Policy Brief

Anti-Corruption Policies: Impact and Challenges

Disclaimer: This policy brief builds on the discussions and insights generated during the Moroccan Policy Dialogue on *"Anti-Corruption Policies: Impact and Challenges"*, held on April 11, 2026- Rabat. The ideas and policy directions presented herein synthesize the main discussions, conclusions, and recommendations that emerged from this exchange.

Introduction

Corruption in Morocco remains a structural governance challenge that continues to undermine institutional effectiveness, economic performance, and public trust. While the country has undertaken multiple waves of reforms, particularly since the 2011 Constitution, evidence suggests a persistent gap between formal anti-corruption commitments and tangible outcomes.

At its core, corruption refers to the abuse of public authority for private gain, encompassing practices such as bribery, embezzlement, clientelism, and conflicts of interest. However, in the Moroccan context, corruption is not merely a set of isolated illegal acts; rather, it reflects embedded patterns within political, administrative, and socio-economic systems.

According to the 2025 Corruption Perceptions Index, Morocco scored 39 out of 100, ranking 91st globally[1], a position that places it within the lower-middle tier internationally and signals only modest improvement over time. This perception is reinforced by broader governance indicators. The Worldwide Governance Indicator (WGI) framework, which measures governance across six dimensions on a scale from –2.5 (weak) to +2.5 (strong), consistently places Morocco in the lower half of global rankings, with negative scores across most indicators since the early 2000s. In 2023, the country recorded a particularly concerning decline in the "Control of Corruption" indicator, reaching –0.54, its lowest level in over a decade, alongside a drop in global ranking to approximately the 33rd [2].

Beyond estimated annual financial losses of approximately 50 billion dirhams[3], the phenomenon erodes social cohesion, weakens democratic legitimacy, and distorts public policy priorities. Perception-based evidence further underscores the depth of the corruption challenge in Morocco. According to the Moroccan Institute for Policy Analysis (MIPA)'s Trust in Institutions Index

[1]https://www.transparency.org/en/cpi/2025?gad_source=1&gad_campaignid=23552156524&gbraid=0AAAADud0D34V289xvLTf4GhlYshm4cX&gclid=CjwKCAjwzLHPBhBTEiwABaLsSlIfo0Pq7xvgbpp0CE0ri0z953Yo9ZzWvAi6A_LCY053xVnk0g1pPBoC2sQQAvD_BwE
[2] https://www.inpplc.ma/sites/default/files/WGI.pdf
3 https://www.leconomiste.com/1126304-corruption-it-still-endemic/

(2023)[4], 83% of respondents consider bribery to be widespread. At the same time, public confidence in anti-corruption efforts remains fragile as only 47% of respondents express satisfaction with government actions to combat corruption. These findings are compounded by a broader erosion of political trust, as confidence in key elected institutions has declined sharply, trust in government fell to 43% in 2023 (down from 69% in 2022), while trust in political parties dropped to 33%, suggesting that corruption is not only perceived as widespread but also contributes directly to weakening institutional legitimacy and citizen-state relations.

Taken together, these indicators point to the persistence of corruption as a structural feature of governance in Morocco, with far-reaching economic, political, and societal consequences. Understanding this persistence requires situating the phenomenon within the broader trajectory of public action aimed at addressing it. Over the past two decades, Morocco has progressively developed a legislative and institutional framework dedicated to integrity and anti-corruption, accompanied by official discourse emphasizing transparency and accountability. This trajectory has been marked by limited and uneven outcomes; where Morocco's anti-corruption policies have been constrained by a combination of weak institutional effectiveness, delays in implementation, and gaps between stated political commitments and operational practice, reflecting deeper structural and political constraints [5]. Therefore, what explains the persistence of limited outcomes despite the progressive development of this framework, and to what extent are these constraints rooted in its design, implementation, or broader political context?

Tracing the Evolution of Morocco's Anti-Corruption Legislative and Institutional Framework

Morocco's anti-corruption framework has evolved through two distinct phases, marked by the constitutional turning point of 2011.

Before 2011, the fight against corruption relied primarily on general provisions of the Penal Code (1962)[6] and a set of sectoral laws addressing financial oversight and criminal procedure. Core corruption-related offences, such as bribery, embezzlement of public funds, abuse of office, and influence peddling, were formally criminalized, providing a basic legal foundation aligned in part with international standards. However, important gaps persisted. Moroccan legislation did not fully incorporate key concepts required by the United Nations Convention against Corruption (UNCAC), including the absence of explicit provisions on bribery of foreign public officials, incomplete coverage of trading in influence and abuse of functions, and the lack of criminalization of illicit enrichment. Moreover, enforcement mechanisms were constrained by relatively lenient sanctions, limited deterrence capacity, and the absence of specialized anti-corruption law enforcement bodies, reducing the practical impact of existing legal provisions[7].

Institutionally, the pre-2011 landscape was characterized by a multiplicity of actors with limited coordination. Oversight functions were distributed across bodies such as the Inspectorate General of Finance, the Inspectorate General of Territorial Administration, the Financial Courts, and the

[4] https://mipa.institute/wp-content/uploads/2023/09/4-Trust-Index-2023-charte-2.pdf
[5] https://mipa.institute/wp-content/uploads/2019/03/mohamed-berraou-english-2-.pdf
[6] https://features.hrw.org/features/african-union/files/Morocco%20-%201962%20Penal%20Code%20(as%20amended).pdf
[7] https://www.mmsp.gov.ma/uploads/file/Morocco_Final_English_Report_detaille.pdf

Public Prosecutor's Office, without a unified strategic framework[8]. The establishment of the Central Authority for the Prevention of Corruption (ICPC) in 2007, operational in 2009, marked an initial attempt to introduce a preventive and coordinating dimension. However, its mandate remained restricted to advisory and coordination functions, without investigative or enforcement powers, limiting its overall effectiveness within the broader governance system.

The adoption of the 2011 Constitution[9] represents a critical inflection point, signaling a shift toward a more integrated and principle-based approach to governance and anti-corruption. The Constitution explicitly enshrines transparency, accountability, good governance, and integrity as fundamental state principles, while also recognizing the primacy of international conventions, including UNCAC, over domestic law. Notably, Article 36 criminalizes a wide range of corrupt practices, including conflicts of interest, insider trading, and misuse of public resources, thereby broadening the conceptual and legal scope of corruption beyond traditional bribery offenses.

The Constitution further provides for the constitutionalization of anti-corruption institutions, notably transforming the existing preventive body into a National Authority for Integrity, Prevention and the Fight against Corruption (INPPLC)[10], with an expanded mandate covering coordination, monitoring, and policy guidance. Despite this constitutional ambition, the INPPLC itself was only fully institutionalized several years later, reflecting delays in translating constitutional commitments into effective institutional capacity.

In parallel with constitutional reforms, Morocco introduced a series of legislative measures aimed at strengthening transparency and accountability. Among the most significant is Law No. 31-13 on the Right of Access to Information, adopted in 2018 and implemented in 2020. The law is grounded in the principle that access to information is a fundamental right and a necessary condition for public accountability. However, its effectiveness has been constrained by broad exceptions, administrative resistance, and limited public awareness, which collectively reduce its transformative potential[11].

Another key pillar of the legal framework concerns public financial governance and procurement reform, an area widely recognized as highly vulnerable to corruption. Morocco has progressively modernized its public procurement system, particularly through the adoption of the 2013 Decree on Public Procurement (Decree No. 2-12-349)[12], which marked a significant shift toward aligning national procedures with international standards of transparency, competition, and equal access. This reform introduced clearer rules governing tendering processes, expanded the scope of competitive bidding, and strengthened requirements for the publication of procurement opportunities and results. A central component of this modernization has been the development of the national e-procurement portal (Portail des marchés publics)[13], which has gradually become mandatory for the publication of calls for tender and procurement-related information, thereby improving accessibility and traceability of public contracts. However, despite these advances,

[8] Ibid
[9] https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Morocco-Constitution.pdf
[10] https://www.inpplc.ma/fr
[11] https://carnegieendowment.org/sada/2024/07/morocco-faces-barriers-to-effective-implementation-of-the-right-to-information-law
[12] https://www.equipement.gov.ma/Ingenierie/Reglementation/Documents/Decret-relatif-aux-marches-publics-BO-n6140.pdf
[13] https://www.marchespublics.gov.ma/pmmp/

procurement remains a structurally high-risk area, characterized by implementation gaps between regulatory frameworks and actual practices, as well as limited effective competition, administrative discretion in decision-making, and uneven oversight capacity across contracting authorities. These challenges are compounded by institutional weaknesses in monitoring and audit functions, as well as risks of collusion and restricted market access in practice, particularly affecting smaller firms[14].

Complementing these sectoral reforms, Morocco has also adopted legislation requiring asset declarations for public officials, as well as laws addressing money laundering and financial crimes. Asset declaration requirements, expanded over time to cover elected officials and senior public servants, aim to enhance transparency and prevent illicit enrichment, with oversight entrusted primarily to institutions such as the Court of Auditors. In parallel, Morocco has significantly reinforced its anti-money laundering framework through Law No. 43-05 (2007) and its subsequent amendments, particularly in 2011, which broadened the scope of predicate offences, strengthened due diligence obligations, and enhanced the role of the Financial Intelligence Unit (UTRF). These reforms contributed to Morocco's removal from the FATF "grey list" in February 2023[15]. However, the 2019 FATF Mutual Evaluation[16] highlights that, despite a relatively comprehensive legal framework, the effectiveness of these mechanisms remains constrained by significant implementation gaps. In particular, the report underscores limited use of financial intelligence in corruption-related investigations, a relatively low number of money laundering prosecutions and convictions, and weak confiscation of criminal assets, reducing the deterrent effect of the system. It also points to deficiencies in the supervision of non-financial sectors, gaps in beneficial ownership transparency, and insufficient application of enhanced due diligence measures for politically exposed persons (PEPs); all of which are critical in corruption-related cases. Similarly, asset declaration systems continue to face structural limitations in verification, control, and sanctioning mechanisms, with oversight bodies lacking the resources and legal tools necessary to ensure systematic compliance.

The most comprehensive attempt to integrate these various initiatives into a coherent policy framework is the National Anti-Corruption Strategy (2015–2025)**.** Conceived as a multi-dimensional roadmap, the strategy aimed to address corruption through a combination of prevention, enforcement, awareness, and institutional coordination**,** reflecting an explicit recognition of corruption as a systemic issue requiring a holistic response rather than isolated legal interventions. However, multiple evaluations indicate that the strategy has struggled to achieve its intended impact[17]. While it contributed to structuring public action and clarifying institutional roles, its implementation has been constrained by fragmented governance, limited ownership across public institutions, and insufficient integration of anti-corruption objectives into sectoral policies**.** In this context, the development of a national anti-corruption impact

[14] Dynamics and Challenges of Public Procurement Reform in Morocco: Current Status and Prospects for Improvement. *(2024).* https://www.researchgate.net/publication/398577434
[15] https://www.mapnews.ma/en/actualites/economy/european-commission-removes-morocco-grey-list-countries-under-money-laundering
[16] https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-mer/MENAFATF-Morocco-Mutual-Evaluation-2019.pdf.coredownload.inline.pdf
[17]https://snrtnews.com/fr/article/linpplc-lance-un-guide-national-devaluation-dimpact-anticorruption-141808

evaluation guide reflects an effort to operationalize this missing dimension by providing methodological tools to evaluate results and strengthen accountability.

It is within this same perspective that the INPPLC's institutional strategy for 2025–2030[18] has been formulated, marking a shift toward a more operational, impact-oriented approach**.** Rather than merely articulating strategic priorities, this new phase seeks to consolidate an integrated national integrity system**,** reposition the INPPLC as a central actor in coordination, policy orientation, and evaluation**,** and move from a logic of dispersed initiatives to one focused on institutional coherence and measurable results**.** This shift is further supported by an emphasis on digital transformation as a core enabler, including the development of integrated information systems, risk-mapping tools, and data-driven monitoring mechanisms to strengthen transparency, inter-institutional coordination, and evidence-based decision-making. In doing so, it explicitly acknowledges the need to transition from formal commitments to tangible impact**,** while addressing persistent structural challenges such as fragmentation of efforts, weak evaluation culture, and limited public trust in the effectiveness of anti-corruption mechanisms**.**

The trajectory outlined above highlights a gradual shift from fragmented legal provisions to a more structured and ambitious anti-corruption architecture. Yet, this evolution also brings into focus a critical tension between the expansion of frameworks and the consistency of their outcomes. Rather than resolving the problem, successive reforms have exposed a set of underlying constraints that continue to shape how these mechanisms function in practice.

From Reforms to Impact: Key Policy Directions

- ***Impact, Not Architecture***

Morocco's anti-corruption challenge no longer lies in the absence of strategies or institutional frameworks, but in their ability to generate tangible and sustained impact. The accumulation of legal and strategic instruments has not been matched by equivalent progress in outcomes, pointing to a structural imbalance between policy design and implementation. This gap is compounded by the adaptive nature of corruption, which increasingly operates through diffuse and evolving practices that leave limited traceability, complicating detection, proof, and enforcement. In this context, corruption appears less as a static phenomenon than as a "mutating" system, capable of reproducing itself across sectors despite successive waves of reform. Addressing this requires shifting toward a model of performance-based governance, where anti-corruption efforts are anchored in measurable indicators, systematic evaluation, and enforceable accountability. Without such mechanisms, even well-designed strategies risk remaining declaratory, with limited influence on administrative practices or public perceptions.

- ***Norms, Education, Media and the Reproduction of Integrity***

Efforts to combat corruption must also address the normative environments in which it is produced and reproduced. Legal deterrence alone remains insufficient in contexts where corrupt

[18] https://inpplc.ma/sites/default/files/2026-01/Strate%CC%81gie%20quinquennale%20de%20l%E2%80%99INPPLC%202025-230.pdf

practices are tolerated, normalized, or embedded in everyday interactions. In Morocco, the emergence of colloquial expressions used to describe such practices reflects an attempt to capture their sociological depth and embeddedness. Terms such as *"الفراقشية"*, alongside widely used notions like *"باك صاحبي"* or *"المعريفة"*, point to forms of informality and relational influence that often operate at the margins of formal legality. These expressions do more than describe corruption; they signal its social intelligibility and normalization, while also highlighting patterns that remain difficult to regulate, trace, or sanction through formal mechanisms alone.

Education systems, and schools in particular, constitute a critical pillar in anti-corruption efforts, not primarily as sites of rule enforcement, but as spaces where the foundations of integrity are formed and reproduced. By embedding principles of ethics, responsibility, and citizenship within curricula and pedagogical practices, education can shape the value systems that underpin individual behavior. This normative dimension is essential in contexts where corruption is sustained not only by institutional gaps, but also by social acceptance and adaptive practices**.**

Beyond value formation, education contributes to building resilience to corruption by equipping individuals with critical thinking skills and ethical decision-making capacities**,** enabling them to recognize, question, and resist corrupt practices. It also plays a key role in fostering active engagement, encouraging students to participate in initiatives that promote transparency and accountability, thereby strengthening their sense of agency as future citizens. When integrated across formal and informal learning environments, these processes can generate sustained shifts in attitudes and behaviors, contributing to the emergence of a culture in which corruption is less tolerated and more consistently challenged.

The media constitutes a central pillar in anti-corruption efforts, operating at the intersection of information, accountability, and norm formation. Its primary contribution lies in reducing information asymmetries by uncovering and disseminating evidence of corrupt practices, thereby increasing the visibility of wrongdoing and raising the political and reputational costs associated with it. Investigative journalism, in particular, plays a critical role in triggering accountability processes. Beyond its watchdog role, the media also shapes how corruption is understood and evaluated within society. Through sustained coverage, framing, and public debate, it contributes to defining corruption not as an inevitable or tolerated practice, but as a deviant behavior subject to scrutiny and sanction**.**

- ***Power, Influence, and the Limits of Accountability***

The persistence of corruption also reflects deeper imbalances in how power and influence are structured and exercised**.** In many instances, corruption is not external to the system but embedded within the dynamics of political and institutional action itself, shaping incentives and constraining reform efforts. This is particularly evident where governance arrangements allow for blurred boundaries between public authority and private interest, making part of the problem endogenous to the functioning of institutions. In such contexts, corruption networks do not merely bypass legal frameworks; they can also adapt, reinterpret, and at times instrumentalize them to sustain their position and protect their interests. This dynamic complicates the production of effective anti-corruption legislation, particularly when reforms are designed and

implemented within institutional environments where corruption becomes a structuring feature of practice rather than an anomaly**.** These dynamics are further reinforced by the profiles and trajectories of political elites, particularly when segments of decision-making bodies include actors associated with business interests, conflict-of-interest situations, or prior corruption-related allegations or cases.

In this regard, recent assessments point to signs of regression in anti-corruption efforts since 2016, which have become more pronounced in the post-2021 period, notably with the presence of parliamentary actors associated with judicial proceedings, convictions, or conflicts of interest, including issues related to asset declaration. These trends have been accompanied by legal and procedural developments affecting accountability mechanisms, including debates over the criminalization of illicit enrichment and reforms to procedural rules governing corruption complaints, most notably the adoption of Article 3 of the draft Law on Criminal Procedure, which centralizes the filing of corruption-related complaints in the hands of the public prosecution; thereby restricting the role of citizens and civil society in reporting and oversight**.**

The regulation of lobbying[19] and interest representation remains a critical, yet underdeveloped, dimension of anti-corruption efforts. While lobbying can serve as a legitimate channel through which interests are articulated, the absence of clear rules governing interactions between public officials and private actors creates risks of opaque influence, unequal access, and policy capture. These risks are particularly pronounced where decision-making processes lack transparency, allowing influence to be exercised informally and without scrutiny.

Addressing this gap requires the establishment of clear and enforceable frameworks that define how influence can be exercised within the policymaking process. This includes transparency requirements regarding meetings and communications, disclosure of interests, and safeguards against conflicts of interest and revolving-door practices. However, international experience suggests that transparency measures alone are insufficient unless supported by independent oversight and effective enforcement, capable of ensuring that rules are not only established, but applied in practice

- ***Participation, Protection, and the Conditions of Engagement***

Finally, the role of citizens in anti-corruption efforts cannot be understood in isolation from the conditions that enable or constrain their participation. While public engagement is often presented as a key pillar of accountability, it remains limited in the absence of trust, protection, and meaningful channels for action**.** In Morocco, several mechanisms have been introduced to facilitate citizen reporting, including the toll-free anti-corruption hotline “numéro vert” managed by the Public Prosecutor’s Office, and digital platforms such as “Chikaya.ma”**,** designed to receive and process complaints related to public administration. While these initiatives reflect an institutional effort to open channels for reporting, their effectiveness remains closely tied to citizens’ perceptions of confidentiality, follow-up, and tangible outcomes. Expecting citizens to act as primary agents of accountability, particularly through reporting and exposure, raises fundamental questions about the distribution of responsibility in combating corruption,

[19] https://www.opengovpartnership.org/open-gov-guide/anti-corruption-lobbying/

especially where individuals are left to bear disproportionate risks. In this context, strengthening frameworks for whistleblower protection, grounded in robust legal safeguards, effective institutional support, and credible guarantees of fairness, becomes essential. Creating such conditions is not only necessary to protect individuals, but also to ensure that reporting mechanisms are perceived as legitimate and usable in practice.

Beyond individual engagement, research highlights the importance of collective action[20] as a more effective and sustainable approach to addressing corruption. Anti-corruption efforts are significantly strengthened when citizens are not isolated actors, but part of a broader coordinated societal response, involving civil society organizations, professional associations, trade unions, and other intermediary actors. Civil society organizations play a critical role in this process by mobilizing public awareness, monitoring government actions, advocating for reforms, and facilitating reporting mechanisms**.** At the same time, their effectiveness often depends on their ability to coordinate with other stakeholders**,** including academia, media, and the private sector, in order to build sustained and credible accountability coalitions.

In this regard, recent legislative developments in Morocco illustrate the tensions surrounding the role of civil society in anti-corruption efforts[21]. In 2024, the government approved Bill 03.23 amending the Code of Criminal Procedure, which restricts the ability of civil society organizations to initiate legal action in cases involving public funds, unless such action is authorized by the public prosecutor at the Court of Cassation. This reform has sparked significant debate, particularly among anti-corruption organizations, which argue that it limits their role in exposing and prosecuting corruption cases. A notable example often cited is the case of a former minister and local elected official, whose prosecution was triggered by a complaint filed by a civil society organization specializing in the protection of public funds.

While government authorities have justified the reform by pointing to risks of misuse of complaints by certain associations, civil society actors argue that such restrictions undermine their constitutional role within Morocco's framework of participatory democracy, as enshrined in the 2011 Constitution. More broadly, this debate reflects a structural tension between efforts to regulate participation and the need to preserve independent societal oversight as a core component of anti-corruption systems.

Conclusion

Morocco's anti-corruption trajectory now appears to be entering a more politically contested phase, where the central question is no longer the expansion of frameworks, but the direction they will take in practice. As the country approaches upcoming electoral cycles, including the next legislative elections of September 2026, debates around accountability, public integrity, and the role of institutions are likely to intensify, particularly in light of recent controversies surrounding legal reforms, civil society participation, and the profiles of political elites. These dynamics suggest that anti-corruption is increasingly intertwined with broader questions of

[20] https://www.oecd.org/content/dam/oecd/en/publications/reports/2020/07/global-lessons-on-collective-action-against-corruption_ab9070e7/07d817f0-en.pdf
[21] https://carnegieendowment.org/sada/2024/10/morocco-public-law

political competition, legitimacy, and state–society relations, rather than being confined to a technical policy domain.