



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
Confederaziun svizra

Swiss Confederation

# The Federal Council's Anti-Corruption Strategy 2021–24



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# 1 Introduction

Switzerland takes pride in the quality of its institutions and public governance – and justifiably so. This is a crucial factor in its global competitiveness, giving it an advantage over many of its peers.<sup>1</sup> But above all, the Swiss state enjoys high levels of public trust in government, measured by the “[confidence of citizens and businesses in the actions of government to do what is right and perceived as fair](#)”.<sup>2</sup> This healthy degree of citizen confidence both reflects and contributes to good public governance. It could be seriously eroded by allegations of public corruption, as too would Switzerland’s international reputation.

Public institutions are constantly exposed to the risk of corruption. Switzerland has numerous measures in place to contain this risk, the most fundamental being the checks and balances provided by democratic elections and referendums and the separation of powers. The Federal Administration is subject to the supervision of the Federal Council, in turn under parliamentary oversight, and the judicial oversight of the Federal Administrative Court. The federal departments have internal audit functions and are also independently audited by the Swiss Federal Audit Office. The freedom of information and the freedom of the press allow private citizens and organisations to form and express their own opinions of the public administration. Strict codes and standards exist at all levels, from the oaths of office taken by members of the Federal Council and of the Federal Supreme Court down to the code of conduct applicable to all federal employees. Further measures in place include internal control systems, personnel security screening, reporting offices and advisory services – all of which enhance the quality and integrity of governance.

Consequently, this national anti-corruption strategy – although the first of its kind in Switzerland – builds on a strong foundation. It has been formulated proactively out of a commitment to continuous improvement and not in response to any particular incident or allegation. In doing so, the Federal Council intends to expand on certain aspects of Switzerland’s anti-corruption framework, without losing sight of the bigger picture.

This strategy for 2021–24 presents a number of goals and the measures to be taken to achieve them. Focusing largely on the Federal Council’s areas of responsibility, it presents measures specifically directed at the Federal Administration. Indirectly, however, it is intended that this strategy will have a wider influence – be it through the management of autonomous entities of the Confederation, or the example set for the cantons, or through Switzerland’s anti-corruption efforts at the international level. Corruption often occurs at the boundary between public and private interests and cannot be prevented or tackled by the state alone. The Federal Council therefore calls on the private sector and civil society to join with it in the fight against corruption.

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1 Switzerland ranked 6th out of 141 countries under ‘Institutions’ in The Global Competitiveness Report 2019 from the World Economic Forum. It ranked 4th for ‘Government efficiency’ in the IMD World Competitiveness Ranking 2019.

2 OECD (2013), ‘Trust in government, policy effectiveness and the governance agenda’, in *Government at a Glance 2013*, OECD Publishing, Paris.

## 2 Vision

- *Citizens can expect Swiss public authorities and institutions to be free of corruption.*
- *The Confederation, cantons and communes assist and learn from each other in their anti-corruption efforts.*
- *Switzerland is renowned worldwide for its integrity as a business location and does not attract illegally obtained assets.*
- *Switzerland's international cooperation makes anti-corruption a priority in all fields of activity.*

# 3 Goals and measures

## 3.1 Prevention

Despite occasionally making the headlines, corruption is not a common occurrence in Switzerland. In international comparison, Switzerland enjoys a high level of citizen confidence in its institutions and a trusted public administration. This solid basis needs to be preserved by preventing corruption. Maintaining a low rate of corruption and of perceived corruption is important because in countries where corruption is considered a rare occurrence, it tends to remain an exception, and people are less likely to engage in it.



Chart 1: Switzerland in the Corruption Perceptions Index (Source: Transparency International)

As the chart shows, Switzerland consistently scores among the highest of the 180 countries surveyed in the Corruption Perceptions Index (CPI) from Transparency International. The CPI measures perceived levels of public sector corruption (on a scale from 0 for 'highly corrupt' to 100 for 'very clean') based on surveys of experts and business executives as well as other data sources.

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## Goal 1: Raising awareness

All public officials and federal employees ensure that their public duties are not compromised by private interests.

### Context:

For the most part, federal employees identify with the Confederation as their employer and the duties this entails. However, there may be isolated cases where private interests (friendships, secondary occupations, personal investments, etc.) unduly influence employees' official activities and conflict with the overriding public interest. The Federal Council has set out the main obligations of federal employees in the Federal Personnel Ordinance (FPersO)<sup>3</sup> and issued a [Federal Administration Code of Conduct](#) .

### Measures:

1. The heads of the federal departments and senior management will lead by example and regularly remind their staff of the obligations of federal employees under the FPersO and the Federal Administration Code of Conduct.
2. Line managers will ensure that their staff are at all times familiar with the legal basis for the performance of their duties and are aware of the overriding public interest.
3. All secondary occupations subject to notification will be recorded in employees' personnel files and updated regularly.
4. Potential conflicts of interest will be discussed at least once a year as part of the MbO cycle (employee appraisal) and, if necessary, appropriate action will be agreed on.
5. Management staff will be made aware of the need to prevent corruption as part of their training and continuing education programmes.

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## Goal 2: Risk-based approach

The administrative units are aware of the risks of corruption specific to their field of activity and pay particular attention to those activities and task areas with increased risk exposure.

### Context:

In the various administrative units of the federal government, not all roles are exposed to the same degree of corruption risk. To date, no role-specific record of corruption risks has been drawn up as a basis for targeting preventive measures to those administrative units or roles found to be most at risk.

Corruption risks fall between the internal control system (ICS), which focuses on the operational risks of financially relevant business processes, and the risk management function. Corruption prevention measures can therefore build on the existing structures.

### Measures:

6. The Interdepartmental Working Group (IDWG) on Combating Corruption will develop guidelines (in addition to the ICS) for identifying the roles within the Federal Administration most exposed to the risk of corruption.
7. The Federal Council will examine the possibility of adapting existing regulations so that employees in roles with a higher risk of corruption can be subjected to extended personnel security screening at random intervals.
8. A study will be conducted to examine the possibility of introducing an obligation for employees in roles with a higher risk of corruption to disclose substantial personal assets, investments and liabilities.
9. Each administrative unit will designate a point of contact for line managers seeking advice on corruption prevention, e.g. the risk coach or compliance office.
10. The waiting period under Art. 94b FPersO for public servants taking up private employment will be applied more frequently in order to avoid conflicts of interest.

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<sup>3</sup> Federal Ordinance of 3 July 2001 on the Personnel of the Swiss Confederation (FPersO; SR 172.220.111.3).

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### Goal 3: Transparency

The Confederation creates and preserves trust through greater transparency.

#### Context:

The principle of freedom of information in public administration, introduced in 2006, is now widely accepted as a means of monitoring official conduct. However, many types of information are only made available upon request or application. Developments in digitalisation and e-government, which increase openness and transparency and unlock the potential of open data, are expected to further strengthen public confidence in institutions.

#### Measures:

11. The administrative units will inform their private sector partners of the rules applicable to their employees when dealing with private parties (e.g. regarding the acceptance of invitations and gifts) and will require that their contractors also comply with the same rules.
12. The Federal Administration will voluntarily publish the types of information most frequently released in response to freedom of information requests.
13. The Confederation will look into expanding the database of federal subsidies so as to improve transparency in identifying the recipients.
14. The Confederation will examine measures to improve transparency of the beneficial owners of real property and legal entities.

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### Goal 4: Autonomous entities of the Confederation

The autonomous entities act as role models in terms of integrity and transparency.

#### Context:

Various federal tasks are not performed by the central Federal Administration itself but have been delegated to companies or entities owned by the Confederation.<sup>4</sup> The Federal Council intends to ensure that the Confederation, as a company owner, sets an example with regard to responsible business conduct (including the prevention of corruption).<sup>5</sup> With its 'Corporate Governance Report 2006'<sup>6</sup> and a supplementary report in 2009<sup>7</sup>, the Federal Council created guidelines for the organisation and management of such organisations. In June 2019 it decided that their accountability to the Confederation in regard to compliance should be further expanded.<sup>8</sup> At the international level, the OECD has recommended that its members should ensure clarity in their expectations of state-owned enterprises regarding anti-corruption and integrity.<sup>9</sup>

#### Measures:

15. In the next revision, the Federal Council will amend the strategic objectives of the autonomous entities of the Confederation in regard to compliance, taking account of national and international standards.
16. The relevant federal departments will check that codes of conduct are issued for dealing with conflicts of interests and awareness-raising measures are implemented.

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4 Autonomous entities of the Confederation which are managed by means of strategic goals as described in Art. 8 para. 5 of the Government and Administration Organisation Act (GAOA; SR 172.010).

5 Cf. chapter 2.2. and measure B.3 in [CSR position paper and action plan of the Federal Council](#), of 1 April 2015.

6 Federal Council Corporate Governance Report of 13 September 2006, [BBI 2006 8233 \(de\)](#).

7 Federal Council Supplementary Corporate Governance Report of 25 March 2009, [BBI 2009 2659 \(de\)](#).

8 [Federal Council decision of 26.6.2019 \(de\)](#).

9 OECD (2019), [Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises](#).

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## **Goal 5: Federalism**

The Confederation, cantons and communes collaborate in their anti-corruption efforts and learn from each other.

### **Context:**

The cantons and communes face similar challenges as the Confederation in the prevention of corruption; they develop solutions independently but are interested in exchanging their experiences. To this end, the IDWG on Combating Corruption joined forces with the Conference of Cantonal Governments (CCG) in 2018 to create the federal-cantonal information network on corruption, which meets regularly.

### **Measures:**

17. The IDWG on Combating Corruption will use its federal-cantonal information network to ensure that the Confederation and the cantons take note of each other's best practices and reforms derived from corruption cases and examine their applicability.
18. The federal-cantonal information network will collaborate with the academic community and with relevant business and civil society organisations in the collection and dissemination of best practices.
19. The relevant federal agencies will support information and training events on anti-corruption measures at cantonal and communal level.

## 3.2 Detection and deterrence

The idea of a society completely free of corruption is just as utopian as one that is free of crime. However, where corruption offences do occur, the likelihood of detection should be as high as possible. The particular challenge with corruption is that both active and passive offenders are accomplices; also, the damage caused often remains blurred and hidden from the victims. Whistleblowers with insider information therefore play a key role in detection. In order to maintain public confidence in the rule of law, it is important that allegations of corruption should be seen to be investigated and dealt with by the competent authorities.



Chart 2: Convictions for bribery offences under the SCC  
(Source: Federal Statistical Office (FSO))

As the chart shows, the long-term average annual number of convictions in Switzerland for bribery offences under the SCC<sup>10</sup> is 16.

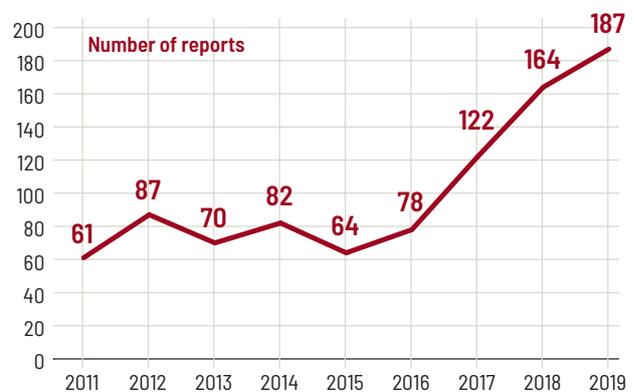


Chart 3: Reports received by the SFAO  
(Source: Swiss Federal Audit Office (SFAO))

The number of reports received by the Swiss Federal Audit Office (SFAO) has risen sharply since 2016 following the launch of the whistleblowing platform ([www.whistleblowing.admin.ch](http://www.whistleblowing.admin.ch)) on 1 June 2017. In 2019, 44% of these reports came from federal employees.

<sup>10</sup> Swiss Criminal Code of 21 December 1937 (SCC; SR 311.0), Title Nineteen and Articles 168 and 281. The sharp rise in 2015 results from the high number of summary penalty orders in connection with an individual fraud case.

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## Goal 6: Detection

Whistleblowers within the Confederation need not fear any reprisals.

### Context:

There is some reticence in Switzerland when it comes to the reporting of suspected corruption. Numerous companies and federal offices have set up internal reporting offices, and the SFAO operates a reporting office for the Confederation, which also accepts anonymous reports. The Confederation also offers protection against discrimination to its employees who submit a report in good faith. In the private sector, however, there are currently no general legal provisions for the protection of reporting persons. Whistleblowing therefore remains fraught with uncertain risks.

### Measures:

20. The open and constructive handling of grievances and conflicts (speak-up culture) will be systematically encouraged through existing management courses.
21. The Confederation will inform all new employees of their duty to report under the Federal Personnel Act and about the reporting offices and procedures available to whistleblowers and their protection against retaliation for anyone submitting such a report.
22. The Confederation will require its contractors (companies, NGOs, etc.) by contract to designate a whistleblower reporting office and to protect whistleblowers. In turn, it will guarantee that contractors are not disadvantaged if they report any indications of corruption within the Confederation to the SFAO.
23. The Federal Administration and the autonomous entities of the Confederation are open to employing persons who have legitimately acted as whistleblowers.

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## Goal 7: Investigation

The judicial and supervisory authorities have effective legal instruments at their disposal to consistently prosecute corruption offences.

### Context:

In their quest for innovative anti-corruption instruments, some states have at times shifted the burden of proof. In some countries, for example, public officials may be guilty of illicit enrichment (as defined in Article 20 of the United Nations Convention against Corruption<sup>11</sup>) if they cannot reasonably explain a significant increase in their assets. In Switzerland, there has been a shift in the burden of proof for the administrative confiscation of assets of foreign politically exposed persons (PEPs).<sup>12</sup> In the United Kingdom, an 'unexplained wealth order' can now be served on foreign PEPs to force them to prove the legitimate origin of their assets. The effectiveness of this instrument has yet to be determined.

Leniency programmes have proven a useful anti-corruption instrument in other countries. These provide an incentive for individuals to self-report and they reward cooperative behaviour. In Switzerland they have been applied to date in cases involving cartels and organised crime.

The relatively low number of corruption offences detected in Switzerland would appear to indicate there is little need for action. However, it should be borne in mind that, given the low level of reporting, some cases are bound to go unreported. Moreover, international corruption cases also place a heavy burden on the Swiss judicial authorities.

### Measures:

24. The IDWG on Combating Corruption will observe other countries' experience with the requirement for foreign PEPs to prove the legitimate origin of their assets, where there is a reasonable suspicion of corruption, and will assess the advantages and disadvantages of this practice with regard to the rule of law.
25. The IDWG on Combating Corruption will examine incentives for more self-reporting of bribery offences by legal entities and natural persons.

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<sup>11</sup> SR 0.311.56.

<sup>12</sup> Art. 15 of the [Federal Act on the Freezing and the Restitution of Illicit Assets held by Foreign Politically Exposed Persons](#) (FIAA; SR 196.1).

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## Goal 8: Penalties

Corruption offences are consistently prosecuted and appropriately punished.

### Context:

Experts believe that the pressure of criminal prosecution and penalties imposed by other states (particularly the United States and the United Kingdom) is more relevant to Swiss-based companies operating internationally than Swiss criminal law with its comparatively lower penalties. While companies may also be held liable for organisational shortcomings in Switzerland, only in certain sectors can a supervisory authority – such as FINMA – order and enforce organisational changes. The revised Public Procurement Act<sup>13</sup> allows the federal procurement authorities to exclude from public contracts any Swiss or foreign suppliers who have been convicted of corruption.<sup>14</sup> Furthermore, the Confederation has the authority to prevent persons suspected of corruption from taking up residence in Switzerland. In exercising its supervisory powers, it has a right of veto against any cantonal decisions to approve the temporary or permanent residence status of foreign nationals.

### Measures:

26. In implementing the revised Public Procurement Act, contracting authorities will exercise the option to temporarily exclude suppliers convicted of corruption from public tenders.
27. The Confederation will examine whether the penalties imposed on legal entities for corruption offences are sufficient to effectively address organisational shortcomings in the offending companies.
28. Switzerland will avoid granting temporary or permanent residence status to politically exposed persons and their relatives if there are concrete indications that their assets originate from corruption.

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<sup>13</sup> [Federal Act of 21 June 2019 on Public Procurement \(PPA\)](#), BBl 2019 4505 (de).

<sup>14</sup> It is not necessary to wait for a legally binding conviction of the supplier concerned or its governing bodies. Reasonable grounds for suspicion, such as the opening of an investigation by the criminal investigation authorities, are sufficient in this respect. Cf. Federal Council dispatch on the total revision of the Federal Act of 15 February 2017 on Public Procurement, BBl 2017 1962.

### 3.3 International dimension

While corruption may be endemic in many countries, this does not mean it should be accepted as the normal state of affairs. All states are required by international standards to engage in the fight against corruption, and this is what their citizens expect. There are institutions, organisations and individuals all over the world who stand up for the law, good governance and clean business ethics and who are willing to cooperate to achieve their goals. Swiss foreign policy is also committed to such goals. The Foreign Policy Strategy 2020–23 recognises that corruption poses a threat to prosperity and justice in many regions. It therefore reaffirms Switzerland’s will to combat corruption by advocating the rule of law, good governance and favourable framework conditions, both at home and abroad.

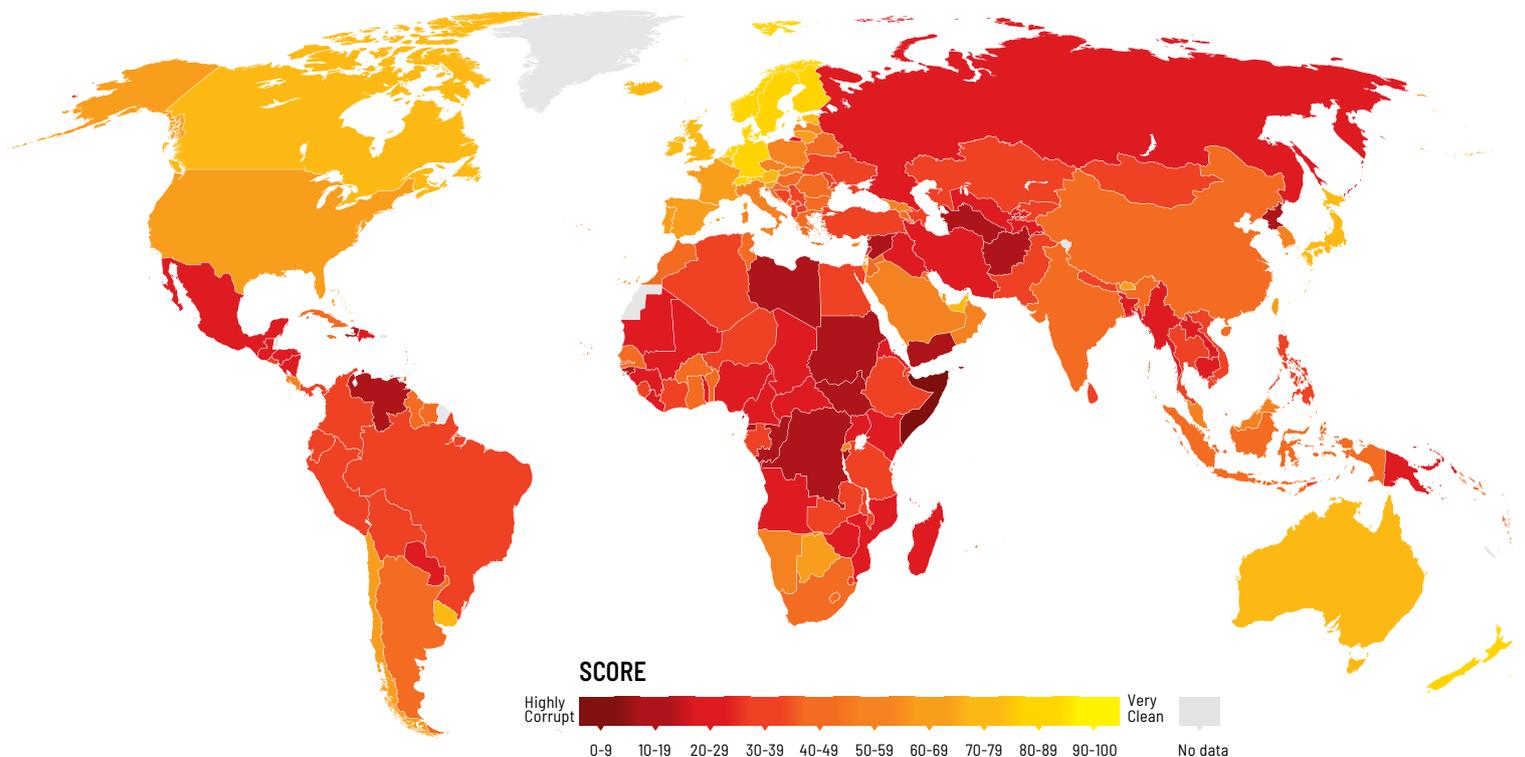


Chart 4: Perception of corruption worldwide (2019)  
(Source: Transparency International)

The map shows that corruption is more pervasive in emerging markets and developing countries than in OECD member states. Perceived levels of corruption are particularly high in crisis and conflict-affected areas. There is also a strong statistical correlation between perceived corruption and development levels (measured by GDP per capita).

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## Goal 9: Private sector

Companies with honest business practices are not at a competitive disadvantage on international markets.

### Context:

Bribery of foreign public officials is also prohibited under Swiss law. Most Swiss companies operating internationally are committed to honest business practices and minimise their compliance risks but are occasionally confronted with demands for bribes abroad. Where the supervisory and judicial systems fail, an unscrupulous competitor may prevail in isolated cases; on the other hand, a respected company with a clean reputation will be less exposed to the unreasonable demands of corrupt officials. If Swiss companies are known worldwide for their integrity and cultivate this reputation, it is also a collective asset that is worth preserving. Nonetheless, Switzerland's good reputation as a business location can still be tarnished by the behaviour of individual companies and their representatives. International sports federations based in Switzerland, which receive a great deal of media attention, also have this potential for reputational damage. Many (though not all) federations have now begun to jointly address corruption issues in their governance through the International Partnership against Corruption in Sport (IPACS), in which Switzerland also participates.

### Measures:

29. The Confederation will inform companies operating abroad about anti-corruption norms and standards and support them in applying these.
30. The Confederation's export promotion programmes will offer Swiss companies integrity checks of prospective sales agents or distribution partners.
31. If necessary, the Confederation will provide consular assistance to Swiss companies facing demands for bribes abroad.
32. Switzerland will work to ensure that the ban on foreign bribery is also consistently enforced by the countries in which the main competitors of Swiss companies are based.
33. The Federal Council will support international efforts to increase transparency in the extractive sector, including commodities trading.
34. The Federal Council will urge the international sports federations to join the International Partnership against Corruption in Sport (IPACS).

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## Goal 10: Police and judicial cooperation

Switzerland is perceived as a reliable partner in the fight against corruption.

### Context:

The Federal Council greatly values the integrity of the financial centre and has made huge efforts in recent years to identify risks early and improve the anti-money laundering mechanisms. Nonetheless, many people still think of Switzerland as a safe haven for dirty money. As long as this image persists, illicit funds will continue to flow into Switzerland, placing a burden on both the financial centre's reputation and the judicial system. In around a quarter of all money laundering cases reported and investigated, the predicate offence was a form of corruption.<sup>15</sup> Most cases are transnational and can only be solved through international collaboration.

### Measures:

35. The Swiss police authorities will participate to a greater extent in police information exchanges on international corruption cases, e.g. within the International Anti-Corruption Coordination Centre (IACCC) on a regular basis.
36. In cases of corruption, the competent federal authorities will make an active effort to forward information without prior request. Moreover, they will be open to the establishment of joint investigative bodies with non-European countries.
37. If necessary, Switzerland will offer expert technical assistance to states requesting mutual legal assistance.
38. Switzerland will comply with internationally recognised principles (GFAR Principles) in the return and disposition of confiscated assets from corruption cases.

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<sup>15</sup> Cf. National risk assessment (NRA): corruption as a predicate offence to money laundering. [Report by the interdepartmental coordinating group on combating money laundering and the financing of terrorism](#)  (CGMF), April 2019 (de).

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## Goal 11: International cooperation

Switzerland combines international cooperation and human rights protection with the fight against corruption.

### Context:

At the global level, corruption poses a serious challenge to sustainable development and the fulfilment of human rights. Corruption undermines legal certainty and deprives the state of vital resources for fundamental public services. It is the poorest who suffer the most from this. Corruption at the highest levels of state and government is also a frequent cause of domestic conflicts and crisis situations, jeopardising security, democracy and peace.

Switzerland fights corruption with various foreign policy instruments, in particular the 'International Cooperation Strategy 2021–24'.<sup>16</sup> In this way it promotes good governance and the rule of law and strengthens civil society. It must also bear in mind that not only states, but also multilateral organisations and development banks, as well as the private sector, non-governmental organisations and the scientific community are exposed to the risk of corruption.

### Measures:

39. The Federal Council will consistently support the implementation of existing international anti-corruption norms in its foreign policy activities. In bilateral and multilateral forums, it will give political weight to the recommendations resulting from country reviews.
40. Switzerland will promote the development of accountable and transparent institutions in its partner countries and a strategic approach to combating corruption. To this end, it will support national anti-corruption authorities and independent supervisory bodies as well as independent media and will promote a strong civil society. It will promote digital governance, state-of-the-art customs procedures, budget and expenditure management for public procurement and investment, and strengthen internal and external financial controls.
41. The administrative units involved in implementing Switzerland's international cooperation strategy will systematically assess the risk of corruption in all projects and programmes, contractually commit their partner organisations to taking preventive measures and respond to any sign of corruption with appropriate measures and penalties. Where possible, they will build upon the existing instruments of their partner organisations.
42. Switzerland will promote exchanges of expertise and experience between human rights and anti-corruption experts, encouraging them to get to know and use each other's existing international instruments.

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<sup>16</sup> Dispatch on Switzerland's International Cooperation Strategy 2021–24 (IC Strategy 2021–24) of 19 February 2020. BBl 2020 2597. Two of the ten strategic sub-objectives explicitly seek to promote good governance in the partner countries.

# 4 Conclusion

With this anti-corruption strategy, the Federal Council sets a binding framework for public employees in the Federal Administration. This strategy can also serve as a reference or source of inspiration for other stakeholders, including the cantons, cities and communes, as well as the private sector, academia and NGOs.

The goals formulated in this strategy are general in nature and indicate the main lines of approach. The Interdepartmental Working Group on Combating Corruption will assume responsibility for monitoring and will promote implementation of the measures by organising exchanges of information on the progress made and encouraging joint action by the relevant federal offices. To this end, it will organise workshops on the various goals and may formulate recommendations for achieving these goals.

This strategy covers the customary time horizon of four years (2021–24). The FDFA will commission an independent body to evaluate the strategy's implementation in 2024. Such an evaluation should demonstrate the extent to which the measures are being implemented and whether they are proving to be effective.

Switzerland already undergoes numerous formal reviews of the effectiveness of its anti-corruption measures, e.g. the peer review mechanisms of the UN, the OECD and the Council of Europe's Group of States Against Corruption (GRECO). These regularly provide Switzerland with critical feedback and recommendations, some of which have been incorporated into this strategy. The work of the Interdepartmental Working Group on Combating Corruption has always been and will continue to be critically monitored by the Swiss Federal Audit Office. The better the strategy's effectiveness can be measured, especially in terms of resource efficiency, the clearer the results will be at the end of the four-year period.

Switzerland is held in high esteem worldwide, not least because of its very low level of corruption. This low rate – as measured by the perceived degree of corruption from abroad – must be maintained, and it is important to ensure that the necessary instruments are adapted to domestic and foreign policy developments and challenges (e.g. digitalisation) and are updated in a proportionate manner.

The Federal Council will review the progress made at the end of 2024 and decide at that stage on how to further develop the strategy.

## **Imprint**

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