



INVESTING IN ANTI-CORRUPTION: A COMPARATIVE ANALYSIS OF THE EU'S ANTI-CORRUPTION APPROACH IN THE SOUTHERN AND EASTERN NEIGHBOURHOODS

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Introduction

This policy brief aims to shed light on the strategies employed by the European Union (EU) to combat corruption, and compares anti-corruption programmes implemented in the diverse countries of the Eastern and Southern Neighbourhoods. By examining the variations in anti-corruption frameworks and the level of EU support for anti-corruption initiatives, this brief provides a comparative analysis of the efforts made in these two regions.

To achieve this, the brief highlights the existing differences between the Eastern and Southern Neighbourhoods in tackling corruption. The analysis is based on Action Plans (APs) established between the EU and specific countries, as well as Progress Reports published by the European Commission (EC) from 2007 to 2022, obtained through scraping Directorate-General for Neighbourhood and Enlargement Negotiation (DG NEAR)'s website. Through a basic content analysis of EU documents, an overview of the effectiveness of anti-corruption programmes and the level of EU support at both the individual country and Neighbourhood levels is presented.

Furthermore, this analysis not only examines the variations but also identifies best practices in addressing corruption within the Eastern and Southern Neighbourhoods. It explores the strategies and approaches that have shown promising results in combating corruption. This policy brief also suggests that the EU has demonstrated a higher degree of support for anti-

corruption efforts in the Eastern Neighbourhood when compared to the Southern Neighbourhood.

In addition to the comparative analysis, this policy brief offers recommendations for future efforts in combating corruption. These recommendations emphasise the need to strengthen existing frameworks, enhance civil society engagement, promote transparency and accountability, foster international cooperation, and underscore the essential role of political commitment by countries in effectively fighting corruption.

By shedding light on the strategies employed by the EU, comparing anti-corruption programmes, highlighting best practices and providing recommendations, this policy brief aims to contribute to the ongoing efforts to combat corruption in the Eastern and Southern Neighbourhoods, ultimately promoting good governance and transparent administrations.

Background

Since 2004, the EU has been engaged in promoting and enhancing stability, security and prosperity in the Eastern and Southern Neighbourhoods under the European Neighbourhood Policy (ENP) umbrella. The fundamental goals of the ENP have been to support democratic values, uphold the rule of law, and protect human rights in European Neighbourhood Instrument (ENI)-South (Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine**, Syria*, Tunisia) and ENI-East (Armenia, Azerbaijan, Belarus, Georgia, Moldova, Ukraine). The fight against corruption figures on the ENP agenda and reference documents including the fight against fraud and organised crime are part of the reforms that partner countries must commit to in their ENP Action Plans (Chêne, 2008).

Key political documents for fulfilling the goals of the ENP are the EU's APs, which are tailor-made negotiated agreements with certain goals, detailed priorities, values and standards that should be followed by each "ring of friends" country. The progress in meeting the objectives is overseen by the association or partnership councils established through the agreements, and the EC provides regular updates on the outcomes. The implementation of the APs is supported by EU aid (Eriş, 2012).

The European Neighbourhood and Partnership Instrument (ENPI), which was operational from 2007 to 2013 with an overall budget of €11,181 million, served as the first financial tool to support the ENP scope of community assistance, which also included supporting the fight against corruption (European Union, 2006). The new financing instrument significantly expanded the focus of corruption-sensitive reforms of judicial reforms, reform of the public administration, civil service reform, public finance management, and measures aiming at improving the business and investment climate (Börzel et al., 2010). However, EC aid was not protected by a specific anti-corruption mechanism, which often limited transparency and accountability (Chêne, 2008). Additionally, the objectives related to governance and fighting corruption in the APs were generally vague and unquantifiable, making monitoring and comparison difficult.

After the adoption of the 2014-2020 financial framework,¹ the High Representative and the EC adopted a revised version of the ENP (European Union, 2014). The review of the ENP in 2015 was a response to the migration crisis and recognised the need for a more strategic and flexible approach to address the challenges in the areas of economic development, migration, mobility, and security.

Global Europe, officially known as the Neighbourhood, Development and International Cooperation Instrument (NDICI) from 2021-2027, is currently the latest instrument in the EU's

¹ Under the ENI with a total budget of €15,433 million.

external policy repertoire. As Josep Borrell, the High Representative/Vice-President of European External Action Service (EEAS) mentioned, this new instrument enables a fast and coherent response to global challenges, and promotes peace, stability, trade, sustainable growth and good governance, which is often linked to tackling corruption (European Commission, 2021). The budget for Neighbourhood regions is €19,323 million for 2021-2027 and the priority of fighting corruption is frequently mentioned, despite the fact that it does not specify its practical implementation.

What is the EU approach in fighting corruption?

The EU has created a variety of legal tools either specifically on corruption (or by incorporating anti-corruption provisions in other sectoral legislation) to counter corruption. In a recent statement, [Commission President von der Leyen](#) said that the Commission will introduce new measures in the upcoming year to modernise the EU anti-corruption legislative framework. [A global objective of the EU's anti corruption policy](#) approach goes in line with the United Nations (UN)'s Sustainable Development Goals (SDGs), particularly Goal 16: Peace, justice, and strong institutions. Between 2014 and 2020, more than €770 million has been invested globally in anti-corruption projects and interventions by the EU and its member states. Moreover, the EC mentioned plans to support anti-corruption initiatives through a comprehensive strategy in more than 50 partner countries as part of its strategic agenda for the financial framework period between 2021 and 2027. This will entail funding programmes to strengthen anti-corruption organisations, combat impunity, support the growth of national human rights institutions, boost investigative capabilities, enhance justice systems, reduce money laundering, foster international cooperation, and empower stakeholders in civil society. It is interesting to note that the EU is following international conventions in its anti-corruption approach in an attempt to align with existing initiatives of international organisations, thereby harmonising its own actions with national strategies of recipient countries where possible.

What do we know about the anti-corruption programme in the Southern and Eastern Neighbourhoods?

One of the main differences between the Eastern and Southern Neighbourhoods is that all Eastern Neighbourhood countries are part of the Council of Europe (CoE) and have signed the CoE Criminal Law Convention on Corruption. This legally binding international instrument was adopted in 1999 and aims to promote the prevention, detection, investigation, and prosecution of corruption offences, as well as to enhance international cooperation in this area. Its implementation is monitored by the Group of States against Corruption (GRECO), which regularly publishes evaluation and compliance reports on different fields relating to [corruption](#).

The EU countries themselves are also being evaluated in this way and so are part of the same anti-corruption framework as the Eastern Neighbourhood countries. None of the Southern Neighbourhood countries are part of this framework. With the exception of Syria, they are however part of the UN Convention against Corruption and are being regularly evaluated on the implementation of this convention (United Nations Office on Drugs and Crime, 2004).

Comparing anti-corruption approaches in the Southern and Eastern Neighbourhoods can be difficult due to the complexity of the regions, which include variances both within and across countries and because every country creates its own AP and strategy. However, to illustrate

the extent of the EU's support for anti-corruption initiatives in ENP countries an analysis was conducted of action and programming documents for 2007 to 2022 available on DG NEARs website (see Table below). Documents were extracted from the website and searched for occurrences of the term "corruption". Looking at the action plans and programmes for the 16 Neighbourhood countries DG NEAR published on its [website](#), it is noticeable that anti-corruption is mentioned more often as a specific target in documents for the Eastern Neighbourhood than for the Southern Neighbourhood. This data might indicate the level of anti-corruption commitment by each ENP country, as the EU supports recipient country initiatives.

ENP Country	ENP Region	Action and Programming Documents on DG NEAR Website (2007-2022)*	"Corruption" mentioned in texts
Armenia	East	61	404
Azerbaijan	East	36	40
Belarus	East	57	14
Georgia	East	66	136
Moldova	East	69	402
Ukraine	East	92	709
Algeria	South	52	15
Egypt	South	72	305
Israel	South	21	1
Jordan	South	81	134
Lebanon	South	98	188
Libya	South	39	33
Morocco	South	85	150
Palestine	South	164	26
Syria	South	53	5
Tunisia	South	82	213

*Documents accessed on 18 and 19 March 2023.

EU initiatives tackling corruption in Armenia since 2014 include the [Public Finance Policy Reform Programme \(2015\)](#), the [Support to Public Administration Reform Action \(2016\)](#), the [Consolidation of the Justice System in Armenia \(2017\)](#) and the [Support to Justice Sector Reforms in Armenia: Phase I \(2020\) and Phase II \(2022\)](#). This included providing budget support to public institutions in Armenia to improve the efficiency, transparency and accountability of the state budget and public finance management within three fiscal years. Also there has been a significant effort on the Strategic Plan of Legal and Judicial Reforms of the Republic of Armenia for 2018-2022, as well as other key strategic documents related to the field of justice and human rights, included but not limited to the National Strategy on Protection of Human Rights and Action Plan, the Anti-Corruption Strategy and the Action Plan for 2015-2018, and the E-Governance Action Plan for 2014- 2018. Additionally, the EU has awarded direct grants to the Armenian Anti-Corruption Coalition of Civil Society Organizations. These developments also show Armenia's proactive approach in addressing corruption, which was quite rewarding. In the Progress Report published by the Commission in 2015, it mentioned that Armenia was ranked 94th out of 175 countries in the Corruption Perceptions Index in 2014, but in 2022 it had significantly improved its ranking, moving up to 63rd place out of 180 countries (European Commission, 2014; Transparency International, 2022).

The EU supported anti-corruption efforts in Ukraine after 2014 with the State Building Contract (2014), the Ukraine Local Empowerment, Accountability and Development

Programme (2015), the Anti-corruption Initiative Phase I and II (2016, 2019), the Support to Rule of Law Reforms (2016), the Support to Comprehensive Reform of Public Administration (2016), the Support to Development of Integrated Border Management and Migration in Ukraine (2021) and with a Technical Cooperation Facility (2021). According to an overview by Králiková (2022), Ukraine adopted a series of legislation and regulations intended to reduce corruption and increase transparency in the country, including the establishment of an independent anti-corruption court and independent anti-corruption agency, and a transparent e-declarations system. The anti-corruption reforms in Ukraine have only been partly successful because reforms have been limited in a society where informal rules often prevail over formal ones, and reflects the criticism the EU directed against Ukraine in 2017 for its lack of advancement in the fight against corruption (Králiková, 2022).

Anti-corruption efforts for these countries mostly took the form of supporting Neighbourhood countries with implementing public administration and justice system reforms in order to make the institutions more resilient towards corruption. This pattern of support is similar for actions in Moldova and Georgia. Georgia has established a comprehensive legal framework, such as the Law on Conflict of Interests, formed an Anti-Corruption Council, and has shown good results in adopting e-procurement, e-declarations, e-auction, and other programmes. However, Georgia also demonstrated how “an anti-corruption champion in the region” can lose its effectiveness in continuing to combat corruption. The governing Georgian Dream party, reportedly controlled by former minister Bidzina Ivanishvili, has taken control of important state institutions, including judiciary and law enforcement. According to [Transparency International](#) (2023), high-level corruption cases remain uninvestigated, indicating a rise in kleptocracy, where officials use political power to appropriate the country's wealth and suppress critical voices.

In comparison, in Azerbaijan anti-corruption was one of the targets of the Support to Civil Society in Azerbaijan Action (2014) and the Action Document for Partnership Priorities Facility (2019) but was not mentioned explicitly in the 15 other AP documents published since 2014. Corruption in Belarus was addressed with the EU Good Governance Programme (2017) and the Belarus Legal Co-operation Programme (2019). Both appear to reflect the lesser prioritisation of anti-corruption methods by the EU in both countries.

Looking at the Southern Neighbourhood, the EU supported the fight against corruption in Morocco in actions in support of the health sector (2014) and justice sector (2014, 2015). Corruption was mentioned as a problem in the country in the multiannual action programmes of 2018, 2019 and 2021, yet this found no expression in actions specifically targeting corruption. In order to not imperil its relationship with the government, the EU has seemed hesitant to directly address corruption in the country and to engage with and support civil society organizations (CSOs) active in this field (Khakee & Weilandt, 2022).

In Tunisia, however, the EU engaged with CSOs in diverse formats, including through personal relations between EU representatives and activists, and seemed to see them as an ally in anti-corruption efforts (Khakee & Weilandt, 2022). Moreover, corruption in Tunisia was also targeted in the Modernization of Administration and Public Companies (MAPU) Action (2016). Support for public administration reforms and institutions tasked with fighting corruption was provided in the Annual Action Programmes in 2017-2021.

In Egypt, contributing to support efforts towards fighting against corruption was one of two components of the 2019 action “Support to Accountability and Democratic Governance”. This was the only major anti-corruption action financed by the EU in Egypt.

In Jordan the EU supported the Anti-Corruption Commission through its Annual Action Programme 2020 and fighting corruption was also a target of the Action for Support to

Democratic Reforms in Jordan (2022) and the Partnership Implementation Facility (“Sharaka”) (2022). In Lebanon the EU targeted corruption in its 2020 Annual Action Programme and its 2021 action “Supporting progress in key areas of public administration reform in Lebanon”. Documents detailing support to Algeria, Libya and Palestine since 2014 include mentions of support to anti-corruption organisations and institutions. In Algeria, for example, EU assistance was aimed at improving the capacity of public institutions in a variety of areas, including administrative reform, public procurement, ethics in the public sector, anti-corruption measures, and internal and external financial control (Martini, 2012).

Based on the above desk research and basic content analysis of the available EU documents (see Table above), it can be suggested that the EU has shown relatively greater support for anti-corruption efforts in the Eastern Neighbourhood compared to the Southern Neighbourhood. It is important to acknowledge the need for further research and a more in-depth analysis to comprehensively evaluate the extent of the EU's support in both regions. Nevertheless, this is potentially the consequence of existing anti-corruption strategies and initiatives in Armenia, Georgia, Moldova and Ukraine, which the EU could continue supporting, as well as the integration of these countries into existing international structures as previously noted. Other Eastern Neighbourhood countries and all of the Southern Neighbourhood countries (with the exception of Jordan) lack such strategies and existing frameworks, which limit the possibility of the EU to support anti-corruption efforts under its Neighbourhood Policy. In essence, it is clear that the existence of on-going anti-corruption programmes, as well as the involvement of countries in international organisations (e.g., CoE, GRECO) may have a positive impact on the EU's anti-corruption initiatives. Additionally, it should be noted that prospective North Atlantic Treaty Organization (NATO) and EU-membership and/or prospective candidacy may equally impact perceived incentive mechanics for anti-corruption reform, which, in turn, may affect EU proactiveness. A final point, which can also help explain differing policies across the Southern and Eastern Neighbourhoods, is the “regionalised” and different priorities of leading EU member states at the Council level in Brussels and across member state capitals. For example, while Southern Neighbourhood countries have traditionally had more involvement from France in the project design and policy-making sphere, the countries across the Eastern Partnership have historically yielded more support and attention, both formally and informally, from Germany. Overall, however, many differences also exist within each Neighbourhood area (e.g., Southern and Eastern), which are likely also due to differing priorities of countries, leverage points, domestic situation and their respective relationship with the EU, as well as bilateral relationship, with EU member states.

Recommendations

The anti-corruption approach differs for each country in the ENP region, while certain regional comparative differences also exist. While some states have established large commitments and implemented numerous programmes to fight corruption and get financial, technical and educational assistance, others have been less active in including anti-corruption initiatives in APs. While the EU helped develop mechanisms to combat corruption in Ukraine, the results have been mixed; Armenia's score in the Corruption Perceptions Index has significantly improved as a result of the EU's ENP cooperation and support. Yet in Tunisia, the EU adopted a different strategy and focused primarily on backing CSOs in their fight against corruption. The overarching anti-corruption approach of the EU is focused on helping neighbouring states and their governments to create strategies, implement reforms in the justice system to create institutional resilience against corruption, and also improve public administration in order to simplify processes and reduce the risks of corruption mechanisms. As was mentioned above, it is important to note that divergences exist on a country-to-country basis, linked primarily to each respective country's relationship to the EU, as well as due to bilateral relations with EU member states. In addition, it is also clear that divergences exist between the Eastern and

Southern Neighbourhood, which can be explained in part due to more projects being implemented in the region (and for a longer period of time). It should also be noted that the involvement of countries in international organisations (e.g., CoE, GRECO) as well as prospective candidacy to NATO or the EU could also positively influence the EU's anti-corruption initiatives. With a comprehensive understanding of the divergences between the Eastern and Southern Neighbourhood and the potential influence of international organisations and prospective EU/NATO candidacy, the following recommendations aim to enhance the effectiveness of anti-corruption initiatives within the ENP and Neighbourhood, Development and International Cooperation Instrument (NDICI) financial tool.

Firstly, within the context of heightened global digitalisation, ENP countries and the EU must prioritise the adoption of modern technology as an effective tool to tackle corruption. This could entail embracing the best practices of integrating and harmonising diverse datasets from various agencies, which have yielded successful results in initiatives like ERAR (a platform demonstrating public expenditure) in the Republic of Slovenia, and Prevent in Romania (Huss et al., 2023). Furthermore, the EU should take proactive steps to train civil society actors in utilising open-source data effectively.

To expand on this recommendation, it should be noted that much of the EU-supported anti-corruption initiatives have focused on fostering change within the institutions of Neighbourhood countries. In order to let these efforts be successful, more emphasis should be placed on involving civil society and citizens directly in anti-corruption actions. This kind of engagement could make use of innovative technical solutions, such as supporting the creation of online platforms on which citizens are enabled to contribute actively to monitoring public procurement processes, ensuring transparency, and detecting irregularities. Funding should be made available to support the development of grassroots initiatives, and CSOs that focus on anti-corruption activities can strengthen societal resilience against corrupt practices. The benefits of this approach include increased public awareness, involvement, and ownership of anti-corruption initiatives. An advantage of placing more emphasis on this approach would be that if anti-corruption efforts have a broader base in society, it is harder to reverse success achieved in this regard, as was the case in Georgia in recent years. There should be an increased awareness that successful institution-building and judicial reforms will have to be defended from potential changes in government and political climate in the future. CSOs and citizens should be actively built up to act as the guardians of these successes. However, the EU works through supporting Neighbourhood countries' own initiatives, and governments might be reluctant to allow the active promotion of citizen engagement and creating transparency. Other limitations include limited resources and capacity within civil society and citizens in economically challenged regions. To be effective, civil society building efforts must be long-term, and this would necessitate a sustained funding commitment on the EU-side as well as sustained efforts from citizens.

Secondly, there should be more awareness of the situation that while anti-corruption efforts can be successful in removing petty corruption by minor officials or in sectors such as health care and education, this does not exclude the continued prevalence of high-level corruption. Corruption might disappear from the highway speed control, the classroom and the doctor's office, but grow stronger on ministry top floors and in executive suites. Countries might improve in international corruption rankings, which are often based on perception of corruption, while corruption continues to exist. To counter such developments the EU could encourage the adoption of comprehensive legislation on whistleblower protection. This should include clear mechanisms for reporting, investigation and protection of whistleblowers across both public and private sectors. By incentivising individuals to report corruption safely, this can significantly contribute to uncovering hidden cases and deterring corrupt practices. The advantages of this approach include the potential for exposing high-level corruption and promoting a culture of accountability. However, Neighbourhood governments might be reluctant to support reforms that are aimed at offering checks on the highest levels of government itself. Moreover, effective whistleblower protection is only possible in states with independent law enforcement and judicial systems, and most Neighbourhood states still lack in this respect.

Thirdly, it is important to mention that transparency policies are associated with lower corruption levels, but only when there is independent media and internet freedom (Žuffová, 2020). This means that combating corruption in the ENP countries can only be properly verified in the case of proper

investigative and independent media, as well as qualified CSOs dealing with monitoring and reporting. The EU must therefore pay additional attention in supporting capacity-building of CSOs and investigative journalists with such specific skill sets in order to make use of open source data provided by the government. Additionally, it is highly recommended that the standardisation practices of anti-corruption not only remain a government-to-government priority, but that cross-regional cooperation and training is given to CSOs in the Eastern and Southern Neighbourhoods in tandem and cooperatively, in order to properly be able to compare and contrast results from an evidence-based and methodologically sound approach across both regions, and internationally.

Fourthly, countries in the Eastern Neighbourhood, like Armenia and Georgia, can be a role model for ENP countries, especially from the Southern Neighbourhood, in combating corruption by studying these countries' relatively successful strategies and reforms. Armenia has made significant progress in the Corruption Perceptions Index, while Georgia, despite difficulties with its new government and a slowdown in reform progress, continues to rank as the best country together with Israel as a low level of corruption country. Civil society study visits, exchanges, coordination and workshops across both regions, and also in the case of third countries like Türkiye, remain important to support skilled CSO-to-CSO networking and best practice exchanges.

Finally, during the process of crafting this policy brief, we came to the realisation that the APs were readily available through open sources, offering readers a broad understanding of each country's intended actions, but it remained challenging to determine the exact effectiveness of anti-corruption initiatives due to the lack of precise information on progress and results. Therefore, it is strongly advised that the EU work to improve reporting transparency by providing comprehensive data on achievements and insightful analysis that covers not only anti-corruption initiatives within the ENP but also across other initiatives connected to the APs.

Conclusion

Since combating corruption continues to be a major concern and relevant in the ENP agenda, it is essential to take a systematic and coordinated approach, which needs to include best practices, new technologies, promotion of transparency, and strong civil society engagement. It is also important to remember that countries themselves choose what to improve and include in the APs. Therefore, to combat corruption, a political commitment of the Southern and Eastern Neighbourhood countries is essential.

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