

STEP EU final project evaluation report

Final report, 25 February 2026

Executive summary

This endline evaluation assessed the STEP EU project, a EUR 1.485 million, 28-month initiative ending in March 2026, funded primarily by the European Commission (DG JUST) and implemented by Transparency International Secretariat (TI-S), the TI Liaison Office to the EU, and nine National Chapters. The project aimed to step up the EU-wide fight against cross-border corruption by improving data on financial crime, including filling critical data gaps on under-regulated asset classes such as cryptocurrencies, artwork, and yachts, strengthening member states' investigative capacities, and enhancing cooperation among competent authorities. The evaluation used a mixed-methods design anchored in a retrospectively developed Theory of Change, more than 20 interviews with different project stakeholders, comprehensive document analysis and participant observation during a public event and internal workshop. The analysis drew on outcome harvesting, process tracing, contribution analysis, and ripple effect mapping.

Relevance and coherence. The project demonstrated strong strategic alignment with EU policy priorities, including the EU Strategy to Tackle Organised Crime 2021–2025 and the Security Union Strategy 2020–2025, and was well timed to coincide with the adoption and transposition of the 6th Anti-Money Laundering Directive (AMLD6). All participating Chapters confirmed the project's high relevance to their national priorities. The project was coherent in its design, with three logically sequenced and interlinked objectives, and was deeply anchored in TI's Strategy 2030 and complementary to adjacent TI initiatives such as the Global Anti-Corruption Consortium and Integrity Watch. Some coherence challenges were noted, including uneven initial clarity among Chapters on how activities linked to longer-term impact ambitions, and difficulties matching a standardised research approach with divergent Chapter capacities and different levels of prior domain expertise.

Efficiency and effectiveness. The project achieved a sound level of cost-effectiveness by prioritising internal personnel and capacity development over external consultants, strategically reallocating underspend to an in-person workshop that proved a critical turning point for consortium engagement and making judicious use of digital tools to reduce travel for collaboration. The research-heavy focus—roughly two-thirds of person-months—was commensurate with the project's technically complex agenda and capacity-building ambition, though some Chapters questioned the balance between research and advocacy. Implementation faced a “cold start” due to delays in key staff recruitment and high staff turnover, but adaptive management measures, including a three-month no-cost extension and bi-weekly coordination calls, kept the project on track. On effectiveness, the project produced six substantive research outputs that have been published and disseminated through multiple channels, including a high-profile Brussels conference keynoted by European Commissioner Michael McGrath. Evidence on the second objective—strengthened capacity of national authorities—was very limited, as the evaluation was unable to obtain substantial feedback from target institutions. Evidence on the third objective—enhanced inter-agency cooperation—remained largely anecdotal and was set at a very ambitious level, as it pertains to longer-term development among external project partners, and is thus likely to materialise only after the immediate project implementation period.

Outcomes and impact. The evaluation found evidence of substantive outcomes across all four pathways of the project's Theory of Change, while recognising that it is too early to capture the full extent of the project's contributions. On the research pathway, outcomes include a Lithuanian anti-corruption agency representative committing to advocate for cryptocurrency

regulation in the national anti-corruption plan, TI Ireland using research findings to make submissions to the government for the development of key national strategies, and TI Italy establishing itself as a credible interlocutor with the Guardia di Finanza through a FATF submission on beneficial ownership transparency. On the engagement pathway, Chapters across the board achieved greater access to and recognition from national authorities, with several building relationships from scratch with previously disengaged institutions such as financial intelligence units, law enforcement agencies, and beneficial ownership registers. TI Spain became part of the national AML ecosystem, TI Ireland's CEO was appointed to the Advisory Council on Economic Crime and Corruption, and TI France was invited to participate in future National Risk Analysis consultations. On the advocacy pathway, the project contributed to tangible legislative changes: TI France secured the inclusion of full ownership chain and historical data requirements in a new AML law (rated as a significant contribution) and TI Slovenia, together with civil society allies, successfully prevented the severe restriction of access to beneficial ownership data (also rated as a significant contribution). On the TI strategy pathway, the project strengthened TI-S's positioning in the global AML ecosystem and directly complemented or informed a set of adjacent initiatives, thereby ensuring continuity and scale-up.

Sustainability. The project laid a solid foundation for continued engagement. Five Chapters will carry forward their work through the SECURE project, and several others are pursuing formalised relationships with national authorities, including through memoranda of understanding and participation in institutional advisory mechanisms. Chapters are also applying acquired expertise to emerging areas such as crypto assets, artwork, and national security dimensions of illicit finance. The AMLD6 transposition process provides a concrete near-term opportunity for sustained policy engagement. However, sustainability depends on continued funding, staff retention, and the ability to translate the substantial evidence base into sustained advocacy—conditions that appear to be materialising but could not be fully validated at the time of evaluation.

Key lessons and recommendations. The evaluation identifies several forward-looking considerations. These include embedding early, needs-based capacity assessments and co-creating a shared Theory of Change at project inception; adopting a modular research design that better accommodates differing Chapter capacities while giving advocacy more prominence; investing in access strategies such as liaison consultants or advisory committees to reach reluctant law enforcement stakeholders; strengthening institutional resilience against staff turnover through relationship redundancy and handover protocols; and shifting from ad hoc follow-up fundraising to continuous, integrated resource mobilisation throughout the project cycle.

Abbreviations and acronyms

AML	Anti-Money Laundering
AML6	European Union's Sixth Anti-Money Laundering Directive (AMLD6)
CRAB	Spain's Anti-Money Laundering Registration Centre
CSO	Civil society organisation
DG FISMA	Directorate General for Financial Stability
DG JUST	Directorate-General for Justice and Consumers
EPPO	European Public Prosecutor's Office
FIU	Financial Intelligence Unit
MoU	Memorandum of Understanding
NGO	Non-governmental organisation
OLAF	European Anti-Fraud Office
RCTIR	Spain's Central Register of Beneficial Owners
REM	Ripple Effect Mapping
SECURE	Strengthening EU Collaboration to Uncover and Resist Emerging Corruption
STEP EU	Strengthened enforcement capacities of public authorities in the European Union
TI	Transparency International
TI EU	TI Liaison Office to the European Union
ToC	Theory of Change

Table of Contents

<i>Executive summary</i>	<i>ii</i>
<i>Abbreviations and acronyms</i>	<i>iv</i>
<i>1. Introduction</i>	<i>1</i>
<i>2. Purpose and scope of the evaluation</i>	<i>1</i>
<i>3. Approach and methodology</i>	<i>2</i>
3.1 Overall approach.....	<i>2</i>
3.2 Primary data collection approaches	<i>2</i>
<i>4. Project relevance and coherence</i>	<i>3</i>
4.1 Project relevance.....	<i>3</i>
4.2 Project coherence	<i>4</i>
<i>5. Project efficiency and effectiveness</i>	<i>5</i>
5.1 Project efficiency	<i>5</i>
5.2 Project effectiveness	<i>7</i>
5.3 Critical enablers and barriers	<i>11</i>
<i>6. Project outcomes and impact</i>	<i>12</i>
6.1 Using a project Theory of Change to frame the Project’s outcomes and impact	<i>12</i>
6.2 Evidence of Project outcomes and impact	<i>15</i>
<i>7. Project sustainability</i>	<i>24</i>
<i>8. Conclusion</i>	<i>25</i>
<i>9. Lessons, recommendations and considerations for future programming</i>	<i>26</i>
<i>10. Annexes</i>	<i>29</i>
Annex A: Key evaluation questions	<i>29</i>
Annex B: List of interviewees from TI Chapters and TI-S	<i>30</i>

1. Introduction

This is an endline evaluation of the “Strengthened enforcement capacities of public authorities in the European Union project” (STEP EU project; henceforth the Project), a 28-month-long project ending on 14 March 2026, that aimed to significantly step up the EU-wide fight against cross-border corruption. Transparency International Secretariat (TI-S) and the TI Liaison Office to the European Union (TI EU), came together with National Chapters in France, Germany, Ireland, Italy, Latvia, Lithuania, Portugal, Slovenia and Spain to implement the Project. The Project was funded through the European Commission (DG JUST) with an overall funding envelope of EUR 1,485 million (of which the European Commission funded EUR 1,337 million). External stakeholders and engagement partners included competent authorities in the Project countries and key agencies and departments at the EU level.

The Project had three key objectives:

- To improve the understanding of available data and identify any gaps, including its use, for the prevention and early detection of corruption and other financial crimes.
- To strengthen EU member states’ capacities to detect, investigate and prosecute cross-border corruption.
- To enhance cooperation between competent authorities to facilitate a consolidated EU approach to reducing cross-border corruption.

This evaluation report is structured around a set of key evaluation questions informed by the OECD evaluation criteria of relevance, coherence, effectiveness, efficiency, impact, and sustainability. It is structured into nine major sections plus an annex. After laying out the purpose and scope of the evaluation (section 2) and the methodology used (section 3), section 4 focuses on the Project's purpose and appropriateness (relevance and coherence), and section 5 focuses on the Project’s performance and results (efficiency and effectiveness). Section 6 lays out the retrospective project Theory of Change and uses it to discuss and examine the Project's systemic change (impact). The analysis ends with the long-term viability of the Project (sustainability) in section 7. Section 8 concludes, and section 9 offers lessons learned and considerations for future projects.

2. Purpose and scope of the evaluation

The primary purpose of this endline evaluation is to provide an external and independent review of the STEP EU project’s performance and achievements. A key audience for this evaluation is TI-S, participating TI Chapters, and other TI National Chapters, which may use the results to sustain the project outcomes and inform the design of future related projects. The European Commission (DG JUST) may use the evaluation for accountability and verification purposes.

The evaluation was guided by 16 key evaluation questions under the OECD six core criteria: relevance, coherence, effectiveness, efficiency, impact, and sustainability (See key evaluation questions in Annex A), seeking to examine and assess project activities, deliverables, and outputs as well as capture outcomes and impacts that the Project plausibly has contributed to or is in the process of contributing to.

In terms of timing, this evaluation slightly overlapped with the Project's completion phase (March 2026) to generate timely, actionable insights that can inform follow-up activities and subsequent project designs.

Given time frames and budgetary resources, the evaluation did not make any on-site visits. Instead, it took advantage of the end-of-project meeting of all partners in November 2025 in Brussels for in-person check-ins, complemented by in-depth online interviews, stakeholder surveys, and a comprehensive document review.

3. Approach and methodology

3.1 Overall approach

A retrospectively developed project Theory of Change (ToC) provided the analytical framework for interpreting results and understanding causality, laying the groundwork for using a variety of qualitative and participatory evaluation methods. These included Outcome Harvesting to identify key outcomes; Process Tracing to understand the causal linkages between activities/interventions and the harvested outcomes; Contribution Analysis to understand the extent of the Project's contribution to the harvested outcomes, and Ripple Effect Mapping to identify the plethora of ways in which aspects of the project may be sustained. This overall evaluation design was chosen for its suitability for complex, multi-country initiatives such as the STEP EU project, where outcomes emerge from interacting systems and contextual factors rather than from linear cause-and-effect relationships.

To balance the independence of the evaluation with a participatory, adaptive approach that maximises both accountability and learning, the following principles have guided the interaction between the evaluators and TI:

- The end-of-project evaluation was planned and conducted in close consultation with the STEP EU Project Team.
- The evaluation consultants were responsible for the overall methodological approach and design of the evaluation and consultation process.
- The evaluation approach and methods were agreed with the TI-S monitoring, evaluation and learning team and the STEP EU Project Team.
- The STEP EU Project Team provided the necessary support, including the submission of all documents for desk review.
- The evaluation was anchored in a participatory approach engaging relevant staff at TI-S, TI EU and National Chapter levels, stakeholders, and target institutions through structured methods.
- The main deliverables were shared with the STEP EU Project Team in draft form for comments, feedback and additional inputs.

3.2 Primary data collection approaches

Aside from using documents that have been generated from the Project and collated by the Project Team, the following primary data collection strategy was implemented between November 2025 and January 2026.

3.2.1 Primary data collection for Outcome Harvesting and Process Tracing

Outcomes from the Project were “harvested” through interviews with all participating TI Chapters, and with five members of the Project Team at TI-S. Most of the interviews were conducted via video calls (recorded for transcription after obtaining consent) while two were done in person at the end-of-project conference in Brussels. Altogether, 19 Chapter members were interviewed for this evaluation (see Annex B below for a full list of interviewees per organisation). Efforts to also surface the project sponsor’s perspective and experience did not succeed, as there had been a change in responsibilities and the new project holders in a different directorate indicated they would not be able to substantively comment.

Target institutions – those that have benefited from the Project’s outputs and collaborative efforts – constituted the second key constituency for providing evidence, particularly regarding the evaluation’s focus on outcomes, impacts and sustainability. The TI Chapters helped establish contact with the relevant authorities in their countries and were asked to either set up interviews or share a short online survey via email. This, unfortunately, resulted in meagre evidence base regarding national authorities, with one in-person interview (Lithuania) and two survey responses (Latvia and Spain). Engaging with this key constituency proved to be the most difficult part of the evaluation design, as it was largely beyond the evaluators’ direct control.

Once the evidence cases had been identified using the outcome-harvesting approach, a deeper dig into these cases was conducted using complementary data, including documents shared by the TI Chapters, media articles (news and social media), and other information sources.

3.2.2 Ripple Effect Mapping session on sustainability

A facilitated Ripple Effect Mapping (REM) session was held at the in-person end-of-project convening in Brussels on 19 November 2025. The session had 15 participants from Chapters and TI EU, as well as three from the TI-S project team. REM is a participatory evaluation technique that utilises group storytelling, where participants' stories are mapped in real-time to facilitate collective meaning-making. By asking each TI Chapter to address the question “What do you think will be the legacy of the STEP EU Project?”, the REM technique was used to conceptualise and map the full range of ways in which the Project (specific project components or lessons) is likely to be sustained beyond the implementation period.

4. Project relevance and coherence

The project demonstrated a high degree of internal and external relevance and coherence by aligning its objectives with the urgent needs of EU member states, European-level policy priorities, the strategic orientation of TI-S and participating chapters, and the broader strategic anti-corruption landscape.

4.1 Project relevance

4.1.1 Strategic alignment with EU priorities

The project was specifically designed to address gaps identified in the EU Strategy to tackle Organised Crime 2021-2025 and the Security Union Strategy 2020-2025. It targeted the

underlying mechanisms—such as opaque ownership and fragmented financial integrity data—that allow criminals to launder illicit funds across borders.

4.1.2 Timeliness and policy windows

The Project coincided with the adoption and transposition of the 6th Anti-Money Laundering Directive (AMLD6), making its research findings immediately applicable to national legislative reforms. TI Chapter participants noted that the Project provided an essential "toolbox" at a time when the EU was seeking to strengthen its anti-fraud architecture. It also provided a welcome antidote to evidence and policy messaging in a context of democratic backsliding, adverse court rulings, or the cutting of red tape that have given rise to efforts to roll back essential transparency measures, particularly with regard to ownership transparency.

4.1.3 Addressing critical data gaps

Research and awareness-raising activities under the Project were also designed to identify, map, and validate critical data gaps, including those related to under-regulated asset classes, such as cryptocurrencies, artwork, and yachts. These data gaps are critical to future progress in AML and therefore constitute a timely and topical area of research and engagement.

4.1.4 Country-level and target group relevance

All interviewed participating Chapters confirmed that the Project was highly relevant to their national priorities. As the maturity of capacity and prior engagement in this highly technical area at the outset varied significantly across TI Chapters, different participants emphasised different aspects as particularly relevant, including the opportunity to gain new technical expertise or to build and expand relationships with previously disengaged authorities like Financial Intelligence Units (FIUs). The capacity-building elements, the continued relevance of the research generated, and the forward-looking investment in new and stronger relationships with competent authorities also underpin a plausible ambition to generate longer-term relevance beyond the immediate project duration.

The depth and breadth of external partner feedback were somewhat limited despite committed efforts by TI stakeholders to facilitate access and feedback for the evaluating team. Nevertheless, the evaluative feedback, which touches on external target groups through a stakeholder survey, interviews, and event analyses, including participant observation at the public end-of-project event in Brussels, indicates that the project was highly relevant to these external stakeholder groups and their work.

4.2 Project coherence

4.2.1 Coherence of internal project design

The Project's design utilised three interlinked objectives—improving data and problem understanding, strengthening investigative capacity, and enhancing cooperation—to create a comprehensive response to cross-border corruption. The three objectives connect in logical sequence. The overall level of ambition articulated through these three objectives speaks to desirable longer-term impacts well beyond any direct contributions that can realistically be anticipated for the project duration or its immediate aftermath. To effectuate capacity and coordination improvements on the part of the competent authorities, a group of stakeholders

that is expected to be unfamiliar with civil society and often initially reluctant to engage with it, is more a long-term impact ambition than a set of concrete project objectives against which the initiative should be realistically assessed in the view of the evaluators. Project activities were overall designed coherently and logically sequenced, with adequate resource and time allotments. Observed minor adjustments along the way in terms of project duration, deliverables and resource allocation were primarily due to staff transitions and other external circumstances, such as limited and slow initial responsiveness by some of the external partners in law enforcement, but not inherent to the initial design of the project.

4.2.2 Coherence with TI Strategy and other TI initiatives

The Project is deeply anchored in Transparency International's Strategy 2030, particularly Objective 2: "Stop flows of dirty money". It directly supports the movement's goal of ensuring power is held to account for the common good by fostering institutional checks and balances.

The degree of complementarity with TI programming is also considerable. STEP EU was designed to complement, feed into or further advance adjacent TI initiatives, such as the Global Anti-Corruption Consortium ([GACC](#)), [Integrity Watch](#), and it helped inform the development of the [SECURE project](#). This synergy ensured that evidence generated in one project could be used to populate risk-indicator dashboards in other projects or build the evidence base for follow-up programming and fundraising.

While the overall internal and external coherence with TI programming across the movement was strong, some challenges were identified. These include the difficult task of matching a rather uniform approach to research and advocacy with divergent research capabilities and prior domain expertise among participating chapters, and an uneven initial clarity by Chapters on how specific project activities link to longer-term impact ambitions, a concern amplified by a relatively high level of staff changes, particularly in the early phases of the Project.

5. Project efficiency and effectiveness

5.1 Project efficiency

Project efficiency is evaluated along three dimensions: the Project's cost-effectiveness, the timeliness of its outputs, and the management of the project delivery. Overall, the level of efficiency was in line with what can be expected for complex, multi-country projects that face numerous trade-offs. These trade-offs occurred, for example, between distributed ownership and agile decision-making and writing, between research capacity building and centralised competence, between standardised approaches for comparability/unified messaging and tailoring/discretion to accommodate the diversity of participating TI Chapters.

5.1.1 Cost-effectiveness and resource allocation

A number of measures and decisions contributed to achieving a sound level of cost-effectiveness and sensible resource allocation. These measures included:

- Internal personnel over consultants: The project design maximised cost-effectiveness and established an explicit ambition of capacity building throughout the TI network by prioritising internal staff over external consultants. This approach ensured that the

project budget contributed to capacity building and institutional knowledge retention within the TI movement rather than paying for time-limited outside support.

- Strategic use of underspend: Due to initial delays in recruiting key Secretariat staff, the Project realised an underspend in the staff budget. These funds were efficiently reallocated to organise an in-person policy and advocacy workshop in Berlin in February 2025, which was cited as a major boost for consortium engagement and motivation.
- Travel and digital tools: Efficiency was further supported by a policy of limiting travel to necessary project objectives, instead utilising online tools for regular project management, regional advocacy, and communications. Questions, however, were raised about whether a dedicated in-person meeting at the beginning would have been more effective in nurturing the critical interpersonal relationships and collective spirit among participants and in ensuring that everyone is fully informed and inducted.

A strong resource allocation focus on research – roughly 2/3 of the person-months were dedicated to these activities – is commensurate with the expansive, technically complex research agenda the Project adopted. Overall, however, some Chapters raised questions about whether the balance between research and advocacy, in both resources and activities, was too heavily weighted toward research. This choice is defensible given the required cross-country capacity building, the technical nature of the subject and the ambition to fill critical knowledge gaps even when external stakeholders may be reluctant at first to share information. And it also needs to be viewed against the backdrop of some built-in flexibility for Chapters to develop and implement – depending on their internal capacities, readiness and national level windows of opportunities - some of their own advocacy efforts already in earlier project phases. Going forward, however, it will be important that the generated data and insights continue to inform advocacy and other activities beyond the project horizon to fully realise the knowledge value created.

5.1.2 Timeliness and pacing

- Initial delays: The Project faced a "cold start" due to a short timeline between the grant award and the required start date, which delayed the recruitment of key project staff at the TI Secretariat.
- Revised deliverable timelines: These recruitment delays, combined with high staff turnover at the Chapter level (one Project Team member estimated that half of all Project point persons at the Chapter level changed within the first six months of the Project), resulted in several months of delay for initial research outputs and a need to repeat some induction activities. However, the Project Team successfully managed these risks by applying for a three-month no-cost extension, which the donor approved to allow sufficient time for the dissemination of results.
- Reporting discipline: Despite implementation challenges, the project maintained bi-annual reporting cycles, and budget consumption was documented as being in line with the advancement of activities.

5.1.3 Operational efficiency and management strategy

- Project management: Some STEP participants noted that a "committee-like" approach to some of the more detailed decision-making, intended to safeguard local ownership, also entailed inefficiencies. One participant considered the finalisation of knowledge products to have taken significantly longer than in other comparable professional contexts.
- Process breakthroughs: To improve efficiency, the Research Coordinator introduced bi-weekly one-on-one calls with Chapters. These 14-day rhythms provided crucial structure, helped overcome individual technical blocks, and increased accountability for deliverable deadlines.
- Some tool inefficiencies: The Project discovered that long, complex surveys sent to law enforcement authorities yielded a low return on investment because they elicited superficial answers and required extensive follow-up. In contrast, semi-structured interviews provided much richer data for the same level of effort.

5.1.4 Technical and structural hurdles

- Platform inefficiencies: Technical platform limitations and temporary glitches, some due to the diversity of IT tools used by some participants, but also the lag in document updates in SharePoint/Teams, were identified as efficiency drains that caused several teams to lose time during high-stress finalisation phases.
- Methodological trade-offs: There was an intentional trade-off between efficiency and capacity building; while it would have been more efficient for the Secretariat to conduct more of the research in-house, the Project intentionally distributed this work to Chapters to help them build technical credibility and establish relationships with national authorities.

5.2 Project effectiveness

5.2.1 Output-level results: In-depth and country-comparative research is undertaken, published and disseminated

The main focus of TI-S and the Chapters during the Project's implementation period was to undertake in-depth and country-comparative research related to the detection and prevention of cross-border corrupt money flows, particularly (i) the mapping of asset ownership data and (ii) the assessment of law enforcement capabilities.

This research resulted in six research outputs:

- Chasing Grand Corruption: Hurdles to detection, investigation and prosecution of complex cases across the EU
- One click away? The barriers investigators face across the EU when tracing asset ownership
- From real estate to yachts: What do we know about assets across the EU? The state of play in nine countries
- Development of Red Flag indicators
- Best practice case studies from targeted countries

- TI EU delivered a separate report to the Commission’s portal titled “Assessment of EU Norms and Practices on Information Exchange”

The TI-S Project Team provided the research framework, including research designs and methodologies (detailed assessment frameworks and data collection templates), to ensure comparability across the nine countries. The Project Team also provided oversight throughout the research phase. Aside from the Red Flag indicators research output, which was written entirely in-house by the Project Team, and the Assessment of EU Norms and Practices on Information Exchange, which was submitted by TI EU, the other four research outputs were drafted (or compiled) by the Project Team, relying on TI Chapters for primary data input. This role included analysing national legal frameworks and statistics where publicly available, sending out requests for information through direct communication, freedom of information requests or via members of the parliament as parliamentary requests, sending out surveys to relevant authorities, and, where possible, following up with qualitative assessment through semi-structured interviews and focus group discussions.

Three of these research outputs have been published online by TI-S on the Transparency International website. Some of the Chapters have also published them on their websites. Table 1 provides an overview of online dissemination by research output.

Table 1: Dissemination of the research outputs and findings

	Chasing Grand Corruption: Hurdles to detection, investigation and prosecution of complex cases across the EU	One click away? The barriers investigators face across the EU when tracing asset ownership	From real estate to yachts: What do we know about assets across the EU? The state of play in nine countries
Websites featuring the research report/web features	Transparency International: published in May 2025 under publications TI Germany reported web feature on social media TI Ireland; published on website, link to report in blog TI Italy; published on website, link to report in blog TI Latvia; published on website, link to report in blog TI Lithuania; published on website, link to report in blog TI Slovenia; published on website, link to report in news	Transparency International: published in September under news TI France published a web feature and LinkedIn post TI Germany reported web feature on social media TI Ireland; published on website, link to web feature in blog TI Italy; published on website, link to web feature in blog	Transparency International: published in October under news TI France published a web feature and LinkedIn post TI Germany reported web feature on social media TI Ireland; published on website, link to web feature in blog TI Italy; published on website, link to web feature in blog
Visibility statistics (not including separate)	Unique visitors: 782 Total visits: 868 Total pageviews: 1K Unique downloads: 343	Unique visitors: 1.1K Total visits: 2.2K Total pageviews: 3K	Unique visitors: 2K Total visits: 3.6K Total pageviews: 4.7K

Chapter publications)	Total downloads: 398		
-----------------------	----------------------	--	--

Note: Website searches for the nine National Chapters and TI-EU were conducted on 7 January 2026. Data on analytics was provided by TI-S on 9 and 12 January 2026.

The report published by TI EU – Assessment of EU Norms and Practices on Information Exchange – had (by 15 January 2026) achieved 134 views and 50 downloads.

The visibility statistics are still evolving, given that most research outputs are relatively recent and can be expected to have a longer shelf life. Against this backdrop, the visit and download numbers that appear low might be quite in line with comparable policy publications that focus on very technical subject matters and expert audiences, although these metrics are very difficult to adequately benchmark.

Because the research outputs in their synthesised format could not focus too much on national details, some Chapters also produced their own blogs and reports. Examples include an article by TI Ireland titled ‘The changing scope of ownership transparency and its relevance to national security’, which was published by the Azure Forum for Contemporary Security Strategy.¹ These efforts worked particularly well when they could link up with peers and other stakeholders in the AML ecosystem, as in the case of TI Germany.

Case worth highlighting 1: TI Germany feeds and amplifies the country-level AML community with research findings

TI Germany published a STEP EU-special issue of its "Scheinwerfer" magazine. Approximately half of the issue, the first 23 pages, was devoted to the project's topics and findings. Through this issue, which contained several articles about the STEP EU project and TI Germany’s work on cross-border corrupt money flows received attention from several well-known persons in the AML sphere, including Pulitzer Prize-winning investigative reporter Frederik Obermaier, who is well known from the Panama Papers, Bahamas Leaks and Paradise Papers investigations, who wrote a LinkedIn post, tagging and linking the magazine.² Other well-known thematic experts, such as Bastian Obermayer (Panama Papers) and Claudia von Salzen (Tagesspiegel), reposted the article, substantially increasing its audience. All in all, the issue has to date received over 1,000 impressions, which is higher than any other issue published in the Scheinwerfer magazine.

Events also served as a primary vehicle for disseminating research findings to relevant stakeholders. At the in-person event “Strengthening Enforcement Against Cross-Border Corruption & Financial Crime”, held in Brussels on 18 November 2025, research findings were presented to an audience of law enforcement authorities, civil society, and EU institutions. The keynote address was given by Michael McGrath, European Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection. A LinkedIn post about the event by TI-S had, by 9 January 2026, reached 4,175 people and had 831 engagements (reactions, shares,

¹ More about the article can be found on this link: https://transparency.ie/news_events/changing-scope-ownership-transparency-and-its-relevance-national-security

² That post is available here: https://www.linkedin.com/posts/activity-7405638733078974464-UYTw?utm_source=share&utm_medium=member_desktop&rcm=ACoAADMh_OMBMCvktm1H7jGwaCELVkrS0-XOn48

comments, and clicks on the pictures), which constitutes a very high engagement rate for LinkedIn posts on similar matters.³

Also concerning EU institutions, following the publication of the research outputs, TI EU was invited to present its findings directly to Commissioner Serafin and the European Anti-Fraud Office (OLAF), indicating the potential for uptake of evidence in high-level policy discussions concerning the review of the EU's anti-fraud architecture.

Research dissemination events also took place at the national level, including at TI Spain, which invited the Central Register of Beneficial Owners authority and other relevant national stakeholders to its offices to present the Project's findings, in particular those related to central registers of beneficial ownership, and to compare Spain with other European countries. Similarly, armed with the research findings, TI Germany convened a high-level event in January 2025 with the Association of German Criminal Investigators, and TI Ireland hosted an online event on 9 December 2025 to mark International Anti-Corruption Day, for journalists, academics and CSOs to present and discuss the Project's findings, with a particular focus on the role of data access in exposing corruption, money laundering and wider economic crime.

5.2.2 Results in relation to the specific project objectives

Beyond the output-level results that were linked to the various research reports (project deliverables), the Project also intended to achieve results in relation to one overall objective, "Increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU," and three specific objectives:

1. Improved understanding of available data and gaps, including its use, for the prevention and early detection of corruption and other financial crimes;
2. Strengthened EU Member States' capacity to prevent, detect, investigate and prosecute cross-border corruption, and
3. Enhanced cooperation between competent authorities to facilitate a consolidated EU approach to reducing cross-border corruption.

A more thorough discussion of results at the outcome and impact levels will be provided in the next section. However, it is worth stressing that it is too soon to gauge the full extent to which the Project has contributed to the overall objective of increasing prevention, detection, investigation, and prosecution of cross-border corruption in the EU. There are many steps between producing evidence and initiating engagement with national authorities, which have been the focus of the Project, to those national authorities having the systems in place to better deal with cross-border corruption, to finally see tangible results in the form of increased prevention, detection, investigation, and prosecution of cross-border corruption.

With regard to the first main objective, "improved understanding of available data and gaps," this objective has been achieved through the methodology and rigour of the research, which lent credibility to the reports and through effective research dissemination across multiple avenues.

³ The post is available here: https://www.linkedin.com/posts/transparency-international_yesterday-in-brussels-we-held-the-conference-activity-7396935890310434817-2W4u/. Another article, published by Aperio Financial Crime Digest, features an in-depth interview with TI Ireland and TI-S on AML developments in Ireland and the EU. The article is available at: <https://www.portal.aperio-intelligence.com/fcd/article?articleId=17133&type=specialFeatures>

For the second main objective, “strengthened capacity to prevent, detect, investigate and prosecute cross-border corruption”, the evidence is very slim, since the evaluation did not manage to obtain much information from the national authorities or otherwise gain a good understanding of the extent to which the findings and recommendations from the research activities have been absorbed by the targeted national authorities. The exception is Latvia, whose Corruption Prevention and Combating Bureau responded that their engagement with TI Latvia and the insights from the STEP EU research has provided them with a clearer understanding of the available data landscape, as well as highlighted significant gaps that affect early detection and prevention of corruption and financial crimes, and that TI’s ideas and approach has reinforced their commitment to proactive risk detection and collaboration with other institutions.

Lastly, regarding the third main objective, “enhanced cooperation between competent authorities,” with only anecdotal evidence, there is unfortunately no way to know the extent to which relevant and meaningful inter-agency cooperation has increased, or even whether this objective was shared by the relevant national authorities.

5.3 Critical enablers and barriers

5.3.1 Critical enablers for achieving results

Several factors that have helped the Project achieve its results have been mentioned in interviews. Some of these factors concern the context in which the Project was implemented. These include the strategic timing of the Project (the “policy window”), its alignment with the EU legislative cycle, and the delivery of the research findings at an optimal time to inform the transposition of the AMLD6, thereby allowing Chapters to feed immediate, evidence-based recommendations into national legislative processes.

The comparative research design, which compared nine countries using common indicators, created a potentially powerful advocacy tool with built-in peer pressure that may spur countries to improve their policies, processes, and systems. The rigorous data collection allowed Chapters to approach authorities not just as critics, but as technical experts possessing a global overview that the authorities themselves sometimes lacked.

Other enabling factors concern the way the Project was managed. Factors that have been mentioned in this regard include the robust coordination and individualised support provided to the Chapters by TI-S, including hands-on research support and bi-weekly coordination calls, which helped maintain momentum, “forced” preparation, and provided a regular space for troubleshooting. The adaptive management approach helped ensure the continuation of the research by TI Germany when it faced critical staffing disruptions, and helped TI Portugal amend its involvement in the project in line with its internal constraints. Other project management-specific enabling factors included the in-person convening, both the Berlin workshop in February 2025, which was identified as a critical turning point for engagement and trust-building, and the Brussels final conference in November 2025.

5.3.2 Critical barriers for achieving results

Several critical barriers were mentioned in interviews. One type of barrier concerned human resources, especially the changes in project management staffing and high staff turnover, with approximately half of the Chapters’ research staff changing within the first six months,

necessitating repeated training and onboarding. This problem was particularly severe for TI Germany, which faced the resignation of both its Project Manager and Executive Director during the project, requiring TI-S to intervene with consultants, and TI Portugal, which experienced severe internal governance issues, the resignation of key staff, and long-term sick leave, which forced the project board to remove them from one of the work packages.

A second type of barrier concerned the Project's research-heavy focus, and some Chapters were critical of this aspect of the project design and remarked that it underestimated the workload and overestimated Chapter capacity. The highly technical nature of AML research (e.g., analysing legal frameworks) overwhelmed staff without prior expertise. Some Chapters also perceived the imbalance between research and advocacy as unfavourable, leaving insufficient room for advocacy (although multiple advocacy efforts were launched as described in sub-section 6.2.3 below). Some Chapters also felt that their role was *akin* to being subcontractors providing data to Berlin rather than partners leading the research.

A third type of barrier concerned data access and the difficulty of collecting high-quality data in several countries, such as in Italy, where the beneficial ownership register was legally suspended during the Project, preventing access to crucial data.

6. Project outcomes and impact

6.1 Using a project Theory of Change to frame the Project's outcomes and impact

As part of the final evaluation of the STEP EU project, a retrospective Theory of Change (ToC) was developed to anchor and frame the analysis of outcomes and impact. This ToC is described below in narrative and visual form.

The ToC articulates the pathway to change through a logical sequence of changes that should occur between project activities and the ultimate impact. The pathway to change starts at the activity and output level, which is within the project's sphere of control. Moving to the right are changes within the project's sphere of influence. These denote actions, behaviours, and processes that the project can nudge and influence but are not fully determined by the project. The further to the right within the pathway, the lower is the level of direct influence of the project. Finally, the sphere of interest is where the ultimate impact is found. This is the "north star" of the project, and if the ToC holds, the project should be able to contribute to it, albeit as one source of change among others.

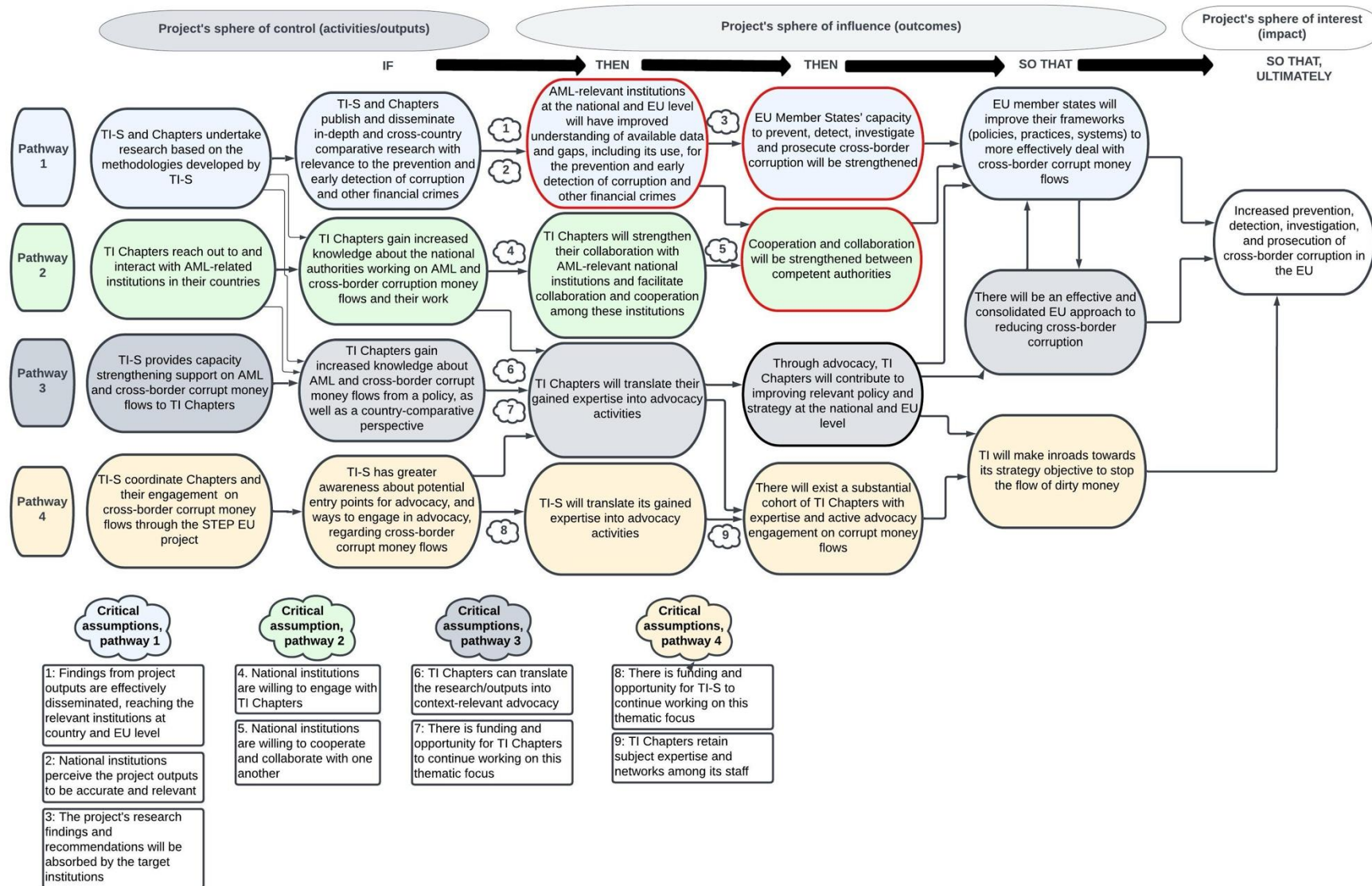
Determining which change belongs to which sphere is important from an evaluation perspective, so as not to hold the project to account for changes that are not within its sphere of control and not expect changes that are quite far down the logical sequence of change to have already occurred and become visible at the close of the project. In fact, the expected outcomes from this Project's results framework (framed in red) are at different distances from its sphere of control, and this should influence expectations for both what the evaluation will unearth and the degree to which the Project can be held to account for these outcomes.

The ultimate impact in the ToC is stated as "Increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU". That is the long-term goal the Project aims to contribute to: its "north star". Four interrelated pathways of change lead to that goal:

1. Impact from the research undertaken by the Project;
2. Impact from improved coordination and collaboration with and between national authorities;
3. Impact from STEP EU-related advocacy at the national level, and
4. Impact from TI-S advocacy and in line with TI movement strategy.

These four pathways are illustrated in the ToC diagram below, with arrows from output to outcome to impact through the various stepping stones that comprise each pathway. Nine critical assumptions are articulated in the ToC, and they signal the necessary conditions for moving to the next stepping stone along the pathway to change.

Project Theory of Change diagram



6.2 Evidence of Project outcomes and impact

This section presents evidence on outcomes and impact, framed by the ToC and its four pathways.

6.2.1 Pathway 1: Outcomes from in-depth and cross-country comparative research

The first pathway in the project ToC focuses on the research undertaken by the Project and how the research outputs, by pointing out gaps and showing what good practices entail from a country-comparative perspective, help strengthen national frameworks (policies, practices, systems) to more effectively deal with cross-border corrupt money flows.

In an evidence-based advocacy project, such as the STEP EU project, research and evidence can help shape policies and practices in myriad ways, including through evidence-based policymaking, in which findings from research can demonstrate policy effectiveness, feasibility, and value.⁴ Evidence can also reframe issues to make them salient or urgent, thereby advancing a topic onto the policy agenda,⁵ and can prompt new learning that fosters incremental change within authorities.⁶

Furthermore, the country-comparative aspects of the Project's research, which shows how countries are doing compared to their peers (through assessment tables) and highlights what is possible and doable (through best practice cases) may result in improved policies, practices and systems through both "mimetic adoption"⁷ (countries/authorities mimicking good practise from peers to improve legitimacy) and "normative diffusion" (convergence across countries/authorities to higher normative standards).⁸

Pathway 1

IF the Project undertakes in-depth and cross-country comparative research with relevance to the prevention and early detection of corruption and other financial crimes, and publishes and disseminates this research, **THEN** AML-relevant institutions at the national and EU level will have an improved understanding of available data and gaps, including its use, for the prevention and early detection of corruption and other financial crimes. For this causal link to hold, findings from the project's research will need to have been effectively disseminated, reaching the relevant institutions at the country and EU level (critical assumption 1). National institutions must also perceive the findings to be accurate and relevant (critical assumption 2). **THEN**, EU Member States' capacity to prevent, detect, investigate and prosecute cross-border corruption will be strengthened (which relies on the project's research findings and recommendations being absorbed by the target institutions (critical assumption 3)), **SO THAT** EU member states and EU institutions will use this capacity to improve their frameworks to more effectively deal with cross-border corrupt money flows, **SO THAT, ULTIMATELY,**

⁴ See, for example, Head, B. W. (2010). Reconsidering evidence-based policy: Key issues and challenges. *Policy and Society*, 29(2), 77-94. <https://doi.org/10.1016/j.polsoc.2010.03.001>

⁵ Kingdon, J. (2010). *Agendas, Alternatives and Public Policy*, (2nd ed.). New York: Pearson.

⁶ See, for example, Visser, M., Van der Togt, K. (2016) Learning in Public Sector Organizations: A Theory of Action Approach. *Public Organiz Rev* 16, 235–249. <https://doi.org/10.1007/s11115-015-0303-5>

⁷ Katsumata, H. (2011). Mimetic adoption and norm diffusion: "Western" security cooperation in Southeast Asia? *Review of International Studies*, 37(2), 557–576. <http://www.jstor.org/stable/23024609>

⁸ Finnemore, M., Sikkink, K. (1998). International Norm Dynamics and Political Change. *International Organization*, 52 (4), 887–917 *JSTOR*, <http://www.jstor.org/stable/2601361>

increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU is achieved.

The direct attribution of the Project's research outputs is very difficult to ascertain for several reasons, including the limited time that has passed since the research was published, and the limited input from national authorities for this evaluation. To date, the only harvested outcome in the form of a change pertaining to pathway 1 comes from Lithuania and is explained in the box below.

Identified change case 1: Armed with evidence from across the EU, Lithuania's anti-corruption agency representative commits to advocating for cryptocurrency to be included in the 2026 national anti-corruption plan

The STEP-EU asset gaps research presented at the STEP EU event "Strengthening Enforcement Against Cross-Border Corruption & Financial Crime" in Brussels on 18 November 2025 convinced the invited panellist, Elanas Jablonskas from the Lithuanian anti-corruption agency, that cryptocurrency is the next AML frontier for his country and motivated him to advocate for its inclusion in the next national anti-corruption plan. He noted the effectiveness of cross-country comparative research; that seeing "red" (negative) ratings in TI's comparative research compared to other countries is an effective motivator for initiating change at the country level.

The identified change received a rating of 2 (medium contribution) on TI's contribution scale (ranging from 0 to 3).⁹ The Project's contribution to the change was important, although the change would probably have happened without TI's involvement.¹⁰

Case worth highlighting 2: TI Ireland uses research findings to make submissions to the government for the development of key national strategies

TI Ireland has used the project research to contribute to the development of Ireland's first-ever multi-annual national strategy on tackling economic crime and corruption, the 'Strategy to Combat Economic Crime and Corruption'. In June 2024, TI Ireland's CEO was appointed to the Advisory Council on Economic Crime and Corruption, a body established by the Government of Ireland in 2022 and responsible for developing the national Strategy. In November 2024, TI Ireland made a submission to the Department of Justice's consultation on developing the Strategy,¹¹ as well as contributing to an invitation-only stakeholder consultation event on the development of the Strategy. Key findings from the project research have since been disseminated by TI Ireland to both the Advisory Council and the Department of Justice.

In addition, TI Ireland found during the project research serious deficiencies in Ireland's vessel registration system, in which data was found to be paper based with no verification mechanisms, making digital analysis impossible. This finding was included in TI Ireland's

⁹ This assessment was preliminarily made by the evaluators and was later validated by those Chapters that participated in the online evaluation validation meeting on 4 February 2026.

¹⁰ TI's contribution scale provides a framework for gauging the level of contribution by a project to changes in behaviour and policy that have been identified as part of an evaluation or similar project assessment. Each identified change is rated on a four-point scale ranging from 0 (no contribution) to 3 (significant contribution). For more information, see Transparency International Monitoring Guide, page 21, <https://files.transparencycdn.org/images/Are-we-on-the-road-to-impact-Transparency-International-monitoring-guide.pdf>

¹¹ The submission is available to download from this announcement: https://transparency.ie/resources/submissions/2024_Strategy_Economic_Crime_Corruption

submission to the Department of Defence’s public consultation on the development of the new National Maritime Security Strategy, in July 2025.¹² It also attracted media attention¹³ and led to TI Ireland meeting with the Departments of Defence and Transport to discuss its findings.

TI Ireland provisionally assesses that their influence on the overall shape and content of the Strategy to Combat Economic Crime and Corruption will be Medium, i.e. ‘*TI’s contribution to the change was important, although the change would probably have happened without TI’s involvement, but it might not have had the same quality*’. Nevertheless, since the Strategy has not yet been published at the time of writing,¹⁴ it is not possible to conclusively assess the extent to which TI Ireland’s proposals have gained traction and been incorporated into the final text. Consequently, as the actual change (i.e. in strategy language) is not yet possible to confirm, this case falls under “cases worth highlighting” as opposed to “identified change case”.

Case worth highlighting 3: TI Italy’s research enables it to provide inputs to an important external review process and establish national-level recognition as a competent interlocutor on beneficial ownership transparency

TI Italy used its core research findings and recommendations to submit detailed input on shortcomings in beneficial ownership transparency to the Financial Action Task Force (FATF) in April 2025, ahead of Italy’s mutual evaluation. The submission focused on a particularly topical issue: the controversial judicial suspension of Italy’s register due to a court challenge. This submission was shared confidentially by FATF with key national stakeholders, including the Italian Ministry of Finance and the Guardia di Finanza. This indicated that FATF considered TI’s evidence as relevant and of high quality. The submission earned the Chapter a reputation among national authorities as a respectable interlocutor and domain expert and opened the door to further exchanges and to building a trust-based institutional relationship with institutions such as the large, hierarchical Guardia di Finanza, which are known to be very difficult to access by civil society groups.

The technical precision and depth of the research on beneficial ownership undertaken for this project were judged essential to the salience and recognition that the submission and TI Italy received. TI Italy intends to build on both the research insights, its expanded capacity and competence in this area, and the strengthened institutional relationships that have ensued with key stakeholders to engage in follow-up advocacy to accompany the transposition of the 6th Anti-Money Laundering Directive (AMLD6) through 2027.

While it is too early to say whether the commitment will come to fruition in Lithuania and actually change national policy, whether TI Ireland’s submissions will influence the relevant government strategies, and whether TI Italy’s input will move the situation forward with regard to the national BO register, these cases nonetheless provide support for the ToC sequence from research to improved understanding of gaps. It validates (together with the dissemination information in section 5.3.1 above) critical assumption 1, that the research has been effectively disseminated. It also, at least partly, validates critical assumption 2, that national institutions

¹² The submission is available to download from this announcement: <https://transparency.ie/resources/submissions/2025-National-Maritime-Security-Strategy>

¹³ This news article from The Journal is available here: <https://www.thejournal.ie/ship-register-system-ireland-criminal-gangs-6818142-Sep2025/>

¹⁴ Ireland’s Minister for Defence confirmed on 16 February 2026 that the Strategy will be published in the coming weeks, <https://www.rte.ie/news/2026/0216/1558703-ireland-defence/>

perceive the project outputs as accurate and relevant, and 3 that findings have been absorbed by relevant national institutions.

6.2.2 Pathway 2: Outcomes from engagement with national authorities

The second pathway in the project ToC focuses on the collaborative aspects of the Project, in which TI Chapters sought to engage with national authorities and spur collaboration and coordination among them.

Pathway 2

IF TI Chapters, by reaching out to and interacting with AML-related institutions in their countries as part of the Project, gain increased knowledge about the national authorities working on AML and cross-border corruption money flows and their work, **THEN** TI Chapters will strengthen their collaboration with AML-relevant national institutions and facilitate collaboration and cooperation among these institutions. This causal link depends on the national institutions' willingness to engage with TI Chapters (critical assumption 4). **THEN** cooperation and collaboration between competent authorities will be strengthened, which depends on the willingness of these authorities to cooperate and collaborate (critical assumption 5), **SO THAT** EU member states will improve their frameworks (policies, practices, systems) to more effectively deal with cross-border corrupt money flows, **SO THAT, ULTIMATELY**, increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU is achieved.

Improved collaboration between TI Chapters and national authorities

Through the Project, greater engagement of TI Chapters with their national authorities has been noted across the board. With TI Chapters becoming technical experts in the AML and cross-border corruption money flows area, they have been granted unprecedented access to relevant stakeholders in their countries.

While some TI Chapters, like Lithuania, were already part of a network that included national authorities engaged in AML and the prevention of cross-border flows of corrupt money and thus could use the Project to continue and deepen this collaboration, several Chapters had to establish functional relationships with law enforcement and registries where none had existed previously. Italy, for example, managed to build a crucial, trust-based working relationship with the Guardia di Finanza (Financial Police) entirely from scratch over the project's lifespan. This was considered a major achievement given the agency's large, militarised, and hierarchical structure. TI Slovenia reported a clear shift from initially limited receptiveness among some authorities to being increasingly recognised as a credible technical interlocutor, with authorities proactively reaching out for input on relevant topics, while TI EU's engagement with Europol went from Europol not responding to the survey requests to TI EU being invited to present research findings at their annual meeting. Moreover, TI Ireland was asked by the Office of the Director of Public Prosecutions (with whom there was no prior relationship) to submit input on its anti-corruption policies.

The experience of TI Spain illustrates how the Project helped a TI Chapter become part of the ecosystem of national actors in this policy area.

Case worth highlighting 4: TI Spain strengthens its collaboration with relevant national authorities

The STEP EU project provided an entry point for TI Spain to build relationships and engage directly with several of the country's key institutions related to AML and cross-border corrupt money flows through the Project, including with the newly established and Ministry of Justice-managed Central Register of Beneficial Owners (Registro Central de Titularidades Reales (RCTIR)). In fact, it was at a TI Spain-organised event that the register first made its public debut. A working relationship was also established between TI Spain and the Spanish Anti-Money Laundering Registration Centre (CRAB), which is the national body that processes information from property and commercial registries to assist authorities in combating financial crime. TI Spain published a case study on the CRAB in October 2025 titled "Key aspects of CRAB in the prevention of money laundering",¹⁵ which was very well received by the authority in question. Finally, through the Project, TI Spain established a connection with the Spanish National Police, and one of its representatives, Daniel Llorens, travelled to Brussels to serve as a panellist at the STEP EU event "Strengthening Enforcement Against Cross-Border Corruption & Financial Crime".

As the Project was ending in December 2025, TI Spain invited RCTIR for another event to present the findings from the STEP EU project, in particular those related to central registers of beneficial ownership, comparing Spain with other European countries. This event cemented TI Spain's relationship with RCTIR, which expressed openness to continuing the collaboration with TI, including inviting the Chapter to participate in the public consultation on the law being prepared for the transposition of the AML6 Directive.

With these relationships in place, TI Spain has become part of an ecosystem of actors in the AML and cross-border corrupt money flows national policy space. From this position, the organisation feels confident it can contribute to positive change. As an example, TI Spain submitted 100 recommendations for the national anti-corruption strategy, several of which specifically address cross-border flows of corrupt money.¹⁶

A key factor for the successful collaboration with the national authorities was the technical credibility and rigorous research methodology embedded in the Project, which gave Chapters the currency needed to engage authorities. TI France, for example, developed recommendations specifically targeted to the French context, drawing on the main findings from the Project, and relayed them to the relevant actors in France through a report titled "Untraceable? Following the money trail in financial crime cases". This context-specific work strengthened TI France's dialogue with national authorities.¹⁷

By presenting comparative data and deep technical knowledge, Chapters demonstrated they understood the "nitty-gritty" of the legal frameworks, making authorities more willing to open up about their own challenges. This required level of detail, however, also came at a price, and several Chapters remarked that the rigorous, detail-oriented research methodology had put

¹⁵ The published study can be found at: https://transparencia.org.es/wp-content/uploads/VF.-2025_Task-3.3_Good-practice_CRAB_ES.pdf

¹⁶ These recommendations are published at: <https://transparencia.org.es/wp-content/uploads/Transparencia-Internacional-Espana-presenta-100-recomendaciones-para-impulsar-una-estrategia-nacional-anticorrupcion.pdf>

¹⁷ The report is available in French (long version) here: https://transparency-france.org/wp-content/uploads/2025/12/RAPPORT_intracables_FR_VF_compressed.pdf and in English (short version) here: https://transparency-france.org/wp-content/uploads/2025/12/RAPPORT_untraceable_ENG_VF.pdf

them in awkward positions with these authorities, including having to ask them to complete lengthy, detailed surveys and engage in several follow-up conversations over seemingly minute details.

The Project helped grant some Chapters a seat at the decision-making table, as in the case of TI Ireland, whose CEO was appointed to the Advisory Council on Economic Crime and Corruption, allowing them to feed detailed recommendations into Ireland's first-ever national strategy on the topic. The Chapter was also invited to an invitation-only event to inform the development of the new Strategy and to advise the statutory body responsible for reviewing company law. Similarly, TI France has been invited (pending confirmation) by the French Treasury to participate in consultations on the future National Risk Analysis and in G7 side events.

Engagement at the country level did not only target the national authorities responsible for financial crime. In Portugal, the Chapter organised a meeting at the end of the Project with four political parties represented in Parliament to disseminate the results and initiate a discussion on the way forward for an improved national response to cross-border flows of corrupt money.

Improved collaboration among national authorities

There are fewer examples of TI Chapters serving as system facilitators and contributing to greater collaboration and cooperation among relevant national institutions. An exception is TI Slovenia, which informally bridged agency divides after observing that agencies often blamed one another for inaction. By engaging both sides and clarifying their respective constraints, TI Slovenia facilitated informal follow-up dialogue and encouraged direct communication between institutions.

The more common way of bringing together various national authorities, thus at least indirectly contributing to inter-agency collaboration, is through organised events. TI France, for example, asserted its system facilitator role by organising an Anti-Money Laundering and Counter-Terrorist Financing conference in January 2025, which brought together 300 participants, including representatives from relevant authorities, academics, and civil society. The event, which featured two roundtables that explored how to balance the effectiveness of Anti-Money Laundering and Counter-Terrorist Financing standards with fundamental rights, while simultaneously strengthening collaboration among key stakeholders, was part of TI France's broader outreach strategy to engage with authorities and stakeholders and helped pave the way for ongoing dialogue and regular exchanges on technical areas of research and cooperation.

The evidence gathered for Pathway 2 confirms the steps of the ToC from engagement to knowledge to increased collaboration, as well as the accompanying critical assumption 4, that national institutions are willing to engage with TI Chapters. However, to date, there is little evidence that the Project has directly contributed to increased collaboration and cooperation among national authorities, and critical assumption 5 that national authorities are willing to cooperate and collaborate with one another cannot be validated.

6.2.3 Pathway 3: Outcomes from advocacy efforts

The third pathway in the project ToC focuses on Chapters using the Project and what they learned from being part of it as an entry point to engage in subject-relevant advocacy.

Pathway 3

IF, through being part of the Project and receiving support from TI-S, TI Chapters gain increased knowledge about AML and cross-border corruption money flows from a policy, as well as a country-comparative perspective, **THEN** TI Chapters will translate their gained expertise into advocacy activities, provided they have the capacity to translate this into context-relevant advocacy (critical assumption 6) and provided there is funding and opportunity to engage in such advocacy (critical assumption 7). **THEN**, TI Chapters will contribute to improving relevant policy and strategy at the national and EU level, **SO THAT** EU member states will have improved frameworks in place to deal more effectively with cross-border corrupt money flows and there will be an effective and consolidated EU approach to reducing cross-border corruption, **SO THAT, ULTIMATELY**, increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU is achieved.

A major result of the Project was a significant increase in the technical expertise of participating Chapters on AML and cross-border corrupt money flows. TI-S's support and mentoring, as well as regular Project meetings, helped build expertise, as did the in-country research with its rigorous methodology, which provided the Chapters with expertise through "learning by doing".

While the Project formally left little room for centrally organised advocacy efforts during the project implementation period, several Chapters nonetheless found ways to capitalise on the Project for advocacy related to cross-border corrupt money flows. Moving forward, if funding and opportunity are available, these efforts are likely to multiply with the completion of the Project's research.

Identified change case 2: TI France achieves legislative reform

TI France secured an important policy victory by integrating STEP EU recommendations into a new French anti-money laundering law. Notably, the law now explicitly requires the inclusion of the full ownership chain and historical data in the beneficial ownership (BO) register—key recommendations from the project's findings. TI France also successfully pushed for a broader understanding of "legitimate interest" under the Sixth Anti-Money Laundering Directive (AMLD6), enabling CSOs with even indirect ties to AML efforts to access crucial data.

These achievements were grounded in robust research insights from the project and supporting studies from related initiatives. For example, TI France highlighted that over 70% of corporate-owned real estate in France is held anonymously. This type of compelling evidence supported a multi-pronged advocacy approach: direct engagement with a number of key government agencies, leveraging public and media attention through outlets like Le Monde, organising high-profile events such as an AML conference attended by 300 participants, and presenting specific legislative amendment proposals for different related bills.

The identified change receives an evaluator's rating of 3 (significant contribution) on TI's contribution scale (ranging from 0 to 3; see footnote 7).¹⁸ The Project's contribution to the change was essential, and it is clear that the change would not have happened or would not have happened in the same way without TI's involvement.

¹⁸ This assessment was preliminarily made by the evaluators and was later validated by those Chapters that participated in the online evaluation validation meeting on 4 February 2026.

For TI Slovenia, the knowledge generated from the Project proved useful in response to a shift in the national context.

Identified change case 3: TI Slovenia prevents beneficial ownership information from becoming severely restricted

By engaging in beneficial ownership transparency through the STEP EU project, TI-Slovenia was able to act swiftly when a proposed amendment would have restricted access to beneficial ownership data. Effective advocacy by TI Slovenia and other civil society groups ensured that beneficial ownership data remains accessible to NGOs, researchers, and journalists.

Through TI Slovenia's engagement in the STEP EU project and their heightened awareness of, and eye on, the country's beneficial ownership register, they stood ready when the government suddenly proposed an amendment to the Anti-Money Laundering and Terrorism Financing Act (ZPPDFT-2C). Together with two other NGOs in the country with whom TI Slovenia had recently formed the Alliance for Integrity, Pravni center za varstvo človekovih pravic in okolja and Danes je nov dan, TI Slovenia co-wrote an open letter to the government, which the three organisations simultaneously published on their social media web pages. In the letter, they stated that the amendment unjustifiably restricts access to the register of beneficial owners of companies, thereby significantly reducing transparency.¹⁹ The letter received overwhelming support, with approximately 50 NGOs signing it within a few days. This collective action resulted in a change to the amendment, giving NGOs, researchers, and journalists continued access to the beneficial ownership register. While going from a publicly accessible register to a legitimate-interest-restricted one cannot be said to be a pure win for transparency, at least the actions taken by TI Slovenia helped prevent a substantial setback to transparency in that country.

The identified change receives an evaluator's rating of 3 (significant contribution) on TI's contribution scale (ranging from 0 to 3; see footnote 7).²⁰ The Project's contribution to the change was essential, and it is clear that the change would not have happened or would not have happened in the same way without TI's involvement.

Other successful advocacy efforts on the back of the Project include that of TI Latvia, which contributed to the Enterprise Register and Beneficial Owner Register committing to create specific registers for assets exceeding €750,000 (such as ships) by 2027.

These cases confirm the pathway of the ToC from increased Chapter knowledge to advocacy actions to policy change at the national level, as well as the accompanying critical assumption 6, that TI-S/TI Chapters can translate the research/outputs into context-relevant advocacy. Critical assumption 7 concerning opportunities and funding for developing further advocacy work based on the Project could not be validated.

¹⁹ Information about the changes to the law can be found on the EY Slovenia Law News Website: https://www.ey.com/en_si/technical/ey-slovenia-law-news/law-news-august-2025#:~:text=ADOPTED%20PROPOSAL%20OF%20THE%20PREVENTION,no%20longer%20be%20publicly%20accessible. The letter itself can be accessed on TI Slovenia's Facebook page at: <https://www.facebook.com/photo?fbid=1196913762466843&set=a.581351144023111>

²⁰ This assessment was preliminarily made by the evaluators and was later validated by those Chapters that participated in the online evaluation validation meeting on 4 February 2026.

6.2.4 Pathway 4: TI Strategy outcomes

The fourth pathway in the project ToC focuses on TI-S and its strategic engagement in the policy area of AML and cross-border corrupt money flows in the EU (and beyond).

Pathway 4

IF, through coordinating Chapters and their engagement on cross-border corrupt money flows through the STEP EU project, TI-S gains greater awareness of potential entry points for advocacy and ways to engage in advocacy on cross-border corrupt money flows, **THEN** TI-S will translate this expertise into advocacy activities. This hinges on there being funding and opportunity for TI-S to continue working on this thematic focus (critical assumption 8). **THEN** a substantial cohort of TI Chapters with subject expertise and active advocacy engagement on corrupt money flows will exist (which depends on TI Chapters retaining subject expertise and networks among its staff critical assumption 9)), **SO THAT** TI will make inroads toward its strategy objective to stop the flow of dirty money, **SO THAT, ULTIMATELY**, increased prevention, detection, investigation, and prosecution of cross-border corruption in the EU is achieved.

The Project should not be seen as an ad-hoc or stand-alone endeavour from a TI perspective, but as part of a larger programmatic focus tied to its strategy objective of stopping the flow of dirty money. In that vein, the TI-S Project Team has used global events and conferences to present findings and recommendations from the Project, discuss future opportunities to engage in the policy area, build networks with leading actors working on AML and cross-border corrupt money flows, and cement TI-S's standing as a stakeholder in this global ecosystem. In 2025, members of the Project Team participated in seven thematically relevant regional and global events organised by GRECO (June), the European Business Registry Association (June), the Egmont Group (July), the IMF/World Bank (October, annual meetings), and Europol (December). The list of events also included the TI Europe & Central Asia Regional Meeting (October) and a conference organised by the University of Luxembourg for leading academics on anti-fraud (November).

In March 2026, TI-S will host a Strategic Objective 2 (Stop Flows of Dirty Money) meeting in Berlin. Topics may include areas of shared interest, such as crypto, and the meeting will include some non-STEP EU Chapters. In addition, the TI-S Policy and Advocacy Team is contracting a research consultant who will support a new mapping exercise on crypto assets.

As the STEP EU project comes to an end, TI-S will continue its engagement in this policy area and build on the knowledge, collaborations, and lessons learned in the Project through a new multi-year, multi-country project called Strengthening EU Collaboration to Uncover and Resist Emerging Corruption (SECURE).

Case worth highlighting 5: TI-S scales up and sustains knowledge and lessons from the STEP EU project in future work

The SECURE project will be undertaken by Transparency International, in consortium with Transcrime (UCSC), 10 beneficiaries, and two law enforcement and anti-corruption agencies as associated partners. Five of the beneficiaries were part of the STEP EU project (France, Germany, Ireland, Italy, and TI EU), and five were not (Bulgaria, Hungary, the Netherlands, Serbia, and Slovakia). The project will pursue three specific objectives: (i) Improving the mapping and measurement of corruption risks (evidence generation); (ii) boosting anti-

corruption advocacy and awareness (national and regional awareness raising), and (iii) strengthening anti-corruption capacities of public authorities and CSOs (working with authorities). Evidence collected and recommendations under STEP EU will directly feed into activities under this project, including designing training materials for law enforcement agencies and developing a mapping dashboard of high-risk corruption areas. The "red flag" indicators developed for real estate will likely also be integrated into the project's training modules.

These various engagements align with the fourth pathway of the ToC, from greater awareness about advocacy entry points to translating gained expertise into advocacy activities, to a substantial cohort of TI Chapters with expertise having active advocacy engagement on cross-border corrupt money flows. It also supports critical assumption 8, that there is funding and opportunity for TI-S to continue working on this thematic focus. Considerations should be given to ensuring that subject expertise and networks are retained within TI-S and among TI Chapters, as critical assumption 9 could not be validated.

In summary, there is evidence of outcomes (beyond output) in relation to all four pathways to change in the Project's ToC. However, this evaluation has likely not been able to capture all eventual outcomes and impacts from the Project since changes in policies, processes, or "ways of doing things" that are likely to be influenced by the evidence reports, collaboration and expertise among Chapters and TI-S are unlikely to have had enough time to materialise at the time of this writing.

7. Project sustainability

Asked to look to the future during the ripple effect mapping session, TI Chapters envisioned a variety of ways in which their work on AML and cross-border corrupt money flows will be sustained and feed into related areas of work.

The ongoing national implementation of the EU's 6th Anti-Money Laundering Directive (AMLD6) will likely provide opportunities for several Chapters to keep engaging their national authorities in this matter.

A primary sustainability strategy involves converting ad-hoc project dialogues into permanent, formal consultations with national authorities. TI Italy, for example, is pursuing an MoU with the Guardia di Finanza (the financial police) and has been invited to join an institutional roundtable on the Lazio region. Similarly, TI France has been invited (pending confirmation) to participate in the future National Risk Analysis consultation with the French treasury and G7 side events on beneficial ownership transparency, TI Ireland has been asked to feed into the National Strategy on Combatting Economic Crime and Corruption and its Action Plan, and TI EU has solidified relationships with entities like the EC's Directorate General for Financial Stability (DG FISMA), OLAF, and the European Public Prosecutor's Office (EPPO), partly building on existing contacts but partly also moving from having no prior relationship to being asked to present findings at annual meetings.

Chapters' acquired knowledge and skills on mapping asset ownership are also being applied to new asset classes and sectors. TI France, for example, plans to replicate the project's methodology to investigate artwork and investment funds, while TI Latvia and TI Lithuania see specific opportunities in developing data platforms and expertise around crypto assets, and

TI Ireland has formed a partnership with Ulster University to work with a PhD researcher on the use of crypto/blockchain in corruption, money laundering and wider financial crime.

Five of the participating TI Chapters (France, Germany, Ireland, Italy and TI EU) will continue working on cross-border corrupt money flows and continue engaging national authorities in their countries through the SECURE project. This new project will utilise the AML frameworks learned in the STEP EU project but apply them to foreign undue influence and national security. TI Germany, for example, noted that this focus makes beneficial ownership transparency instrumental to a larger geopolitical goal, keeping it high on the political agenda. TI Ireland, which is also part of the SECURE project, has begun framing illicit finance as a national security risk, opening doors to non-traditional partners such as the Department of Defence and the National Security Service and harnessing growing interest in Ireland's national security, including the development of the country's first National Security Strategy. TI Ireland has to date written an article on the relevance of ownership transparency to national security, drawing on key findings from the Project, which was published by Ireland's leading security-focused think tank, with a readership of academics, experts, and practitioners in this space.²¹

Another strategy for sustaining and further developing expertise in AML and cross-border corrupt money flows within the Chapters in the absence of specific project grants is to develop paid services for companies and public bodies on anti-corruption and AML. This strategy is under deliberation by TI Ireland.

8. Conclusion

This endline evaluation of the STEP EU project has assessed the Project based on its relevance and coherence, efficiency and effectiveness, outcomes and impacts (framed on a retrospective Theory of Change), and the likelihood and ways in which aspects of the Project will be sustained after its termination.

In regard to relevance and coherence, the Project demonstrated strong alignment with both EU-level policy priorities and the strategic objectives of Transparency International and the participating Chapters. Its design and implementation addressed urgent challenges in the anti-money laundering and anti-corruption landscape, particularly by filling critical data gaps and building capacity among National Chapters. There was considerable coherence in the Project, both in design and with TI's broader strategic initiatives, although the Chapters' initial clarity on how specific Project activities would link to longer-term impact ambitions was uneven. Some coherence-related barriers were also noted, including capacity differences across Chapters and substantial staff turnover.

Regarding the Project's efficiency and effectiveness, through rigorous research, cross-country comparative and standardised methodologies, and strategic dissemination efforts, the project contributed valuable data, actionable insights, and policy recommendations that have begun to inform national and EU-level discussions. An adaptive management approach and strong coordination among participating Chapters enabled the Project to achieve its deliverables and overcome obstacles during implementation.

²¹ A link to this article is available here: https://transparency.ie/news_events/changing-scope-ownership-transparency-and-its-relevance-national-security

With regard to the Project's outcomes and impact, evidence gathered demonstrates that Project activities and outputs have resulted in outcomes across all four pathways of the retrospectively developed Project Theory of Change. While it is too early to capture the full extent of the Project's results and contributions to the overall and specific objectives, the documented outcomes validate key assumptions in the Theory of Change and illustrate the Project's contribution to policy reform.

Lastly, on sustainability, the Project's achievements in generating credible evidence, fostering collaborative networks, and influencing stakeholders provide a solid foundation for continued progress. TI-S will continue to build on the Project's achievements as part of its multi-year strategy objective to stop the flow of dirty money, including through the SECURE project, which some of the Project's National Chapters are part of. Other opportunities exist for the participating Chapters to build on the Project and continue working on the theme of cross-border corrupt money flows, including formalising key relationships with authorities in the AML ecosystem, applying acquired expertise to emerging challenges, and developing new collaborations and services.

Given that the Project, by design, invested most of its attention and resources in producing evidence and comparatively few resources in strategically translating this evidence into advocacy activities, the full impact of the Project is not yet visible and will depend on how this evidence is used strategically through advocacy going forward. Thus, moving forward, it will be essential to sustain the momentum generated by the Project by nurturing the networks and collaborations that have been developed and ensuring that the Project's research findings and recommendations translate into effective and contextually meaningful advocacy strategies at the country and regional levels.

9. Lessons, recommendations and considerations for future programming

The evaluation identified a set of lessons learned and forward-looking considerations relevant to the *relevance, coherence, effectiveness, and sustainability* of similar future initiatives. These reflections should be read in close conjunction with the [Draft Learning Paper](#)²², which provides a more detailed synthesis of participant perspectives on what worked well and where adaptive improvements may be warranted.

Project design

- **Levelling up to build even capacity:** From a *relevance and coherence* perspective, the evaluation highlights the value of embedding an early, on-demand capacity-building component. Joint activities at project inception—such as co-creating a shared Theory of Change—can support a stronger common understanding of objectives, assumptions, and roles, and help establish a unifying narrative that complements more linear deliverables. A needs-based assessment of technical research capacities and thematic knowledge at Chapter level in the first project phase can enable more targeted and tailored support during the project period.

²² This is an internal Transparency International document and may be shared upon request.

- Modular research, with more focus on research exploitation/advocacy: The project design placed strong emphasis on research, generating substantive outputs. Looking ahead, a more differentiated design could enhance *effectiveness and efficiency*. A two-tier research model—comprising a core module for all chapters and an optional advanced module that Chapters can self-select into—could better accommodate differing capacities and allocate research support while allowing advocacy objectives to feature more prominently where specific context and windows of opportunities make this advisable. Greater methodological flexibility could further enhance *effectiveness*. In some contexts, semi-structured interviews may complement or partially substitute surveys, enabling richer insights while retaining sufficient cross-country comparability.
- Shopping for access: The evaluation also points to access constraints in some policy and practitioner spaces, issues that were most likely already anticipated during the design phase. Where appropriate, engaging a liaison consultant with existing networks in the AML/law enforcement area or establishing an advisory committee with retired and practising professionals may produce considerable benefits, improve *strategic positioning* and facilitate much-needed broader access to key stakeholders.
- Forging meshes and personal connection: Finally, more frequent in-person check-ins and structured opportunities for lateral exchange between sub-groups of participating TI chapters could strengthen *coherence* and collective action across countries, particularly if organised around emerging thematic sub-areas such as crypto assets or art-related financial crime.

Project implementation

- Broader alliances, non-traditional partners: In terms of *coherence and effectiveness*, the project demonstrated the value of cross-practice collaboration with other civil society actors, with several strong examples at the country level. Building on these experiences, future initiatives could adopt a more systematic approach to partnership-building across all participating chapters. Additional opportunities to consider include collaborations with academic institutions, particularly to maximise the analytical use of the generated data, as well as with NGOs working on emerging or adjacent issues. More deliberately broadening outreach beyond established AML stakeholders may further enhance *the potential impact*.
- Editing the editing process: Clearer and more streamlined participation and consultation procedures for collective output production—supported by well-defined roles and responsibilities—would likely further improve *implementation efficiency*.
- Counter-talking points: The evaluation also suggests scope to strengthen policy influence through more systematic testing of research messages and policy asks. Proactive “red-teaming” could help anticipate both tactical counterarguments and substantive concerns—such as those related to surveillance or law enforcement accountability—and address them more robustly.
- A live business card for the project: Establishing a web presence that collects and showcases all public-facing deliverables and communications outputs also from Chapter level could further strengthen public, dynamic visibility to external and internal stakeholders, provided this can be technically implemented at reasonable effort level.

- From follow-up to all-along fundraising: With regard to *sustainability*, the findings indicate the benefits of shifting from ad hoc follow-up fundraising to a more continuous approach. Mapping emerging research insights and potential new partnerships during the project and linking them to additional funding opportunities and developing joint add-on proposals along the way, may help sustain commitment, capacity, and results beyond the project period.

Managing staff transitions and relationships

Considerable staff turnover was observed across chapters, the Secretariat, partner institutions, and funders. While largely unavoidable, transitions were managed competently overall, with no major delivery failures or significant delays, indicating adequate *adaptive capacity*. Nevertheless, the experience underscores the importance of strengthening institutional resilience.

- Connection redundancy: Broadening external relationships can mitigate risks associated with staff changes. This may include cultivating linkages at both more senior and more junior levels, supported by practical measures such as co-attendance at key meetings.
- Relationship handover: Strong internal and external handover protocols, underpinned by a shared and living Theory of Change, can further support continuity and *organisational learning*.
- Continuity architectures: Light forms of institutionalisation—such as participation in technical working groups or advisory mechanisms—may also enhance *sustainability*, while recognising that formal agreements (e.g. MoUs) may be impractical in some law enforcement contexts.

At the same time, the evaluation recognises that not all partnerships need to be permanent. Some relationships are context-specific or time-bound, and efforts to maintain them beyond their period of relevance may not represent an efficient use of resources.

Monitoring, evaluation, and learning (MEL)

From a *learning-and-adaptive management perspective*, the MEL approach is a clear strength. The longer time frame and early initiation of MEL activities allowed learning to accompany final implementation stages in real time.

The production of a learning paper that consolidates feedback and lessons for future programming was also identified as good practice, providing a solid evidence base to inform future design and implementation decisions.

10. Annexes

Annex A: Key evaluation questions

Relevance/Coherence:

- To what extent are the objectives of the project adequately defined, realistic and feasible, and to what extent are results verifiable?
- To what extent does the project align with the priorities and policies of the beneficiaries, i.e. the participating TI chapters?
- Are the activities and outputs of the project consistent with the project goals and objectives (i.e. was the planned chain of causality coherent)?
- How well does the project's approach align with TI's strategic objective to stop flows of dirty money?

Efficiency

- To what extent have the resources (financial, human, technical support) been allocated strategically and sufficiently to achieve the project outputs/outcomes?
- Were the project's activities in line with the schedule of activities as defined in the work plans? If not, what factors hindered timely delivery and what countermeasures were taken to address these issues?

Effectiveness:

- To what extent have the project objectives been achieved?
- What are the results achieved, both intended and unintended? To what extent can these be linked to TI-S and the project partners' work?
- What were the main internal and external factors that influenced the achievement or non-achievement of results?

Outcomes/impact:

- What key outcomes and impact were achieved, including any unintended positive or negative effects? How were these leveraged or addressed? To what extent can these changes be attributed to the project, and what other factors contributed?
- To what extent did the project contribute to strengthening EU member states' understanding of available data and gaps, including its use, for the prevention and early detection of corruption and other financial crimes?
- To what extent did the project contribute to strengthening EU member states' capacities to detect, investigate and prosecute cross-border corruption?
- Did the project contribute to enhanced cooperation between competent authorities to facilitate a consolidated EU approach to reducing corruption? If yes, what evidence exists? To what extent can these changes be attributed to the project, and what other factors contributed?

Sustainability

- To what extent are the results/outcomes of the project likely to continue after the project has ended?
- What are the major factors that will influence the sustainability and resilience of the achieved results/outcomes from the project?
- What are the opportunities for wider scalability of tools and approaches developed under this project, within and beyond the TI Movement?

Annex B: List of interviewees from TI Chapters and TI-S

TI Chapter	Interviewee	Title
Liaison Office for the EU	Anna Terrone	Project staff
	Nick Aiossa	TI EU Director
France	Charlotte Palmieri	Legal Officer – Illicit Financial Flows
Germany	Sarina Korte	Project Manager
Ireland	Alex Chance	Head of Policy & Research
	John Devitt	Chief Executive of TI Ireland
Italy	Giovanni Zorra	Project Manager
	Aiste Galinyte	Project Officer
Latvia	Jekabs Rasnacs	Project Manager
Lithuania	Ingrida Kalinauskienė	Executive Director of TI Lithuania
Portugal	José Fontão	Vice-President of TI Portugal/ Board member
Slovenia	Peter Malensek	Secretary General of TI Slovenia
Spain	Ailén Rubio	Researcher
	David Martínez	CEO of TI Spain
TI-S	Isabella Buechner	Thematic Specialist, Research & Knowledge
	Nadja Kostka	Project Manager
	Katherine Wilkins	Policy & Advocacy Coordinator
	Eka Rostomashvili	Campaigns Lead, Corrupt Money Flows
	Flora Cresswell	Regional Advisor, Western Europe