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EUComplianceM4UA

# Legal regulation and responsibility aspects of compliance management

This topic is part of the EUComplianceM4UA project  
101179706-ERASMUS-EDU-2024-CBHE:

## Implementation of the European Approach to Compliance Management in Higher Education.

Onsite Convention (Workshops)  
January 20–23, 2025

Co-funded by the Erasmus+ Programme of the EU

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January 22, 2025



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# 1.1. Compliance Management

## - ВІДПОВІДНІСТЬ.

- Compliance management refers to organizational procedures and policies to ensure compliance with all legal and regulatory standards pertinent to their information securities practices. It encompasses a continuous, systematic process where companies identify applicable regulations, assess current security protocols against these requirements, implement necessary controls and conduct ongoing monitoring and reporting activities.



# 1.1. Compliance Management

- **Compliance Management** process is not just about ticking boxes; it aims to protect sensitive data from breaches and cyber threats while maintaining trust with customers, partners and stakeholders. In practice, compliance management develops comprehensive policies that govern how an organization handles data access its network. The policies must be rigorously enforced through employee training programs and regular audits to detect potential non-compliance issues promptly.
- **Compliance Management** is important because noncompliance may result in fines, security breaches, loss of certification, or other damage to business. Staying on top of compliance changes and updates prevents disruption of business processes and saves money.
- <https://www.redhat.com/en/topics/management/what-is-compliance-management>

# Legal Requirements

**Compliance management is the management of compliance with legal requirements**

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## 1.2. The management of compliance with legal requirements

- Legal requirements set the parameters for a manager's actions.
- Law and legislation are the measuring tools for the permissibility of decisions and actions.
- It is through law and legislative requirements that a manager evaluates relationships between people in the organization.
- A manager's violation of the law leads to his legal liability.
- A manager's violation of natural law results in unjust decisions and organizational losses.

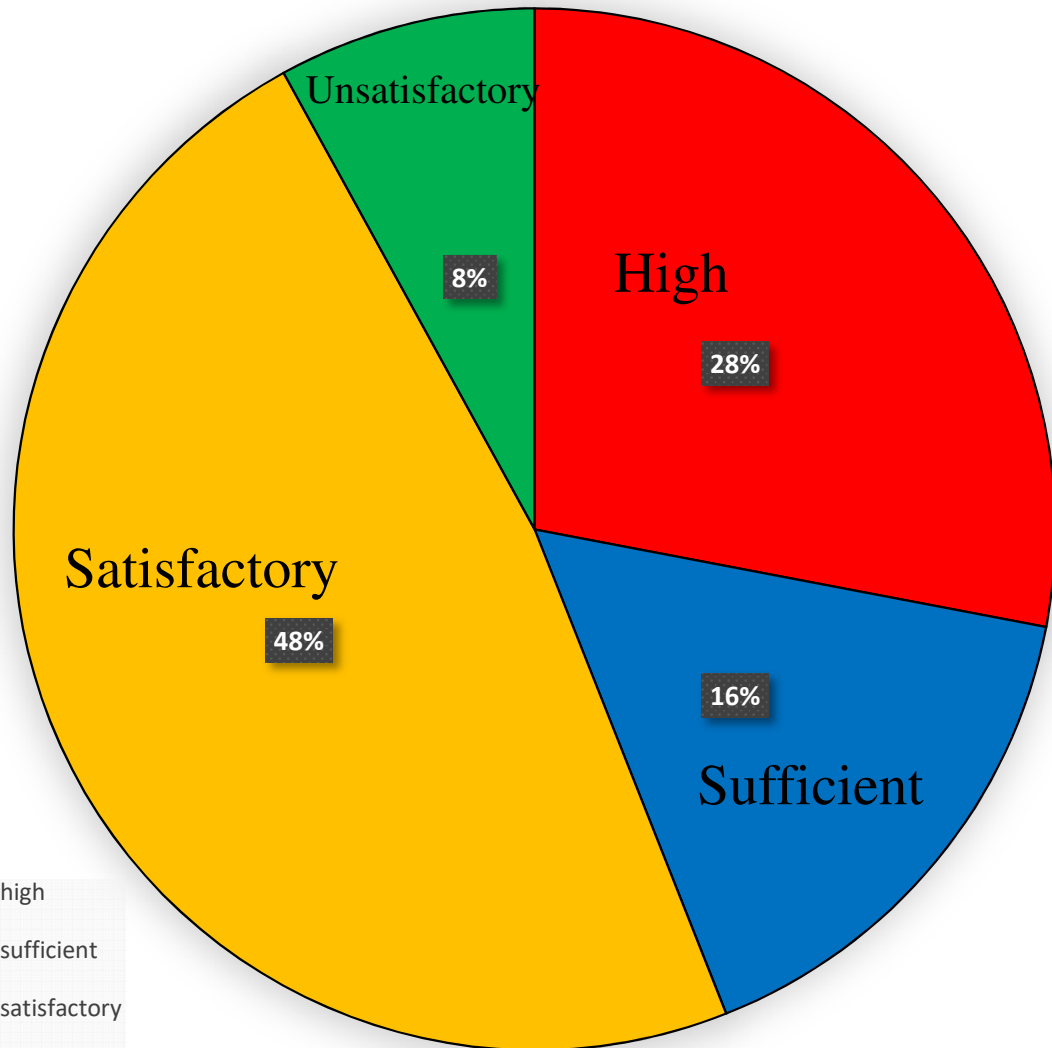
# 1.2. The management of compliance with legal requirements

- Legal requirements in compliance management focus on economic and managerial relationships.
- Legal requirements are specified in each segment of both spheres of relations. For example, in the segment of the supply of abrasive ores to EU markets, etc.
- Information technology is a tool for processing data on these relations, the results of which are used by the manager.

- *Example:* An illustration of agricultural produce – coriander (originating from Ukraine), the export of which requires verification of **compliance with rules regarding origin, safety, product quality, and a range of other requirements** set by the buyer company (Saatbau Linz, Austria), the buyer's country, and the EU.



## 2. The EU Law



Survey results within the project  
«**Modernization of Legal Education  
to Support Ukraine’s European and  
Euro-Atlantic Integration**»

101129068 - EU4UA -ERASMUS-  
EDU-2023-CBHE **indicate** that  
stakeholders **evaluate the  
preparation level of law graduates  
in the area of European integration  
of Ukraine** as follows (Figure)

## 2. The EU Law

- **The indicated data** were obtained as a result of the survey in November-December 2024 of the 102 stakeholders (Judicial authority – 29 (28.4%); Prosecutor's office – 24 (23.5%); Local state authorities – 12 (11.8%); Local self-government bodies – 19 (18.6%); Legislative authority – 6 (5.9%); Executive authority (higher bodies) – 1 (1%); Other – 12 (11.8%).
- The survey also included individuals whose professional legal activities are related to the administration of justice (lawyers) and the promotion of European and Euro-Atlantic integration (members of the Research Service of the Verkhovna Rada of Ukraine, representatives of the United Nations and non-governmental human rights organizations, Corporate Counsel overseeing a group of manufacturing and trading entities in Zaporizhzhia, and specialists in statistics and legal analysis).

## 2. The EU Law

### 2.1. Sources and hierarchy of EU law

- Treaty on European Union (TEU), Treaty on the Functioning of the European Union (TFEU), and their protocols (there are 37 protocols, 2 annexes and 65 declarations, which are attached to the treaties to fill in details, without being incorporated into the full legal text)
- Consolidated versions of the Treaty on EU and the Treaty on the Functioning of the EU with Protocols, Annexes. Protocol # 12 “On the excessive deficit procedure”. 7.6.2016. Official Journal of the EU. C 202/1. [URL](#)

## 2. The EU Law

### Treaty on European Union

- The respect for **The Rule Of Law** is an essential precondition for *compliance* with the principles of sound *financial management* established in Article 317 of the Treaty on the Functioning of the European Union (TFEU).



## 2. The EU Law

### Treaty on European Union

- Commission decision of 31.01.2018

“On a **Code of Conduct** for the Members of the European Commission” (2018/C 65/06) [URL](#)

## 2. The EU Law

### Sources and hierarchy of EU law

- Charter of Fundamental Rights of the EU;
- The Treaty Establishing the European Atomic Energy Community (Euratom) is still in force as a separate treaty;
- International agreements;
- General principles of Union law;
- Secondary legislation: Regulations, Directives, Decisions, recommendations and opinions.

## 2. The EU Law

### The role of the court in ensuring the rule of law in the EU, according to the Treaty on EU

- The very existence of effective judicial review designed to ensure compliance with Union law is the essence of **the rule of law** and requires independent courts. Maintaining the **independence of the courts** is essential.
- This is true, in particular, for the judicial review of the validity of measures, contracts or other instruments giving rise to public expenditure or debts, inter alia, in the context of public procurement procedures which may also be brought before the courts.

## 2.2. Tax and Commercial (Civil) Law of the EU

- *The Common Reporting Standard (CRS)*, developed in response to the G20 request and approved by the OECD Council on 15 July 2014. [URL](#)
- CRS ("Common Reporting Standard") is a global standard for the automatic exchange of information on financial accounts between local competent authorities from different countries issued by OECD ("Organization for Economic Co-operation and Development"). The standard requires financial institutions to identify and document financial accounts held by customers with a tax residence in another state or jurisdiction other than its own and report that information to local competent authorities.

## 2.2. Tax and Commercial (Civil) Law of the EU

- All EU Member States are participating in CRS and have signed an agreement on automatic exchange of financial information. Portugal has committed to implement the CRS developed by the OECD.
- The CRS requires financial institutions resident in a participating jurisdiction to implement due diligence procedures to collect certain information about clients and counterparties tax residency status.
- In order to comply with CRS requirements, company should also provide its tax residency information to counterparties that are carrying out their CRS due diligence obligations.



## 2.3. Administrative and Criminal Law of the EU

### 2.3.1. ADMINISTRATIVE law standards of CM of the EU

- On **Mutual Administrative Assistance in Tax Matters**: Convention, adopted by the Council of the Organisation for Economic Co-operation and Development on 01.06.2011. [URL](#)
- On **market surveillance and COMPLIANCE of products**: regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019. [URL](#)
- On a **general regime of conditionality for the protection of the Union budget**: regulation (EU) 2020/2092 of the European Parliament and of the Council of 16 December, 2020. [URL](#)
- On **public procurement and repealing**: Directive 2004/18/EC: directive 2014/24/EU of the European Parliament and of the Council of 26.02.2014. [URL](#)



## 2.3.2. Criminal Law standards of CM of the EU

- European Anti-Fraud Office, OLAFs' legal background. 1999-2024. [URL](#)
- On a contact-point network against corruption: Acts adopted under title VI of the EU Treaty Council decision 2008/852/JHA of 24 October 2008. [URL](#)
- Anti-bribery management systems: International Organization for Standardization decision 37001:2016. October 2016. [URL](#)
- OECD Work on Anti-corruption and Integrity. 1960-2024. [URL](#)
- Criminal Law Convention on Corruption of January 27, 1999. The member States of the Council of Europe and the other States signatory. [URL](#)
- Civil Law Convention on Corruption of November 04, 1999. The member States of the Council of Europe, the other States, and the European Community signatories. [URL](#)
- Convention against corruption involving public officials of June 25, 1997. EU. [URL](#)

## 2.3.2. Criminal Law standards of CM of the EU

- Communication from the Commission to the Council and the European Parliament «On a **union policy against corruption**» of 21 May 1997 # COM(97) 192. EU. [URL](#)
- Action plan to **combat organized crime**, adopted by the Council on 28 April 1997, # 97/C 251/01. EU. [URL](#)
- On combating **money laundering** by criminal law: regulation 2018/1673 of the European Parliament and of the Council. 23.10.2018. [URL](#)
- On setting the EU's priorities for the fight against **serious and organised crime** for EMPACT 2022-2025: Council conclusions. 09.03.2023. no. 7101/23. [URL](#)
- The Directive “On the fight against fraud to the Union’s financial interests by means of criminal law” (Directive (EU) 2017/1371) establishes rules on the definition of criminal offences and sanctions with regard to combatting fraud, corruption and other illegal activities affecting the EU’s financial interests. [URL](#)

## 2.3.2. Criminal Law standards of CM of the EU

- International Standards on **Combating Money Laundering and the Financing of Terrorism & Proliferation**. Paris: FATF. 2012-2023. 148 p. [URL](#)
- Commission Anti-Fraud Strategy Action Plan - 2023 revision: communication from the European Commission. 11.7.2023. [URL](#)
- Convention on Cybercrime, adopted by the Council of Europe 23.XI.2001. ETS No. 185. Budapest. [URL](#)

## 2.4. EU legislative requirements specific to the company's business profile

- In the field of **food** in the EU

Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 «On official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products»

In the field of **information management** for official control in the EU

- Commission implementing regulation (EU) 2019/1715 of 30 September 2019 laying down rules for the functioning of the information management system for official controls and its system components

In the field of **AI** use in EU

- Artificial Intelligence Act: regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024. [URL](#)

## 2.4. EU legislative requirements specific to the company's business profile

- Regarding **financial reporting** of certain types of enterprises

On the annual financial statements, consolidated financial statements and related reports of certain types of undertakings: Directive 2013/34/EU of the European parliament and of the council of 26 June 2013. [URL](#)

- **CM rules in the EU virtual asset market**

On markets in crypto-assets: regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 may 2023. [URL](#)

On information accompanying transfers of funds and certain crypto-assets: regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023. [URL](#)

### 3. National law of EU member states for CM: Portugal case

#### 3.1. CM Comparison in Tax Law

**Ukraine** has **2** key tax laws: the Tax Code and the Customs Code.

In comparison, **Portugal** has **22** key tax laws, 10 of which are codified. [URL](#)

1. Tax Codes
2. Personal Income Tax Code
3. Corporate Income Tax Code
4. Statute of Tax Benefits
5. Value Added Tax Code (VAT)
6. VAT Regime for Intra-Community Transactions
7. Stamp Duty Code
8. Municipal Property Tax Code
9. Municipal Tax Code on Real Estate Transfers
10. Single Circulation Tax Code
11. General Regime for Tax Offenses
12. Complementary Regime for Tax and Customs Inspection Procedures

## 3.1. CM Comparison in Tax Law

13. General Tax Law
14. Tax Procedure and Process Code
15. Legal Regime for Tax Arbitration
16. Investment Tax Code
17. Regime Establishing the Extraordinary Contribution to the Energy Sector
18. Financial Information Reporting Regime
19. Regime Establishing the Financial Information Reporting Regime
20. Financial Information Reporting Regime
21. Contribution on the Banking Sector
22. Regime for Tax Incentives for Recovery

## 3.2. Requirements of commercial, criminal, information law for CM: Portugal case

### Codified legal requirements for **commercial** activities in Portugal

- Código das Sociedades **Comerciais**: Decreto-Lei n.º 262/86

entra em vigor em 1 de Novembro de 1986. [URL](#)

(Commercial Companies Code: Decree-Law No. 262/86 enters into force on November 1, 1986)

### Codified rules on **criminal** offenses in Portugal

- Código **Penal** Português, aprovado pelo Decreto-Lei n.º 400/82, de 23 de Setembro 1982. [URL](#)

(Portuguese Penal Code, approved by Decree-Law No. 400/82, of September 23, 1982)

### Rules for the mode of **confidential information** in CM

- Regime do segredo de estado: Lei Orgânica n.º 2/2014.

06.08.2014. Assembleia da República Portuguesa. [URL](#)

(State Secret Regime: Organic Law No. 2/2014. 08/06/2014. Portuguese Assembly of the Republic)

### 3.3. Corporate CM requirements: Galp case

- Galp Energia, SGPS, S.A. is an integrated energy Portuguese multinational energy corporation, present throughout the entire oil and natural gas value chain, and in the marketing of electricity; participates in the two largest discoveries of oil and natural gas of the last decades in Brazil and Mozambique (since 1846).
- This company is aware of its corporate responsibility, and it is a priority for its management to consolidate the assumed values and principles of loyalty, transparency and integrity. They work continuously to achieve business efficiency, respecting the principles of fair competition, acting in accordance with the external controls (laws and regulations), and the internal controls, preventing corruption and ensuring transparency of our business.



### 3.3. Corporate CM requirements: Galp case

- In an effort to prevent corruption, Galp prohibits all corrupt practices in all its active and passive forms, including any attempts to practice it. For this purpose, Galp has approved the Corruption Prevention Policy, committing to promote full respect for the Ethics and Conduct Code and laws, and to pursue the best practices in transparency in line with the UN Convention against Corruption from 2003 (Principle 10 of UN Global Compact) and according to the following:
  - Internal Code of Ethics and Conduct,
  - Corruption Prevention Policy,
  - Prevention of Money Laundering and Financing of Terrorism Policy,
  - Standard for Related Party's Transactions of Galp Group,
  - Tax Policy,
  - Standard on Management of Conflicts of Interest,
  - Plan on the prevention of risks of corruption and correlated infractions
  - Galps' transparency and corruption prevention. 1846-2024. [URL](#)



# CONCLUSIONS

## Legal Standards of CM in the EU and Member States

- Compared to less developed countries, the distinguishing features of the legal standards of CM in the EU and its member states are their exceptionally high level of **detail**. Additionally, legal requirements are **applied** more extensively in practical life.
- A key substantive characteristic of these standards is the **correlation** between the **scope** of **tax** requirements **and** the rules **governing the expenditure of public funds**, particularly in public procurement. Disproportions in this correlation indicate significant corruption risks for fair business practices.
- Countries with a high level of public integrity are distinguished by the fact that their public authorities are **equally diligent** in ensuring **not only the funding of public budgets** but also the transparent, targeted, and efficient **use of public funds**.

# 4. Risks of Implementing EU Legal Standards of CM in Ukraine

## INTERNAL Risks to Legal Standards of CM:

- Corrupt distortions of legal reality. For comparison: the **Rule of Law Index** countries ranking for **2024** (across 142 countries):
  - Germany - 5 / 0.83 points;
  - Portugal- 28 / 0.68 points;
  - Ukraine - 88 / 0.49 points.
- Financial fraud: aimed at misappropriating citizens' funds or evading taxes, including falsification of accounting records
- Commercial fraud: non-commodity and other non-genuine transactions, fictitious contract
- Shadow employment and other forms of tax evasion



## 4. Risks of Implementing EU Legal Standards of CM in Ukraine

### EXTERNAL Risks and/or Challenges to Legal Standards of CM:

- Direct military aggression against Ukraine
  - Hybrid military aggression against Ukraine
  - The necessity of maintaining economic viability during wartime
  - The need for post-war reconstruction of Ukraine
  - The requirement to integrate into the EU on equal legal terms
  - The need for physical protection of constitutional values against external military aggression
- 
- *Normative Source of CM in the Defense Sector of Countries to Which Ukraine is Integrating*
  - NATO Building Integrity Policy. 2016. [URL](#)



## 4.1. The Case of Ukraine in the Sphere of Public Procurement for Defense Needs

Throughout 2023, multiple individuals – including subjects of US and Ukrainian investigations – **solicited bribes** from Sinclair & Wilde to secure payment of the remaining \$14.5 million owed to it.

Sinclair & Wilde refused and reported these solicitations to US and Ukrainian authorities.

Law enforcement organizations and defense officials have examined the uniforms and found the prices charged by Sinclair & Wilde to be BELOW fair market value, particularly when you account for the costs associated with shipping and logistics

Delnero, D. L. Open Letter to Ukrainian National Police.  
29.11.2024. BGD Legal & Consulting LLC. [URL](#)





**Pieter Bruegel** the Elder (Flemish artist born in Breda city) "The World Turned Upside Down / The Blue Cloak or The Topsy Turvy World" allegorical painting 1559 (Antwerp Period 1554–1562).

- Bruegel's painting depicts the absurdity, wickedness and folly of human beings.
- The concept and imagery of this painting correlate with the vices of people who had economic and/or political resources and/or power, but, due to their obsession with various variations of economic violence (unearned profit from other people's labor, extortion, greed and different types of corrupt perversions), the activities of these people led to corruption at the level of a real threat to both human survival and development, as well as national security.

## 4. Risks of Implementing EU Legal Standards of CM in Ukraine

- **REPORTS** and *other legal acts* on Ukraine's implementation of EU legal standards
- Ukraine 2024 Report. Communication on EU enlargement policy: Commission staff working document. 30.10.2024. SWD (2024) 699. 105 p. [URL](#)

## 4.2. CM Human Resource Infrastructure

- Given the current conditions of Ukraine's development, the success of a compliance manager's work in this country simultaneously *requires* knowledge, skills, and expertise in **crisis management**.
- Accordingly, the **crisis management** required by a compliance manager in Ukraine *defines* the extent to which the experience of CM in EU countries can be beneficial.

# CONCLUSION about the CM Human Resource Infrastructure

- The effective functioning of CM relies on the coordinated work of various specialists, including:
- **Lawyers:** to ensure adherence to legal and regulatory frameworks.
- **Accountants and Auditors:** to monitor financial compliance, maintain accurate records, and detect potential irregularities.
- **Advisors:** specialized in the markets for goods, works, and services that align with the organization's field of activity.
- The ideal **profile** of a compliance manager encompasses a combination of legal expertise, financial acumen, and strategic insight. This professional acts as a mediator between regulatory requirements and the organization's operational processes, ensuring compliance while supporting ethical and sustainable business practices.

- The subject of CM implementation is ***homo juridicus***
- This is a person with mental, sensitive, and very importantly, volitional qualities that together allow a person to perceive the rules of law, implement them in the form of legislative acts and/or comply with the requirements of these acts, as well avoid participation in corrupt practices and/or inducing others to do so.

## 5. Legal Cases of Non-Compliance in the EU

- 'NON-COMPLIANCE' means any failure to comply with any requirement under the Union harmonization legislation or under this Regulation

## CONFLICTS OF INTEREST

### The key concept in EU of Non- Compliance Legal Cases

It covers any situation where staff members of the contracting authority, or a procurement service provider acting on its behalf, are involved in managing the procurement process or have the ability to influence its outcome. This includes cases where they have, directly or indirectly, any financial, economic, or personal interest that could be seen as compromising their impartiality and independence during the procurement process. [URL](#)

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## 5.1. Whistleblower Institute in the Fight against criminal violations of CM

- Directive 2019/1937 of the European Parliament and of the Council of 23.10.2019 on the protection of persons who report breaches of Union law. [URL](#)

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## 5.2. Legal Cases of Non-Compliance in the EU

### DALLIGATE

- The aggressive tobacco industry lobbying case (2009-2014):
  - EP's Members complained about “unsolicited tobacco lobbyists turning up in their offices;
  - numerous invitations to drinks, dinners and cocktail events;
  - targeted social media and email campaigns coordinated by tobacco companies;
  - indirect lobbying through small retailers, anti-counterfeiting firms and farmers’ groups;
  - allegations of industry-sourced amendments.

## 5.2. Legal Cases of Non-Compliance in the EU

### DALLIGATE

- At least 161 employees of the tobacco giant Philip Morris International's staff had (undisclosed) lobby meetings with no less than 233 Members of the European Parliament to attempt to influence the European Parliament's decision-making on the final version of the Tobacco Product Directive, a new law that strengthens the rules on how tobacco products are manufactured, produced and marketed in the EU.
- It is known that the adoption of this Directive, following the neutralization of the tobacco lobby's corrupt influence on EU public authorities, has led to a two-thirds reduction in the number of smokers.



## 5.2. Legal Cases of Non- Compliance in the EU DALLIGATE

- Part of the corruption of this lobby involved the discrediting of EU Health Commissioner John Dalli. Although this resulted in his dismissal, journalists and members of the European Parliament established that John Dalli acted with integrity and was free from corruption. The accusations against him became possible due to procedural violations by the European Anti-Fraud Office (OLAF).

## 5.3. Legal Cases of Non-Compliance in the EU

### QATARGATE

- Corruption scandal in the European Parliament.

The essence of the offense is that European Parliament officials (as Eva Kaili and others), lobbyists, as well as their close associates were under the influence of the governments of **Qatar, Morocco and Mauritania**, engaging in **corrupt** practices, **money laundering**, and **organized crime**.

- Qatar tried to influence decisions using huge sums of cash and lavish gifts. For example, police seized €150,000 in Kaili's flat, €600,000 in the home of a former Italian EPM and €750,000 at Eva Kaili father's Brussels hotel room.



### **5.3. Legal Cases of Non-Compliance in the EU**

#### **QATARGATE**

Kaili meets Qatar's labour minister, Ali bin Samikh al-Marri, in Doha on 31 October, 2022

## 5.3. Legal Cases of Non-Compliance in the EU

### QATARGATE



**Francesco Giorgi**, an assistant at the parliament, Charismatic and well-connected, lived with his partner **Eva Kaili**, a Greek member of EP, who had enjoyed a meteoric rise to become one of the parliament's 14 vice-presidents since her election in 2014.

**Giorgi's** interrogation, and the seizure of his phone, was deemed crucial to the investigation, which revealed the details of his arrest.

# 6. CM and non-compliance within the practices of famous top-level executives from Portugal

## 6.1. Barroso's case

- José M.D. Barroso, who was president of the Commission from 2004 to 2014, sparked concerns about **potential conflicts of interest** when he took a job at Goldman Sachs in 2016.
- He stated the following:
  - He stood by the assurances he gave to the European Commission.
  - All meetings with EU officials were personal.
  - Refused to represent the bank in any interactions with EU officials.
  - Did not participate in any lobbying activities with European institutions on behalf of Goldman Sachs.

## 6.1. Barroso's case



- European Ombudsman Emily O'Reilly expressed concern that J. Barroso's new position could damage the image of EU institutions, despite **the diligent work and ethical behavior of the vast majority** of people working within them.
- The EU's Anti-Fraud Office (OLAF) cleared Barroso of allegations regarding potential violations of EU conflict-of-interest rules (October 2017).
- OLAF reached its conclusion after a nine-month investigation to know if the former Commission president “undertook relevant initiatives to engage in a contractual relationship with GS [Goldman Sachs] during his mandate;” if he “acted in violations of relevant duties of transparency;” and if he “may have found himself in a situation of conflict of interest when dealing with GS during his mandate.”



## 6.1. Barroso's case



- As part of the probe, the OLAF office **reviewed documents** about two of Barroso's **trips** while Commission chief — one to New York in September 2013 and another to the World Economic Forum in Davos in 2014.
- **Two further meetings** between Goldman Sachs and Barroso, in May 2012 and October 2014, were also **scrutinized**.
- OLAF also **reviewed correspondence** between the president's private office and Goldman Sachs, and conducted **interviews** with his former head and deputy head of Cabinet.
- OLAF confirmed that, in October 2017, it concluded an investigation into possible breaches of the **European Commission's Code of Conduct** by former Commission President relating to his appointment at Goldman Sachs.
- OLAF did not establish any evidence of wrongdoings on the part of former President Barroso and the investigation was concluded without recommendations for action to be taken.

## 6.2. Costa's case



- **António Costa** – Portuguese and European politician and statesman. **President of the European Council** since December 1, 2024. Prime Minister of Portugal (2015–2024). Minister for Parliamentary Affairs (1995–1997), Minister of Justice (1999–2002), and Minister of Internal Administration (2005–2007). **Member of the European Parliament** (2004–2005). Mayor of Lisbon (2007–2015).
  
- *Corruption Charges filed by the Prosecutor's Office Against Five Top Officials from António Costa's Government, had Political Consequences and Led to the Government's Resignation*

## 6.2. Costa's case



- The case involved alleged irregularities in lithium mining projects across various regions of Portugal, as part of a broader EU campaign to secure critical raw materials. The lithium was ***purportedly of low quality***, and the ***anticipated environmental damage was disproportionately high***. A 2021 ***journalistic investigation*** into one mining scheme in the northern region of Montalegre exposed these contradictions, ultimately prompting the Portuguese government to cancel a major project in the area.
- Another project under scrutiny was a green hydrogen production center at the Port of Sines, funded with millions of euros from EU innovation funds.

## 6.3. Guterres's case



- **António Guterres** is a Portuguese politician and diplomat who is serving as the ninth and current secretary-general of the United Nations since 2017. Guterres served as prime minister of Portugal from 1995 to 2002.
- As President of the European Council in early 2000, he led the adoption of the Lisbon Agenda **for growth and jobs**.
- He chaired the Parliamentary **Committee for Economy, Finance and Planning**, and later the Parliamentary Committee for **Territorial Administration, Municipalities and Environment** in Portuguese Parliament

## 6.3. Guterres's case



- Under the leadership of A. Guterres, the **UN Department of Management Strategy, Policy and Compliance** was created in 2019.
- It is responsible for policy leadership in all management areas through the provision of a clear, integrated global management strategy and policy framework and through strengthened monitoring, evaluation and accountability mechanisms. [URL](#)



## Management Strategy, Policy and Compliance

The United Nations Department of Management Strategy, Policy and Compliance is responsible for policy leadership in all management areas through the provision of a clear, integrated global management strategy and policy framework and through strengthened monitoring, evaluation and accountability mechanisms.

The Department is also responsible, jointly with the Department of Operational Support, for managing the activities of the Office of Information and Communications Technology.

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**Compliance management in der  
Immobilienwirtschaft: Grundwissen für die  
Praxis.  
2019**



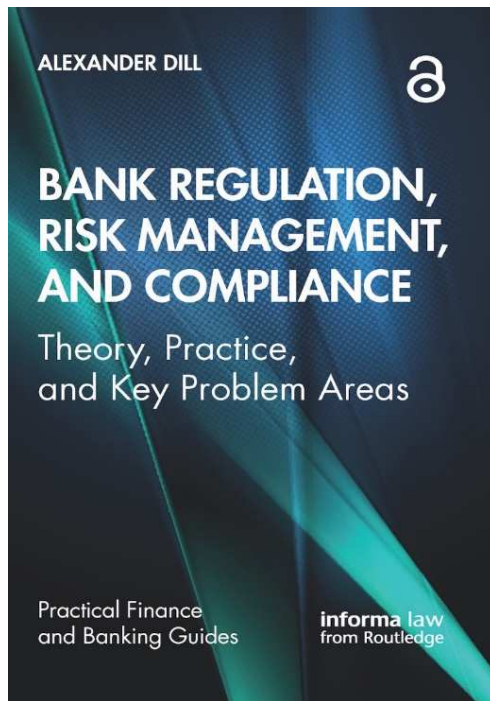
**Smoke Signals (Une affaire de principe). 2024**



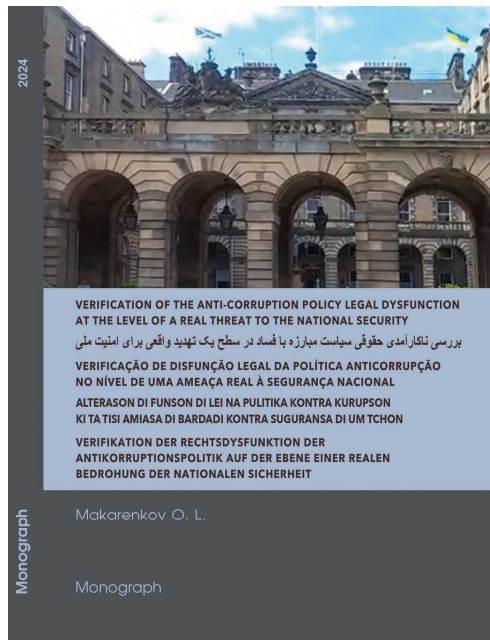
## Mastering information security compliance management: a comprehensive handbook on ISO/IEC 27001:2022 compliance. 2023



## Corporate Social Responsibility und Compliance. 2018



## Bank Regulation, Risk Management, and Compliance - Theory, Practice, and Key Problem Areas. 2019



## Verification of the anti-corruption policy legal dysfunction at the level of a real threat to the national security. 2024



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