYPE OF ACTOR	TARGET-COUNTRY ACTORS	SOURCE-ALIGNED ACTORS	INTERMEDIARY / THIRD-COUNTRY ACTORS
State	Politicians, regulators, security bodies	Source-state institutions, diplomats, State Owned Enterprises (SOE)	Regulatory havens, financial authorities in enabling jurisdictions
Non-state	Businesspeople, lawyers, media, criminal market actors	Oligarchs, source-country corporations, criminal proxies or tolerated illicit networks	Offshore vehicles, financial intermediaries, law firms, consultants, shell directors, laundering networks, criminal facilitators

Domestic actors involved in strategic corruption are not limited to politicians, businesspeople, or public officials. A broader ecosystem of professional and institutional enablers may facilitate or structure corrupt inducements without being the primary corrupting or corrupted parties. These may include:

- **lawyers and law firms** (structuring legal vehicles or arbitration mechanisms),
- **notaries** (formalising ownership transfers),
- **auditors and accountants** (designing complex financial arrangements),
- **academics and experts** (providing reputational or policy legitimacy),
- **university lecturers** (may facilitate possible future intelligence recruitment),
- **influencers and media professionals** (amplifying aligned narratives),
- **bank employees and financial intermediaries** (facilitating transactions),
- **engineers and operators of strategic industries.**

Such actors become relevant to the analysis of strategic corruption when their actions materially contribute to the inducement or concealment of abuse of entrusted authority. Absent such contribution, they fall within the broader ecosystem of foreign influence or professional services rather than strategic corruption itself.

External actors include primarily **authoritarian regimes, oligarchs, and intelligence services**.

- Authoritarian states (e.g. Russia, China) use corruption as a tool of geopolitical influence by **bribing elites**, investing in media, think tanks, or infrastructure in target states.
- Oligarchs linked to state power act as **intermediaries**, channeling their country's interests abroad through investments, foundations, shell companies, and informal networks.
- Intelligence services often cover or coordinate these operations, using corruption to build **networks of contacts**, gain access to information, and weaken trust in democratic institutions.

These actors act **in parallel or in coordination** with the long-term goal of undermining the **sovereignty, stability, and resilience** of the target state.

MECHANISMS AND PROXY INDICATORS (RED FLAGS)

Proxy indicators help to **detect suspicious patterns early** – situations that may signal the presence of strategic corruption mechanisms. Proxies are always **context-dependent** and rarely prove guilt on their own. They serve as **warning signals** that trigger further inquiry and **triangulation**.

For analytical clarity, this chapter distinguishes between Layer I mechanisms, which involve corruption-based inducement and may constitute strategic corruption, and Layer II conditions, which may facilitate, conceal, or normalize such mechanisms without amounting to strategic corruption in themselves.

Layer I mechanisms

Strategic corruption is often observed in sectors that may generate significant leverage, such as **energy and infrastructure, security and defence, public procurement, strategic regulation or education, media and other influence-sensitive domains**.

Empirical studies and investigative reporting have identified several channels through which corruption-based inducements may be operationalised, including:

- **Politics:** illicit or non-transparent party financing, corruption-linked advisory roles, or inducement-based access to political decision-makers.
- **Economy:** manipulation of procurement, privatisation, or investment processes through bribery, collusion, or conflict-of-interest arrangements.

These mechanisms are analytically relevant because they represent the principal channels through which corrupt inducements may translate into the abuse of entrusted authority.

The following mechanisms are classified as Layer I because they contain the core operational possibility of strategic corruption rather than merely creating permissive conditions for it.

Table 4 Layer I: Mechanisms of Strategic Corruption and Proposed Proxy Indicators

MECHANISM	INDICATOR DOMAINS	PROPOSED PROXIES (WHAT TO MEASURE)
I. Political bribery and elite inducement	1) Political finance 2) Wealth management 3) Networks	1) Illicit, concealed, or non-transparent funding linked to decision-makers (including indirect channels or intermediaries). 2) Unexplained asset growth of decision-makers temporally linked to policy or contract decisions. 3) Repeated interaction patterns between decision-makers and benefiting entities preceding key decisions.
II. Corruption-Linked Legislative Manipulation	1) Legislative process 2) Beneficiary clauses 3) Conflict-of-interest 4) Network overlap	1) Tailor-made clauses directly benefiting specific identifiable actors. 2) Financial or relational links between drafters/sponsors and beneficiaries. 3) Suppression of oversight provisions linked to benefiting entities. 4) Temporal alignment between private inducements and legislative amendments.
III. Procurement Manipulation and Regulatory Capture	1) Tender structure 2) Competition patterns 3) Pricing 4) Post-award changes	1) Single-bidder awards combined with relational ties to decision-makers. 2) Repeated awards to politically connected firms despite poor performance. 3) Systematic pricing above sectoral benchmarks with identifiable intermediaries. 4) Contract modifications significantly increasing value after award.
IV. Revolving Doors Involving Conflict-of-Interest Inducements	1) Career trajectories 2) Cooling-off compliance 3) Decision–employment match 4) Compensation patterns	1) Transition of officials into firms that directly benefited from their prior decisions. 2) Evidence of pre-departure interactions linked to subsequent employment. 3) Non-compliance with cooling-off regulations. 4) Compensation packages disproportionate to market standards following regulatory decisions.
V. Corruption-Based Dependency Arrangements	1) Loan agreements 2) Collateralisation 3) Political clauses 4) Personal gain indicators	1) Evidence of side-payments, commissions, or inducements linked to approval of external financing. 2) Loan or concession terms deviating from market standards combined with personal benefit to approving officials. 3) Suppression of oversight or bypassing required procedures in exchange for external financing. 4) Repeated approval of disadvantageous agreements benefiting a linked foreign entity.

Indicators in separate categories were inspired by public Integrity Indicators (OECD, 2024a), including post-public employment (OECD, 2010); GRECO / Council of Europe (2026) for legislative integrity, party funding, lobbying and legislative footprint; UNODC (2013) and the World Bank (2010) for procurement red flags and corruption-risk diagnostics; and FATF (2013, 2023) for beneficial ownership, politically exposed persons, and corruption-related money-laundering indicators.

Layer II enabling environment of Strategic Corruption

The mechanisms described in this section do not constitute strategic corruption per se. They describe structural or environmental conditions that may facilitate or conceal corruption-based inducements. They become relevant under this framework only when linked to inducement-based abuse of entrusted authority.

Table 5 Layer II: Enablers of Strategic Corruption and Proposed Proxy Indicators

ENABLER	INDICATOR DOMAINS	STRATEGIC EFFECT (CLASSIFICATION) TEST
I. Media Acquisition and Narrative Capture	Media structure and ownership transparency	Primarily creates an information-control environment that reduces public scrutiny and increases tolerance for corruption. Indicators: 1) Opaque ownership structures linked to foreign or politically exposed capital. 2) Entry of investors without media background coinciding with politically sensitive periods. 3) Concentration of state/SOE advertising in politically aligned outlets. 4) Sudden editorial shifts benefiting actors linked to strategic sectors. Classification rule: Becomes strategic corruption only if corruption-based inducements distort regulatory decisions (e.g., licensing, procurement, subsidies) or political processes.
II. Infrastructure Investments	Ownership, procurement structure, dependency patterns	Primarily creates structural dependency or leverage but does not constitute corruption per se. Indicators: 1) High concentration of critical infrastructure ownership in entities linked to a foreign state. 2) Single-source infrastructure projects without transparent competition. 3) Contract clauses creating long-term technological or operational lock-in. 4) Investment timing aligned with geopolitical or regulatory shifts. Classification rule: Becomes strategic corruption only when inducements lead decision-makers to approve disadvantageous or irregular contracts, including those that create lasting dependency on a malign external actor.
III. Soft Power Projects (Culture, Sport, Academia)	Sponsorship, grants, institutional partnerships	Primarily generates reputational legitimization and elite access. Indicators: 1) Sponsorship from state-linked entities in politically sensitive sectors. 2) Funding of academic chairs or research centers without transparent reporting. 3) High-visibility PR initiatives lacking economic rationale. 4) Institutional partnerships concentrated in security-relevant domains. Classification rule: Becomes strategic corruption only where such funding or sponsorship is linked to corrupt inducement, preferential treatment, abuse of entrusted authority, or the creation of covert positions or access channels for foreign intelligence assets.

Table 5 Layer II: Enablers of Strategic Corruption and Proposed Proxy Indicators

ENABLER	INDICATOR DOMAINS	STRATEGIC EFFECT (CLASSIFICATION) TEST
IV. Lawfare / strategic litigation	Judicial environment and litigation patterns	Primarily creates deterrence, chilling effects, or procedural obstruction. Indicators: 1) SLAPPs targeting watchdogs investigating foreign-linked investments. 2) Repeated arbitration cases benefiting foreign-connected entities. 3) Cross-border legal financing networks. 4) Procedural maneuvers that stall oversight bodies. Classification rule: Becomes strategic corruption only if judicial decisions are demonstrably influenced by inducement or corrupt exchanges.
V. External loans and grants	Financial exposure and contractual design	Primarily creates economic leverage or policy conditionality. Indicators: 1) Concessional loans from a single foreign source forming high sectoral exposure. 2) Collateralisation of strategic assets. 3) Cross-default or tied-service clauses. 4) Policy reforms temporally aligned with financing packages. Classification rule: Becomes strategic corruption only if inducements distort entrusted decision-making (e.g., bribery linked to loan approval).
Indicators were inspired by Media Freedom Act (European Commission, 2024), Media Pluralism Monitor (European Commission, 2026a), EU FDI screening materials (European Commission 2026b), OECD (2026) work on investment and national security, the World Bank (2020) Infrastructure Governance Assessment Framework, OECD (2024b) report on transparency and integrity of foreign influence activities, European Parliament (2022) materials on tackling foreign interference, European Commission (2026b) on countering SLAPPs; World Bank (2025) debt-transparency work, the IMF (2023) note on collateralized transactions, and OECD (2026b) rules on tied aid and officially supported export credits.		

2 LEGAL AND INSTITUTIONAL FRAMEWORK RELEVANT TO STRATEGIC CORRUPTION

LEGAL FRAMEWORK FOR STRATEGIC CORRUPTION

The legal framework addressing corruption at the international and European levels consists of a network of conventions, directives, regulations, and soft-law instruments. This chapter focuses primarily on the international and European legal and institutional architecture most relevant to strategic corruption, especially the UN, OECD, Council of Europe, EU, and related Western security and hybrid-threat frameworks. While the concept of "strategic corruption" is not explicitly codified in binding legal texts, existing legal regimes collectively address many of its components, including bribery, abuse of office, illicit financial flows, and foreign interference. Increasingly, these instruments are interpreted through a security lens, reflecting the growing recognition of corruption as a vector of geopolitical influence and hybrid threats. This shift is particularly visible in NATO documents, European Union instruments, and initiatives aimed at countering hybrid threats.

Key International Legal Instruments

The United Nations Convention against Corruption (UNCAC) remains the cornerstone of the global anti-corruption legal framework. It establishes legally binding obligations in the areas of prevention, criminalisation, asset recovery, and international cooperation. Although UNCAC does not explicitly address strategic corruption, its provisions on illicit enrichment, foreign bribery, and beneficial ownership transparency are directly applicable to cases where corruption is used as a tool of influence by state or non-state actors (UNODC, 2004).

The OECD Anti-Bribery Convention focuses specifically on the bribery of foreign public officials in international business transactions. It creates binding obligations for states to criminalise such conduct and enforce corporate liability. This framework is particularly relevant for addressing strategic corruption conducted through multinational corporations or state-owned enterprises operating abroad (OECD, 2012).

The legal standards of the Financial Action Task Force (FATF), while formally non-binding, are highly influential and effectively mandatory through peer pressure and financial system integration. FATF Recommendations establish global norms on anti-money laundering (AML), counter-terrorist financing (CFT), and transparency of beneficial ownership. These standards are crucial in detecting and disrupting financial flows linked to strategic corruption, particularly where opaque ownership structures are used to conceal influence operations (FATF, 2022).

European Union Legal Framework

Within the European Union, the fight against corruption is embedded in a broader legal architecture covering rule of law, financial integrity, and internal security.

The Council of Europe (1999a, 1999b) has adopted several key legal instruments, including **the Criminal Law Convention on Corruption and the Civil Law Convention on Corruption**. These instruments harmonise legal definitions of corruption offences and facilitate cross-border cooperation. Their monitoring mechanism, GRECO, indirectly strengthens the legal resilience of states against strategic corruption by identifying legislative and institutional gaps.

The EU Anti-Money Laundering (AML) framework, including successive AML Directives and the establishment of the new Anti-Money Laundering Authority (AMLA), provides a comprehensive legal basis for tracking illicit financial flows. These instruments impose obligations on financial institutions, beneficial ownership registries, and high-risk sectors, thereby targeting the financial infrastructure that enables strategic corruption (European Commission, 2024b).

Public procurement law, particularly **Directive 2014/24/EU**, plays a critical preventive role. By establishing transparency, competition, and accountability requirements, it reduces the risk of manipulation of public contracts - a key channel through which strategic corruption often materialises.

The EU mechanism for screening foreign direct investment (Regulation 2019/452): Although it is not an anti-corruption instrument in the classical sense, this mechanism allows Member States and the Commission to assess investments from the perspective of security and public order. Strategic corruption often manifests precisely through non-transparent investments in critical infrastructure (European Parliament, 2019).

The Rule of Law Conditionality Regulation (Regulation (EU) 2020/2092) introduces a direct link between respect for rule of law principles and access to EU funds. This mechanism allows the EU to suspend funding where systemic corruption undermines financial management, thereby addressing structural vulnerabilities associated with state capture (European Parliament, 2020).

Sanctions regimes under the EU Common Foreign and Security Policy (CFSP) also have increasing relevance (European External Action Service, 2024). **The EU Global Human Rights Sanctions Regime ("EU Magnitsky Act")** enables targeted sanctions against individuals involved in serious corruption and human rights abuses, including asset freezes and travel bans. While not exclusively designed for strategic corruption, such measures can be used to counter networks of influence linked to foreign actors (European Parliament, 2021).

The EU Anti-Corruption Directive (currently under development as part of broader reforms) aims to harmonise definitions of corruption offences and sanctions across Member States. It seeks to address fragmentation in national legal systems, which can otherwise be exploited in cross-border corruption schemes (Council of the European Union, 2026).

Legal Aspects of Hybrid Threats and Foreign Interference

Although no comprehensive legal instrument specifically governs hybrid threats, several EU and international legal tools address their components.

The North Atlantic Treaty Organization (NATO) does not operate as a law-making body in the traditional sense, but its standards and commitments influence national legal frameworks, particularly in areas such as defence integrity and resilience against corruption in the security sector.

Within the EU, legal responses to foreign interference include regulations on political advertising transparency, foreign funding of political parties, and measures addressing disinformation. These instruments increasingly intersect with anti-corruption law, as financial influence operations often combine legal and illegal practices.

Judicial Cooperation and Enforcement Mechanisms

Legal frameworks are complemented by mechanisms that enable their enforcement across borders.

Mutual legal assistance treaties (MLATs), European Arrest Warrants, and instruments such as the European Investigation Order facilitate cross-border investigations and prosecutions. These tools are essential in cases of strategic corruption, which typically involve multiple jurisdictions and complex financial structures (European Commission, 2026c).

The legal mandate of the European Public Prosecutor's Office (EPPO) is particularly relevant, as it allows for direct prosecution of crimes affecting the EU's financial interests. Similarly, the work of Europol and Eurojust is grounded in legal instruments that enable operational and judicial coordination (EPPO, 2026)

INSTITUTIONAL FRAMEWORK FOR COUNTERING STRATEGIC CORRUPTION

The international community and the European Union possess a complex, albeit somewhat fragmented, architecture of institutions addressing corruption, financial crime, and hybrid threats. Although few institutions explicitly use the term "strategic corruption," their mandates significantly overlap in addressing situations where corruption is used as a tool of state influence, foreign interference, or geopolitical power projection.

International Organizations

The United Nations Convention against Corruption (UNCAC, 2004) represents the only globally legally binding instrument covering prevention, criminalization, and international cooperation.

The Group of States against Corruption (GRECO, 2026) of the Council of Europe is a key monitoring mechanism in Europe. It evaluates legislation and practice in areas such as the integrity of public officials, political party financing, and the prevention of conflicts of interest.

The OECD Working Group on Bribery (OECD, 2026b) monitors the implementation of the Anti-Bribery Convention. It is essential in addressing corruption in international business and the conduct of multinational corporations.

The Financial Action Task Force (FATF)1 is a global standard-setting body for combating money laundering and terrorist financing. Transparency of beneficial ownership is critical for detecting financial flows linked to strategic corruption.

The North Atlantic Treaty Organization (NATO) increasingly views corruption as a cross-cutting issue spanning the security, economic, and political domains, and as a security threat that can undermine state resilience, erode trust in institutions, and create entry points for hostile influence. In the context of strategic corruption, NATO primarily acts indirectly through resilience-building and standard-setting, particularly by strengthening integrity and transparency in the defence sector (e.g. the Building Integrity Programme). It closely cooperates with the EU, including the European **Centre of Excellence for Countering Hybrid Threats**[2], thereby linking military and civilian perspectives on threats.

Institutions at the European Union Level

The European Commission plays a central role in policymaking, legislation, and monitoring the rule of law in Member States. It is a key actor in identifying systemic weaknesses that can be exploited for strategic corruption.

---

1 *https://www.fatf-gafi.org/en/home.html*

2 *https://www.hybridcoe.fi/*

The European External Action Service (EEAS)3, through its StratCom Task Forces, analyses disinformation and hybrid operations. Corruption is understood as a tool for building influence networks and weakening democratic institutions.

The Directorate-General for Migration and Home Affairs (DG HOME)[4] is responsible for coordinating internal security policies, including the fight against corruption, organised crime, and money laundering. It also plays a role in drafting legislation (e.g. anti-money laundering packages).

The Rule of Law Reports constitute a key preventive tool of the EU. They assess the state of the judiciary, media, and anti-corruption frameworks in Member States and identify systemic vulnerabilities (e.g. "state capture") that create conditions for strategic corruption (European Commission, 2025).

EU Judicial and Investigative Bodies

These entities represent the "executive arm" of the EU in protecting its financial interests and combating transnational crime.

The European Public Prosecutor's Office (EPPO)[5] is a supranational prosecution office with the authority to investigate and prosecute crimes affecting the EU's financial interests (e.g. fraud involving EU funds, VAT fraud). Strategic corruption often materialises through the manipulation of public procurement and EU funds.

The European Anti-Fraud Office (OLAF)[6] conducts administrative investigations into fraud, corruption, and irregularities within the EU budget. Unlike EPPO, it does not have criminal prosecution powers, but its findings serve as a basis for further proceedings.

The European Union Agency for Law Enforcement Cooperation (Europol)[7] supports Member States through intelligence analysis, operational coordination, and efforts to combat organised crime, including cross-border corruption networks.

The European Union Agency for Criminal Justice Cooperation (Eurojust)[8] facilitates judicial cooperation by coordinating investigations and prosecutions among Member States, particularly in complex, multi-jurisdictional cases.

Specialised Bodies for Countering Hybrid Threats

The European Centre of Excellence for Countering Hybrid Threats (Hybrid CoE)[9], based in Helsinki, serves as a platform for cooperation between the EU and NATO. It provides analysis, training, and scenario-building aimed at identifying and building resilience against hybrid threats, including economic coercion, elite capture, and strategic corruption.

The EU Intelligence and Situation Centre (INTCEN) is a key analytical hub of the EU for intelligence synthesis and situational awareness. Operating within the EEAS[10], it collects, analyses, and evaluates intelligence provided by Member States. In the context of

---

3 *https://www.eeas.europa.eu/_en*

4 *https://commission.europa.eu/about/departments-and-executive-agencies/migration-and-home-affairs_en*

5 *https://www.eppo.europa.eu/en*

6 *https://anti-fraud.ec.europa.eu/index_en*

7 *https://www.europol.europa.eu/*

8 *https://www.eurojust.europa.eu/*

9 *https://www.hybridcoe.fi/*

10 *https://www.eeas.europa.eu/eeas/structure-and-organisation_en*

strategic corruption, it integrates fragmented intelligence inputs to identify behavioural patterns that may remain invisible at the national level (e.g. coordinated influence over political elites through financial flows), analyses hybrid threats where corruption acts as an "enabler" of foreign influence, and cooperates closely with other EU analytical capacities such as the Hybrid Fusion Cell, thereby linking the security, economic, and informational dimensions of corruption. Its main limitation lies in the absence of operational and investigative powers.

Non-Governmental and Informal Actors

As at the national level, civil society plays an indispensable role globally in detecting and analysing strategic corruption. These actors often function as an "early warning system," identifying patterns that formal institutions may capture only with delay. Key actors include:

Transparency International plays a crucial role in identifying systemic vulnerabilities enabling strategic corruption, particularly through the Corruption Perceptions Index (CPI) and thematic reports. While the CPI measures perceived corruption, in the context of strategic corruption it serves as an indicator of environments susceptible to state capture and foreign influence. The organisation also conducts advocacy on political finance transparency, lobbying regulation, and whistleblower protection, directly addressing mechanisms exploited by foreign actors (Transparency International, 2026).

The Organized Crime and Corruption Reporting Project (OCCRP) provides significant empirical evidence on how strategic corruption operates in practice. Through cross-border investigative journalism, it uncovers complex networks linking political elites, oligarchs, and foreign actors, including money laundering schemes and hidden ownership structures. Its work often identifies concrete cases where corruption is used as a geopolitical tool and provides input for law enforcement actions and sanctions regimes (OCCRP, 2026).

Think tanks and academic institutions (e.g. **Carnegie Endowment for International Peace**, **Brookings Institution**, **Chatham House**) play an analytical and conceptual role in framing strategic corruption. They develop concepts such as "state capture," "kleptocracy," and "sharp power," and analyse how foreign actors systematically use economic and corrupt practices to influence political decision-making. Their outputs inform policymaking, identify emerging trends, and link corruption with national security and geopolitics.

Summary of the Legal and Institutional Framework

The phenomenon of strategic corruption at the international and European levels is addressed through a combination of anti-corruption law, financial regulation, public procurement rules, sanctions regimes, and instruments targeting hybrid threats. At the same time, **the institutional framework is evolving** from a primarily criminal-law focus toward a more integrated, security-oriented approach. Although no single institution is exclusively dedicated to strategic corruption, the interplay of legal, security, and analytical tools at both EU and global levels creates a multi-layered system capable of responding to complex influence operations.

However, a **key limitation lies in fragmentation**. Legal and institutional instruments are dispersed across different domains and actors, often lacking a unifying conceptual framework, which creates gaps that strategic corruption actively exploits. Its effective mitigation therefore depends not only on strengthening individual tools, but on ensuring their coherent application, improving coordination and intelligence sharing between security and law enforcement actors, and recognising corruption as a potential instrument of geopolitical influence within both legal and policy frameworks.

3 ANALYTICAL TOOLS FOR DETECTING AND ASSESSING STRATEGIC CORRUPTION

Evidence logic: "ordinary" corruption vs. strategic corruption

Proving strategic corruption differs fundamentally from proving corruption in a classic criminal-law sense. **Ordinary corruption** is typically an individual unlawful act motivated by private gain. Investigations aim to prove a concrete offence - most often a **direct exchange of value (quid pro quo)** - and to establish individual intent and guilt **beyond reasonable doubt**, using evidence such as bank records, wiretaps, witness testimony, seized cash, or confessions.

Strategic corruption, by contrast, usually does not present as a single illegal act. Instead of focusing primarily on "grey-zone behaviour", the framework evaluates whether three core conditions are present: an inducement, abuse of entrusted authority, and an institutional or dependency effect. Analytical tools therefore aim to identify patterns that may signal the presence of these conditions, even when direct criminal evidence is not available.

Accordingly, this framework relies less on "smoking-gun" proof and more on **convergence evidence**: multiple indirect indicators that may be legal in isolation but become meaningful through their **consistency, recurrence, and alignment** over time.

Table 6 Evidence dimensions: ordinary vs. strategic corruption

DIMENSION	ORDINARY CORRUPTION	STRATEGIC CORRUPTION
Primary objective	Private financial gain	Geopolitical / systemic effect
Typical actors	Individuals, firms	States, networks, proxy actors
Operative logic	Direct bribe / benefit	Co-optation, influence, dependency, revolving doors
Legal visibility / prosecutability	Clearly illegal	Often mixes illegal conduct with formally legal grey-zone activities, making legal qualification more difficult
Proof approach	Criminal-law evidence	Analytical / security-oriented
Key evidentiary unit	Quid pro quo	Convergent pattern of indicators
Proof standard	Beyond reasonable doubt	Probabilistic / pattern-based
Typical effect horizon	Short-term, discrete	Long-term, cumulative
Typical tools	Wiretaps, bank data, witnesses	Network + ownership + tracing + narratives + dependency analysis
State intervention threshold	Criminal offence	Security / political risk (often below criminal threshold)

The analytical proof standard is therefore different: rather than focusing on criminal attribution, it relies on a probabilistic assessment of convergent indicators, pattern robustness, and the presence of negative institutional or dependency effects. According to Pozsgai-Alvarez (forthcoming), these effects may appear at the micro level (individual decision-making), **meso** level (organizational or sectoral functioning), or macro level (state policy, resilience, or dependency structures). A single case does not need to demonstrate systemic transformation of the entire state apparatus in order to be analytically relevant.

At the same time, the framework also considers whether the cumulative effect of similar cases may, over time, contribute to broader systemic consequences, such as rising external leverage, deepening dependency, weakened oversight, or reduced institutional resilience.

CORE EVIDENTIARY PILLARS

- **Proxy indicators**
  Observable signals (financial anomalies, career moves, legal irregularities, ownership structures, narrative shifts, dependency patterns). Individually weak; cumulatively strong.
- **Convergence evidence**
  Not a single “proof”, but a consistent alignment of financial, relational, legal, discursive, or structural signals pointing toward the same strategic direction.
- **Strategic effect test**
  The key question is: **Did the behaviour strengthen an external actor’s strategic interests and/or weaken state resilience?**

A case becomes analytically strong when there are signals of inducement, signals of power abuse, the conduct has a clear strategic effect, and those elements are linked to a foreign state actor, with the evidence converging across multiple domains rather than resting on one fact alone.

THE FIVE ANALYTICAL TOOLS

The analytical tools used in this framework each focus on a different dimension of strategic corruption. **Network analysis asks** who is connected to whom, through what kinds of relationships, and where influence clusters or intermediaries emerge. **Ownership mapping** asks who ultimately owns, controls, or benefits from corporate, financial, or organizational structures that may conceal foreign-linked interests. **Legislative tracing** asks who changes formal rules, exemptions, or regulatory conditions, and whose interests those changes appear to serve. **Narrative analysis** asks who legitimises influence, how relationships are framed publicly, and how reputational cover or discursive alignment is produced. Finally, **dependency analysis** asks who depends on whom, in what sector, and how strong the resulting leverage or vulnerability may be. Taken together, these tools do not provide proof in isolation, but help identify recurring patterns of inducement, capture, dependency, and strategic effect across complex cases.

Table 7 Mapping Analytical Tools to Strategic Corruption Mechanisms and Enablers

ANALYTICAL TOOL	LAYER I. MECHANISMS CONTEXTS	LAYER II. ENABLING CONTEXTS	MAIN CONTRIBUTION TO CASE ASSESSMENT /DEFINITIONAL ELEMENTS
Network analysis	Political bribery and elite inducement; revolving doors; brokered influence networks	Media/narrative networks; soft power projects	Helps identify relational patterns linking source-aligned actors, intermediaries, and target decision-makers; most useful for tracing source linkage, possible inducement channels, and patterns surrounding abuse of entrusted authority
Ownership mapping	Corruption-based dependency arrangements; procurement manipulation; regulatory capture	Strategic infrastructure investments; external loans and grants	Helps identify control, beneficial ownership, and proxy structures; most useful for tracing source linkage, hidden beneficiaries, and material structures connected to dependency effects

Table 7 Mapping Analytical Tools to Strategic Corruption Mechanisms and Enablers

ANALYTICAL TOOL	LAYER I. MECHANISMS CONTEXTS	LAYER II. ENABLING CONTEXTS	MAIN CONTRIBUTION TO CASE ASSESSMENT /DEFINITIONAL ELEMENTS
Legislative tracing	Corruption-linked legislative manipulation	Lawfare / strategic legal frameworks	Helps identify how entrusted authority was exercised and whether legal or regulatory change selectively benefited linked actors; most useful for evidencing abuse of entrusted authority and its institutional consequences
Strategic dependency analysis	Corruption-based dependency arrangements	Infrastructure investments; external financing arrangements	Helps assess whether decisions increase concentration, leverage, or exposure; most useful for evidencing institutional / dependency effects
Narrative analysis	Indirectly relevant across mechanisms	Media acquisition and narrative capture; soft power projects	Helps identify how influence is legitimised, masked, or normalised in public discourse; most useful as contextual support for strategic effect, reputational laundering, and concealment, rather than as stand-alone evidence of inducement

Some tools are particularly useful for detecting corruption-based mechanisms (e.g., ownership mapping, procurement analysis), while others help identify enabling environments of influence (e.g., narrative analysis or soft-power networks).

I. LEGISLATIVE TRACING

Purpose: systematically examine the full lifecycle of a legal norm - initiation, authorship, consultation, adoption, timing, and sectoral context - to detect patterns of selective advantage and influence (Mechanism: influencing legislation).

What to measure (proxy signals) - based on World Bank (2021), OECD (2014)

- fast-track use for high-impact laws; limited consultation; unusually rapid adoption
- tailor-made clauses; procurement exemptions; reduced transparency obligations
- repeated amendments in the same sector; coincidence with tenders/investments/ grants
- links between proposers and beneficiaries; systematic disregard of substantive objections

Workflow

1. Collect	2. Trace	3. Connect
law/novel, explanatory report, consultation comments, version history	proposer(s), sponsors, consultation actors, acceptance/ rejection of comments; timeline anomalies; text-diff of versions	overlay with procurement/grants/ investments and beneficiary ownership/network data

Typical sources: official legal and information portals, providing access to legislation, legislative processes, and related legal information.

Limits: Fast adoption can be legitimate; legal change is not proof of corruption. It requires context and triangulation with procurement, ownership, and network evidence.

Strongest when combined with: procurement data, ownership mapping, and network analysis.

II. NETWORK ANALYSIS

Purpose: map and interpret relationships among political, economic, and institutional actors to identify intermediaries, elite clusters, revolving-door trajectories, and cross-border influence networks (Luna-Pla and Nicolás-Carlock, 2020).

Network analysis is particularly useful for identifying what Wedel (2011) describes as "flex networks" - informal clusters of actors who move across public office, private business, and advisory roles while advancing shared interests. Such networks often operate without formal hierarchies or contractual ties, which makes them difficult to detect using traditional corruption investigation tools. Mapping these flexible networks helps identify intermediaries, brokers, and influence hubs that link political decision-makers with external actors.

What to measure (proxy signals) - based on World Bank (2021b)

- repeated shared directors/owners across "competing" firms
- hub intermediaries bridging state and private actors
- donor-contractor overlap; public officials moving into regulated sectors - revolving doors (Transparency International, 2015)
- transnational ties (state-owned enterprises, sanctioned/high-risk entities, offshore nodes)

Workflow

1. Define core actors:	2. Collect relations	3. Model/visualis	4. Interpret
decision-makers, regulators, contractors, lobby/NGO/think-tank nodes	ownership, management roles, advisory contracts, board seats, nominations	nodes/edges; centrality; clustering; bridging actors; density	influence concentration, brokerage, repeated patterns across time and sectors

Typical source: company registers, offshore leaks, sanctions/Politically Exposed Persons (PEP) portals.

Optional software: Gephi, Maltego, Neo4j, NodeXL.

Limits: A link is not proof; data can be incomplete; offshore opacity reduces visibility. It requires corroboration.

Strongest when combined with: ownership mapping, legislative tracing, procurement patterns.

III. OWNERSHIP MAPPING

Purpose: identify who ultimately owns and controls assets and entities (beneficial owners), including proxy structures, offshore layers, and state-linked corporate vehicles, based on OECD (2024c) and Kiepe (2021). Retrospective analysis helps mapping out past corruption schemes with potential contemporary and future effects.

What to measure (proxy signals)

- multi-layer holdings; shell entities without economic activity
- sudden ownership/control changes around key decisions
- Politically Exposed Persons (PEP) links; nominee directors; jurisdictional opacity
- real-estate as value storage; land accumulation before public investment announcements; liens/encumbrances tied to public projects

Workflow - based on FATF (2023), Kiepe and Okunbor (2021)

1. Select the entity/ asset	2. Map structure	3. Identify Beneficial Owners (BO)	4. Link to politics/ state	5. Time-test
contractor, investor, grant recipient, media owner	shareholders, control rights, holding chains	Beneficial Ownership registry, investigative databases, leak datasets	PEP screening, party finance links, state-owned enterprise proximity	ownership changes vs. legislation/tenders/ investment milestones

Typical source: land/real-estate registers, Register of Public Sector Partners, Offshore Leaks, Sanctions lists, corporate registers.

Limits: Offshore/legal opacity; formal vs. real control; registry delays. It must be triangulated.

Strongest when combined with: network analysis + procurement + strategic dependency assessment.

IV. DEPENDENCY METRICS

Purpose: quantify structural dependence in critical sectors (suppliers, infrastructure nodes, financing), and estimate substitutability and leverage (OECD, 2024d; European Commission, 2024d).

What to measure

- supplier dominance (e.g., >50% share) and lack of alternatives
- high single-bidder rates; repeated contract clustering (European Court of Auditors, 2023)
- external-financing exposure (% GDP, sector budgets); collateralisation; political clauses (World Bank, 2024)
- grant concentration in narrow networks; geographic clustering of strategic investments

Workflow

1. Select strategic sector	2. Collect contracting data	3. Collect contracting data	4. Assess financing exposure	5. Test substitutability
energy, transport, defence, health, ICT	tenders, concessions, PPPs, investment contracts, contracts linked to politically exposed people	market share, market concentration (HHI), single-bidder ratio, contract clustering	volume, terms, collateral, tied services	alternatives, diversification cost, time-to-replace

Limits: small markets are naturally concentrated; dependency can be legitimate; some loan clauses are not public. It needs sector expertise.

Typical sources: central registries of contracts, public procurement office bulletins.

Strongest when combined with: legislative tracing, ownership mapping, and strategic effect assessment.

V. NARRATIVE ANALYSIS

Purpose: detect discursive influence: how decisions and dependencies are legitimised, criticised voices are delegitimised, and reputational laundering (Prelec, 2022) occurs through culture/sport/academia or "technical" framing (National Endowment for Democracy, 2017; Jungwirth et al., 2023). This part is also inspired by recent frameworks on strategic communication, e.g. NATO (2023).

What to measure

- repeated talking points; shifts in editorial line (Media Development Investment Fund, 2018)
- minimisation of security risks; "purely economic/technical" framing
- "national interest" rhetoric for selective projects
- "securitisation" of certain investment or legislative decisions
- whitewashing via sponsorships/grants; opaque think-tank funding
- attacks on watchdogs/media; labelling critique as "political" or "foreign-driven"

Workflow

1. Collect discourse	2. Identify frames	3. Map narrators	4. Time-test	5. Correlate
traditional media, social media, speeches, parliamentary debates, think-tank outputs, PR, position papers	security vs. economy; sovereignty vs. regulation; tradition vs. geopolitics	politicians, experts, media owners, NGOs/think tanks, lobby nodes	pre-decision vs. adoption vs. crisis moments	align narrative shifts with legislation, procurement, ownership, and dependency changes

Typical sources: media datasets, news tools such as GDELT or Media Cloud, EP debates, national parliamentary archives and platform-specific monitoring where available, various social media monitoring platforms / tools

Limits: discourse is not proof; interpretation risks bias; requires triangulation with material evidence.

Strongest when combined with: legislative, ownership, dependency signals (to connect rhetoric to outcomes)

> Data sources can vary across countries and institutional environments. The purpose of this framework is not to prescribe a fixed set of tools or databases, but rather to demonstrate the analytical approach and methodology that can be applied when identifying and assessing potential cases of strategic corruption.
>
> For the most comprehensive overview of national-level sources and reporting mechanisms, please see UN GlobE Network[11].
>
> The indicative examples of sources that may support individual areas of analysis in the use case of Slovakia can be found in Annex 2.
>
> In addition to national databases and registers, analysts can also draw on a range of international and cross-border investigative resources. Particularly useful are platforms focused on corporate ownership, sanctions, politically exposed persons (PEPs), offshore structures, public procurement, and EU funding flows. These include OCCRP Aleph, OCCRP ID, OpenCorporates, Offshore Leaks Database, and OpenSanctions. For analysis related to European Union financial flows and public funding, relevant sources may include Data Europa EU Open Data Europa, CORDIS EU Research Projects Database, databases of Cohesion beneficiaries, and the Financial Transparency System (FTS)

---

11 United Nations Global Operational Network of Anti-Corruption Law Enforcement Authorities, https://globenetwork.unodc.org/globenetwork/en/directory-of-open-source-registries/index.html

INTEGRATIVE MODEL: HOW TOOLS CONVERGE INTO AN ASSESSMENT

Strategic corruption rarely rests on a single document or datapoint. Analysts typically assemble a mosaic (Bravo et al., 2025) in which each tool captures a different dimension of the same influence mechanism. Analytical robustness increases when outputs begin to confirm each other and form a coherent picture: who acted, for whose benefit, by which mechanism, with what strategic effect, and through what legitimising discourse.

This framework therefore relies on convergence evidence rather than a single "smoking gun". Convergence does not require the use of all five legal in every case. Instead, it involves the structured combination of those tools that are relevant to the case and that, taken together, help substantiate the core analytical elements of strategic corruption: inducement, abuse of entrusted authority, institutional or dependency effect, and linkage to an external source of strategic interest where applicable.

Outputs of the integrative model

- **Assessment of inducement:** whether available evidence suggests the presence of financial or non-financial inducements directed at a public power-holder or relevant intermediary
- **Assessment of abuse of entrusted authority:** whether entrusted decision-making appears to have been distorted, improperly biased, or otherwise exercised in a way that departs from the public interest
- **Assessment of strategic effect:** whether outcomes increase dependency, reduce oversight, deepen external leverage, or weaken resilience
- **Assessment of external linkage:** whether the case shows a material, relational, or functional link to an external source of strategic interest
- **Mechanism map:** most plausible mechanism(s) at play (e.g., influencing legislation, revolving doors, or soft power)
- **Convergent pattern:** a set of findings or signals that becomes analytically meaningful when evidence from different sources and methods aligns and points in the same direction.

METHODOLOGICAL CAUTIONS

This framework **should be applied with conceptual discipline and evidentiary caution**. Proxy indicators help to detect suspicious patterns early. Proxies are always context-dependent and never prove guilt on their own. They serve as warning signals that trigger further inquiry and triangulation across multiple sources.

The framework must not be used to label individuals or justify political targeting. It is designed to support structured analysis, not to replace legal proof.

Several methodological risks should be explicitly acknowledged. First, there is a risk of **conceptual overstretch:** if the term strategic corruption is applied to all forms of foreign-linked influence, dependency, or opacity, it loses analytical usefulness. Second, there is a **securitisation risk:** framing corruption as a security threat may be analytically justified in some cases, but it may also encourage selective or politically motivated use. Third, there is **boundary ambiguity:** it is often difficult to distinguish strategic corruption from legitimate lobbying, foreign investment, soft power, foreign interference, or other adjacent phenomena (Pozsgai-Alvarez and Lang, 2025). Fourth, there is a **risk of misattribution:** some seemingly irrational procurement or legislative decisions may result from miscalculation, incompetence, or ideological bias rather than corruption, meaning that strategic corruption is not always the only plausible explanation.

In addition, this framework also recognises two practical methodological challenges of its own: **evidentiary asymmetry**, where effects may be easier to observe than inducements, and the **no-smoking-gun problem**, where direct instructions or explicit corrupt bargains are often unavailable and assessment must rely on layered inference and corroboration.

For these reasons, the framework distinguishes clearly between analytical detection, classification, and prosecutorial proof.

Practical Challenges in Addressing Strategic Corruption

These methodological cautions are matched by a set of operational challenges that affect how the concept can be embedded in institutional practice, legal frameworks, and cross-border cooperation.

Lang, Pozsgai-Alvarez and Hogić (2025) stress that any framework must account for a **changing geopolitical environment** and support the **long-term resilience** of domestic institutions, without relying solely on external incentives.

Kerusauskaite and Peiffer (2025) highlight several key difficulties:

- **Institutional integration:** how to embed strategic corruption into existing legal frameworks and policies.
- **International coordination:** lack of effective tools for cross-border investigation and sanctioning of perpetrators.
- **Domestic vulnerabilities:** internal weaknesses that external actors exploit (fragile institutions, politicised oversight, low integrity culture).
- **Openness vs. security:** balancing transparency with necessary confidentiality in high-risk areas.
- **Grey-zone strategies:** strategic corruption uses legal loopholes and long-term strategies that allow it to operate in the "grey zone" of law.
- **Complexity of hybrid operations:** it is extremely difficult to isolate corruption as part of broader influence campaigns.

Implications for detection and prosecution

This framework is a practical tool for identifying and analysing strategic corruption. It does not replace legal or investigative processes, but helps detect suspicious patterns early, place them in context, and guide further inquiry. It is intended as a tool for risk identification, case orientation, and evidentiary guidance, not as a substitute for legal proof.

For strategic corruption, **vulnerability assessment** should not be only a technical internal audit exercise. It should form part of inter-agency risk assessment. Institutional vulnerability indicates where inducement-based abuse of entrusted authority is more likely to emerge, remain hidden, or produce wider strategic effects.

4 SELECTED INTERNATIONAL CASE STUDIES

The cases in this chapter are not identical or equally proven examples of strategic corruption. They vary in evidentiary strength, degree of foreign involvement, and causal clarity. Some are stronger confirmatory cases, while others serve as boundary or stress-test cases that help assess how well the framework distinguishes strategic corruption from related phenomena such as ordinary corruption, foreign influence, or dependency-building.

AZERBAIJAN: CAVIAR DIPLOMACY AND THE LAUNDROMAT IN THE COUNCIL OF EUROPE

Primary mechanism: Political bribery and elite inducement

Indicative sources: Council of Europe (2018) inquiries and reporting on PACE; OCCRP (2017) investigations into the Azerbaijani Laundromat, European Stability Initiative (2012, 2016) investigations into "caviar diplomacy"

The Azerbaijani case remains one of the clearest examples of strategic corruption in a European institutional setting. During the 2000s and 2010s, Azerbaijan faced sustained criticism over political prisoners, electoral manipulation, and human rights abuses. At the same time, a growing body of investigative reporting and later institutional inquiries showed that Azerbaijani state-linked networks had developed a sophisticated influence strategy inside the Parliamentary Assembly of the Council of Europe (PACE). The aim was not simply to improve Azerbaijan's image, but to weaken scrutiny, soften criticism, and shape the behaviour of European actors entrusted with monitoring democratic standards.

The most visible expression of this strategy became known as "caviar diplomacy." The term refers to a pattern in which influential European interlocutors were cultivated through gifts, luxury hospitality, paid trips, and other benefits. These practices were not random diplomatic courtesies. They formed part of a broader inducement structure aimed at building a circle of sympathetic or accommodating voices within European institutions. In parallel, the so-called Azerbaijani Laundromat revealed a wider financial architecture involving shell companies and covert money transfers that could be used to move funds, conceal their origin, and support influence-building abroad.

What makes this case especially important is the link between material inducement and abuse of entrusted power. The relevant concern was not merely that foreign-linked gifts or payments existed. It was that these benefits appear to have been connected to the conduct of individuals who occupied monitoring, parliamentary, or reputational gatekeeping roles inside a major European norm-setting institution. In that context, corruption had a strategic effect: it reduced institutional pressure on an authoritarian government and distorted the credibility of a body meant to defend democratic standards.

The case also illustrates how strategic corruption often operates through a combination of direct and enabling mechanisms. The direct mechanism was inducement. But this mechanism was strengthened by opaque financial structures, informal lobbying channels, and reputation-laundering practices that made it easier to obscure the relationship between benefits, networks, and institutional outcomes. The strategic objective was not necessarily to buy one isolated vote. It was to create a permissive environment in which Azerbaijan could blunt criticism, complicate accountability, and gain room for manoeuvre in European diplomacy.

For the analytical framework, Azerbaijan is a benchmark case because it presents all three core conditions in a relatively clear form. There were identifiable inducements, plausible abuse of entrusted institutional roles, and a discernible institutional effect. The case therefore shows how corruption can function not only as a private transaction but as a foreign-policy tool used to shape the behaviour of democratic institutions beyond the borders of the source state.

SERBIA AND MONTENEGRO: RUSSIAN FINANCIAL FLOWS, GAS MIDDLEMEN, AND LOCAL PROXIES

Primary mechanism: Corruption-based dependency arrangements

Indicative sources: Russian illicit financial flows in Montenegro and Serbia according to Prelec (2023); BridgeGap reporting on Russian infiltration and sanctions-related vulnerabilities (Kostova et al., 2025)

This case of Western Balkans is best understood as a political space in which foreign financial influence, local patronage, and strategic sectors became deeply intertwined. For the purposes of this chapter, the strongest and most coherent narrative centres on Serbia and Montenegro. In both countries, Russian influence was not exercised mainly through one dramatic bribery scandal. Instead, it was built through a mixture of financial flows, political relationships, energy-sector intermediation, and local actors willing to convert external connections into domestic power.

In Montenegro, the story is closely connected to the post-Yugoslav privatisation era. Russian capital entered the country in large volumes, especially in the 2000s, when the Montenegrin state was moving toward independence and large segments of the economy were being restructured. Some of this investment took the form of high-profile acquisitions and real estate purchases, particularly on the coast. The significance of these flows was not only economic. They became politically relevant because they intersected with domestic elites, campaign financing needs, weak oversight, and a privatisation environment in which political and business interests were often closely aligned. In this sense, Russian-linked capital did not simply exploit existing weaknesses. It also became part of the internal logic through which those weaknesses were reproduced.

In Serbia, the most important channel was the energy sector. Russian influence was entrenched through gas intermediaries, state-linked corporate structures, and long-term ties between Russian energy interests and politically connected Serbian actors. The use of middlemen in gas trading created opportunities not only for economic dependency but also for rent distribution, elite loyalty, and institutional distortion. Deals around the oil and gas sector were embedded in a wider political context in which energy dependence, the Kosovo question, and Serbia's balancing posture between Russia and the West reinforced one another. The result was a durable ecosystem in which politically connected actors had strong incentives to defend arrangements that were framed as commercially necessary or geopolitically natural, even when they weakened transparency, competition, or strategic autonomy.

What makes the Western-Balkans case analytically valuable is the role of local proxies. Russian influence did not operate in a vacuum and did not require complete foreign control. It relied on domestic political, business, and administrative actors who could translate foreign-linked finance into patronage, legitimacy, and access. This is why the case is better understood as a hybrid or mediated form of strategic corruption rather than a purely exogenous operation. The strategic effect emerged cumulatively. In Montenegro, illicit or opaque flows intersected with privatisation, real estate, and elite politics. In Serbia, energy ties and middlemen arrangements helped stabilise a system of dependency and selective political loyalty.

The case also shows why strategic corruption cannot be reduced to criminal proof of a single transaction. In both Serbia and Montenegro, the more important issue is how external financial and commercial relationships became embedded in domestic governance structures. The result was not only private enrichment. It was a pattern of weakened oversight, reinforced patronage networks, and greater room for Russian leverage in a strategically sensitive region. This makes the Balkans case especially useful for illustrating strategic corruption as a long-term political economy rather than a one-off scandal.

GERMANY: GERHARD SCHRÖDER AND THE STRATEGIC RISKS OF THE REVOLVING DOOR

Primary mechanism: Revolving doors involving conflict-of-interest inducements

Indicative sources: Public reporting and analysis on Nord Stream, Gazprom, Rosneft, and German-Russian elite networks (Liboreiro, 2022; Daniels et al. 2022). BridgeGap reporting on strategic corruption patterns linked to Germany (Galev et al. 2025).

The case of former German Chancellor Gerhard Schröder illustrates a more ambiguous but highly important form of strategic corruption risk. Unlike direct bribery cases, this is not a story of cash-for-favours uncovered by police raids. It is a case in which formally legal post-office conduct created serious concerns about conflicts of interest, elite capture, and the strategic consequences of the revolving door between high public office and foreign state-controlled enterprises.

Shortly after leaving office in 2005, Schröder moved into senior roles connected to Russian state energy interests, including positions linked to Nord Stream, Gazprom, and later Rosneft. These appointments mattered because they followed major political decisions taken during his time as Chancellor that had supported Russian energy infrastructure projects of enormous geopolitical importance. The key issue, therefore, was not only personal remuneration. It was the alignment between prior political decisions, later corporate appointments, and the strengthening of a dependency relationship that became strategically damaging for Europe.

This case sits in a grey zone between legality and corruption risk. There is no publicly established criminal case proving that decisions taken in office were purchased in advance by promises of later reward. Yet the speed and nature of Schröder's transition into Russian state-linked corporate roles created a powerful appearance of conflict of interest. More importantly, his post-office role helped normalise and legitimise projects that increased Europe's structural dependence on Russian gas. A former German Chancellor was not simply taking a private-sector job; he was lending prestige, access, and political credibility to a strategic infrastructure project closely aligned with the foreign-policy interests of the Kremlin.

The strategic effect of the case became much clearer over time. As tensions with Russia intensified after 2014 and especially after the full-scale invasion of Ukraine in 2022, the earlier political and infrastructural choices surrounding Nord Stream came to be seen not only as commercial decisions but as contributors to a major security vulnerability. Schröder's case therefore demonstrates that strategic corruption may sometimes operate through post-office inducements and elite network capture, even where the legal threshold for corruption is not met.

For the analytical framework, this is best treated as a grey-zone strategic influence case rather than a confirmed corruption case. The inducement is plausible but not demonstrably proven in the narrow criminal sense. The abuse of entrusted power is best framed as a conflict-of-interest risk rather than a fully established act. But the institutional and dependency effect is unmistakable. That combination makes the case indispensable: it shows how formally legal elite behaviour can still produce strategic outcomes closely resembling corruption in effect.

Although Schröder became the most emblematic example of the revolving-door pattern, similar trajectories were also visible elsewhere, particularly in Austria, where a number of former high-ranking political figures took up roles connected to Russian state companies or influence networks.

SUDAN: FOREIGN-SUPPORTED MILITARY BUSINESS NETWORKS AND THE DERAILMENT OF DEMOCRATIC TRANSITION

Primary mechanism: Corruption-based dependency arrangements

Indicative sources: Chatham House analysis of Sudan's conflict (Soliman and Baldo, 2025); reporting on military-business networks, gold, and external support structures (Currie-Edwards, 2024; Kassa, 2025, Sharife et al., 2022; AML Network, 2025)

Sudan is a particularly important case because it shows strategic corruption not as a discrete scandal but as a system of exchange between domestic power centres and external actors. In this case, the relevant question is not whether Sudan was simply "targeted" from outside. Rather, the case demonstrates how domestic political and military elites actively used external relationships to preserve their power, resist reform, and transform public authority into a vehicle for private and geopolitical exchange.

Under Omar al-Bashir and during the fragile transition that followed his fall in 2019, Sudan's political economy was shaped by military-business structures, weak civilian oversight, and high-value resource sectors, especially gold. These conditions created fertile ground for foreign-supported dependency arrangements. External actors, including Russia and regional Gulf states, had strong interests in Sudan's resources, strategic geography, and political alignment. Sudanese elites, in turn, had strong incentives to exchange access, concessions, and strategic cooperation for money, arms, diplomatic backing, and support against domestic challengers.

The inducements reportedly included money, arms, diplomatic backing, preferential concessions, and access to strategic sectors channelled to domestic power centres such as the Rapid Support Forces (RSF) led by Mohamed Hamdan Dagalo ("Hemeti") and the Al-Junaid network (U.S. Department of the Treasury, 2023), especially in the gold sector. On the external side, public reporting has linked parts of this support structure to Wagner-linked entities such as Meroe Gold, as well as to Gulf-based support channels, particularly those associated in reporting with the United Arab Emirates.

This is why the Sudan case is best understood as a co-produced form of strategic corruption. External support did not operate independently of domestic agency. It reinforced military and political actors who were already invested in blocking democratic reform and preserving extractive systems of power. Access to resources, mining networks, logistics routes, and security partnerships became intertwined with anti-reform incentives. Corruption was not merely a side effect. It was one of the operating principles through which political loyalty, resource access, and strategic alignment were organised.

The strategic effect was severe. These arrangements helped sustain anti-reform actors, undermined the transition launched in 2019, and contributed to the fragmentation and collapse that followed. The consequences were felt not only in governance terms, but also in security, regional stability, and the future of Sudanese statehood. The case therefore illustrates that strategic corruption can operate at the level of regime trajectory. It can help determine whether a state moves toward accountable government or back toward militarised predation.

Methodologically, Sudan is not a “clean” case in the way that a bribery scandal may be. The evidence is layered and often reconstructed from political economy analysis, investigative reporting, and conflict-focused research rather than court judgments. But analytically, the case is very strong. It shows how corruption-based dependency can become embedded in a wider system of military power, external support, and democratic derailment. That makes it an essential case for demonstrating the security relevance of strategic corruption in fragile states.

SRI LANKA: HAMBANTOTA, PORT CITY, AND DEPENDENCY THROUGH ELITE CAPTURE

Primary mechanism: Corruption-based dependency arrangements

Indicative sources: Research and reporting on Hambantota, Port City, Rajapaksa-era governance, and Chinese state-linked project finance (David-Barrett and Okamura, 2025).

Sri Lanka is one of the strongest cases of strategic corruption built around dependency. The core story is not simply about debt, and it is not reducible to the slogan of a “debt trap.” Rather, it concerns the interaction between foreign state-linked finance, domestic elite incentives, weak oversight, and the eventual transfer of strategic leverage through infrastructure and governance decisions.

During the Rajapaksa era, China became a major financier and political partner for the Sri Lankan government. This relationship was particularly visible in large-scale projects such as Hambantota Port and, later, Port City. These projects were promoted as symbols of national development and modernisation. Yet major concerns emerged about their economic viability, the quality of oversight, the political incentives surrounding their approval, and the way they were used to consolidate domestic patronage. In this sense, infrastructure was not merely a development instrument. It also became a vehicle for elite political gain and foreign strategic positioning.

The Hambantota case is central because it shows the full chain of strategic corruption logic. External financing supported projects whose economic rationale had been questioned. Domestic elites pushed them forward anyway, while benefiting from the political symbolism, distributive opportunities, and concentrated decision-making that accompanied them. As financial pressures deepened, Sri Lanka’s inability to service the relevant obligations culminated in the 2017 lease of Hambantota Port for 99 years to a Chinese state-linked company. This did not prove every claim ever made about the case, but it did demonstrate how dependency can be translated into durable strategic advantage.

What makes Sri Lanka especially important is the combination of inducement, abuse of entrusted power, and long-term effect. The inducement was not only money in the narrow sense. It also consisted of project-based rents, political support, campaign-related allegations, and patronage opportunities. The abuse of entrusted power lay in pushing forward questionable projects, weakening oversight, and using state institutions in ways that favoured narrow political interests over the public interest. The institutional effect was profound: strategic infrastructure governance became tied to external leverage, while domestic governance deteriorated.

For the analytical framework, Sri Lanka is therefore one of the strongest examples of dependency-oriented strategic corruption. It demonstrates how large-scale foreign financing can become strategically corrupt not simply because it creates debt, but because it is embedded in elite capture, distorted decision-making, and the transfer of long-term leverage over nationally significant assets.

BULGARIA: LUKOIL, TURKSTREAM, AND ENERGY-SECTOR ACCOMMODATION

Primary mechanism: Corruption-based dependency arrangements

Indicative sources: BridgeGap reporting on Bulgaria, Lukoil, TurkStream, and Russian infiltration patterns (Galev, 2025).

Bulgaria should be treated as a distinct case rather than merely a subchapter of the wider Balkans story. Its importance lies in the way Russian state-linked influence intersected with the energy sector, domestic regulatory accommodation, and EU-level vulnerabilities exposed by sanctions and supply dependence. The case is analytically stronger when presented not as one single scandal, but as a pattern in which strategic energy infrastructure, market privileges, and political protection reinforced one another.

One key strand of the Bulgarian case centres on Lukoil. For years, the company occupied an exceptionally important position in Bulgaria's fuel market through its role in refining, storage, and logistics, including control linked to the Rosenets terminal. This economic weight translated into broader political significance. Concerns repeatedly emerged that the company's position gave it unusual leverage over national energy governance, taxation, regulatory decisions, and policy implementation. In such a setting, the issue is not only whether a specific bribe can be proven. It is whether market dominance, regulatory exceptions, and weak oversight created a politically protected dependency relationship with strategic consequences.

The second strand concerns TurkStream and related infrastructure choices. Bulgaria's role in enabling the continuation of Russian gas transit toward Serbia and beyond raised broader questions about how domestic decision-making interacted with Russian geopolitical interests. Here again, the importance of the case lies in the combination of formal legality and strategic effect. Decisions could be presented as technical, commercial, or energy-security choices, yet they also helped sustain dependency, created room for politically connected intermediaries, and weakened the coherence of the wider European response to Russian leverage.

This is what makes Bulgaria different from a pure bribery case. The evidence is strongest when read as an energy capture and accommodation case. External state-linked corporate power, domestic intermediaries, and politically sensitive regulation interacted in a way that benefited the source actor while limiting the target state's autonomy. The resulting effect was not just commercial concentration. It was a pattern of vulnerability in a strategic sector closely connected to national resilience, sanctions policy, and regional energy politics.

For the analytical framework, Bulgaria is best classified as a strong analytical case of a strategic corruption environment, even if it does not meet the evidentiary threshold of a classic hard-bribery scandal. It is particularly useful because it shows how strategic corruption may be built through regulatory accommodation, infrastructure choices, and market lock-in rather than cash payments alone. In that respect, it forms an important bridge between the Balkans dependency cases and the broader European energy-security dimension.

Table 8 Comparative Summary of the Cases (1/2)

CASE	MECHANISM MAP	ASSESSMENT OF INDUCEMENT	ASSESSMENT OF ABUSE OF ENTRUSTED POWER	ASSESSMENT OF STRATEGIC EFFECT
Azerbaijan	Political bribery and elite inducement	Clear evidence of gifts, luxury benefits, and concealed transfers	Clear abuse through softening scrutiny and influencing institutional conduct	Clear damage to oversight credibility and reduced pressure on Azerbaijan
Serbia and Montenegro	Dependency arrangements; energy capture; IFF-enabled patronage	Partial but strong evidence of rents, protection, and elite benefits	Strong analytical evidence of enabling and protecting opaque arrangements	Clear effect through energy lock-in, patronage, and external leverage
Germany (Schröder)	Revolving doors; conflict-of-interest inducements	Plausible post-office inducement, but not conclusively proven	Plausible conflict-of-interest and alignment risk	Clear structural dependency effect in the energy sphere
Sudan	Dependency arrangements; resource-for-protection exchange	Clear evidence of external support, concessions, and protection benefits	Clear abuse by military and political elites resisting reform	Clear effect on democratic collapse, predatory power, and external leverage
Sri Lanka	Dependency arrangements; elite-capture through infrastructure finance	Clear evidence of project-linked rents and political benefit structures	Clear abuse through distorted project approval and weakened oversight	Clear long-term dependency and strategic asset transfer
Bulgaria	Dependency arrangements; regulatory and policy capture in energy	Partial but strong evidence of privileges, rents, and regulatory accommodation	Strong analytical evidence of policy and regulatory distortion	Clear effect through market lock-in, sanctions vulnerability, and energy dependence

Table 8 Comparative Summary of the Cases (2/2)

CASE	ASSESSMENT OF STRATEGIC EFFECT	ASSESSMENT OF FOREIGN INVOLVEMENT	CONVERGENT PATTERN	ANALYTICAL CLASSIFICATION
Azerbaijan	Clear damage to oversight credibility and reduced pressure on Azerbaijan	Exogenous (direct)	Financial transfers, shell-company structures, gifting patterns, travel benefits, and institutional outcomes align in the same direction	Strategic corruption (confirmed)
Serbia and Montenegro	Clear effect through energy lock-in, patronage, and external leverage	Proxy / hybrid / mediated	Energy dependency, intermediary structures, financial flows, privatisation patterns, and local elite alignment converge	Hybrid strategic corruption environment / strong analytical case
Germany (Schröder)	Clear structural dependency effect in the energy sphere	Endogenous / strategically aligned	Timing of political decisions, later appointments, public advocacy, and strategic infrastructure outcomes point in the same direction	Grey-zone strategic influence
Sudan	Clear effect on democratic collapse, predatory power, and external leverage	Proxy / mediated with strong domestic co-production	Resource access, military support, conflict dynamics, and anti-reform governance patterns align consistently	Strategic corruption (analytically strong, complex, and co-produced)
Sri Lanka	Clear long-term dependency and strategic asset transfer	Proxy / mediated with strong source-linkage	Financing patterns, feasibility concerns, governance distortions, and eventual strategic asset transfer converge	Strategic corruption environment (strong analytical case)
Bulgaria	Clear effect through market lock-in, sanctions vulnerability, and energy dependence	Exogenous; proxy local enablers	Market dominance, infrastructure choices, regulatory accommodation, and regional dependency outcomes point in the same direction	Strategic corruption environment (strong analytical case)

This table mirrors the outputs of the integrative model presented in the previous chapter. It is designed to show not only the final classification of each case, but also **how the classification is reached through assessments of inducement, abuse of entrusted authority, strategic effect, external linkage, and the convergence of findings.**

5 POLICY AND INSTITUTIONAL RECOMMENDATIONS

KEY LEGISLATIVE MEASURES

As noted in the previous sections, strategic corruption exploits gaps between legal, security, and financial systems. Therefore, its effective response does not primarily require new instruments, but rather their interconnection, coordination, and a security-oriented approach.

Recommendations for National Legislation

States should first and foremost explicitly integrate strategic corruption into the national security framework, rather than treating it solely as a criminal law issue. This includes linking law enforcement authorities with intelligence services, enabling the use of intelligence in relevant proceedings, and regularly assessing risks in strategic sectors such as energy, defence, media, and critical infrastructure. The objective is to capture corruption not only as a criminal offence, but as part of broader influence operations.

A key pillar is the transparency of financial flows and ownership structures. States should ensure the interconnection of registers, effective access to data for authorised actors, and systematic screening of investments in sensitive sectors. This will limit the use of shell and "proxy" structures as tools of foreign influence, which is one of the main mechanisms of strategic corruption.

It is equally important to strengthen rules on political financing and the regulation of influence over decision-making. This includes transparency not only of financial contributions but also of indirect forms of support, effective oversight with real investigative powers, and rapid response mechanisms in cases of suspected foreign interference. Particular attention should be paid to the regulation of third parties and preventing their use as instruments of covert influence.

Finally, it is essential to strengthen the public sector and control mechanisms. This includes effective asset declaration systems, robust whistleblowing frameworks, strong internal controls, and limiting informal links between the public and private sectors. These measures reduce the space for the emergence and consolidation of corruption networks that underpin strategic corruption.

Recommendations for EU Legislation

At the EU level, the key challenge is to overcome the fragmentation of the existing legal and institutional framework. The EU should systematically link anti-corruption policies with security and hybrid threats agendas, thereby explicitly recognising strategic corruption as part of hybrid activity.

An important step is the harmonisation of rules in areas with a high risk of abuse, particularly transparency of beneficial ownership, political financing, and the protection of critical infrastructure. At the same time, financial instruments (the AML framework), sanctions regimes, and law enforcement must be interconnected to effectively identify and disrupt financial flows linked to strategic corruption.

The EU should also significantly strengthen information sharing and operational cooperation between Member States and institutions, particularly through actors such as Europol, Eurojust, and the European Public Prosecutor's Office. It is crucial that financial investigations are not conducted in isolation, but are linked to the analysis of broader influence and hybrid operations.

Finally, preventive mechanisms at the EU level need to be reinforced, especially through systematic assessments of Member States' vulnerabilities, capacity building, and the introduction of common standards of resilience against foreign influence. These tools should identify weaknesses before they can be exploited.

KEY INSTITUTIONAL MEASURES

As already emphasized, strategic corruption is not merely a failure of individuals or a lack of regulation, but a systemic phenomenon that exploits gaps between institutions, jurisdictions, and sectors. Therefore, addressing it effectively does not primarily require creating new bodies, but rather connecting existing capacities, strengthening coordination, and introducing a security-oriented approach across the institutional framework.

Recommendations for Institutional Setup at the National Level

The starting point should be an integrated security-criminal approach. Strategic corruption should not be perceived solely as criminal activity, but as a tool of foreign influence and a component of broader security threats. This requires linking intelligence services, law enforcement authorities, and financial analytical capacities, as well as the ability to identify risk factors already in the early stages.

Strong coordination among existing institutions is essential. Instead of creating new bodies, it is necessary to establish a functional coordination mechanism that ensures systematic information sharing, joint risk assessments, and a clear division of competences. A lack of coordination remains one of the main weaknesses of the current system.

In terms of capacities, it is crucial to strengthen in a targeted manner those institutions that deal with financial flows and strategic decision-making, particularly in sectors such as defence, energy, and infrastructure. At the same time, states should develop analytical capabilities, connect data sources, and shift from reactive investigations to systematic, preventive risk identification.

An important element is the regular assessment of institutional vulnerabilities, including past mistakes. This should take into account not only internal control mechanisms, but also external influences, network linkages, and the potential for foreign interference. Such assessments should be coordinated across multiple authorities and linked to practical measures in the areas of integrity and risk management.

Finally, strengthening institutional resilience and openness to external oversight is essential. This includes the professional training of key actors, high integrity standards, as well as active cooperation with civil society and the protection of whistleblowers. External actors play a key role in the early detection of risks that the state may not be able to identify on its own.

Recommendations for Institutional Setup at the European Union Level

At the EU level, the key challenge is also to overcome fragmentation between institutions and policies. Strategic corruption should be explicitly defined and systematically integrated into frameworks addressing hybrid threats, foreign interference, and the protection of the internal market. A common definition would enable Member States to approach the issue in a consistent and coordinated manner.

A key measure is the integration of intelligence, analytical, and investigative capacities. Effective action against strategic corruption requires systematic information sharing among actors such as Europol, Eurojust, and EPPO, as well as analytical structures within EEAS. Overcoming the divide between intelligence and evidence usable in criminal proceedings remains one of the major challenges.

The EU should also strengthen the powers and capacities of existing bodies. This includes extending the mandate of EPPO to cover broader forms of corruption with a security dimension, as well as enhancing the analytical and operational capabilities of Europol, particularly in the area of financial flows and transnational networks. Close cooperation with Eurojust is essential for the effective coordination of complex cross-border cases.

A crucial role is also played by the creation of an integrated European approach to financial flows and investments, including cryptocurrencies. Linking anti-money laundering systems, beneficial ownership registers, and foreign investment screening mechanisms would enable the tracking of risky financial operations across the single market. This approach must also include coordinated sanctions regimes and their effective enforcement.

In protecting the single market, it is necessary to prevent the exploitation of differences between Member States. This requires harmonising public procurement rules in high-risk sectors, sharing information on risky entities, and adopting a coordinated approach to protecting critical infrastructure. Without such measures, strategic corruption will continue to exploit "forum shopping" between jurisdictions.

The EU should also strengthen its analytical capacities in the area of hybrid threats. Cooperation with Hybrid CoE and the development of joint risk assessments can improve understanding of the links between corruption, economic influence, and information operations. Sharing knowledge and best practices among Member States, as well as learning from partner countries, which are more exposed to Russian hybrid warfare (such as Ukraine, Moldova or Armenia) is key to building collective resilience.

Finally, the EU should systematically engage non-state actors. Organizations such as Transparency International and OCCRP provide unique data and analysis that can significantly contribute to identifying risks and supporting investigations. Their involvement should be formalised and linked to EU institutional mechanisms.

Summary of measures for legislation and institutions

The most effective response to strategic corruption requires moving beyond a fragmented, stand-alone anti-corruption model toward an integrated framework that aligns legal, security, and financial systems. The priority is not to introduce new rules, but to close gaps between existing instruments, ensure their coordinated use, and recognise corruption as a vehicle of geopolitical influence.

This, in turn, demands a shift in how institutions function: rather than expanding structures, the focus should be on connectivity, coordination, and the ability to operate across sectors and borders. In practice, this approach rests on three core principles: the integration of security, financial, and investigative capacities; systematic coordination at both national and EU levels; and a strong emphasis on risk analysis, financial flows, and strategically sensitive sectors.

Because strategic corruption operates through networks and cross-border influence, the institutional response must be equally interconnected, coordinated, and strategically oriented.

ANNEX 1 LEGISLATIVE AND INSTITUTIONAL FRAMEWORK IN SLOVAKIA

LEGAL FRAMEWORK

The concept of strategic corruption is relatively new in Slovakia and does not yet have a direct legislative definition or anchoring in legal terminology. In the Slovak context, the term is used primarily in security and analytical discussions, where it refers to the systematic and targeted use of corruption as a tool of political or geopolitical influence (hybrid interference), typically in the interests of foreign powers or transnational actors.

Nevertheless, several legal norms and strategic documents already partially address manifestations of strategic corruption, which can be understood as partial counter-mechanisms. These include, in particular, the Criminal Code (Act No. 300/2005 Coll.), which criminalises bribery and abuse of power by public officials. Anti-corruption instruments such as the Register of Public Sector Partners, public procurement rules, and whistleblower protection increase transparency and enable the detection of “ordinary” corruption practices. Importantly, the Security Strategy of the Slovak Republic (2021) explicitly states that strategic corruption is one of the tools of hybrid operations and poses a serious threat to national security.

At the same time, even legitimate and internationally recommended transparency measures can be misused to restrict public oversight, civil society, or independent scrutiny. This was reflected in proposed legislation targeting NGOs, where the government relied on references to EU, GRECO, and OECD recommendations. A similar risk exists in the regulation of lobbying, where such measures may serve political pressure rather than genuinely strengthening transparency and public oversight (Transparency International Slovakia, 2025). The problem therefore lies not in the existence of oversight mechanisms themselves, but in their design and potential misuse for political purposes - a concern that has, in some cases, also been confirmed by interventions of the Constitutional Court.

LAWS AND STRATEGIC DOCUMENTS ADDRESSING MANIFESTATIONS OF STRATEGIC CORRUPTION

Criminal law

Criminal Code (Act No. 300/2005 Coll.)

The Criminal Code contains the legal definitions of corruption-related offences, including accepting a bribe (§ 329), bribery (§ 332), electoral corruption (§ 336a), obstruction of the preparation and conduct of elections and referenda (§ 351), and abuse of power by a public official (§ 326). While these provisions effectively address corruption in its transactional form, there is no recorded case-law or enforcement practice that explicitly reflects the phenomenon of strategic corruption (Slovakia, 2005).

Anti-corruption legislation

Act No. 54/2019 Coll. on the Protection of Whistleblowers supports the detection of corruption practices.

Preliminary note: In December 2025, the National Council of the Slovak Republic approved the abolition of the Whistleblower Protection Office and its replacement by a new body as of 1 January 2026, fundamentally altering the existing protection system. The Constitutional Court subsequently suspended the effectiveness of this legislation pending a review of its constitutionality (Slovakia, 2019).

Act No. 297/2008 Coll. on Protection against the Legalisation of Proceeds from Criminal Activity constitutes the key AML framework based on EU directives and is directly relevant for countering financial flows related to strategic corruption (Slovakia, 2025a).

Act No. 315/2016 Coll. on the Register of Public Sector Partners increases transparency of ownership structures of entities doing business with the state (Slovakia, 2016).

Act No. 272/2015 Coll. on the Register of Legal Entities unlike the Act No. 297/2008, it requires the disclosure of beneficial owners for all companies. However, a key problem remains the lack of data verification (as companies self-report the information) and limited public oversight due to rulings of the Court of Justice of the European Union, which reduces the credibility of the data (Slovakia, 2025b).

Anti-Corruption Policy of the Slovak Republic (adopted periodically by the government; latest update as of 30 June 2025) defines national priorities in the fight against corruption (Slovakia, 2026).

Hybrid threats and security framework

The Security Strategy of the Slovak Republic (Ministry of Defence of the Slovak Republic, 2021) explicitly states that the activities of foreign intelligence services on Slovak territory represent one of the most serious long-term threats with potentially significant impacts on national security and stability. These activities include intelligence gathering (including classified information), covert penetration of state administration, security forces and critical infrastructure, as well as strategic corruption, political influence operations, manipulation of public opinion, espionage, sabotage, and other hybrid activities.

The Defence Strategy of the Slovak Republic (2021) emphasises the need for transparent and efficient defence financing as a preventive measure against misuse of resources.

Act No. 45/2011 Coll. on Critical Infrastructure and the Cybersecurity Act (No. 69/2018 Coll.) indirectly strengthen resilience against external actors who may exploit corruption channels.

EU and Slovak sanctions framework

The Slovak Republic applies EU and UN sanctions regimes under Act No. 289/2016 Coll. on the Implementation of International Sanctions. These regimes allow for sanctions against individuals and entities seeking to influence political or economic processes through strategic corruption (Slovakia, 2025c).

Although Slovakia formally implements sanctions within its legal competencies (Act No. 289/2016 Coll.; Act No. 566/2001 Coll.), the approach remains largely reactive rather than proactive. It is therefore highly likely that a similar deficit exists with regard to strategic corruption, which is primarily addressed in strategic documents rather than in specific legislation.

Additional mechanisms

Act No. 181/2014 Coll. on Electoral Campaigns and Act No. 85/2005 Coll. on Political Party Financing aim to limit hidden financing of political actors. A key problem here appears to be the weak and overly formalistic state oversight exercised by the State Commission for Elections, which lacks investigative powers to examine problematic financing (Slovakia, 2014; Slovakia, 2023).

Asset declarations of public officials (under Constitutional Act No. 357/2004 Coll. on the Protection of the Public Interest in the Performance of Public Office) currently remain an ineffective instrument, as they do not allow for the efficient detection of suspicious increases in assets and are susceptible to circumvention,e.g. failure to declare properties that are actually used (Slovakia, 2020).

Summary of the legal framework in Slovakia

Slovakia currently lacks specific legislation that explicitly defines and regulates strategic corruption as a distinct legal category. The term is used primarily as an analytical and security concept rather than a legally codified one. Nevertheless, its manifestations are partially addressed through existing criminal law, anti-corruption instruments, and security and defence strategies, which explicitly recognise corruption as a tool of hybrid interference by foreign powers aimed at weakening state resilience.

While the adoption of specific legislation on strategic corruption could strengthen the political and symbolic dimension of countering hybrid threats, it would face significant challenges in practice - ranging from definitional precision and evidentiary complexity to the risk of political misuse. A more effective approach may lie in expanding existing legal frameworks (criminal law, sanctions law, public procurement legislation) and complementing security strategies with clearer mechanisms for identifying and addressing strategic corruption.

INSTITUTIONAL FRAMEWORK

The Slovak Republic already has a certain institutional framework in place for combating corruption, economic crime, and partially hybrid threats. Although the concept of strategic corruption is not legally defined, state authorities possess a number of instruments and competencies capable of capturing its manifestations. especially when linked to foreign influence, economic coercion, or the undermining of democratic institutions.

INSTITUTIONS DEALING WITH MANIFESTATIONS OF STRATEGIC CORRUPTION:

Legislative power and government

The Government of the Slovak Republic and the National Council of the Slovak Republic ensure the development, adoption, and implementation of strategic documents (Security Strategy, Defence Strategy, National Anti-Corruption Programme, relevant action plans) in line with international commitments (EU, NATO, UN), and coordinate individual ministries.

The Section for Corruption Prevention and Crisis Management of the Office of the Government of the Slovak Republic[12] is a unit tasked with coordinating anti-corruption policies, although its actual activities and effectiveness are currently unclear.

National Contact Point for Hybrid CoE[13]. Slovakia is a member of the European Centre of Excellence for Countering Hybrid Threats, which opens opportunities for international cooperation.

Ministry of the Interior of the Slovak Republic

Office for the Fight against Organised Crime (ÚBOK)[14] is a specialised unit combating corruption, economic crime, and criminal networks; in the area of strategic corruption, it can play a role in identifying and investigating links to foreign influence.

The Inspection Service Office[15] investigates potential corruption within police structures.

---

12 *https://www.olaf.vlada.gov.sk/odbor-prevencie-korupcie-v-ramci-kancelarie-predsedu-vlady/*

13 *https://www.vlada.gov.sk/site/assets/files/1765/statut_situacneho_centra_slovenskej_republiky.pdf*

14 *https://www.minv.sk/?UBOK*

15 *https://www.minv.sk/?urad-inspekcnej-sluzby*

The Financial Intelligence Unit[16] is a unit of the Police Force and investigates serious economic and financial crimes, including damage to the financial interests of the EU; it analyses links to international financial networks that may fund strategic corruption.

The Institute for Administrative and Security Analysis[17] should have a certain analytical capacity to identify links between corruption schemes and foreign influence, regularly assess state vulnerabilities in key sectors, effectively coordinate the exchange of information between security and financial authorities, and actively cooperate with EU and NATO partners. Raising public awareness of strategic corruption is equally important. However, the current leadership of the Ministry of Interior's approach to addressing hybrid threats remains insufficient.

Ministry of Finance of the Slovak Republic

The Criminal Office of the Financial Administration[18] plays an important role in detecting illicit financial flows, although it has not avoided past suspicions of being misused for political purposes.

Value for Money Unit[19] assesses the efficiency of public spending and may identify risk schemes linked to inefficient investments.

Ministry of Foreign and European Affairs of the Slovak Republic

Department of Common Foreign and Security Policy coordinates foreign policy actions, including the implementation of EU and UN sanctions against entities involved in strategic corruption.

Other state authorities

Slovak Information Service[20] has direct responsibility for detecting and documenting activities of foreign intelligence services and external actors that may use strategic corruption as a tool for gaining influence. In reports to parliament and the government, it highlights risks of so-called "strategic influence" (e.g. in energy, critical infrastructure, media).

The National Security Authority[21] is responsible for the protection of classified information, security clearances, and cybersecurity. In the context of strategic corruption, it is key in vetting individuals in sensitive positions and identifying risks of links to foreign powers.

The Office for the Protection of Whistleblowers[22] provides protection to whistleblowers who may expose cases of strategic corruption. It is an important preventive element, as it enables the disclosure of cases that would otherwise remain hidden.

Antimonopoly Office of the Slovak Republic[23] within the protection of competition, it may identify market distortions caused by strategic corruption.

---

16 *https://www.minv.sk/?financna-policia*

17 *https://www.minv.sk/?institut-spravnych-bezpecnostnych-analyz-isba*

18 *https://www.bojprotikorupcii.gov.sk/kriminalny-urad-financnej-spravy-kufs/*

19 *https://www.mfsr.sk/uhp*

20 *https://www.sis.gov.sk/*

21 *https://www.nbu.gov.sk/*

22 *https://www.oznamovatelia.sk/*

23 *https://www.antimon.gov.sk/*

Council for Media Services[24] is relevant in the context of implementing EU legislation (DSA/EMFA) and communication with social media platforms in countering influence operations.

The Supreme Audit Office of the Slovak Republic[25] audits the management of public finances; it may uncover schemes linked to strategic corruption, especially in projects with cross-border implications.

The Public Procurement Office[26] plays a key role in preventing corruption in procurement, which is traditionally a high-risk area for strategic activities by foreign actors.

Non-state and informal institutions

Non-governmental organisations and investigative journalists – in the Slovak environment, they often substitute for the state in monitoring corruption, analysing ownership structures, and uncovering foreign influence, thus forming an essential part of institutional resilience. They communicate their findings to the public and, in cases of systemic corruption, often trigger criminal investigations.

Summary of the institutional framework in Slovakia

The Slovak Republic has not yet established a dedicated institution specialising exclusively in strategic corruption. The concept is used more in the security and analytical discourse than in practical governance. Nevertheless, a number of bodies and units address its manifestations - whether through investigating corruption offences, detecting foreign influence, or building resilience to hybrid threats.

However, the effectiveness of these institutions is limited by formalism and a low level of proactive investigation of suspicions. Successful countering of strategic corruption also requires better coordination among existing bodies, as well as protection of oversight mechanisms from political instrumentalisation.

A worrying trend is the weakening of public oversight and transparency mechanisms. Restricting access to information, weakening whistleblower protections and public registries, or bypassing standard legislative procedures reduces the state's ability to identify and expose strategic corruption in a timely manner. Although some of these measures have faced resistance from civil society, interventions by the Constitutional Court, or pressure from European institutions, the long-term trend poses a risk to the resilience of democratic institutions and the rule of law.

---

24 https://rpms.sk/

25 https://www.nku.gov.sk/sk/web/nku

26 https://www.uvo.gov.sk/

ANNEX 2 ANALYTICAL TOOLS FOR ASSESSING STRATEGIC CORRUPTION IN SLOVAKIA

The Slovak environment provides a useful example of how the framework can be operationalised through the combination of public registries, transparency mechanisms, procurement databases, ownership records, and political or media sources. The objective is not to rely on a single dataset, but to connect dispersed information across institutional, financial, political, and relational domains in order to identify suspicious patterns, dependencies, or influence structures relevant to strategic corruption analysis.

AREA OF ANALYSIS	INDICATIVE SLOVAK SOURCES
Legislative tracing	Slov-Lex Legislative Portal; parliamentary voting records and legislative proposals available through National Council of the Slovak Republic
Network analysis	ORSR – Commercial Register;Trade Register of Slovak Republic; Register of Public Sector Partners (RPVS); insolvency and restructuring registries; political finance disclosures
Ownership mapping	RPVS; Cadastral Portal of Slovakia; ZBGIS Geoportal; Register of Financial Statements (Register účtovných závierok MF SR); Asset Declarations of Public Officials – National Council of the Slovak Republic; Asset Declarations of Prosecutors – General Prosecutor's Office of the Slovak Republic; Asset Declarations of Judges – Judicial Council of the Slovak Republic
Dependency metrics / financial exposure	Central Register of Contracts (CRZ); Public Procurement Office Bulletin (ÚVO);
Narrative and political context	Parliamentary debates; public statements; media archives; investigative journalism databases; political communication and campaign materials

ANNEX 3 SELECTED SLOVAK CASE STUDIES FOR FRAMEWORK TESTING

1. SLOVAKIA: CHINA'S OPAQUE INFLUENCE ON DECISION-MAKERS IN SLOVAKIA

Primary mechanism: Political bribery and elite inducement

Secondary mechanism: Soft power and narrative shaping as enabling conditions

Indicative sources: Investigative reporting on the 2025 visit of Slovak MPs to China financed and programmatically curated by the Chinese embassy (Kiripolská et al. 2026; Mihočková, 2025); reporting on China's broader efforts to deepen political and economic ties with Slovakia (Ministry of Foreign Affairs of the Slovak Republic, 2024).

China has sought to expand its influence in Central and Eastern Europe by cultivating political relationships, reducing criticism within EU institutions, and presenting itself as a reliable economic and technological partner. Slovakia has become part of this effort through the development of a strategic partnership with China and through rising Chinese interest in Slovak investment and industrial projects. Against that background, a 2025 visit of twelve Slovak Members of Parliament to China drew particular attention because, unlike standard official parliamentary travel, the trip was reportedly fully financed and carefully organised by the Chinese embassy. The delegation was accompanied by a former adviser to Prime Minister Robert Fico, and participants later shared highly positive impressions of China's political and industrial development.

Viewed through the framework, the relevance of this case lies less in a proven quid pro quo than in the structure of the engagement itself. The Chinese side did not merely host a diplomatic exchange. It reportedly financed the trip, shaped the programme, and exposed Slovak politicians to a carefully curated sequence of official meetings, cultural performances, and symbolic experiences designed to present China as a successful, modern, and politically capable state. In this sense, the trip functioned as more than protocol. It created conditions for elite-level inducement through sponsored access, hospitality, and reputational framing.

What makes the case analytically interesting is the combination of non-transparent benefit and narrative alignment. Fully sponsored foreign travel for sitting legislators can be understood as a form of inducement when it creates privileged access, prestige, and symbolic benefit outside standard public procedures. At the same time, the case also shows how such inducement may be reinforced by soft-power techniques: selective exposure to official narratives, cultural diplomacy, and tightly managed encounters with state and business actors. The strongest concern is therefore not that the trip itself proves corruption in the narrow criminal sense, but that it may contribute to a form of soft alignment, in which public officials begin to reproduce favourable narratives about an external authoritarian actor without adequate scrutiny or institutional distance.

At present, however, this is best treated as a borderline or framework-testing case, not as confirmed strategic corruption in the narrow sense. The external linkage is relatively clear, since the financing and programme were reportedly controlled by the Chinese embassy. The inducement element is also analytically plausible, given the unusual sponsorship and curated access. What remains weaker is the demonstration of a clear abuse of entrusted power or a specific institutional decision that was subsequently distorted as a result. The strategic effect is therefore best understood as preliminary and reputational rather than fully institutional: the case may have helped normalize a more favourable perception of China among Slovak decision-makers and reduced critical scrutiny at a time when Chinese-linked business and investment interests were expanding in Slovakia.

For the analytical framework, this case is valuable because it sits at the boundary between elite inducement, soft power, and foreign influence-building. It helps show how strategic corruption may begin not with an obvious cash-for-favour exchange, but with a sequence of benefits, access opportunities, and narrative shaping that gradually lowers resistance to externally aligned influence. It is therefore best classified as a high-risk elite influence case with strategic corruption relevance, rather than as a benchmark case of confirmed strategic corruption. Hungarian State-Linked Sponsorships and Influence-Building in Slovakia

MECHANISM MAP	ASSESSMENT OF INDUCEMENT	ASSESSMENT OF ABUSE OF ENTRUSTED AUTHORITY	ASSESSMENT OF STRATEGIC EFFECT
Political bribery and elite inducement; soft power and narrative shaping	Partial but plausible: sponsored travel, curated access, hospitality, reputational benefit.	Not clearly demonstrated	Limited but relevant: favourable perception-building and reduced scrutiny toward Chinese interests

ASSESSMENT OF EXTERNAL LINKAGE	CONVERGENT PATTERN	FINAL ANALYTICAL CLASSIFICATION
Exogenous (direct).	Sponsored access, embassy-curated programming, positive post-visit messaging, and broader China-linked political and economic outreach point in the same direction, but the evidentiary pattern remains stronger on influence-building than on abuse of entrusted authority.	Borderline / framework-testing case; high-risk elite influence case

2. HUNGARIAN STATE-LINKED SPONSORSHIPS AND INFLUENCE-BUILDING IN SLOVAKIA

Primary classification: Layer II – Ambient / Enabling Environment

Main enabling mechanisms: soft power projects, media and narrative capture, strategic public investment

Indicative sources: Investigative reporting on Hungarian influence, financial support and public investments in Slovakia (Kiššimon, 2024; Kleknerová, 2024; Tódová and Mihočková, 2024; Petková et al., 2024; Finta, 2026; Slovak Spectator, 2025)

This case is not best understood as a classic corruption scandal. There is no single "smoking gun" bribe, no clearly proven abuse of office, and no one transaction that would by itself qualify as strategic corruption in the narrow sense. Instead, the story is about how influence can be built slowly, legally, and across multiple sectors until it becomes part of the domestic environment. Over the past decade, Hungary has developed a dense network of state-linked support in Slovakia through minority policy, media, culture, sport, education, and visible public investments. Formally, these activities are presented as legitimate cross-border support for Hungarian communities abroad. Analytically, however, they also create channels of access, loyalty, symbolic legitimacy, and long-term dependency.

The pattern matters because it is broad rather than episodic. Hungarian state-linked foundations, especially those connected to minority and cultural policy, have supported local institutions, sports clubs, media outlets, churches, and community organisations. At the same time, Hungarian-linked media platforms have helped circulate narratives aligned with Orbán government priorities in the Slovak-Hungarian information space. During politically sensitive moments, such as presidential elections, this Hungarian state media ecosystem has shown its capacity to shape communication beyond the reach of ordinary Slovak regulatory safeguards, promoting candidate Peter Pellegrini, who later won the elections. The issue, therefore, is not only funding or messaging in isolation, but the cumulative creation of an influence environment that may over time normalize foreign-backed political presence in domestic public life.

Visible investment projects reinforce this dynamic. Projects such as the football stadium in Komárno or the involvement of Hungarian-linked actors in strategic public investments such as military hospital in Prešov illustrate how infrastructure can also function as a relationship-building tool. These projects may generate goodwill, increase elite access, and strengthen networks of local dependence without automatically amounting to corruption. Under this framework, they become relevant when they are linked to preferential treatment, opaque decision-making, or future abuse of entrusted authority. Until then, they are best treated as enabling conditions rather than core corruption mechanisms.

What makes this case important is precisely that it sits below the threshold of a confirmed corruption case while remaining highly relevant to democratic resilience and national security. It shows how foreign influence may become structurally embedded through socially accepted, politically framed, and often legal channels. In that sense, the Hungarian case helps explain how the environment for strategic corruption can be built before any clearly prosecutable corruption emerges. It is therefore best classified as an ambient or enabling environment case: analytically significant, security-relevant, and potentially facilitative of future strategic corruption, but not in itself sufficient to satisfy the full narrow test.

Why this case matters for the framework:

It demonstrates that strategic corruption is not always preceded by an obvious illicit transaction. In some contexts, the more important analytical task is to detect how soft power, narrative control, patronage networks, and strategic investments gradually reshape the environment in which future corruption-based influence becomes easier, less visible, and more politically normalized.

MECHANISM MAP	ASSESSMENT OF INDUCEMENT	ASSESSMENT OF ABUSE OF ENTRUSTED AUTHORITY	ASSESSMENT OF STRATEGIC EFFECT
Soft power projects; media and narrative capture; strategic public investment in enabling form	Partial / indirect	Not clearly demonstrated	Clear enabling effect

ASSESSMENT OF EXTERNAL LINKAGE	CONVERGENT PATTERN	FINAL ANALYTICAL CLASSIFICATION
Endogenous / structurally embedded	Long-term funding of cultural, sports, educational, community, and media structures; narrative alignment; cross-border media influence during sensitive political periods; and visible investment projects all point in the same direction, even if the evidentiary pattern is stronger on enabling influence than on corrupt abuse of entrusted authority.	Ambient / enabling environment case

3. SLOVAKIA: RUSSIA-LINKED ENERGY DEPENDENCY GOVERNANCE

Primary mechanism: Corruption-based dependency arrangements

Secondary mechanism: Strategic dependence sustained through policy choices and regulatory accommodation

Indicative sources: PISM analysis on Slovakia's continued dependence on Russian gas, oil, and nuclear inputs (Ogrdonik and Pastucha, 2025); Abnett and Lopatka (2025) and Associated Press (2025) reporting on Prime Minister Robert Fico's opposition to ending Russian gas and nuclear-fuel imports; Kelly and Lopatka (2026) reporting on U.S. - Slovak nuclear cooperation intended to reduce dependence on Russian-designed nuclear infrastructure.

Slovakia is not a clean bribery case. It is better understood as a case in which long-standing energy dependence on Russia has been politically maintained and, in some respects, defended even after Russia's full-scale invasion of Ukraine. The strategic relevance of the case lies in the cumulative effect of decisions that preserve Russian leverage in gas, oil, and nuclear energy, despite available diversification pathways. According to PISM, Slovakia remains among the EU states most dependent on Russian energy: in 2024 it still imported large volumes of Russian gas and oil, while all five of its VVER-440 reactors historically relied on Russian parts and nuclear fuel. At the same time, diversification has begun only gradually, with contracts signed with Framatome and Westinghouse and, later, a U.S.–Slovak civil nuclear agreement aimed at reducing long-term dependence on Russian technology. Regarding oil, forced diversification occurred after the Russian attack on oil transportation infrastructure in Ukraine in February 2026, which disrupted the supply of Russian oil to Slovakia. Even after supplies were restored, prices for consumers did not decrease, which had been a long-term key argument for relying on Russian energy imports.

The political dimension of the case is central. Since returning to office, Robert Fico has openly resisted EU efforts to phase out Russian gas and has also rejected proposals targeting Russian nuclear fuel. AP reported that Slovakia's gas contract with Russia runs until 2034, while Reuters noted that Fico said Slovakia would block further sanctions if they harmed Slovak interests, particularly in areas such as Russian nuclear fuel. PISM further argues that after Fico's return, the pace of diversification slowed and imports through alternative routes such as TurkStream were used to preserve continued access to Russian gas rather than to break dependency.

Viewed through the framework, the strongest element here is strategic effect. The case shows how a democratic state can remain exposed to an external actor's leverage through repeated policy choices that preserve dependence in strategic sectors. The external linkage is also relatively clear: the relevant beneficiary is not just a foreign private actor but a broader Russian energy ecosystem centred on Gazprom and, in the nuclear sphere, on continued reliance on Russian-designed infrastructure and fuel supply chains. Where the case is weaker is on inducement and abuse of entrusted power. Publicly available reporting strongly supports the existence of a dependency effect and policy accommodation, but it does not yet clearly demonstrate that those choices were driven by corrupt inducements rather than by ideological alignment, political calculation, or economic preference.

For that reason, this case is best classified as a strategic corruption environment / strong dependency case, rather than confirmed strategic corruption in the narrow sense. Its value lies in showing that strategic corruption analysis cannot focus only on bribery or illicit transfers. In some contexts, the more important question is whether public decision-making systematically preserves external leverage in critical sectors, even where corruption in the strict criminal sense is difficult to prove. Slovakia's Russia-linked energy governance is therefore useful as a framework-testing case at the boundary between strategic corruption, dependency politics, and security-relevant policy capture.

MECHANISM MAP	ASSESSMENT OF INDUCEMENT	ASSESSMENT OF ABUSE OF ENTRUSTED AUTHORITY	ASSESSMENT OF STRATEGIC EFFECT
Corruption-based dependency arrangements; policy accommodation sustaining dependence	Not clearly demonstrated. Publicly available evidence supports dependency-preserving political choices, but does not clearly establish corrupt inducement in the narrow sense.	Partial and analytically plausible, but not proven as corruption in the narrow sense. The case raises concerns about policy accommodation and tolerance of dependence, but does not yet demonstrate a clearly inducement-driven abuse of entrusted authority.	Strong and clear. Continued dependence in gas, oil, and nuclear energy creates durable external leverage and weakens strategic autonomy and resilience.

ASSESSMENT OF EXTERNAL LINKAGE	CONVERGENT PATTERN	FINAL ANALYTICAL CLASSIFICATION
Strong. The case shows a clear material and functional link to an external source of strategic interest through continued dependence on Russian energy supply structures and related political accommodation.	Policy choices, public positioning, slow diversification, continued reliance on Russian-linked supply chains, and the preservation of dependency in strategic sectors point in the same direction, even if the evidentiary pattern is stronger on strategic effect and external linkage than on inducement.	Strategic corruption environment / strong dependency case; framework-testing case

ANNEX 4 RECOMMENDATIONS FOR SLOVAKIA ON ADDRESSING STRATEGIC CORRUPTION

Proposed specific recommendations in the area of Slovak legislation:

The Slovak legal framework already contains several mechanisms addressing individual manifestations of strategic corruption; however, it lacks a systematic approach to the security dimension of this phenomenon. The challenge, therefore, is not only to define the problem legislatively, but above all to effectively integrate it into the state's security, financial, and oversight architecture in a way that strengthens resilience without undermining the principles of the rule of law.

For the state to effectively defend itself against strategic corruption, legislation should include:

I. MORE PRECISE ANCHORING IN EXISTING LAWS

To effectively address strategic corruption, it is necessary **to refine its positioning within existing legislation, particularly in the criminal law domain**. The Criminal Code should reflect the specific nature of strategic corruption by introducing a qualified offence for conduct aimed at influencing political, economic, or security decisions in favor of a foreign state or a transnational actor. At the same time, it is necessary **to establish that cases involving a foreign element should be assessed primarily from a national security perspective**, not merely as standard economic crime.

This is also linked to the need **to improve the application of existing provisions**, especially in relation to foreign public officials, through methodological guidance for law enforcement authorities. At the same time, it is essential **to better connect sanctions regimes with domestic instruments** - for example, by enabling the rapid freezing of assets in cases of suspected links to sanctioned persons and ensuring effective linkage between criminal and administrative proceedings and EU and UN regimes, in order to minimize circumvention through third parties.

An important element is also **strengthening oversight of the asset declarations of public officials**. This requires amending the Constitutional Act on the Protection of Public Interest to introduce centralized and independent oversight of asset declarations with real verification powers and links to key registries. Expanding obligations to include the declaration of used and foreign assets, tightening sanctions, and introducing risk profiling of officials in sensitive sectors should ensure that asset declarations serve as a genuine preventive tool rather than merely a formal requirement.

II. STRENGTHENING FINANCIAL TRANSPARENCY AND DATA VERIFICATION

Increasing financial transparency is key to uncovering hidden influence structures. It is therefore necessary to maintain broad access to data from the register of legal entities for authorized subjects, including journalists, analysts, and academia, who play an important role in identifying risks. At the same time, it is essential **to interconnect existing registries** (e.g., the commercial register, cadastre, register of public sector partners, and tax data) **into a unified analytical tool** usable by security and investigative bodies.

An important measure is also **the introduction of systematic screening of ownership structures in investments into critical infrastructure**. This process should include the identification of so-called "proxy" structures through which foreign influence may be exercised, including non-profit organizations, business entities, and media platforms. The aim is to limit the use of shell and opaque structures as tools of strategic corruption.

III. STRENGTHENING OVERSIGHT OF POLITICAL FINANCING

Protecting the political system from strategic corruption requires a substantial **strengthening of oversight over the financing of political activities**. This may include expanding the powers of existing bodies, such as the State Commission for Elections, to include investigative and analytical competencies, or alternatively establishing a specialised oversight mechanism with real enforcement powers. **It is also essential to introduce rapid-response mechanisms in cases of suspected foreign funding of campaigns** or coordinated influence operations during election periods.

Transparency should **cover not only financial contributions but also in-kind benefits**, such as services or media exposure. All donations and loans must be credited directly to **transparent accounts from their original providers**, while transfers from the regular accounts of political parties must be excluded. **Regulation of so-called third parties should be permitted only under conditions of full registration, transparent accounting, and disclosure of beneficial ownership**, with strict exclusion of foreign funding.

A key element is **the introduction of effective sanctioning mechanisms** enabling oversight bodies to act promptly, including the suspension of entities suspected of circumventing rules or using illicit financial sources. The aim of these measures is to minimise the risk of strategic corruption penetrating political decision-making.

Particular attention must be given to hybrid operations with a corrupt dimension, which may include attempts to influence electoral processes shortly before election day through disinformation or targeted information operations. **The system should therefore also ensure greater operational readiness of the state or independent electoral oversight body**, enabling it to convene rapidly during active campaign periods and to issue warnings or temporarily suspend practices that seriously undermine the fairness of electoral competition.

IV. SECURITY AND INTELLIGENCE COORDINATION

Strategic corruption must be explicitly established as a priority in the state's security policy, with clearly defined competencies among relevant institutions. A key aspect is enabling the **effective use of intelligence information in criminal proceedings** in cases that bear the hallmarks of strategic corruption, thereby overcoming the traditional barrier between intelligence and investigative domains.

This approach should also include **regular risk assessments in strategic sectors such as energy, defense, telecommunications, and media**, as well as systematic sharing of knowledge among security, financial, and investigative authorities. Equally important is strengthening international cooperation, particularly within the EU and NATO, including the exchange of information on financial flows and influence operations.

This must be matched by a legislative framework that enables **effective data sharing and joint investigation of strategic corruption cases at the international level**. The objective of these measures is a fundamental shift in the understanding of strategic corruption-from a narrowly defined anti-corruption issue to a complex matter of national security.

Proposal of specific recommendations to strengthen the institutional framework in the Slovak Republic:

The establishment of a dedicated institution focused on strategic corruption could enhance coordination, analytical capacities, and the symbolic dimension of state resilience. In practice, however, it could face overlapping competences and the risk of duplication. An alternative approach is to strengthen existing specialized units, improve the linkage between security services and law enforcement authorities, and clearly define responsibilities within Slovakia's security and defense strategies. At the same time, it is essential to formally anchor systematic coordination among security, financial, and oversight bodies to ensure that foreign elements in corruption schemes are identified early and consistently. The overall objective is to build a system capable of detecting strategic corruption in a timely manner, assessing risks, and effectively countering foreign influence, thereby increasing the resilience of Slovak institutions to hybrid threats.

I. STRENGTHENING EXISTING INSTITUTIONS

Police Force of the Slovak Republic - Define clear competences for the Office for the Fight against Organized Crime (ÚBOK) **or establish a specialized unit focused on strategic corruption** (building on the former NAKA), with close links to the Slovak Intelligence Service (SIS) and the National Security Authority (NBÚ). Introduce a methodology for identifying foreign elements in corruption cases already at the stage of operational verification.

Slovak Intelligence Service and Military Intelligence - Expand their mandate in monitoring corruption schemes directed from abroad and strengthen analytical links with law enforcement bodies. Introduce an obligation to submit regular thematic reports to the government and parliament on the risks of strategic influence.

Supreme Audit Office (NKÚ) and Public Procurement Office (ÚVO) - Strengthen competences to review cross-border financial flows and partnerships in public procurement, especially in sensitive sectors (energy, defense, IT infrastructure), including systematic assessment of risks related to foreign influence.

Criminal Office of the Financial Administration (KÚFS) - Establish a specialized analytical team focused on identifying high-risk cross-border financial flows, links to EU and UN sanctions regimes, and the verification of beneficial ownership in sensitive sectors. At the same time, it is necessary to formalize information-sharing with SIS, NBÚ, and the police, enable participation in joint investigation teams at the EU level, and strengthen procedural safeguards for independence and transparency in order to prevent political instrumentalization and increase credibility in protecting the state's economic security.

II. ESTABLISHMENT OF A COORDINATION MECHANISM

To coordinate efforts against strategic corruption, it would be appropriate **to establish an interministerial working group under the Office of the Government of the Slovak Republic**, with participation from the Ministry of Interior, Ministry of Defence, Ministry of Foreign and European Affairs, Ministry of Finance, SIS, NBÚ, and NKÚ.

The working group's role would be **to coordinate investigations, ensure mandatory information sharing, connect intelligence findings with criminal proceedings, and regularly assess state vulnerabilities** in key sectors.

This mechanism could be based on the model of a national contact point for hybrid threats, including active links to European structures (e.g. Hybrid CoE), thereby strengthening international cooperation and the exchange of experience.

III. BUILDING ANALYTICAL AND INVESTIGATIVE CAPACITIES

Effective detection of strategic corruption requires **systematic strengthening of the state's analytical and investigative capacities**. A suitable step would be the establishment of a specialized analytical center for strategic corruption, for example within the Ministry of Interior or the NBÚ, making use of existing hybrid threat capacities. Such a center would integrate criminal, economic, and intelligence analyses and ensure systematic assessment of risk schemes and behavioral patterns.

At the same time, it is necessary **to strengthen financial and cyber monitoring of high-risk transactions in close cooperation with the Financial Administration and the National Bank of Slovakia**, including connections to international databases and sanctions lists. An important component is also **the systematic training of judges, prosecutors, and investigators in the areas of hybrid threats**, foreign influence, and complex financial structures, enabling them to effectively address new types of risks.

IV. AWARENESS-RAISING

Strengthening resilience to strategic corruption also requires **systematic awareness-building within public administration. Regular training should therefore be provided to employees of state and public administration focused on hybrid threats and mechanisms of foreign influence**, with strategic corruption as an integral component. The aim is to improve the ability to identify risk situations early and prevent their emergence.

V. ENGAGEMENT OF CIVIL SOCIETY AND INTERNATIONAL PARTNERS

An effective fight against strategic corruption also requires **the active involvement of external actors**. The state should systematically support watchdog initiatives, which are capable of identifying risky ownership structures and highlighting strategic vulnerabilities.

At the same time, it is necessary **to develop partnerships with the EU and NATO, particularly in the area of information exchange and joint investigations involving foreign elements**. Valuable insights can also be drawn from countries that have already systematically addressed the concept of strategic or political corruption, such as Lithuania and Estonia. The transfer of best practices from these countries can significantly contribute to strengthening Slovakia's legal and security framework.

VI. PROTECTION OF PUBLIC OVERSIGHT AND TRANSPARENCY AS PART OF THE STATE'S SECURITY RESILIENCE

To strengthen the state's resilience to strategic corruption and hybrid threats, **it is essential to systematically protect instruments of public oversight and transparency as part of the state's security architecture**. Key priorities include guaranteeing stable and effective access to information, protection of whistleblowers, and the integrity of public registers (including the cadastre and the register of legal entities), as well as maintaining transparent public procurement rules without weakening oversight mechanisms in sensitive sectors. It is equally necessary **to consistently uphold the standard legislative process**, including inter-ministerial consultation procedures, and to protect the independence of oversight actors, including civil society and the media.

The weakening of these mechanisms represents a security risk, as it reduces the state's ability to detect strategic corruption and hybrid activity in a timely manner.

Summary of measures to strengthen legislation and the institutional framework

Effective handling of strategic corruption requires an integrated approach combining precise legislative anchoring with strengthened institutional capacities. In the legislative domain, it is crucial to strike a balance between sufficiently broad coverage of the phenomenon and legal precision, in order to avoid ambiguity, duplication, or weakening of enforceability. At the same time, alignment with EU law and the legitimacy of the measures must be ensured.

However, these legislative measures cannot be effective without a functional institutional framework. The current system primarily suffers from insufficient coordination, lack of specialized analytical capacities, and weak links between security, financial, and investigative bodies. It is therefore essential to focus on systematic coordination of existing institutions, regular information exchange, and the development of analytical tools capable of addressing the high evidentiary demands of strategic corruption.

Equally important is minimizing the political risks associated with these measures. This includes ensuring the independence of investigative bodies and setting rules that prevent their misuse for political purposes. Ultimately, the success of combating strategic corruption depends on the ability to connect law and institutions into a functional, coordinated system that is both effective and credible.

6 BIBLIOGRAPHY

- Abnett, Kate, and Jan Lopatka. "Slovakia Rejects EU Plan to Phase Out Russian Gas by End-2027." Reuters, May 7, 2025. https://www.reuters.com/business/energy/slovakia-rejects-eu-plan-phase-out-russian-gas-by-end-2027-2025-05-07/.
- AML Network. The UAE's Gold Trade and RSF's Genocidal Campaign in Sudan. November 2025. https://amlnetwork.org/wp-content/uploads/Report-The-UAEs-Gold-Trade-and-RSFs-Genocidal-Campaign-in-Sudan.pdf.
- Associated Press. "Slovakia's Leader Rejects an EU Plan to Halt Russian Natural Gas Imports by the End of 2027." AP News, May 7, 2025. https://apnews.com/article/slovakia-fico-eu-plan-halt-russian-gas-aa37148e4b4461b9d30fa826387be02a.
- Bravo, A., Pozsgai-Alvarez, J., Janssens, J., Cevallos, H., Kumar, K., Eeckhout, M., & Vandeviver, C. (2025). Rethinking Corruption Tolerance: A Critical Interpretive Synthesis and Typology-Based Model Grounded in the Theory of Planned Behavior. CrimRxiv. https://doi.org/10.21428/cb6ab371.595d51e0
- Chayes, Sarah. Thieves of State: Why Corruption Threatens Global Security. New York: W. W. Norton, 2015.
- David-Barrett, Elizabeth, and Ken Okamura. "Does State Capture Facilitate Strategic Corruption?" Public Integrity (2025). https://doi.org/10.1080/10999922.2025.2554416.
- Council of Europe. 1999. Criminal Law Convention on Corruption. Strasbourg: Council of Europe. January 27, 1999. https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=173.
- Council of Europe. 1999. Civil Law Convention on Corruption. Strasbourg: Council of Europe. November 4, 1999. https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=174.
- Council of Europe, Report of the Independent Investigation Body on the Allegations of Corruption within the Parliamentary Assembly, 15 April 2018, https://assembly.coe.int/Communication/IBAC/IBAC-GIAC-Report-EN.pdf
- Council of Europe. 2026. Group of States against Corruption (GRECO). May 12, 2026. https://www.coe.int/en/web/greco.
- Council of the European Union. 2026. Council Adopts New EU-Wide Law to Combat Corruption. April 21, 2026. https://www.consilium.europa.eu/en/press/press-releases/2026/04/21/council-adopts-new-eu-wide-law-to-combat-corruption/.
- Currie-Edwards, Andrea. "The Sudan Crisis Has Become a Magnet for Foreign Malign Influence and Strategic Corruption." Atlantic Council, September 19, 2024. https://www.atlanticcouncil.org/blogs/new-atlanticist/the-sudan-crisis-has-become-a-magnet-for-foreign-malign-influence-and-strategic-corruption/.
- European Commission. 2024. European Media Freedom Act. Accessed June 2026. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/new-push-european-democracy/protecting-democracy/european-media-freedom-act_en.
- European Commission. 2024. Anti-money Laundering and Countering the Financing of Terrorism at EU Level. July 24, 2024. https://finance.ec.europa.eu/financial-crime/anti-money-laundering-and-countering-financing-terrorism-eu-level_en.
- European Commission. 2025 Rule of Law Report: The Importance of the Rule of Law for Europe's Democracy, Security and Economy. Press release, July 8, 2025. https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1742.
- European Commission, Investment Screening, accessed June 2026, https://policy.trade.ec.europa.eu/enforcement-and-protection/investment-screening_en
- European Commission. Protecting Journalists and Human Rights Defenders from Strategic Lawsuits Against Public Participation (SLAPPs). Accessed June 2026. https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/democracy-eu-citizenship-anti-corruption/democracy-and-electoral-rights/protecting-journalists-and-human-rights-defenders-strategic-lawsuits-against-public-participation_en.
- European Commission. 2026. Mutual Legal Assistance and Extradition. May 12, 2026. https://commission.europa.eu/law/cross-border-cases/judicial-cooperation/types-judicial-cooperation/mutual-legal-assistance-and-extradition_en.
- European Commission. 2026. Single Market Scoreboard: Public Procurement. Accessed June 2, 2026. https://single-market-scoreboard.ec.europa.eu/business-framework-conditions/public-procurement.
- European Commission Joint Research Centre (JRC), Media Pluralism Monitor (MPM) Explorer: Media Pluralism Monitor, European Commission, accessed June 2026, https://composite-indicators.jrc.ec.europa.eu/explorer/indices/mpm/media-pluralism-monitor
- European Court of Auditors. Special Report 28/2023: Public Procurement in the EU. Luxembourg: Publications Office of the European Union, 2023. https://www.eca.europa.eu/ECAPublications/SR-2023-28/SR-2023-28_EN.pdf
- European Parliament. Report on Foreign Interference in All Democratic Processes in the European Union, Including Disinformation. A9-0022/2022. Brussels: European Parliament, 2022. https://www.europarl.europa.eu/doceo/document/A-9-2022-0022_EN.html

- European Parliament and Council of the European Union. 2019. Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 Establishing a Framework for the Screening of Foreign Direct Investments into the Union. March 19, 2019. https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32019R0452.
- European Parliament and Council of the European Union. 2020. Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a General Regime of Conditionality for the Protection of the Union Budget. December 16, 2020. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R2092&qid=1653496153260.
- European External Action Service. 2024. European Union Sanctions. August 1, 2024. https://www.eeas.europa.eu/eeas/european-union-sanctions_en.
- European Parliament. 2021. Human Rights Protection and the EU External Migration Policy. European Parliament Resolution TA-9-2021-0349. July 7, 2021. https://www.europarl.europa.eu/doceo/document/TA-9-2021-0349_EN.html.
- European Public Prosecutor's Office (EPPO). 2026. Legal Framework. May 12, 2026. https://www.eppo.europa.eu/en/about/legal-framework.
- European Stability Initiative, Caviar Diplomacy: How Azerbaijan Silenced the Council of Europe, 24 May 2012, https://www.esiweb.org/publications/caviar-diplomacy-how-azerbaijan-silenced-council-europe
- European Stability Initiative, The European Swamp (Caviar Diplomacy Part 2): Prosecutors, Corruption and the Council of Europe, 17 December 2016,
- https://www.esiweb.org/publications/european-swamp-caviar-diplomacy-part-2-prosecutors-corruption-and-council-europe
- Financial Action Task Force (FATF). The FATF Recommendations: International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation. Paris: FATF, 2022. https://www.fatf-gafi.org/en/topics/fatf-recommendations.html.
- Financial Action Task Force (FATF). Guidance: Politically Exposed Persons (Recommendations 12 and 22). Paris: FATF/OECD, 2013. https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Guidance-PEP-Rec12-22.pdf.
- Financial Action Task Force (FATF). Guidance on Beneficial Ownership of Legal Persons. Paris: FATF/OECD, 2023. https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Guidance-Beneficial-Ownership-Legal-Persons.pdf.coredownload.pdf.
- Finta, Márk. "Maďarské milióny a nekonečná rekonštrukcia: Štadión KFC v Komárne sa predražil a objavili sa vážne odborné pochybnosti." Denník N, April 1, 2026. https://dennikn.sk/5234177/madarske-miliony-a-nekonecna-rekonstrukcia-stadion-kfc-v-komarne-sa-predrazil-a-objavili-sa-vazne-odborne-pochybnosti/.
- Galev, Todor, et al. BridgeGap D3.1: Impact of Sanctions on Infiltration of Russia in Europe. Center for the Study of Democracy, 2025. https://doi.org/10.5281/zenodo.14514673.
- Group of States against Corruption (GRECO). "6th Evaluation Round: Preventing Corruption and Promoting Integrity at the Sub-National Level." Council of Europe. Accessed 2026. https://www.coe.int/en/web/greco/evaluations/round-5-new
- Giannopoulos, Georgios, Hanna Smith, and Marina Theocharidou, eds. The Landscape of Hybrid Threats: A Conceptual Model. Luxembourg: Publications Office of the European Union, 2021.
- International Monetary Fund (IMF). Collateralized Transactions: Recent Developments and Policy Considerations. Washington, DC: International Monetary Fund, 2023. https://www.imf.org/external/np/g20/pdf/2023/121423.pdf.
- Jungwirth, Rainer, Hanna Smith, Etienne Willkomm, Jukka Savolainen, Marina Alonso Villota, Maxime Lebrun, Aleksi Aho, and Georgios Giannopoulos. Hybrid Threats: A Comprehensive Resilience Ecosystem. Publications Office of the European Union, 2023. https://doi.org/10.2760/37899.
- Kassa, Saba, and Monica Guy. Quick Guide 37: Strategic Corruption. Basel: Basel Institute on Governance, 2025.
- Kassa, Saba. "Strategic Corruption, Democracy and Security in Sudan." Basel Institute on Governance, 2025. https://baselgovernance.org/blog/strategic-corruption-democracy-and-security-sudan.
- Kelly, Lydia, and Jan Lopatka. "U.S., Slovakia Sign Civil Nuclear Power Agreement." Reuters, January 16, 2026. https://www.reuters.com/business/energy/us-slovakia-sign-civil-nuclear-power-agreement-2026-01-16/.
- Kerusauskaite, Ingrida, and Caryn Peiffer. "Practical Challenges Mitigating Strategic Corruption." Public Integrity (2025). https://doi.org/10.1080/10999922.2025.2520654.
- Kiepe, Tymon. Using Beneficial Ownership Data for National Security. Open Ownership, 2021. https://www.openownership.org/en/publications/using-beneficial-ownership-data-for-national-security/overview/
- Kiepe, Tymon, and Eva Okunbor. Beneficial Ownership Data in Procurement. Open Ownership, 2021. https://www.openownership.org/en/publications/beneficial-ownership-data-in-procurement/operationalising-the-use-of-beneficial-ownership-data-in-procurement/
- Kiripolská, Karolína, Nina Janešíková, and Michaela Barcíková. "Od Číny sa máme čo učiť, obhajujú poslanci výlet, ktorý platil komunistický režim (+video)." Denník N, February 2, 2026. https://dennikn.sk/5100232/od-ciny-sa-mame-co-ucit-obhajuju-poslanci-vylet-ktory-platil-komunisticky-rezim-video/.

- Kiššimon, Viktor. “Maďarské peniaze, Orbánova kontrola: Budapešť si zabezpečuje vplyv stámiliónmi eur, ktoré posiela Maďarom v susedných krajinách.” Investigatívne centrum Jána Kuciaka (ICJK), 2024. https://www.icjk.sk/101/MADARSKE-PENIAZE-ORBANOVA-KONTROLA-Budapest-si-zabezpecuje-vplyv-stamilionmi-eur-ktore-posiela-Madarom-v-susednych-krajinach.
- Kleknerová, Katarína. “Maďarská vláda poslala záhadnej slovenskej organizácii milión eur na prieskumy, po ktorých nie je ani stopa.” Denník N, December 20, 2024. https://dennikn.sk/4371713/madarska-vlada-poslala-zahadnej-slovenskej-organizacii-milion-eur-na-prieskumy-po-ktorych-nie-je-ani-stopa/.
- Kostova, Tihomira, Marius Köppen, Todor Galev, Paige Maylath, and Tsvetomir Nikolov. 2025. BridgeGap D3.1: Impact of Sanctions on Infiltration of Russia in Europe. Center for the Study of Democracy. https://doi.org/10.5281/zenodo.14514673.
- Lang, Bertram, Joseph Pozsgai-Alvarez, and Nedim Hogić. “Strategic Corruption: Conceptualizing the Geostrategic Dimensions of Transnational Corruption.” Public Integrity (2025). https://doi.org/10.1080/10999922.2025.2520704.
- Liboreiro, Jorge. “MEPs Demand Sanctions on Schröder over His Ties with Russian Firms.” Euronews, May 19, 2022. https://www.euronews.com/my-europe/2022/05/19/meps-demand-sanctions-on-schroder-over-his-ties-with-russian-firms.
- Luna-Pla, Issa, and José R. Nicolás-Carlock. “Corruption and Complexity: A Scientific Framework for the Analysis of Corruption Networks.” Applied Network Science 5, no. 13 (2020). https://doi.org/10.1007/s41109-020-00258-2.
- Mihočková, Eva. “Investor zobral poslancov na výlet do Číny, tí potom umožnili baterkáreň v Šuranoch.” Nadácia Zastavme korupciu, February 27, 2025. https://zastavmekorupciu.sk/nezaradene/investor-zobral-poslancov-na-vylet-do-ciny-ti-potom-umoznili-baterkaren-v-suranoch/.
- Ministry of Foreign and European Affairs of the Slovak Republic. “The Slovak Republic and the People’s Republic of China Strengthen Their Strategic Partnership.” Press release, November 6, 2024. https://www.mzv.sk/en/web/peking-en/pressreleasedetail?p_p_id=sk_mzv_portal_pressrelease_detail_portlet_PressReleaseDetailPortlet&p_p_lifecycle=0&groupId=10182&articleId=51437319.
- Media Development Investment Fund. Media Capture in Europe. New York: MDIF, 2018. https://www.mdif.org/wp-content/uploads/2023/10/MDIF-Report-Media-Capture-in-Europe.pdf
- Ministry of Defence of the Slovak Republic. Bezpečnostná stratégia Slovenskej republiky [Security Strategy of the Slovak Republic], 2021. Accessed May 12, 2026. https://www.mosr.sk/bezpecnostna-strategia-sr/.
- National Endowment for Democracy. Sharp Power: Rising Authoritarian Influence. Washington, DC: National Endowment for Democracy, 2017. https://www.ned.org/wp-content/uploads/2017/12/Sharp-Power-Rising-Authoritarian-Influence-Full-Report.pdf
- NATO Strategic Communications Centre of Excellence. Strategic Communications Hybrid Threats Toolkit: Applying the Principles of NATO Strategic Communications to Understand and Counter Grey Zone Threats. Riga: NATO StratCom COE, 2021. https://stratcomcoe.org/publications/strategic-communications-hybrid-threats-toolkit/213.
- Ogrodnik, Łukasz, and Tymon Pastucha. “Slovakia Remains Dependent on Russian Energy.” Polish Institute of International Affairs (PISM), March 14, 2025. https://pism.pl/publications/slovakia-remains-dependent-on-russian-energy.
- Organized Crime and Corruption Reporting Project (OCCRP). 2026. About Us. May 12, 2026. https://www.occrp.org/en/about-us.
- Organisation for Economic Co-operation and Development (OECD). Recommendation of the Council on Fighting Bid Rigging in Public Procurement. OECD Legal Instruments. Paris: OECD, July 17, 2012. https://legalinstruments.oecd.org/public/doc/205/205.en.pdf.
- Organisation for Economic Co-operation and Development (OECD). Lobbyists, Governments and Public Trust, Volume 3: Implementing the OECD Principles for Transparency and Integrity in Lobbying. Paris: OECD Publishing, 2014 https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/11/lobbyists-governments-and-public-trust-volume-3_g1g43c3b/9789264214224-en.pdf
- Organisation for Economic Co-operation and Development (OECD). Methodologies to Measure Market Competition. Paris: OECD, 2021. https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/06/methodologies-to-measure-market-competition_acd00bf0/29bf31c1-en.pdf
- Organisation for Economic Co-operation and Development (OECD)/ OECD Public Integrity Indicators: Criteria for Accountability, OECD, 2024, https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/public-integrity/OECD-PII-Indicators-Criteria-Accountability.pdf.
- Organisation for Economic Co-operation and Development (OECD). Strengthening the Transparency and Integrity of Foreign Influence Activities in France: A Tool for Tackling Foreign Interference Risks. OECD Public Governance Reviews. Paris: OECD Publishing, 2024. https://doi.org/10.1787/438da77f-en.
- Organisation for Economic Co-operation and Development (OECD). Building Effective Beneficial Ownership Frameworks: A Joint Global Forum and IDB Toolkit. 2nd ed. Paris: OECD Publishing, 2024. https://www.oecd.org/content/dam/oecd/en/networks/global-forum-tax-transparency/effective-beneficial-ownership-frameworks-toolkit-en.pdf

- Organisation for Economic Co-operation and Development (OECD). Towards Demystifying Trade Dependencies: At What Point Do Trade Linkages Become a Concern? OECD Trade Policy Papers No. 280. Paris: OECD, 2024. https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/04/towards-demystifying-trade-dependencies_208df692/2a1a2bb9-en.pdf
- Organisation for Economic Co-operation and Development (OECD). Post-Public Employment: Good Practices for Preventing Conflict of Interest. Paris: OECD Publishing, 2010. https://doi.org/10.1787/9789264056701-en
- Organisation for Economic Co-operation and Development (OECD). Investment and National Security. Accessed June 2026. https://www.oecd.org/en/topics/investment-and-national-security.html
- Organisation for Economic Co-operation and Development (OECD). Aid and Export Credits. Accessed June 2026. https://www.oecd.org/en/topics/aid-and-export-credits.html
- Organisation for Economic Co-operation and Development (OECD). 2026. Working Group on Bribery. May 12, 2026. https://www.oecd.org/en/about/committees/working-group-on-bribery.html.
- Organized Crime and Corruption Reporting Project. "The Azerbaijani Laundromat." Published September 4, 2017. https://www.occrp.org/en/project/the-azerbaijani-laundromat.
- Petková, Zuzana, Ľubomír Daňko, and Jaroslav Reich. "Rytmus a Plačková, ministri aj pomoc tretích strán. Kampaň ukázala na medzery v zákone." Nadácia Zastavme korupciu, April 9, 2024. https://zastavmekorupciu.sk/kauzy/rytmus-a-plackova-ministri-aj-pomoc-tretich-tretich-stran-kampan-ukazala-na-medzery-v-zakone/.
- Pozsgai-Alvarez, Joseph, and Bertram Lang. "Getting 'Strategic Corruption' Right: Mapping Contested Meanings in a Changing Geopolitical Landscape." Public Integrity (2025). https://doi.org/10.1080/10999922.2025.2495366.
- Pozsgai-Alvarez, Joseph. Forthcoming. "Toward a Unified Theory of Corruption." In The Routledge Handbook of Political Corruption, 2nd ed., edited by Paul M. Heywood, Dan Hough Kubbe, and Matthias Schwickerath. London: Routledge.
- Prelec, Tena. 2022. Waking Up to Reputation Laundering as a Mechanism for Transnational Kleptocracy. Washington, DC: National Endowment for Democracy. https://www.ned.org/wp-content/uploads/2022/03/Global-Insights-Waking-up-to-Reputation-Laundering-as-a-Mechanism-for-Transnational-Kleptocracy.pdf.
- Prelec, Tena. 2023. Russian Illicit Financial Flows and Political Influence in South Eastern Europe: How Financial Flows and Politics Intersect in Montenegro and Serbia. Briefing Note 8. Serious Organised Crime and Anti-Corruption Evidence (SOC ACE) Research Programme, June 2023. https://static1.squarespace.com/static/63e4aef3ae07ad445eed03b5/t/6481eb183fec0e4552a25969/1730801184443/SOCACE-BN08-RussianIFFSouthEastEurope-Jun23.pdf
- Rotberg, Robert I., ed. Corruption, Global Security, and World Order. Washington, DC: Brookings Institution Press, 2009.
- Sharife, Khadija, Lara Dihmis, and Erin Klazar. "Documents Reveal Wagner's Golden Ties to Sudanese Military Companies." Organized Crime and Corruption Reporting Project (OCCRP), November 2, 2022. https://www.occrp.org/en/investigation/documents-reveal-wagners-golden-ties-to-sudanese-military-companies.
- Shelley, Louise I. Dirty Entanglements: Corruption, Crime, and Terrorism. Cambridge: Cambridge University Press, 2014.
- Slovakia. Act No. 300/2005 Coll., Criminal Code (Trestný zákon). July 2, 2005. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2005/300/.
- Slovakia. Act No. 54/2019 Coll. on the Protection of Whistleblowers and on Amendments to Certain Acts. March 1, 2019. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2019/54/20260324.
- Slovakia. Act No. 297/2008 Coll. on Protection against Legalisation of Proceeds from Crime and on Protection against Financing of Terrorism and on Amendments to Certain Acts. January 15, 2025. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2008/297/20250115.
- Slovakia. Act No. 315/2016 Coll. on the Register of Public Sector Partners and on Amendments to Certain Acts. November 1, 2019. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2016/315/20191101.
- Slovakia. Act No. 272/2015 Coll. on the Register of Legal Entities, Entrepreneurs and Public Authorities and on Amendments to Certain Acts. January 1, 2025. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2015/272/20250101.
- Slovakia. Act No. 45/2011 Coll. on Critical Infrastructure. March 1, 2011. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2011/45/20230301.
- Slovakia. Act No. 69/2018 Coll. on Cybersecurity and on Amendments to Certain Acts. January 30, 2018. Updated April 30, 2026. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2018/69/20260430.
- Slovakia. Act No. 289/2016 Coll. on the Implementation of International Sanctions and on Amendments to Act No. 566/2001 Coll. on Securities and Investment Services and on Amendments to Certain Acts. August 1, 2025. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2016/289/20250801.
- Slovakia. Act No. 181/2014 Coll. on Electoral Campaigns and on Amendments to Act No. 85/2005 Coll. on Political Parties and Political Movements. May 29, 2014. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2014/181/20220801.

- Slovakia. Act No. 85/2005 Coll. on Political Parties and Political Movements. July 8, 2023. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2005/85/20230708.
- Slovakia. Constitutional Act No. 357/2004 Coll. on Protection of Public Interest in the Performance of Public Office. January 1, 2020. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2004/357/20200101.
- Soliman, Ahmed, and Suliman Baldo. “How Sudan’s Gold Sector Connects to a Regional Conflict Ecosystem.” In Gold and the War in Sudan: How Regional Solutions Can Support an End to Conflict. Chatham House, March 26, 2025. https://www.chathamhouse.org/2025/03/gold-and-war-sudan/04-how-sudans-gold-sector-connects-regional-conflict-ecosystem.
- The Slovak Spectator Staff. “Hungarian Allies of Orbán Win Tender to Build Slovak Military Hospital.” The Slovak Spectator, June 26, 2025. https://spectator.sme.sk/politics-and-society/c/hungarian-allies-of-orban-win-tender-to-build-slovak-military-hospital.
- The White House. United States Strategy on Countering Corruption. Washington, DC: The White House, December 2021. https://bidenwhitehouse.archives.gov/wp-content/uploads/2021/12/United-States-Strategy-on-Countering-Corruption.pdf
- Tódová, Monika, and Eva Mihočková. “Súťaž o maďarského voliča vyhral Pellegrini. Z Budapešti mu pomáhali aj počas volebného moratória.” Denník N, April 7, 2024. https://dennikn.sk/3928151/sutaz-o-madarskeho-volica-vyhral-pellegrini-z-budapesti-mu-pomahali-aj-pocas-volebneho-moratoria/.
- Transparency International. 2015. Topic Guide: Conflicts of Interest. Anti-Corruption Knowledge Hub. May 12, 2026. https://knowledgehub.transparency.org/guide/topic-guide-on-conflicts-of-interest/5852.
- Transparency International. 2026. Home. May 12, 2026. https://www.transparency.org/en.
- Transparency International Slovakia. “MVO: Vyzývame vládu na diskusiu o lobingu.” June 20, 2025. https://transparency.sk/sk/mvo-vyzyvame-vladu-na-diskusiu-o-lobingu/.
- United Nations Office on Drugs and Crime (UNODC). 2004. United Nations Convention against Corruption. New York: United Nations. https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.
- United Nations Office on Drugs and Crime (UNODC). Guidebook on Anti-Corruption in Public Procurement and the Management of Public Finances: Good Practices in Ensuring Compliance with Article 9 of the United Nations Convention against Corruption. Vienna: United Nations Office on Drugs and Crime, 2013. https://www.unodc.org/documents/corruption/Publications/2013/Guidebook_on_anti-corruption_in_public_procurement_and_the_management_of_public_finances.pdf.
- U.S. Department of the Treasury. “Treasury Sanctions Military-Affiliated Companies Fueling Both Sides of the Conflict in Sudan.” Press release, June 1, 2023. https://home.treasury.gov/news/press-releases/jy1514.
- von Daniels, Justus, Annika Joeres, and Frederik Richter. “The Gazprom Lobby: How Russia Enlisted German Politicians, Managers and Lawyers to Make Germany Dependent on Russian Gas.” CORRECTIV, October 7, 2022. https://correctiv.org/en/latest-stories/2022/10/07/gazprom-lobby-germany/?lang=en.
- Wedel, Janine R. “Beyond Conflict of Interest: Shadow Elites and the Challenge to Democracy and the Free Market.” Polish Sociological Review 174, no. 2 (2011): 149–176. https://polish-sociological-review.eu/pdf-126487-54231?filename=Beyond-Conflict-of-Intere.pdf.
- World Bank. Governance and Anti-Corruption Diagnostics: Guidance and Tools for Implementation, Monitoring, and Assessment in the Field. Washington, DC: World Bank, 2010. https://openknowledge.worldbank.org/server/api/core/bitstreams/f70c333b-e7d3-5349-ad6a-ddb4865e5904/content.
- World Bank. Infrastructure Governance Assessment Framework. Washington, DC: World Bank, 2020. https://thedocs.worldbank.org/en/doc/96550c14d62154355b6edc367d4d7f33-0080012021/original/Infrastructure-Governance-Assessment-Framework-December-2020.pdf.
- World Bank. How to Identify Capture and Design Privilege-Resistant Policies. EFI Note–Governance. Washington, DC: World Bank, 2021 https://documents1.worldbank.org/curated/en/537291636611822955/pdf/How-to-Identify-Capture-and-Design-Privilege-Resistant-Policies.pdf
- World Bank. State Capture Analysis: A How-to Guide for Practitioners. Washington, DC: World Bank, 2021. https://documents1.worldbank.org/curated/en/909361621214855803/pdf/State-Capture-Analysis-A-How-to-Guide-for-Practitioners.pdf
- World Bank, Asian Development Bank, and Inter-American Development Bank. Public-Private Partnership Reference Guide, Version 3. Washington, DC: World Bank, 2024. https://ppp.worldbank.org/sites/default/files/2024-08/PPP%20Reference%20Guide%20Version%203.pdf
- World Bank. Radical Debt Transparency. Washington, DC: World Bank, 2025. https://www.worldbank.org/en/publication/2025-debt-transparency-report

www.nest-institute.org