

**CAPC ANNUAL NARRATIVE REPORT  
2024**



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The annual narrative report of the CAPC is a presentation of the CAPC activities during 2024, developed for the purpose of executing p. 6.1 letter a) of the Grant Agreement between the Swedish International Development Cooperation Agency, Sida and Centre for the Analysis and Prevention of Corruption Moldova (CAPC) regarding Core Support, Sida Contribution No. 15932.

The report was prepared in accordance with art. 2 of the General Conditions (Annex A) and contains information on CAPC activities and events, related to the implementation of the Grant Agreement, from **January to December 2024**.

## I. ACCOUNT OF THE RESULTS ACHIEVED

- In 2024, CAPC resumed the expertise of draft normative acts, evaluating them for corruptibility and human rights vulnerabilities using a newly integrated Methodology. A total of 67 draft acts registered in Parliament were analysed through an optimized electronic template, ensuring both quantitative and qualitative assessments. The majority of these drafts concerned constitutional, administrative, and justice-related matters, with 70% initiated by the Government. Key findings showed that while 61% of the drafts promoted interests or benefits, only 30% posed risks to the public interest. Expertise reports were submitted to parliamentary committees and published online, with findings widely disseminated through media and social platforms. CAPC also refined its Methodology and template based on legislative updates, and the impact of this expertise will be assessed in a 2025 study. At the same time, in 2024, CAPC also focused on the business sector in Moldova, launching the “#BaniCurati” Anti-Corruption Awareness Campaign, which incorporated information, education, deterrence of illegal acts, and public awareness initiatives in several key areas. CAPC completed the monitoring process of the Pre-Vetting Commission and the Vetting Commission, and the respective reports were developed. In 2024 was developed: the Monitoring Report on Decision-Making Transparency "2023 Anti-Corruption Report"; the report "Parliamentary Oversight Activity in 2022 and 2023: Efficiency and Challenges in Reporting by Public and Anti-Corruption Institutions,"; seven analytical and monitoring reports on public procurement; the study "Public Procurement in Education, Health, and Food Safety: Risks and Vulnerabilities".
- During 2024, the CAPC continued its activity for enhancing protection of whistleblowers and victims of corruption by establishing its dialogue around these innovative anti-corruption mechanisms, conducting awareness raising activities and providing assistance to stakeholders and citizens requesting it.
- As regards strengthened CAPC's organizational, expert, financial capacities, sustainability and visibility, the CAPC was the subject of a mid-term evaluation of the implementation of the CAPC Institutional Development Strategy and Action Plan. CAPC has developed 3 service packages, which could be offered by organization, for a fee. During 2024, the CAPC team continued to strengthen professional capacities, by participating at 1 workshop, 1 training and 2 study visits.

### Lessons learned:

In 2024, CAPC recognized the value of collaboration with the business sector, acknowledging its potential to create meaningful synergies. . These partnerships can bring

significant benefits to both parties. Collaboration with the business community can help NGOs obtain additional resources (financial, logistical, etc.).

Political non-affiliation/non-admission of political partisanship ensures the independence of the organization, maintains public trust and the pursuit of the mission of serving the public interest.

## II. BRIEF ACCOUNT OF MATERIALIZED RISKS

At the time of project conceptualization, the following 5 risks were listed: financial (no other projects contracted); projects' unsustainability; human (staff turnover, lack of narrow-profile specialists); political (political affiliation, instability, confrontation) and Judicial (defamation). During 2024, none of these risks materialized.

<i>Risk matrix of the Project/Core Activities</i>		<i>Account of materialized risk in 2024</i>
<b>Risk</b>	<b>Remedy</b>	
<p><b>Financial (<i>no other projects contracted</i>)</b></p> <p><u>Category (internal/external):</u> Internal</p> <p><u>Probability:</u> High</p> <p><u>Impact:</u> High</p>	<p>One of the goals of IDCSS is to strengthen CAPC's fundraising capacities. It is intended to designate and train people specifically dedicated to the activity of identifying funds for CAPC's project ideas. CAPC will also focus on developing a register of project ideas, creating a record system on donors and their areas of interest, and ensuring the maintenance of high-quality project proposals.</p>	<p>This risk didn't materialize.</p>
<p><b>Projects' unsustainability</b></p> <p><u>Category (internal/external):</u> External</p> <p><u>Probability:</u> Medium</p> <p><u>Impact:</u> Medium</p>	<p>This risk is interconnected with the financial risks. To overcome this risk, the CAPC shall first strengthen its fundraising capacities, and once these issues are fortified and solved, the risk of the unsustainability of projects will decrease significantly. Moreover, the CAPC will pursue the specialization and professional improvement on projects that are already the business card of the organization (corruption proofing/ assistance of whistleblowers), to ensure high-quality services and products. Promoting and disseminating the activities and/or results obtained within projects, both during their implementation and at the end thereof.</p>	<p>This risk didn't materialize in 2024. As in 2023, CAPC managed to obtain funding from different other projects as a result of its collaboration with donors based on the CAPC's previous achievements and portfolio in the anticorruption and justice sectors.</p>
<p><b>Human (<i>staff turnover, lack of narrow-profile specialists</i>)</b></p>	<p>To prevent/remedy this risk, the CAPC aims to ensure the continuity of projects and the sustainability of the organization,</p>	<p>This risk didn't materialize. At the same time, in 2024</p>

<p><u>Category (internal/external):</u> Internal/External</p> <p><u>Probability:</u> Medium</p> <p><u>Impact:</u> Medium</p>	<p>including by strengthening fundraising skills.</p> <p>Also, within the volunteer programs, the identification/training of the potential future employees of the organization will be pursued.</p>	<p>CAPC hired a new communicator.</p>
<p><b>Political (<i>political affiliation, instability, confrontation</i>)</b></p> <p><u>Category (internal/external):</u> External</p> <p><u>Probability:</u> Low</p> <p><u>Impact:</u> Medium</p>	<p>A fundamental condition for the CAPC employees will be their non-involvement in political activities, including their political party membership, a declaration being signed accordingly.</p>	<p>This risk didn't materialize. During 2024, no CAPC member was involved in political activities.</p>
<p><b>Judicial (<i>defamation</i>)</b></p> <p><u>Category (internal/external):</u> External</p> <p><u>Probability:</u> Medium</p> <p><u>Impact:</u> Medium</p>	<p>The CAPC has been promoting and guided by the principles established by IDCSS: fairness, impartiality, integrity, and any activities that could generate possible actions in court (defamation) will be based on indisputable, verifiable evidence.</p> <p>At the same time, CAPC's team and roster of experts is composed of lawyers with notorious experience, who have been able to prove throughout their experience to have acted very professionally in defamation lawsuits.</p>	<p>This risk didn't materialize in 2024.</p>

**III. ACCOUNT OF AGGREGATED RESULTS AND ASSESSMENTS ON EFFECTIVENESS**

1. Upgraded corruption proofing, monitoring and/or assessment tools, covering civic engagement and women empowerment, capitalized in partnerships with public and private sector

**1.1. Corruption proofing of legislation integrating the HRBA upgraded and conducted**

In 2024, CAPC resumed the expertise activity of draft normative acts from the **perspective of corruptibility and human rights vulnerability**. This activity was carried out based on a new Methodology that compiled two previous CAPC documents: one concerning the corruption proofing and the other regarding the expertise of the vulnerability of normative acts from the perspective of human rights compliance. Both expertise exercises were developed by CAPC with the support of various donors between 2006 and 2016 (corruptibility expertise during 2006-2016, and vulnerability expertise during 2013-2016).

The expertise of normative acts was conducted by completing reports using an electronic template (e-template) specifically developed for this exercise and integrated into the CAPC website. The electronic template structures and optimizes the expertise process, allowing both quantitative measurement and qualitative evaluation of the expertise exercises.

At the beginning of 2024, the CAPC Program director revitalized the team of experts and provided mentorship throughout the year on applying the new Methodology and drafting reports using the electronic template.

Additionally, throughout 2024, a supplementary review of the Methodology and, consequently, of the CAPC e-template was conducted, considering the recent legislative changes introduced by Law 100/2017.

In 2024, CAPC conducted expertise on **67 draft normative acts** registered in Parliament. According to statistics generated by CAPC's electronic system:

- **34%** of the expertized drafts were full normative acts, while **67%** were amendment projects
- most of the expertized drafts fell under the areas of **constitutional and administrative law, justice, and human rights and freedoms (48%)**, followed by the **economy, infrastructure, agriculture, and environment sectors (28%)**, and **security, defense, public order, and internal affairs (16%)**.
- most of the normative act drafts subject to expertise were developed and promoted by the Government (70%), followed by representatives of the Parliament (27%).
- 61% of the projects were considered by CAPC experts as promoting interests/benefits; however, only 30% of these were deemed to cause harm to the public interest.

All expertise reports were sent to the parliamentary committees and published on the [CAPC website](#).

Information regarding the expertise reports and the risks identified in the draft normative acts was disseminated through press releases and posts on CAPC's social media pages.

The expertise activity and its effectiveness will be the subject of a CAPC Study in 2025.

## **1.2. Monitoring and assessment of public policies, institutions, international/regional anti-corruption commitments carried out**

In 2024, CAPC completed the monitoring process of the **Pre-Vetting Commission's** activity, based on the Monitoring Methodology previously developed. As a result, a draft Monitoring Report was developed, providing a detailed evaluation of the Pre-Vetting Commission's activity, including aspects such as the number of meetings held, evaluated candidates, appeals against Commission decisions, and Supreme Court of Justice rulings following these appeals. Additionally, the report offers recommendations to enhance transparency, eliminate efficiency barriers, optimize existing mechanisms, and ensure the promotion of the most suitable candidates within the self-administration bodies of judges and prosecutors.

During this period, the monitoring process of the **Vetting Commission** was conducted based on a previously developed Methodology, resulting in the completion of the Monitoring Report on the external evaluation of the ethical and financial integrity of judges and candidates for the position of judge at the Supreme Court of Justice. The report consists of four chapters analyzing the legal framework governing the Vetting Commission's activity, its organization and responsibilities, including those of its Secretariat, as well as the evaluation procedures for candidates for the position of judge at the Supreme Court of Justice. Additionally, the report presents findings from the monitoring of the evaluation process and how the Superior Council of Magistracy (CSM) reviewed its results. Finally, the report provides conclusions and recommendations for improving the vetting process, aiming to enhance transparency, ensure impartiality, and strengthen public trust in the judiciary.

In 2024 was developed the **Monitoring Report on Decision-Making Transparency**. The analysis focused on compliance with transparency standards in decision-making by specialized central public authorities (ministries), autonomous public authorities, and some local authorities. This process was based on an online monitoring platform, integrated into the CAPC website, which tracks, in real-time, the authorities' adherence to the provisions of Law No. 239/2008 and automatically collects data on draft laws and initiatives posted on [www.particip.gov.md](http://www.particip.gov.md) and the Government's website. The system includes a statistical module and an alert module ("red flags") for non-compliance with deadlines for initiating and consulting decisions. The report identifies key dysfunctions in public consultation and decision announcement procedures and includes recommendations regarding the improvement of the information and publication process for draft decisions, compliance with legal consultation deadlines, promotion of constructive dialogue with stakeholders, increased transparency of final decisions, and strengthening the monitoring and evaluation of the decision-making process.

CAPC has developed the "**2023 Anti-Corruption Report**", a comprehensive document reflecting the main developments and challenges in the field of anti-corruption throughout the year. Structured into ten chapters, the report provides a detailed analysis of anti-corruption measures implemented in key sectors, highlighting both progress made and deficiencies and shortcomings identified by experts, the media, and civil society organizations. The document examines commitments undertaken in the context of the European Union accession process, the independence and integrity of the judiciary, the effectiveness of anti-corruption institutions, asset control, and combating illicit enrichment, as well as electoral corruption. Additionally, it addresses key issues such as the recovery of criminal assets, the protection of whistleblowers, access to information, transparency in the decision-making process, integrity in public procurement, and promoting transparency in the business environment. This report serves as a crucial tool for prioritizing anti-corruption measures, improving public policies, and addressing deficiencies across various sectors. Based on the report, a series of podcasts and interviews will be conducted with the chapter authors, who will present key findings and provide concrete recommendations for responsible authorities.

CAPC has developed and presented the report "**Parliamentary Oversight Activity in 2022 and 2023: Efficiency and Challenges in Reporting by Public and Anti-Corruption Institutions**," which analyzes how Parliament exercised its oversight function during this period, focusing on the efficiency and challenges of reporting by public and anti-corruption institutions. At the core of this analysis is the reporting mechanism of public authorities and specialized institutions to Parliament, an essential tool for democratic control and ensuring the

accountability of state entities. A key aspect of parliamentary oversight is the reporting of specialized anti-corruption institutions to Parliament, an important mechanism for ensuring compliance with their legal mandate and enhancing the efficiency of anti-corruption policies. This report provides recommendations for improving the use of reporting as a parliamentary oversight tool, aiming to strengthen transparency, efficiency, and accountability of public and anti-corruption institutions.

In 2024, **seven analytical and monitoring reports on public procurement** were developed and publicly presented. At the national level, the study "Public Procurement in Education, Health, and Food Safety: Risks and Vulnerabilities" was conducted, providing a detailed analysis of procurement in these key sectors. The study identifies corruption risks, assesses the transparency of procurement procedures, analyzes the role and efficiency of competent authorities, and highlights deficiencies in the regulatory framework. Based on the study, three Policy Briefs were developed, each addressing the main challenges identified in public procurement across the three sectors. These documents present specific recommendations for legislative interventions and concrete measures aimed at improving efficiency and increasing transparency in public procurement processes. Following an extensive monitoring process conducted in four regions of the Republic of Moldova (North, Center, South, and UTA Gagauzia), four detailed monitoring reports were published. These reports provide a comprehensive analysis and a clear perspective on the challenges faced in local public procurement in education, health, and food safety, contributing to the identification of solutions for future improvements.

### **1.3. CAPC's partnership with business associations and CSO's created**

In 2024, CAPC launched the anti-corruption awareness campaign "#BaniCurati," implementing a series of actions aimed at discouraging corruption in the business sector of the Republic of Moldova. The campaign adopted a multi-faceted approach, incorporating information, education, deterrence, and public awareness initiatives across several key areas.

The campaign began with information activities, including a press conference, press releases, social media posts, and infographics, to present the results of a national survey conducted among over 530 small and medium-sized enterprises (SMEs) in Moldova. The survey assessed their perceptions and experiences with corruption. The findings were published in the report "Corruption and the Business Environment: Perceptions of Small and Medium Enterprises in Moldova," which provides a comparative analysis with 2017 data, highlighting progress, improvements, or setbacks.

A major priority of the campaign was to change the widespread perception that bribery is essential and that corruption is omnipresent in the public sector. To achieve this, CAPC implemented an innovative initiative featuring digital billboards across Moldova displaying images of Ștefan cel Mare reacting to corruption practices. These dynamic displays were placed in central areas of Chișinău, Bălți, and Cahul. The initiative also extended to social media, where six soundtracked reels were published. The campaign was further promoted by influencers such as Natalia Albot, Cătălin Lungu, Andrei Bolocan, and Ludmila Adamciuc, and Instagram posts were shared in collaboration with the Small Business Alliance of Moldova.



Another key objective of the campaign was to raise awareness about the importance and benefits of implementing anti-bribery management systems for SMEs. Two promotional videos showcased Moldovan businesses operating in the EU that adhere to anti-corruption compliance standards. Additionally, three interviews with national influencers featured inspirational examples of Moldovan entrepreneurs applying integrity policies. Moreover, the "ISO 37001 Anti-Bribery Management System Guide" was developed, including 13 anti-bribery policies tailored for SMEs. The guide is designed to be flexible and adaptable to any company size, providing general principles and specific recommendations that can be adjusted to each organization's needs. SMEs in Cahul, Călărași, Sîngerei, the IT sector in southern Moldova, and representatives of business associations, including women-led businesses, received training on anti-corruption compliance and internal anti-bribery systems.

An essential direction of the campaign was to inform businesses about their rights and procedures during inspections conducted by state authorities. CAPC developed three practical guides on fiscal control by the State Tax Service, the National Food Safety Agency, and the National Public Health Agency, helping entrepreneurs navigate these processes more effectively. The guides were published in both digital and physical formats as brochures. Additionally, six social media cards were created and promoted on Facebook through paid advertising, maximizing their reach.

The impact of the #BaniCurati campaign was amplified by media partners, including the Center for Investigative Journalism ([www.anticoruptie.md](http://www.anticoruptie.md)), Ziarul de Gardă, and TV Nord, which helped disseminate key messages through journalistic materials and TV broadcasts.

Furthermore, it is essential to highlight the innovative digital anti-corruption tools developed to support the private sector, which can also be used by the media and public institutions. In this regard, new functionalities have been implemented on the OpenMoney.md digital platform, including the "Locality Passport," "Public Official Integrity," "Agricultural Subsidies," and "Feedback" features. These tools have the potential to play a significant role in strengthening anti-corruption efforts and improving the quality of public services.

## 2. Gender-sensitive whistleblower reporting, protection and victim-centred assistance in corruption cases provided

### 2.1. Alternative assistance system for whistleblowers and victims of corruption, including for the environment-related disclosures created and implemented

CAPC lawyers have provided legal assistance to a whistleblower in a high-profile case who resigned from his position, accusing political decision-makers of retaliation against him. The whistleblower received the necessary legal consultation, during which all circumstances of the case were thoroughly analyzed, including the employer's actions and the documents presented. He was informed about the legal steps required to protect his rights, in accordance with the applicable legal provisions. Additionally, he was guided on the public authorities to which he should address his complaint to be officially registered as a whistleblower, ensuring that his case is handled appropriately within the integrity protection framework.

## **2.2. Capacity of the duty-bearers built in the whistleblowing and victim-centred assistance area**

Throughout 2024, CAPC promoted the whistleblower mechanism established by the Whistleblower Protection Law No. 165 of 22.06.2023 by developing guidance documents to support its effective implementation. As part of three regional training sessions (Sîngerei, Cahul, Călărași), 91 local small and medium-sized enterprises (SMEs) were trained on whistleblower protection policies.

## **2.3. Right-holders' awareness raised in the whistleblowing and victim-centred assistance area**

CAPC developed a video spot in sketch-comedy style that promote zero tolerance of corruption at the local community and national levels, focusing on the whistleblower mechanism and public interest disclosure in several sectors at high risk of corruption (education, health, food safety). As part of an awareness-raising campaign, the video spot was broadcast daily for two months by 18 national and regional media outlets (TV, radio, web portals), including Teleradio-Moldova Company, the main public broadcasting institution in the Republic of Moldova. According to audience data provided by Moldova 1, the impact of this video spot reached approximately 915,000 viewers

In 2024, the video tutorial "Whistleblowers: What You Need to Know!" was developed and published, explaining step by step the actions a whistleblower should take and the responsibilities of whistleblower protection authorities under the new legal provisions. Additionally, CAPC developed a series of informative infographics to help citizens better understand who whistleblowers are, how violations of the law can be reported, and what measures authorities take to protect whistleblowers.

## **3. Strengthened CAPC's organizational, expert, financial capacities, sustainability and visibility**

### **3.1. CAPC's internal governance and management mechanisms strengthened**

In 2024, CAPC underwent a **mid-term evaluation** of the implementation of its Institutional Development Strategy and Action Plan. To analyze the evaluation results and implement the recommendations formulated by the evaluator, a workshop was organized on May 24, 2024, where the findings, conclusions, and recommendations related to outputs 3.1-3.3 of the CAPC Strategy were presented. Additionally, the CAPC evaluator conducted a practical workshop on initiating the diversification of CAPC's fundraising sources.

### **3.2. Fundraising mechanism created and implemented**

For the implementation of the fundraising mechanism, throughout 2024, CAPC developed three service packages that could be offered for a fee:

- CAPC's offer for the implementation of the ISO 37001 Standard
- CAPC's offer for legislative harmonization services
- CAPC's offer for whistleblower protection

All offers include a brief overview of CAPC, a description of the services, pricing, the benefits of CAPC's services, and information on CAPC's anti-corruption and confidentiality policies.

### **3.3. Visibility and communication Strategy implemented**

In 2024, CAPC implemented and capitalized on the Communication Strategy and Brand book, developed in 2023. As a result, effective, transparent, and explicit communication was ensured, using all available tools and communication channels, in alignment with priorities and visual identity.

Throughout the year, CAPC published on its platforms and sent to journalists 19 press releases, posted 112 updates on Facebook, including 18 videos (reels, live streams, or podcasts), and 94 text posts accompanied by cards, infographics, or photos.

The most extensive communication activity of 2024 was the "#banicurati" campaign. CAPC's Facebook page recorded its best results in December, when the #banicurati campaign was in full swing, reaching 846,000 views.

Similarly, the posts with the highest impact on social media were those related to the #banicurati campaign. The post about the inspection conducted by the National Public Health Agency reached over 212,000 views.

Thanks to regular postings, the #banicurati campaign, and targeted promotions, CAPC's Facebook page followers increased from 2,000 at the end of 2023 to 2,300 by the end of 2024.

In 2024, the CAPC website (capc.md) also recorded growth across all key metrics. The number of page views increased nearly fourfold compared to the previous year, reaching almost 54,000. The number of users also doubled, reaching 7,700.

For greater visibility and to reach a broader audience (especially younger demographics), CAPC created an Instagram page in 2024.

Additionally, based on the new Brand book, a set of visibility materials was produced to promote CAPC's image, including umbrellas (as a symbol of the organization), T-shirts, backpacks, and office supplies.

### **3.4. Professional skills and technical infrastructure enhanced**

Throughout 2024, the CAPC team continued to strengthen its professional capacities.

On May 24, 2024, during a workshop held after the presentation of the mid-term evaluation report on the implementation of CAPC's Institutional Development Strategy and Action Plan, several key topics were discussed: internal governance and management mechanisms, fundraising mechanisms, and visibility strategy. Additionally, during the same workshop, the CAPC team enhanced its knowledge on gender mainstreaming, discussing various recommendations for strengthening gender equality within the organization. These discussions were enriched by the experience of the East European Foundation in integrating gender aspects into the development and implementation of programs.

To facilitate the implementation of the service package that CAPC could offer for a fee, on May 15, 2024, CAPC organized the training "Legislative Harmonization as a Key Element for

the Success of Moldova’s EU Integration Process.” The training covered topics such as EU law, the sources of Moldova’s harmonization obligations, legislative harmonization, and the country’s harmonization mechanism.

Between January 24-27, 2024, to strengthen knowledge about the ECHR mechanism for protecting whistleblowers, six CAPC experts conducted a study visit to the European Court of Human Rights (ECHR). CAPC representatives met with Diana Sîrcu, the national judge from the Republic of Moldova, as well as lawyers from the ECHR Registry and the Enforcement Department. They provided insights into the role of the ECHR, the whistleblower protection mechanism within the ECHR framework, and the enforcement of international court rulings, including cases involving whistleblowers.

On October 29-30, 2024, CAPC experts conducted a study visit to Bucharest, organized with the technical support of the Romanian Academic Society. The key topics of interest included the role of NGOs in the EU accession process and post-accession period, integrity in the private sector, promotion of anti-corruption standards (ISO 37001), whistleblower protection, and the recovery of damages resulting from corruption-related offenses.

#### **IV. BRIEF ACCOUNT OF WORK UNDERTAKEN TO PREVENT INSTANCES OF CORRUPTION AND SEXUAL EXPLOITATION, SEXUAL ABUSE AND SEXUAL HARASSMENT**

During 2024, there were no cases of corruption and sexual exploitation, sexual abuse and sexual harassment within CAPC.

As shown in previous reports:

- the contracts developed and signed by CAPC contain the anti-corruption clause;
- the internal documents of CAPC contain express provisions on all aspects related to the prevention of corruption within CAPC, as well as express provisions on the inadmissibility of any type of harassment and persecution;
- during 2024 CAPC ensured and promoted a balanced gender representation in all its activities.