



ANTI-CORRUPTION COMMISSION
SEYCHELLES

ANNUAL REPORT 2025

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ANTI-CORRUPTION COMMISSION OF SEYCHELLES

Acknowledgment

The production of the **Anti-Corruption Commission of Seychelles Report 2025** represents a significant milestone in documenting the efforts, achievements, challenges, and ongoing commitment of the Anti-Corruption Commission Seychelles (ACCS) in fulfilling its mandate under the Anti-Corruption Act 2016 (as amended) to **investigate, detect, prevent, and prosecute** corrupt practices to combat corruption across all sectors of society.

This comprehensive report would not have been possible without the collective dedication, expertise, and unwavering support of numerous individuals and entities. On behalf of the Commission, we extend our deepest gratitude and sincere appreciation for the following:

- **The Management and Leadership** of the ACCS, including the Commissioner, Deputy Commissioner and senior management team, for providing strategic direction, fostering a culture of excellence, and ensuring that the Commission operates with independence, neutrality, and effectiveness.
- **Our dedicated staff**, the investigators, analysts, administrative personnel, legal officers, prevention and education teams, and all support functions — whose tireless professionalism, integrity, and passion for justice form the backbone of the ACCS. Your daily commitment to upholding transparency, accountability, and ethical standards is truly commendable.
- **The Advisory Council**, whose wise counsel, strategic insights, and independent oversight have been invaluable in guiding the Commission's policies, priorities, and long-term vision in the fight against corruption.
- **Our partners and stakeholders**, including government ministries, departments and agencies; the National Assembly; the Judiciary; law enforcement bodies; civil society organizations; the private sector; media; international development partners; regional and global anti-corruption networks; and the public, for your collaboration, constructive engagement, timely information sharing, and steadfast support throughout the year. Your contributions, whether through joint initiatives, capacity building, policy dialogue, public awareness efforts, or whistleblowing, have strengthened our collective resolve and impact.

This report stands as a testament to what can be achieved when institutions, individuals, and communities unite in pursuit of a common goal: a corruption-free Seychelles built on good governance, integrity, and trust.

We remain deeply grateful for your continued partnership and look forward to strengthening these vital collaborations in the years ahead.

Publication Information

This Annual Report is published following the submission to the Minister and the Minister responsible for Finance.

The Minister for Public Administration shall cause the report to be laid before the National Assembly as per Section 81 of the Anti-Corruption Act 2016 (as amended).

The report captures the administration, activities and recommendations of the ACCS during 2025.

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This Annual Report for the year ending December 2025, is submitted in accordance with section 81 of the Anti-Corruption Act, 2016, which stipulates that: *“The Commission shall, as soon as possible after the expiration of each financial year and in any event not later than the 31st March in any year; submit to the Minister, and the Minister responsible for Finance, an annual report dealing generally with the administration and its activities during the preceding financial year and the Minister shall cause the report to be laid before the National Assembly.”*

I am therefore pleased to submit the ACCS Annual Report for 2025.

May De Silva
COMMISSIONER

Table of Contents

Acknowledgment	5
Table of Contents	8
Lists of Figures, Tables and Illustrations	12
Preface.....	13
Seychelles' Triumph in the Fight Against Corruption.....	13
Legal Framework.....	14
Governance	16
The Advisory Council.....	16
The Commissioner.....	16
The Management	17
Our Vision, Mission and Core Values	17
Vision	17
Mission.....	17
Core Values	17
Funding	17
Foreword.....	18
Statement from Chairman of the Advisory Council	20
Part 1 – Organisational Overview	22
Structure.....	22
Prevention of Corruption	22
Complaints and Referrals.....	23
Investigation.....	23
Policy and Compliance	24
Declaration of Assets	25
Corporate Services	26

Human Resources and Administration.....	26
Legal and Prosecution.....	26
Finance.....	28
Technical Services	29
Information Technology and Cybersecurity	29
Digital Forensic.....	29
Organizational Structure	30
Part 2 – Performance 2025.....	31
Understanding the Commission’s Performance.....	31
Information excluded from the Report	32
Corporate Services.....	33
Finance.....	33
Human Resource and Administration	36
Key Achievements	36
Technical Services	41
Information Technology and Cybersecurity	41
Digital Forensics	44
Programmes and Operations	46
Prevention	46
Staffing and Structure	46
Achievements.....	47
Capacity Building	50
Challenges.....	50
Strategic Planning and Mitigation	50
Complaints.....	52
Functions.....	52
Staffing and Structure	52

Achievements.....	53
Challenges.....	53
Recommendation	58
Investigation.....	59
Functions.....	59
Staffing and Structure	59
Achievements.....	60
Legal and Prosecution Unit.....	61
Active High-Profile Litigation Context (2025).....	62
.....	63
Asset Recovery and Enforcement Activity	64
Legal Unit Workload Overview	64
Case Management Performance	64
Ongoing Court Matters	64
Completed Investigation Files – Review & Disposition.....	64
Legal Advisory Performance	65
Performance Analysis	65
Strengths	65
Challenges and Risks	65
Strategic Work Plan – 2026	66
Recommendations.....	67
Conclusion	67
Declaration of Assets	68
Achievements.....	69
Training.....	70
Challenges.....	70
Recommendation	70

Policy and Compliance	71
Achievements.....	71
National and International Engagements	71
Challenges.....	72
Recommendations.....	73
Partnership and Collaboration.....	73
Local Cooperation and Collaboration.....	73
International Cooperation and Collaboration.....	75
Part 5 Institutional Development and Sustainability	77
Long-Term Vision	77
Defining Political Will and Support in the Context of the ACCS Vision	79
Making the Case for a National Anti-Corruption Strategy	81
Conclusion	83

Lists of Figures, Tables and Illustrations

Table 1: Additional Funding Allocation 2025.....	34
Table 2: Training undertaken during the year 2025	38
Table 3: Staff Movement Detail 2025.....	40
Table 4: Breakdown of Case Status for 2025.....	60
Table 5: List of Competent Authorities with Active MOU During 2025	75
Figure 1: Governance structure and reporting lines.....	30
Figure 2: Breakdown of Budget Allocation for 2025	33
Figure 3: Breakdown of Additional funds by %	34
Figure 4: Budget appropriation flow for 2025	35
Figure 5: Budget allocation trend over last 5 years	35
Figure 6: Help Desk Support Request Data 2025	42
Figure 7: Number of sessions conducted and staff participation per responding entity	47
Figure 8: Entities accepting offer for prevention session by %	48
Figure 9: Breakdown of session conducted quarterly in 2025.....	48
Figure 10 :Illustration for commemoration of International Anti-Corruption Day 2025	49
Figure 11: Proposed structure and human resource mapping	51
Figure 12: Response Rate for Information Request.....	55
Figure 13: Response Rate by Entities during 2025.....	55
Figure 14: Percentage of Complaints by Mode Received in 2025	56
Figure 15: Comparison of Modes of Complaints 2024-2025	56
Figure 16: Complaints Received Classified by Types	57
Figure 17: Complaints Reporting Trends Between 2017-2025	57
Figure 18: Corruption Case Processing Flow Chart	58
Figure 19: Number of hearings comparatively 2021-2025.....	62
Figure 20: Number of hearings by purpose 2025	63
Figure 21: Number of hearings by purpose comparatively 2021-2025	63

Preface

Seychelles' Triumph in the Fight Against Corruption

<p>18th</p> <p>Global Rank — TI CPI 2024 Out of 180 countries</p>	<p>72</p> <p>CPI Score 2024 Highest ever — up from 71 in 2023</p>	<p>1st</p> <p>In Africa Least corrupt in Sub-Saharan Africa</p>	<p>+20 pts</p> <p>Since 2012 Long-term strategic progress</p>
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The Republic of Seychelles has emerged as a beacon of integrity and good governance in Africa, demonstrating remarkable progress in combating corruption through sustained institutional reforms, proactive enforcement, and a national commitment to transparency. According to the 2024 Corruption Perceptions Index (CPI) published by Transparency International, Seychelles achieved its highest-ever score of 72 out of 100, securing the 18th position globally out of 180 countries and solidifying its status as the least corrupt nation in Sub-Saharan Africa. This represents a notable improvement from a score of 71 in 2023 and a significant leap of 20 points since 2012, underscoring the effectiveness of long-term anti-corruption strategies.

Key to this success has been the robust efforts of the Anti-Corruption Commission Seychelles (ACCS), which has prioritized improved legal frameworks, high-profile prosecutions, enhanced capacity building, policy and strategic frameworks, and fostered stronger collaboration, information exchange among law enforcement and other institutions. These measures have also earned international recognition, including Seychelles' removal from the European Union's blacklist for non-compliance with financial transparency standards in recent years.

As reflected in official reports and global ratings, these advancements have mitigated risks such as bribery, nepotism, and state capture, fostering an environment conducive to sustainable development and investor confidence. While challenges persist, Seychelles' trajectory serves as an inspiring model for small island nations, proving that resolute action can yield transformative results in the global fight against corruption. This preface sets the stage for the 2025 Anti-Corruption Report, which builds on these foundations to outline ongoing initiatives and future priorities

Legal Framework

On 27th February 2004, Seychelles signed the United Nations Convention Against Corruption (“UNCAC”). UNCAC is the only legally binding universal anti-corruption instrument. Drafted and negotiated in Vienna, Austria in 2002-2003 it was subsequently adopted by the United Nations General Assembly on 31 October 2003. On 16th March 2006, Seychelles ratified the Convention which made it a legal obligation to implement the Convention.

There are several enduring obligations under UNCAC. Article 6 (Preventive Anti-Corruption Body or Bodies) and Article 36 (Specialized Authorities) stress the importance that every signatory country establishes at least one Anti-Corruption body and “specialized authorities of ethics” in accordance with their own legal systems and endows them with the “necessary power of independence.”

The Anti-Corruption Commission Seychelles (ACCS) was established after the enactment of the Anti-Corruption Act, 2016 in April 2016 by the President and the National Assembly. The intention of the lawmakers was set out in section 4(2) of the Anti-Corruption Act 2016 in stating ACCS shall be “**a self-governing, neutral and independent body and shall not be subject to the direction or control of any person or authority**”. In summary, the Commission is mandated to investigate, detect, prevent, and prosecute corrupt practices.

Specifically, under section 5, the functions of the Commission are:

- (a) to enquire into and conduct investigation of offences relating to corruption as well as money laundering offences committed in furtherance of corrupt practices;
- (b) to file cases based on enquiry or investigation and to conduct cases;
- (c) to hold enquiry into allegations of corruption on its own motion or on the application of an aggrieved person or any person on his or her behalf
- (d) to perform the functions assigned to the Commission by this Act or under any written law;
- (e) to raise awareness and promote the values of honesty and integrity among people with a view to prevent corruption;
- (f) to organise seminars, symposiums, and workshops on the subjects falling within the functions and duties of the Commission;

- g) to identify various causes of corruption in the context of socio-economic conditions of the Republic and make recommendations to the President;
- (h) to determine the procedure of enquiry, investigation, filing of cases and the procedure of according to sanction of the Commission for filing cases against corruption;
- (i) to investigate public officer's conduct which the Commission has reasonable grounds to believe relates to corrupt practices;
- (j) to co-ordinate or co-operate, as applicable, with other institutions authorised to investigate, prosecute, prevent and combat corrupt practices to implement an integrated approach to the eradication of corruption;
- (k) to consult, co-operate and exchange information with appropriate bodies of other countries that are authorised to conduct inquiries or investigations in relation to corrupt practices;
- (l) to adopt and strengthen mechanisms for educating the public to respect the public good and public interest and, in particular-
- (i) create awareness for the fight against corruption and related offences;
 - (ii) develop educational and other programmes in collaboration with the media;
 - (iii) promote an environment for upholding ethics in governance;
- (iv) disseminate information and sensitise the public about the negative effects of corruption and related offences;
- (v) do all such other things that are incidental or conducive to the attainment of its functions;
- (m) to perform any other duty as may be considered necessary for the prevention of corruption;
- (n) to perform any other duty as may be assigned to it by any other Act.

ACCS has the added functions of Declaration of Assets for senior public servants under the Public Officers Ethics Act 2008 and for President, Ministers, Members of the National Assembly, and the Mayor under the Public Persons (Declarations of Assets, Liabilities and Business Interests) Act (Act 26 of 2016) as amended.

These functions are very wide ranging and resource intensive, but crucial to every citizen of Seychelles.

Governance

The Advisory Council

Mandate

The members of the Advisory Council are appointed by the President in accordance with Section 10 of the Anti-Corruption Commission Act 2016 (as amended), following recommendations of the Constitutional Appointments Authority (CAA).

Its mandate is to oversee the administrative policy of the Anti-Corruption Commission of Seychelles (“the Commission”), to review and recognise provisions of laws aimed at the prevention of corruption, and to make recommendations to the President as necessary.

In fulfilling its mandate, the Council provides strategic oversight and guidance as needed, with a focus on strengthening institutional effectiveness, supporting good governance, and sustaining public confidence in the national anti-corruption framework.

The Advisory Council to the Anti-Corruption Commission of Seychelles (“the Council”) comprised four members during the reporting period.

The members were:

Mr. Benard Pool, Chairperson

Ms. Karine Dick, Member (resigned in December 2025)

Mrs. Tanya Thyroomoody, Member

Ms. Valentina Barra, Member

The Council convenes as required to discharge its functions, but not less than quarterly. During 2025, meetings were held in accordance with this mandate to deliberate on matters within the Council’s statutory responsibilities.

The Commissioner

In accordance with Section 6 (1) of the Anti-Corruption Act 2016 (as amended) the Commissioner is appointed by the President upon the recommendation of the Constitutional Appointments Authority (CAA).

The Commissioner can hold office for two terms of five years and is responsible for the control, direction and administration of the Commission as set out under section 6 (2) of the Anti- Corruption Act 2016 (as amended).

The Management

The Commission has a management team comprised of heads of Units who oversee the functions of their relevant units and report to the Commissioner and/or Deputy-Commissioner.

Our Vision, Mission and Core Values

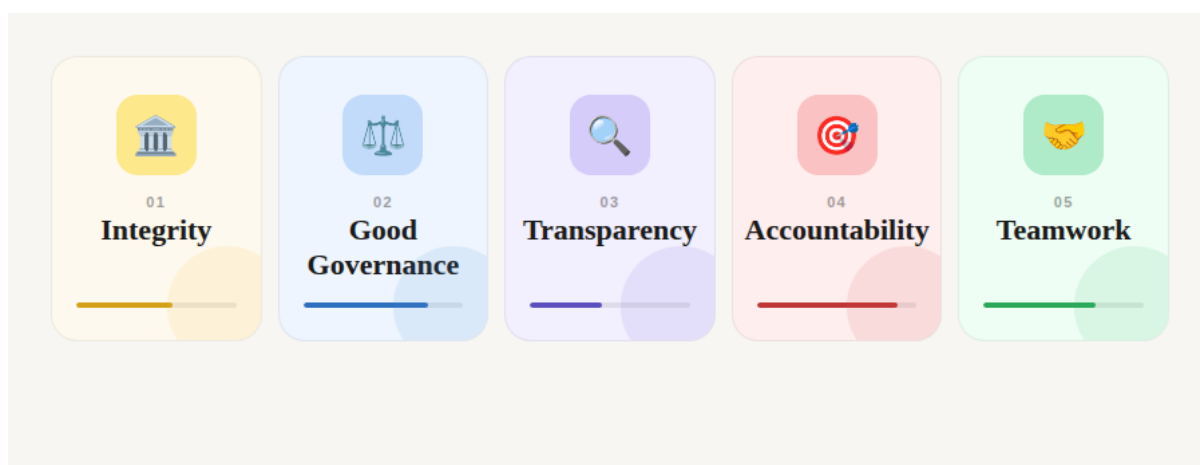
Vision

To be a robust institution that fosters a corruption-free society in an environment of integrity, accountability, and transparency.

Mission

To fight corruption through effective investigation, detection and prevention of corrupt practices for a corruption free Seychelles.

Core Values



Funding

The functions and operations are funded by the Appropriation Act. As per Section 79 (a), (b), (c), the Commission's funds shall consist of monies appropriated by the National Assembly; receive donations, gifts or grants whether local or foreign; and proceeds from sale, lease or transfer of movable or immovable property.

Foreword

It is with great pride and a profound sense of purpose that I present the Anti-Corruption Commission of Seychelles (ACCS) Annual Report for 2025. This report documents a year of substantial achievement, honest reflection, learning and continued commitment to our founding mission: to investigate, detect, prevent, and prosecute corrupt practices in the service of every Seychellois citizen.

Seychelles entered 2025 as a beacon of integrity on the African continent. Our highest-ever score of 72 on the Transparency International Corruption Perceptions Index, (CPI) securing 18th place globally and first in Sub-Saharan Africa, is not merely a number. It is a testament to the resolute efforts of the ACCS team, our partners across government and abroad, civil society, and the trust placed in us by the Seychellois public. A gain of 20 points since 2012 confirms that our long-term, strategic approach is working. We do not take this standing for granted.

Throughout 2025, the Commission operated across all dimensions of its mandate with determination. Our Investigations Unit brought forward 27 cases, including high-value, multi-jurisdictional matters of the utmost complexity. Our Legal and Prosecution Unit simultaneously managed court proceedings, prepared charge sheets, and provided expert legal advisory services across multiple operational units. In parallel, our Digital Forensics Laboratory processed over 2.2 million items of digital evidence in 8 major cases, reflecting the increasing technical nature of modern corruption and the Commission's investment in world-class forensic capabilities, supported by our valued partners at the UK National Crime Agency and the FBI.

Prevention and accountability remain at the heart of our work. The Commission conducted 17 awareness sessions with 377 public servants, championed the theme of youth integrity on International Anti-Corruption Day, and received 412 declarations of assets from public officials across 29 entities. Critically, an amendment to the Public Persons (Declarations of Assets, Liabilities and Business Interests) Act was passed in December 2025, fulfilling international obligations of the nation's most senior public figures.

Institutionally, 2025 was a year of learning, growth and consolidation. Our workforce reached 40 staff operating at 97.5% of approved establishment, with significant new recruits joining across investigative, legal, and prevention roles. We invested heavily in staff development

through training delivered by the UNODC, the FBI, IACCC, OECD, CAACC, and other partner institutions worldwide. We signed a Memorandum of Understanding with the University of Seychelles, strengthening our domestic academic partnerships.

Internationally, the ACCS participated in key forums including the UN Convention Against Corruption (UNCAC) review session, UN Transnational and Organised Crime (UNTOC) meeting, the World Bank Corruption Forum, the IACCC board meeting, Eastern and Southern African Anti-Money Laundering Group (ESAAMLG) meetings, OECD Integrity Forum and the International Association of Prosecutors' Conference, reinforcing Seychelles' standing as a committed and credible global partner in the fight against corruption.

This report also speaks honestly about our challenges. Human resources and financial constraints continue to limit the full reach of our prevention programmes and the pace of our complaint processing. Our structural reliance on external senior counsel for complex prosecutions must be addressed. The absence of a National Anti-Corruption Strategy, despite consistent advocacy by the Commission and the formal recommendation of the National Assembly's International Affairs Committee since 2021, remains a critical gap. We renew our call with urgency: a unified national plan is not a wish — it is an obligation under UNCAC and a strategic necessity for a small island state with much to protect.

As we look to 2026 and beyond, our vision is clear: a mature, resilient, and truly independent institution that deters corruption not through fear alone, but through a society that collectively rejects it. We will continue to build our capacity, strengthen our partnerships, accelerate our prosecution pipeline, and advocate for the resources and political will which is commensurate with our mandate. Every Seychellois deserves governance built on integrity. That is the standard we hold ourselves to every day and will continue to do so with integrity and without fear or favour.



May de Silva
Commissioner

Anti-Corruption Commission of Seychelles

Statement from Chairman of the Advisory Council

Achievements for the Year 2025

In 2025, in furtherance to the Council's vision and aspirations articulated in the previous annual report, the Council actively engaged in the review of the Commission's strategic plans and operational reports. The Council considered matters relating to budget allocation, policy and legislative developments in the anti-corruption sphere, and challenges presented by the Commissioner.

While acknowledging the notable achievements and progress made by the Commission during the year, the Council issued its first formal written recommendation to the President. This marked a significant milestone in the Council's oversight role and reflected its commitment to strengthening the institutional framework supporting the Commission.

The recommendations put forward by the Council were aimed at enhancing operational effectiveness, improving coordination across relevant institutions, and reinforcing public trust in the Commission's mandate and activities and is reproduced below.

Recommendations.

A key challenge identified by the Council relates to case management and the timely prosecution of corruption-related matters. According to the Commission's Annual Report 2024, twenty-one cases were under review during that reporting period, including nineteen cases carried forward from 2023 and two new cases initiated in 2024. By the end of that period, only one case had been concluded and one referred to the Attorney General's Office, with twenty cases remaining active. This trend continued throughout 2025.

In light of these observations, the Council recommended the adoption of a more holistic and strategic approach to facilitate the successful prosecution of pending cases. This includes leveraging the newly established Commercial Court to expedite relevant proceedings and appointing a fully qualified prosecutor to strengthen the Commission's prosecutorial capacity.

The Council also identified human resource constraints as a significant challenge. It recommended prioritising investment in skilled personnel, including investigators, legal analysts, and forensic accounting professionals, alongside targeted training and development programmes. Retention strategies were highlighted as essential to preserving

institutional knowledge and ensuring operational continuity. The Council further noted that, while national policies governing budget allocation and public financial management are in place, special consideration should be given to the Commission in recognition of the complexity and sensitivity of its mandate.

Public engagement and trust were also identified as critical areas requiring continued attention. The Council emphasised the importance of strengthening public feedback mechanisms, including the establishment of transparent systems to keep complainants informed of the status and outcomes of their reports, as well as the regular publication of aggregated information on complaints received, investigations initiated, and resolutions achieved. in identifying areas of institutional weakness that may give rise to corrupt practices. Moreover, the Council was of the view that the Anti-Corruption Commission should be more proactive in engaging with Ministries, Departments and Statutory Authorities to ensure that SOP's are fully complied with and respected.

Separate from the formal recommendation made to the President, the Council also discussed the need for an immediate study into the effectiveness of the multiple institutions involved in the investigation and litigation of financial crimes. Given Seychelles' limited pool of specialised professionals, the Council highlighted the importance of maximising coordination and the efficient use of resources across agencies such as the Financial Crime Investigation Unit, Seychelles Revenue Commission, Financial Intelligence Unit, Central Bank of Seychelles, and the Anti-Corruption Commission. Strengthening inter-agency collaboration was identified as a key factor in improving outcomes in the fight against corruption and financial crimes.

The Chairman

On behalf of the Councillors

13th March 2026

Part 1 – Organisational Overview

Structure

The ACCS is comprised of seven functional units:

Prevention	Complaints & Referrals
Investigations	Declaration of Assets
Policy and Compliance	Digital Forensics
Legal & Prosecution	

Our corporate services are supported by an **Information Technology Section**, a **Human Resource and Administration Section**.

The office of the Commissioner is supported by a Secretariat with a Deputy Commissioner, Finance Officer and a Personal Assistant.

Prevention of Corruption

Prevention is recognized as a long-term investment in building a culture of integrity, ethics, good governance, and accountability throughout Seychellois society. ACCS leads efforts to raise public awareness, educate citizens (particularly youth in schools and post-secondary institutions), promote best practices, and foster ethical standards in institutions. Through targeted anti-corruption awareness sessions, risk assessments, policy development support, and community engagement, ACCS works to address vulnerabilities in public administration, private enterprises, and everyday interactions, emphasizing that preventing corruption is a shared responsibility—not solely that of the Commission, but of every individual, organization, and sector in Seychelles.

As Seychelles continues its progress in the fight against corruption, evidenced by improvements in international perceptions and ongoing commitments to transparency, ACCS remains committed to empowering communities, institutions, and future generations to uphold the values of honesty, fairness, and good governance for a more resilient and prosperous nation.

Complaints and Referrals

The Anti-Corruption Act 2016 (as amended) empowers the ACCS as an independent, self-governing body to receive complaints from any person or entity, investigate allegations of corrupt practices, detect wrongdoing, and take appropriate action across both the public and private sectors.

This is a vital accessibility mechanism, ensuring that every Seychellois, regardless of status, location, or background, has a safe, confidential, and straightforward channel to report suspected corruption. Whether through email, telephone, in-person submissions, or other means, the mechanism lowers barriers to reporting, protects whistleblower identities where possible, and transforms individual observations of wrongdoing into actionable intelligence. It is an open-door approach that democratizes the fight against corruption, empowering ordinary citizens to hold institutions and individuals accountable and reinforcing that no act of corruption, however small, is too insignificant to address.

The accessibility of this complaints process is fundamental: it builds public trust, encourages a culture of reporting rather than silence, and ensures that corruption does not thrive in the shadows of unreported impunity.

Investigation

Investigation is a crucial part of the Commission's mandate, ensuring that allegations of corruption are thoroughly examined and, where evidence supports it, pursued through the judicial system with determination and impartiality.

ACCS undertakes rigorous, evidence-based investigations into complaints received through the Complaints Unit, as well as matters identified through other channels such as intelligence, audits, or proactive detection efforts. Supported by a small team of qualified digital forensics analysts, local and international legal professionals, and law enforcement technicians, investigators gather facts, interview witnesses, analyze documents and digital assets, and build robust cases while upholding the highest standards of fairness, confidentiality, and due process. Where sufficient evidence exists, ACCS advances cases to prosecution, often in coordination with relevant legal authorities, seeking accountability through convictions, asset recovery, and appropriate sanctions.

This enforcement function is indispensable to the fight against corruption: it serves as the ultimate deterrent, demonstrating that corrupt acts carry real consequences and that impunity

will not prevail. By transforming credible allegations into successful investigations and prosecutions, ACCS upholds the rule of law, restores public confidence in institutions, recovers misappropriated resources for the benefit of the nation, and reinforces the message that integrity is non-negotiable in Seychelles' governance and society.

Policy and Compliance

The **Policy and Compliance Unit** of the Anti-Corruption Commission of Seychelles (ACCS) serves as the strategic and oversight arm of the Commission, ensuring that anti-corruption efforts are coherent, effective, sustainable, and aligned with both national priorities and Seychelles' international obligations and commitments. ACCS is a permanent member of the National AML/CFT Committee as per section 6 (1) (h) of the AML/CFT Act 2020 (as amended). The Compliance and Monitoring Officer is a member of the Technical AML/CFT Committee (set up as per section 7 (6) of the AML/CFT Act. It supports the work of the National Committee.

A core responsibility of the Unit is to promote and monitor adherence to international conventions, treaties, and standards that Seychelles have ratified or endorsed. As a State Party to the **United Nations Convention against Corruption (UNCAC)**, the primary global legal instrument for combating corruption, the Unit plays a key role in implementing UNCAC provisions on preventive measures, criminalization, law enforcement cooperation, asset recovery, and technical assistance. This includes supporting periodic self-assessments, reporting to the United Nations Office on Drugs and Crime (UNODC), and aligning domestic frameworks with UNCAC requirements to strengthen transparency, accountability, and international collaboration. The Unit also ensures consistency with other relevant regional and international standards, such as those from the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) and broader good governance benchmarks, fostering a robust national anti-corruption architecture that meets global expectations while addressing Seychelles' unique context as a small island developing state. The work includes Integrity benchmarking by the Organisation for Economic Co-operation and Development (OECD) by engagement on the Public Integrity Indicators (PII) to enhance transparency and governance and coordinated the initiative with the Ministry of Finance and the Judiciary to strengthen institutional integrity.

The Southern African Development Community (SADC) by coordinating national and regional efforts to harmonize AML/CFT strategies and securing Seychelles' acceptance into the **SADC Regional Anti-Corruption Effort Index** as one of the means to reinforce regional credibility.

Declaration of Assets

ACCS is empowered under two laws to administer and enforce the declaration requirements for a wide range of public officers and high-level public persons.

Under the **Public Officers' Ethics Act 2008**, designated public officers are required to declare their income, assets, and liabilities to promote ethical conduct, prevent conflicts of interest, and safeguard public resources from misuse or personal enrichment. Complementing this, the **Public Persons (Declarations of Assets, Liabilities and Business Interests) Act 2016**, as amended, specifically obliges the President, Vice-President, Ministers (including designated ministers), Members of the National Assembly (including the Speaker, Deputy Speaker, Leader of the Opposition, and Leader of Government Business), the Mayor of Victoria to submit comprehensive declarations of their assets, liabilities, and business interests. These declarations, submitted periodically and upon assumption or cessation of office, serve as a vital mechanism to detect illicit enrichment, monitor potential conflicts of interest, and ensure that public office is not used for private gain.

It ensures that public officials lead by example, declarations serve as tools for integrity, and the nation's resources are managed with utmost honesty and fairness for the benefit of all.

*The declaration of assets regime in Seychelles is primarily governed by two legislative instruments. The first is the **Public Officers (Declaration of Assets) Act** (Chapter 195 of the Laws of Seychelles), which imposes an obligation on public officers to declare their assets, liabilities, and financial interests, thereby promoting transparency and accountability in the exercise of public functions. The second is the **Anti-Corruption Act 2016**, which reinforces and expands this framework by requiring designated persons, including those in public life, to declare their assets and financial interests to the Anti-Corruption Commission of Seychelles (ACCS)*

Corporate Services

Human Resources and Administration

The Human Resources and Admin Unit forms part of Corporate Services, which provides consistent strategic support to all ACCS Units to achieve their targets as outlined within the ACCS Strategic Plan.

The Unit is responsible for the planning, implementation, management, and coordination of all human resource activities of the organisation. It covers workforce planning, staff training and development, staff welfare, administrative functions and employee exit. In line with the Commission's Vision, Mission, Core values, Strategic Goals, Themes and Objectives, the Unit aims to work collaboratively with the operational units, in support of their strategies, providing the best possible human resources to build a vibrant, efficient, and effective team of the right caliber, integrity and experience to tackle the scourge of corruption.

Legal and Prosecution

The Legal Unit plays a pivotal role in supporting the core mandate of the Anti-Corruption Commission of Seychelles. The unit serves as the legal backbone of the Commission, providing expert legal advice, ensuring compliance with national legislation, and facilitating the effective investigation, prosecution, and prevention of corruption offences. Operating under the direction of the Commissioner and in close coordination with the Deputy Commissioner and Director of Investigation Operations (DIO), the Legal Unit ensures that all ACCS activities are conducted lawfully, transparently, and in full alignment with constitutional principles, local legislation and relevant international standards such as the United Nations Convention Against Corruption (UNCAC).

The primary functions of the Legal Unit include:

- **Legal Advisory Services** – Providing timely and accurate legal opinions to the Commissioner, DIO, investigative teams, and other units on the interpretation and application of anti-corruption legislation, procedural requirements, evidence admissibility, and jurisdictional matters.
- **Case Review and Prosecution Support** – Reviewing investigation files for legal sufficiency, drafting charge sheets, preparing indictments, and assisting during prosecution proceedings in corruption-related cases as part of the prosecution-led investigation strategy.

- **Legislative and Policy Development** – Contributing to the review, drafting, and amendment of anti-corruption legislation, regulations, and standard operating procedures (SOPs), including the development of guidelines for complaints handling, preliminary investigations, and case management.
- **Compliance and Risk Management** – Ensuring internal compliance with legal and ethical standards, advising on the lawfulness of investigative actions (e.g., searches, seizures, arrests), and supporting corruption risk assessments and prevention initiatives.
- **Training and Capacity Building** – Delivering legal training and orientations to ACCS staff and external stakeholders on key provisions of the Anti-Corruption Act 2016, related statutes, and international obligations.
- **International Cooperation** – Advising on mutual legal assistance requests, intelligence and cross-border corruption investigations in accordance with UNCAC Chapter IV.

The Legal Unit’s work is essential to maintaining the integrity, credibility, and effectiveness of the Commission’s operations. By bridging legal expertise with investigative and preventive functions, the unit ensures that ACCS actions are not only robust and evidence-based but also procedurally fair and legally defensible.

The Anti-Corruption Commission of Seychelles (ACCS) serves as a specialized prosecutorial body mandated to investigate and prosecute corruption-related offences under the Anti-Corruption Act 2016. As a prosecuting authority, the ACCS holds independent powers to institute and conduct criminal proceedings for corruption offences without necessarily routing cases through the Attorney General's office, giving it direct control over the lifecycle of a corruption case from investigation through to prosecution. This independence is a hallmark of effective anti-corruption frameworks, as it insulates prosecutorial decisions from political interference and ensures that cases are handled by individuals with deep subject-matter expertise.

Finance

As a government entity, the ACCS operates within the broader framework of Seychelles' public financial management system, primarily governed by the Public Finance Management Act of 2012 (PFM Act). This act ensures efficient, transparent, and accountable use of public funds across all government agencies, including commissions like the ACCS.

The Finance Unit within the ACCS manages the organization's internal budget and finances in compliance with national procedures. While the ACCS's structure includes departments focused on investigations, prevention, and legal affairs, financial management is integrated into its administrative functions, under the oversight of the Commissioner, who serves as the Accounting Officer. The unit ensures that the ACCS's operations align with Seychelles' national budget process, coordinated by the Ministry of Finance, which involves annual appropriations, mid-year fiscal reviews, and adherence to the Treasury Single Account (TSA) for cash management. This integration helps the ACCS maintain fiscal discipline while effectively combating corruption, with its budget drawn from the Consolidated Fund and subject to National Assembly approval.

Roles and Responsibilities of the Finance Unit

The Finance Unit's responsibilities are shaped by the ACCS's investigative needs and Seychelles' overarching financial management procedures, including budget preparation, execution, reporting, and compliance. Key roles include:

- **Budget Preparation and Planning:** Collaborating with the Commissioner to develop ACCS's annual budget estimates, Manpower Budgeting Exercise (MBE) aligning them with the commission's strategic priorities.
- **Expenditure Control and Cash Management:** Overseeing commitments, payments, and procurements to ensure they are within approved appropriations and comply with financial procedure as per the financial manual of the Minister of Finance.
- **Financial Reporting and Auditing:** Preparing mid-year fiscal statements, annual performance reports, and financial statements. The unit facilitates external audits by the Auditor General, ensuring transparency and accountability.
- **Asset Management:** Maintaining inventories of assets, handling write-offs for obsolete items and managing sales of assets.

- **Compliance and Internal Controls:** Ensuring adherence to PFM Act regulations, including internal audits, surcharge mechanisms for financial losses due to negligence, and processes of appeal. The unit tracks changes in laws and policies, such as those from the Ministry of Finance, and integrates them into ACCS operations to promote integrity and prevent financial misconduct within the commission itself.

Technical Services

Information Technology and Cybersecurity

The IT and Cybersecurity Unit serves as a vital technical backbone, ensuring the secure, efficient, and modern operation of the Commission. In an era where corruption increasingly intersects with digital channels such as cyber-enabled financial crimes, online bribery, money laundering through digital platforms, and electronic record tampering, this specialized unit plays an indispensable role in safeguarding the ACCS's internal systems.

The unit is responsible for managing the Commission's information technology infrastructure, including secure data storage, network administration, software applications for case management, and compliance with national cybersecurity standards.

The importance of the IT and Cybersecurity Unit cannot be overstated: it protects sensitive whistleblower information, investigative data, and Commission operations from cyber threats or unauthorized access, thereby upholding confidentiality, integrity, and the right to a fair process.

Digital Forensic

The Digital Forensics Unit manages the Digital Forensics Laboratory as a specialized, high-tech facility (supported by the National Crime Agency UK) dedicated to the retrieval, analysis, and preservation of digital evidence critical to ongoing investigations and prosecutions. Established to address the rising intersection of corruption with digital technologies such as electronic financial transactions, email communications, mobile device records, and cloud-stored data, this laboratory equips the Commission with advanced capabilities to uncover hidden or deleted evidence that traditional methods cannot access.

The laboratory specializes in forensically sound extraction and examination of data from a wide range of digital equipment, including computers, smartphones, tablets, servers, external drives, and other electronic storage media seized in corruption cases. It employs industry-leading,

high-end forensic platforms such as Nuix for rapid processing and analysis of large volumes of unstructured data, Cellebrite for mobile device extraction and decoding (including deleted messages, app data, and location history), and Nimbus alongside complementary tools to ensure comprehensive, court-admissible results. These technologies enable the secure recovery of encrypted or obscured files, reconstruction of timelines, identification of financial irregularities, tracing of illicit asset transfers, and detection of digital trails linked to bribery, embezzlement, money laundering, or abuse of office.

Why do the Digital Forensic Lab Matters

In a small island nation with increasing digitalisation of public and private sector operations, corruption schemes often leave subtle electronic footprints rather than paper trails. By providing irrefutable, scientifically validated evidence, the DFL strengthens the ACCS's investigative integrity, supports successful prosecutions, facilitates asset recovery, and deters potential offenders through the knowledge that digital concealment is ineffective.

Organizational Structure

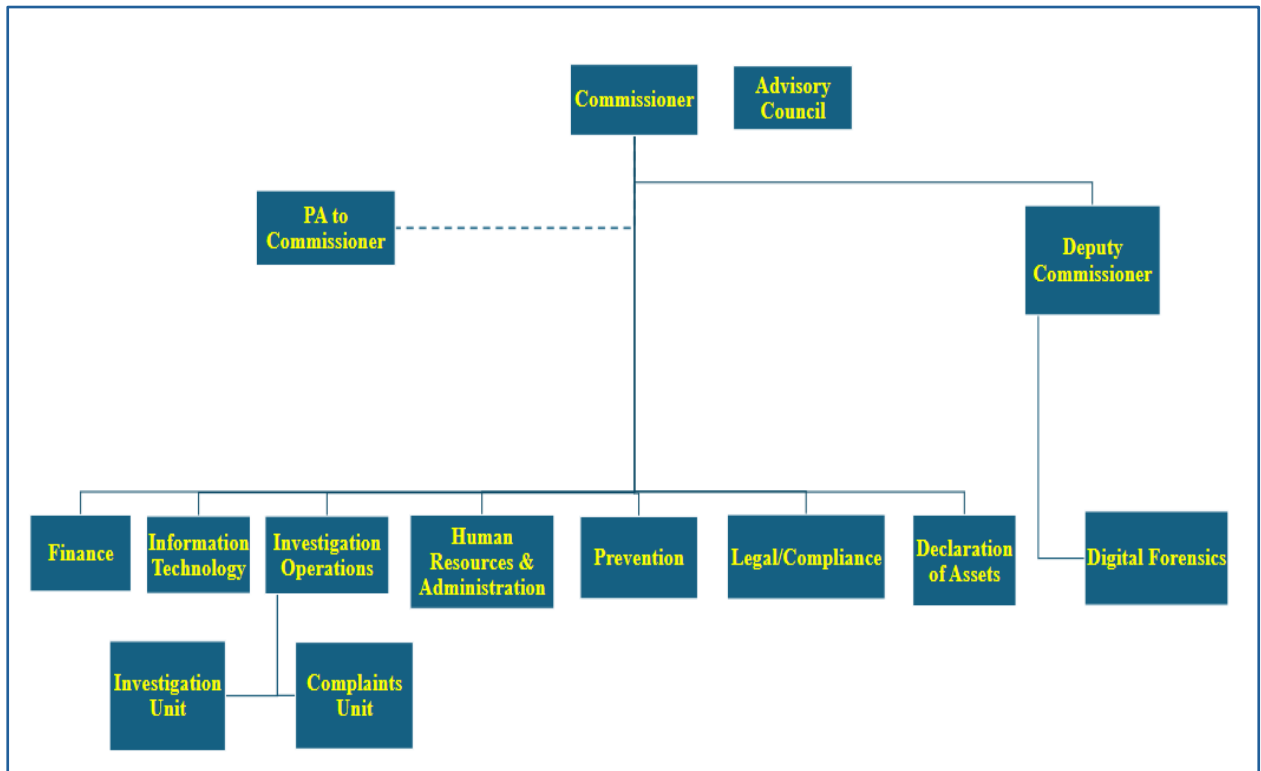


Figure 1: Governance structure and reporting lines

Part 2 – Performance 2025

Understanding the Commission’s Performance

The Anti-Corruption Commission of Seychelles (ACCS) operates in a complex and resource-constrained environment where effective anti-corruption work—from receiving complaints to successful prosecution—requires meticulous adherence to legal processes, rigorous evidence gathering, and careful case management. Investigations often involve intricate financial trails, cross-agency coordination, and the need for solid, admissible evidence, which can extend timelines depending on case complexity, the availability of witnesses, and international cooperation for transnational elements. These inherent challenges mean that performance cannot be judged solely by the number of cases concluded each year; rather, progress must be viewed through the lens of sustained quality, procedural integrity, and long-term impact on reducing corruption risks. The Annual Report reflects not only outputs but also the Commission’s commitment to fairness, transparency, and building a robust foundation for future enforcement and prevention efforts.

This context is essential for the public to interpret the report accurately. High case volumes or longer processing times do not necessarily indicate inefficiency but often reflect thoroughness, legal safeguards, and the deliberate effort to secure convictions that withstand judicial scrutiny. By understanding the investigative journey—from initial complaint intake and triage, through preliminary assessment and full investigation, to prosecution—the public can better appreciate the Commission’s achievements, recognize the systemic challenges it faces, and support its ongoing mission to uphold integrity and accountability across Seychelles.

Information excluded from the Report

Due to the sensitive nature of investigations and anti-corruption prosecutions, ACCS is required to limit the disclosure of certain information in its annual reports. This restriction stems from both **ethical obligations**, **legal requirements** as well as principles aligned with national access to information frameworks that protect exempted categories.

Key reasons include:

- **Preserving the integrity of ongoing investigations** — Revealing specific details, such as case names, evidence, suspects, or investigative techniques, could alert subjects, lead to the destruction of evidence, influence witnesses, or otherwise compromise proceedings.
- **Protecting the right to a fair trial** — Premature or excessive public disclosure risks prejudicing defendants or tainting potential juries, violating constitutional and fair trial protections.
- **Safeguarding confidentiality and privacy** — Ethical standards and legal duties require protecting the identities of complainants, whistleblowers, witnesses, and innocent third parties, as well as sensitive financial or personal data gathered during inquiries.
- **Preventing interference or retaliation** — Publicizing active cases might expose individuals to threats or enable attempts to obstruct justice.

As a result, annual reports typically provide aggregated statistics (e.g., number of complaints received, cases investigated, or prosecutions initiated), general overviews of activities, and achievements without divulging identifiable or operationally sensitive information about active or recently concluded matters. This balanced approach upholds transparency in the Commission's overall performance while fully respecting the imperatives of effective law enforcement and justice.

Corporate Services

Finance

SR 55.9M Initial Budget Approved for 2025	SR 14.6M Additional Funds 70% consultancies, 30% legal fees	SR 70.6M Revised Total After mid-year review	99%+ Budget Utilised SR 69.96M total expenditure
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Initial Budget Allocation

The approved budget allocation for the commission for the year 2025 was **SR55,941,009.92**

Below is a breakdown of the allocation:

Wages & Salaries	15,810,541.45
Goods & Services	39,629,868.47
Minor Capital	500,600.00

Seventy one percent of the initial budget was allocated for Good and Services, 28% for Wages and Salaries and less than 1% for Minor Capital.

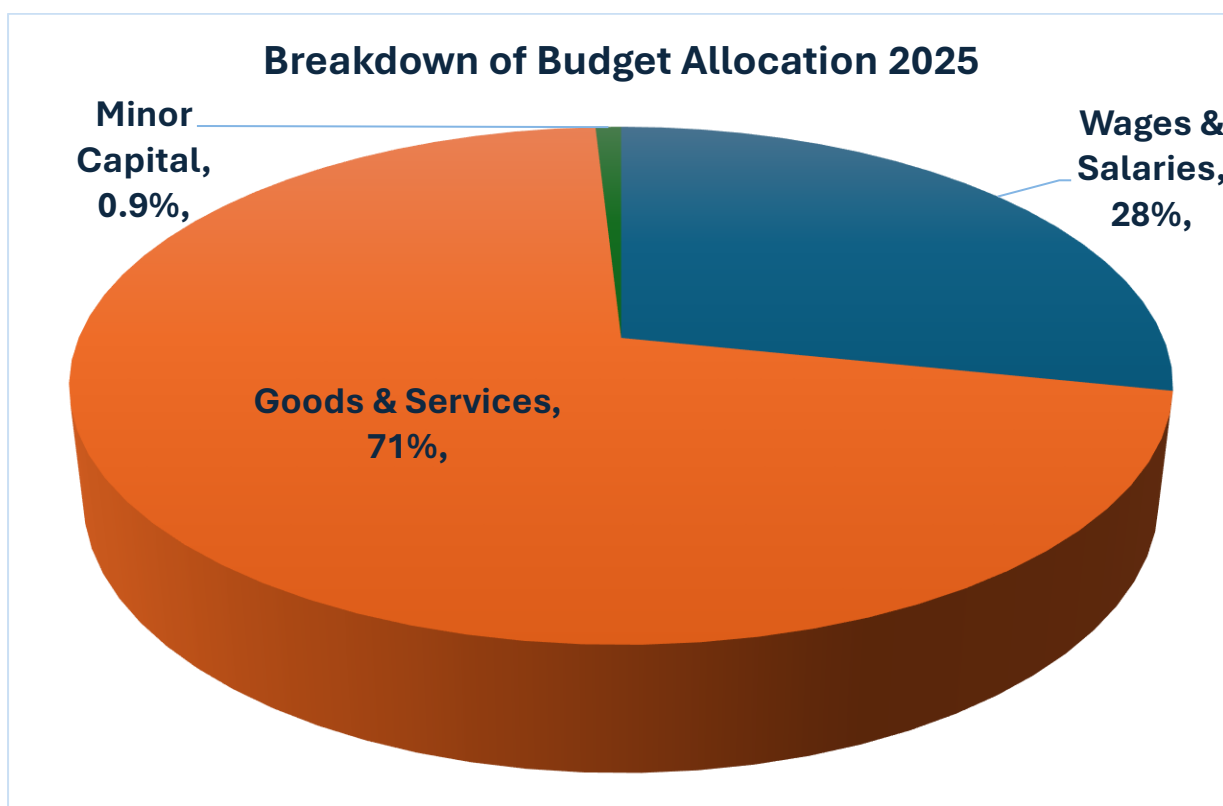


Figure 2: Breakdown of Budget Allocation for 2025

Additional Funds following mid-year review

Following the mid-term review and end of year deficit an additional SR14,635,435.26 was allocated, from which 70% was for specialised financial consultancies and 30% for additional legal fees.

Table 1: Additional Funding Allocation 2025

Area	Amount
Financial Investigations Specialists Consultancy	10,249,614.05
Corruption and Money Laundering Specialists Legal Fees	3,339,850.95
Additional Funds to cover deficit at end of year (Legal Fees)	1,045,970.26

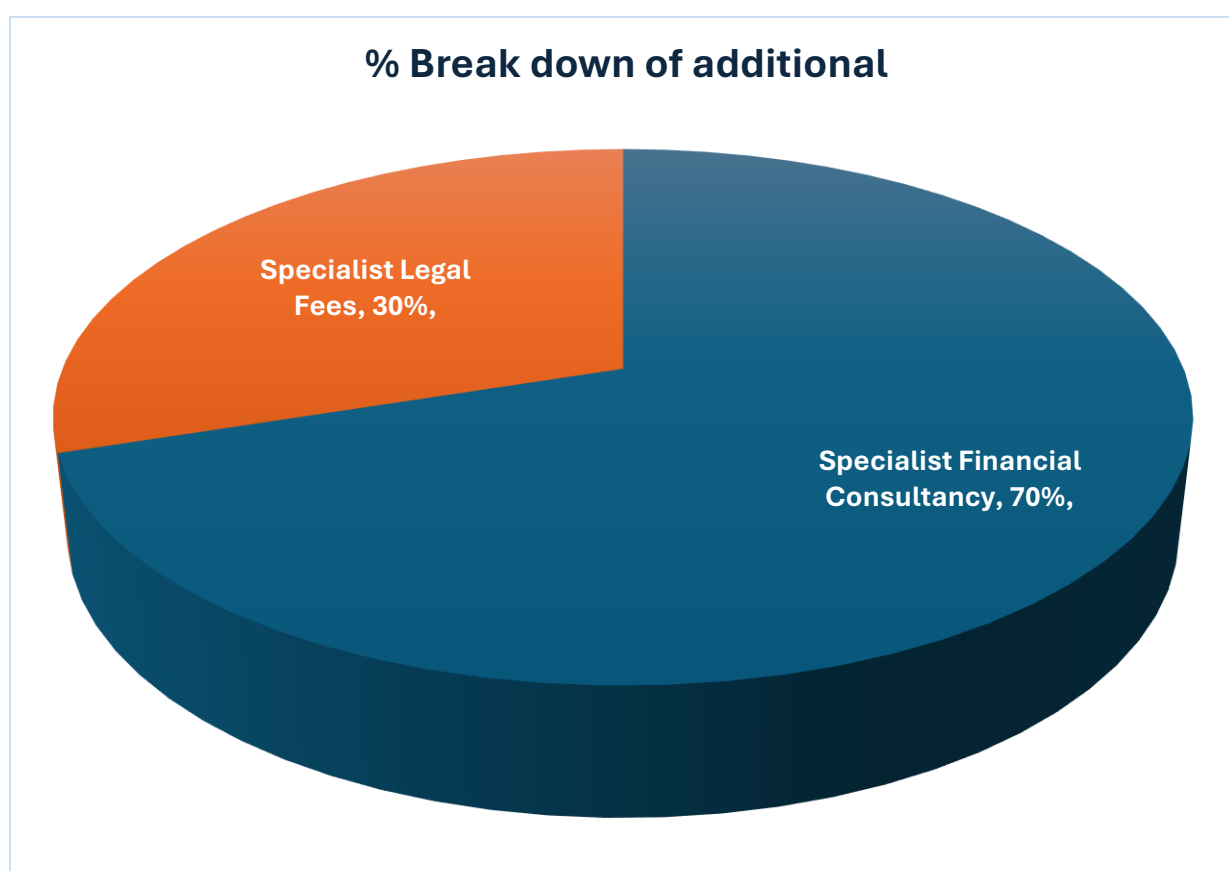


Figure 3: Breakdown of Additional funds by %

The revised budget for 2025 therefore was **SR 70,576,445.18**

The total expenditure of 2025 amounted to **SR 69,958,914.51**

ACCS spent over 99% of its total budget allocation for the year 2025, reflecting a successful implementation of its programmes and projects planned for 2025.

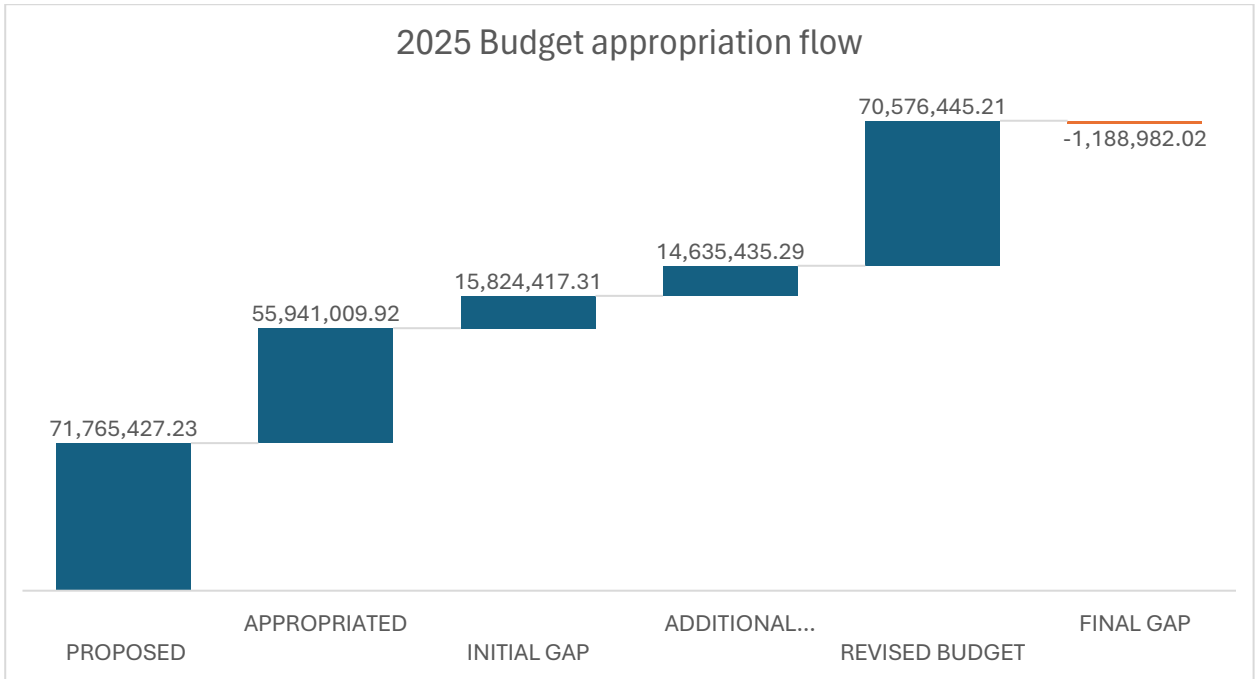


Figure 4: Budget appropriation flow for 2025

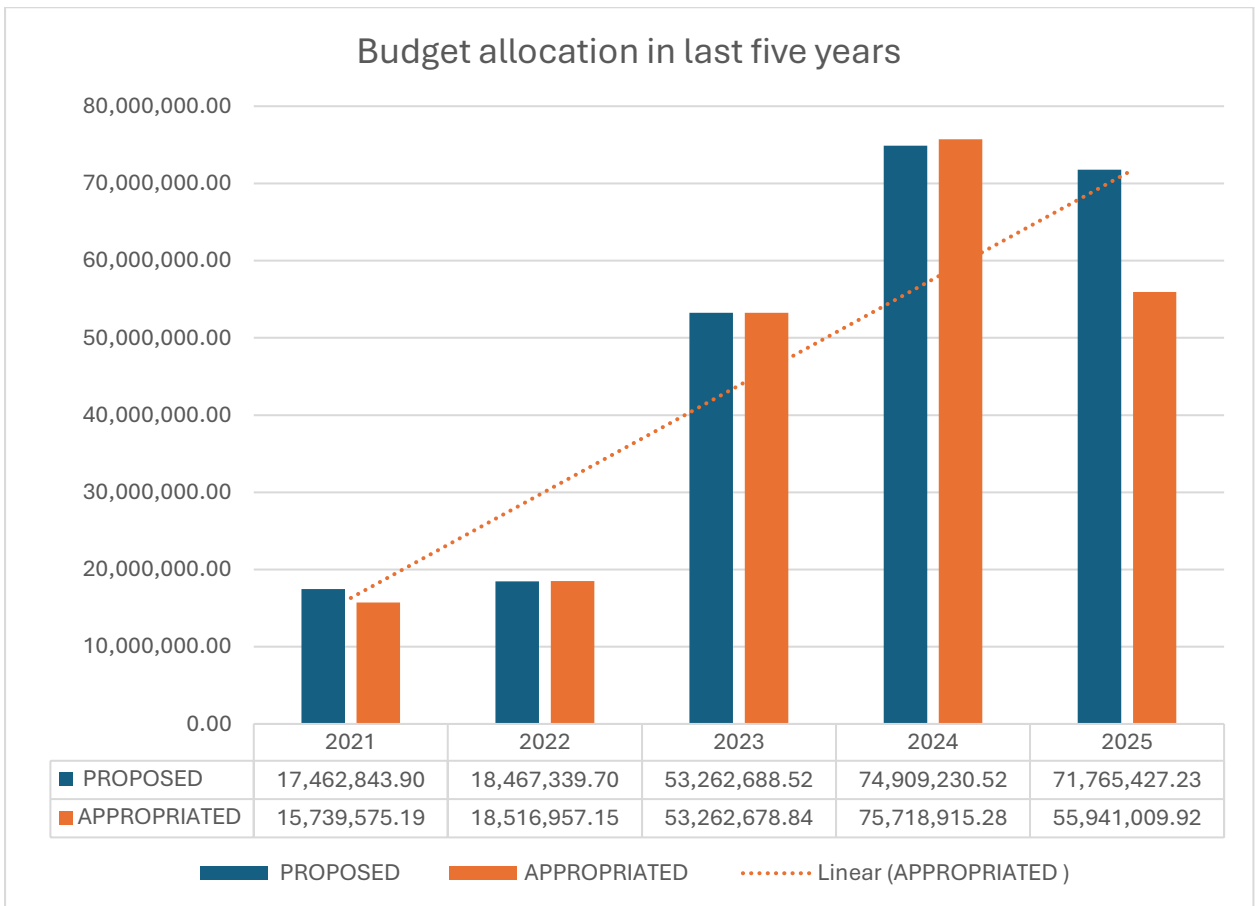


Figure 5: Budget allocation trend over last 5 years

Human Resource and Administration

40 Total Staff As of December 2025	97.5% Establishment Rate 5 of 6 MBE vacancies filled	7 New Recruits Joined in 2025	1 Staff Departure Minimal turnover rate
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Key Achievements

In 2025, the HR and Administration Unit made significant strategic and operational contributions to strengthening the Commission’s institutional capacity, governance frameworks, and organisational culture. Despite resource constraints and heightened operational demands, the Unit delivered tangible outcomes that enhanced compliance, staff welfare, and operational efficiency.

Strengthening Human Resource Capacity and Leadership

A key milestone during the year was the promotion of an HR and Admin Officer, earlier in 2025, reflecting the Unit’s commitment to recognising internal talent and supporting career progression. Recruitment processes were successfully coordinated across several critical roles, contributing to improved staffing levels, workforce stability, and operational continuity.

Policy Development and Governance Enhancement

Substantial progress was achieved in strengthening the Commission’s policy framework. Several key HR policies were developed, reviewed, or implemented during the year. Collectively, these instruments represent a significant step towards enhancing clarity, consistency, and fairness in human resource and administrative practices.

Capacity Building and Strategic Partnerships

The Unit successfully coordinated a wide range of staff training and development initiatives, including the high-profile Whistle-blower Protection Workshop held in March 2025, which contributed to strengthening institutional understanding of whistle-blower frameworks and protections.

Strategic partnerships were strengthened through the signing of a Memorandum of Understanding with the University of Seychelles (UNISEY), enabling collaboration on training initiatives and student placements. In addition, work on a Memorandum of Understanding with the Special Investigation Unit (South Africa) is in progress. These partnerships reinforce the Commission’s regional and academic collaboration efforts.

Operational and Administrative Improvements

Notable improvements were achieved in store and facilities management, including improved cost monitoring and stock control. The revamping of both the mid-year and end-of-year performance review forms improved usability while maintaining the integrity of performance assessment standards.

Security and workplace safety were also strengthened through targeted interventions addressing privacy and security concerns in a sensitive operational environment.

Institutional Reporting and National Obligations

The Unit made positive contributions to key institutional and national reporting requirements, including inputs into the UNCAC Compliance Report, the Access to Information Report, and statutory submissions to the Public Service Bureau (PSB). These contributions enhanced the Commission's compliance posture and strengthened inter-institutional relationships.

Staff Engagement and Organisational Culture

Through the Social Committee, the Unit successfully coordinated a comprehensive programme of staff engagement and welfare activities throughout the year. These initiatives strengthened morale, encouraged cross-unit collaboration, and reinforced a positive organisational culture. In addition, the Unit facilitated internship placements for one student from UNISEY and one from SIT, supporting capacity development and institutional learning.

Overall, the achievements realised in 2025 reflect the HR and Administration Unit's continued commitment to advancing our strategic objectives.

Staffing size

The Unit comprises 5 key personnel: HR and Admin Manager, HR and Admin Officer, 2 Housekeepers and the Transport Officer

Staff Training and Professional Development

In 2025, the HR and Administration Unit prioritised enhancing staff capabilities through a wide range of specialised training programmes aimed at building knowledge, skills, and competencies in critical areas of anti-corruption, governance, human resources, and operational effectiveness. Staff participated in both local and international courses, workshops, and conferences, delivered by reputable organisations such as the United Nations Office on Drugs & Crime (UNODC), the Commonwealth Africa Anti-Corruption Centre (CAACC), ILEA, the Organisation for Economic Co-operation and Development (OECD), The Guy Morel Institute

(TGMI), the University of Seychelles (UNISEY), as well as in-house training sessions conducted by internal staff, including IT and legal sessions.

Collectively, these training initiatives not only helped staff stay abreast of global best practices but also strengthened their technical expertise, operational effectiveness, and leadership potential. The combination of formal academic programmes, specialised external workshops, and practical in-house training ensured that staff were equipped to meet both current operational requirements and emerging organisational challenges.

Details of the training programmes undertaken during the year, including the respective training titles and key remarks, are summarised in Table 1 below. These opportunities contributed significantly to individual professional and personal development and supported the Commission's broader capacity-building objectives by fostering a skilled, knowledgeable, and adaptable workforce.

Table 2: Training undertaken during the year 2025

Training	Remarks
Postgraduate Diploma in Laws programme	University of London
Advanced Investigative Techniques	Federal Bureau of Investigation, Embassy of the United States of America
Certificate in Paralegal Studies	University of Seychelles
Labour Law of Seychelles & Dispute Resolutions	The Guy Morel Institute
Regional workshop for Indian Ocean Islands - Islands of Integrity: Protecting Whistle-blowers in the Indian Ocean	United Nations Office on Drugs & Crime (UNODC) & Platform to Protect Whistleblowers in Africa (PPLAAF)
Strategic Communications workshop	Senior officers from His Majesty's Government Communications Service
The mechanism for the Review of Implementation of the United's Convention against Corruption	Ministry of Foreign Affairs and Tourism
HR Forums	The Guy Morel Institute, On Campus, Ma Joie & the Seychelles Public Service Bureau
Ethics And Integrity Management -The Role of Ethics in Preventing Corruption	Commonwealth Africa Anti-Corruption Centre (CAACC)
Women Against Transnational Corruption Hub (WATCH) Eastern & Southern Africa Corruption Workshop	International Anti-Corruption Coordination Centre (IACCC)

Cybercrime Workshop in Seychelles	The Commonwealth
National Cyber Crisis Stimulation	Seychelles National Cybersecurity Coordination Committee & Foreign Commonwealth & Development Office
Partnerships for Anti-Corruption Global Forum	World Bank Headquarters
Virtual Course on Strategic Planning & Critical Thinking in Anti-Corruption	Commonwealth Africa Anti-Corruption Centre (CAACC)
Partnerships for Anti-Corruption Global Forum	World Bank Headquarters, Washington, D.C
Cybersecurity Awareness Training	Conducted by ACCS IT Team – In-house
Law Review Sessions for our Investigation Team	Conducted by ACCS Junior Counsel – In-house
Virtual Course on Strategic Planning & Critical Thinking in Anti-Corruption	Commonwealth Africa Anti-Corruption Centre (CAACC) – Online
Practical First Aid	Red Cross Society Seychelles
Building Criminal Enterprise Investigations	U.S. Federal Bureau of Investigation (FBI), Mauritius
Anti-Money Laundering & Cyber Crime Security	Commonwealth Africa Anti-Corruption Centre (CAACC), Gaborone, Botswana
Advanced Investigative Techniques (continuation)	Embassy of the United States of America, FIU, Ile Perseverance
Change Management	The Guy Morel Institute, On Campus, Ma Joie
Intermediate Microsoft Excel	The Guy Morel Institute, On Campus, Ma Joie
Basic Bookkeeping	The Guy Morel Institute, On Campus, Ma Joie
Customer Service Excellence	The Guy Morel Institute, On Campus, Ma Joie
Supervisory Skills for the Practicing Supervisors	The Guy Morel Institute, On Campus, Ma Joie
Research & Development: Conducting Anti-Corruption Survey	Commonwealth Africa Anti-Corruption Centre (CAACC), Gaborone, Botswana
Occupational Health & Safety	The Guy Morel Institute, On Campus, Ma Joie
Multi-Stakeholder Engagement & Building Coalitions	Commonwealth Africa Anti-Corruption Centre (CAACC), Gaborone, Botswana
Report Writing Skills	The Guy Morel Institute, On Campus, Ma Joie
Investigative Techniques for the Cash Economy (Speciality) Programme	OECD Africa Academy for Tax & Financial Crime Investigation, Nairobi, Kenya
Mindset for Personal & Professional Development	The Guy Morel Institute, On Campus, Ma Joie

Staff Movement and Workforce Analysis

This section provides an overview of staff movements within the organisation in 2025, including details on recruitment, promotions, internal transfers, and staff departures. **Table 2** below presents a summary of these movements, offering detailed insights into vacancies, recruitment, internal transfers, promotions, and staff departures.

Table 3: Staff Movement Detail 2025

Category	Number
Vacancies (2025 MBE)	6
Recruitment	5
Recruitment (2026 MBE)	1
Staff Departures	1
Internal Transfers	1
Promotions	3

Staff Turnover

In 2025, the organisation experienced a low staff turnover, with only 1 staff member departing, while 7 new employees joined the team. These new recruits included the Declaration of Assets Assistant, Prevention Manager, Investigations Officer (Complaints), Investigations Clerk, Principal Counsel, Deputy Commissioner and Prevention Officer, some of which recruitment started in 2024. The turnover rate remains minimal, reflecting a stable workforce.

In addition to recruitment, there was 1 internal transfer resulting from the recruitment drive, along with 3 promotions, demonstrating a degree of career mobility within the organisation.

Staffing Complement and Proportion to Approved Establishment

As of December 2025, the organisation had a total of 40 staff members, operating at 97.5% of its approved staffing establishment for the year, having filled 5 of the 6 vacancies allocated in the 2025 MBE.

Staff Welfare

Occupational health And Safety

In 2025, occupational health and safety remained a priority for the Anti-Corruption Commission Seychelles (ACCS), as persistent challenges related to shared office spaces, workplace safety, and the suitability of current premises continued. Progress included the relocation of some staff to new premises more conducive to their operations as part of the implementation of a workplace risk assessment conducted.

Overall, while progress was made in mitigating immediate risks and improving maintenance response, 2025 underscored the need for a more structured, preventive, and coordinated approach to occupational health and safety to safeguard staff wellbeing and support productivity in a safer working environment.

Social Activities

The HR and Administration Unit together with the Social Committee took several initiatives to organize and mobilise the participation of staff members in various activities including commemoration of important International UN days, such as Womens’, Mens’, Labour Days amongst others as well as sports activities and special events.

Technical Services

Information Technology and Cybersecurity

<p>260</p> <p>Help Desk Requests 240 resolved (92%+)</p>	<p>1,483</p> <p>Phishing Blocked 99% remediation rate</p>	<p>2,588</p> <p>Spam Caught All prevented</p>	<p>874</p> <p>Files Screened 169 cleaned, 260 verified safe</p>
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In 2025, the IT and Cybersecurity Unit at the Anti-Corruption Commission of Seychelles (ACCS) worked hard to keep the computer systems running smoothly and protected from online threats. This summary, based on our help desk records and security monitoring tools, shows how we handled everyday tech support and defended against cyber risks like viruses and scams. Overall, our systems stayed stable with no major security breaches, thanks to strong controls and quick responses.

Key Achievements

Tech Support (Help Desk): Out of 260 requests for assistance, 240 of them were resolved (that's over 92% fixed). Only 20 remained open at year-end, mostly waiting for approval or

outside help. Requests peaked during busy times like staff changes or system updates. The most common issues were access to accounts (like logins and permissions), general questions, meetings about IT, printing problems, and computer fixes. A quarter of these (65) were security-related, such as VPN connections or password resets, which we handled carefully to avoid unauthorized access.

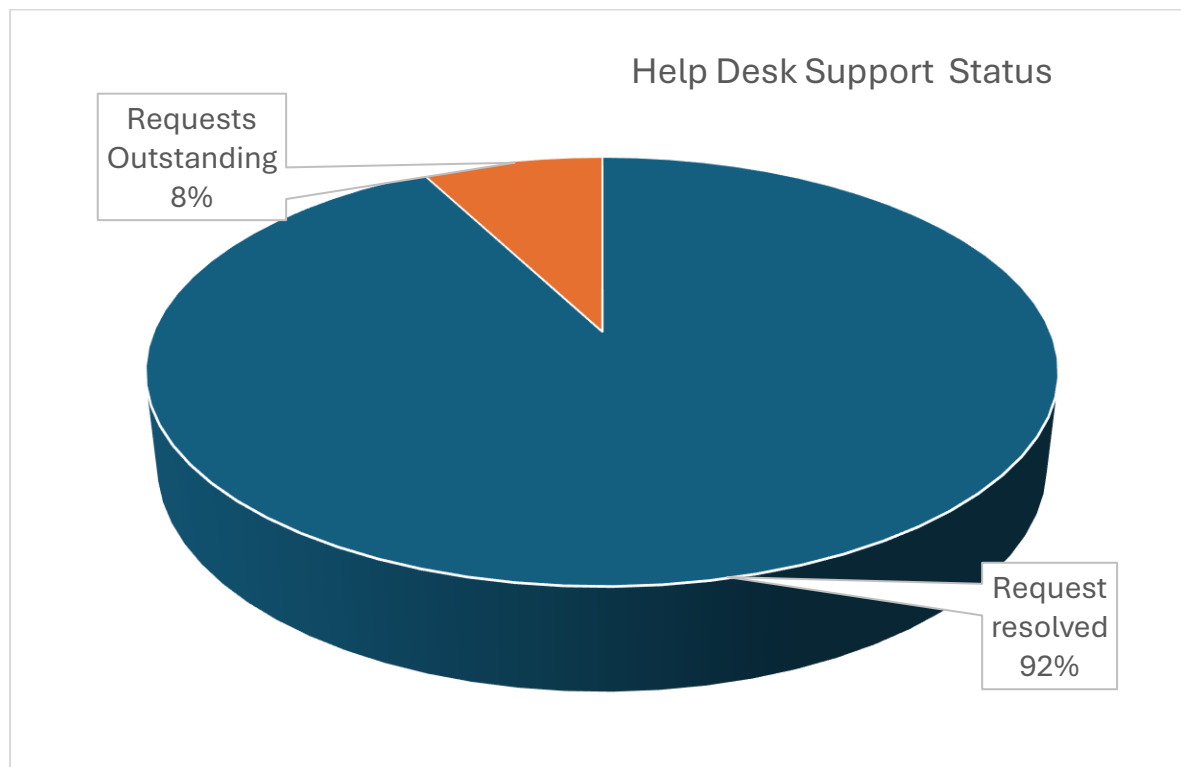


Figure 6: Help Desk Support Request Data 2025

Device Protection (Endpoints): A total of 54 computers and devices were monitored. The system spotted 106 suspicious files, mostly low risk (88), but some serious (13 high-risk and 7 critical). Attacks were blocked on 10 devices, preventing any harm.

Safe File Handling: A total of 874 incoming files were checked for hidden dangers out of which 169 were cleaned by removing risky parts (like active code) and verified 260 as safe before delivery. This helped stop malware from sneaking in through emails or downloads.

Email Security: Filters scanned all incoming and outgoing emails, catching 1,483 phishing attempts (99% fixed), 17 malware emails (all stopped), 259 data leaks (all prevented), and 2,588 spam messages. No business email scams succeeded. Phishing mostly involved fake financial tricks (579), tricks to get personal info (202 social engineering, 184 credential steals), or general scams (515 others, plus 240 suspected). The Unit also handled 97 alerts and 2 low-priority "graymail" items.

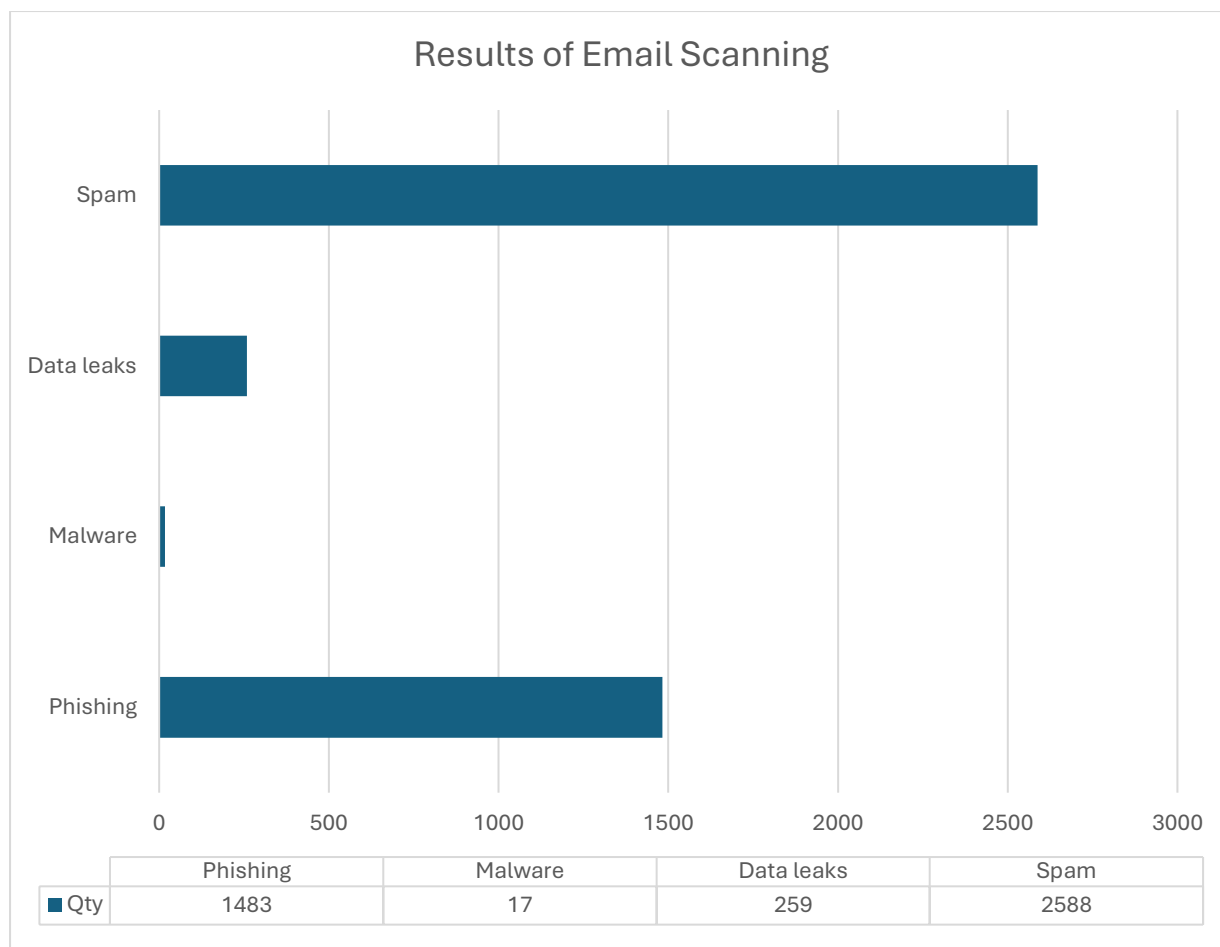


Figure 6: Email Scanning Results per Incidence Category

Risks and How We're Doing

Our risk overview highlights the biggest concerns: account access and email threats, due to their frequency. These are managed with approvals, quarantines, and constant checks, keeping impact low. On maturity, we're strong in email and device security (fully managed with ongoing fixes), incident response (quick detection and handling), and governance (clear policies in place). Areas like account management and staff training are improving but need more consistency.

Major Projects in 2025

- Focused on practical improvements:
- Keeping devices safe with real-time threat blocking.
- Strengthening email filters to catch scams and viruses.
- Safely processing files to remove dangers.
- Managing account access with strict rules.
- Updating servers, networks, and user tools for better reliability.

Looking Ahead to 2026

To stay ahead, we recommend: regular reviews of high-level accounts and multi-factor logins; more training and fake scam tests for staff; fixing device issues faster; and practicing emergency response plans.

In summary, 2025 was a solid year for ACCS IT and Cybersecurity, reliable support, effective defenses, and no compromises. We're aligned with global standards like NIST and ISO, and ready to build on this for even stronger protection. This work supports our mission by ensuring secure operations and quick issue resolution.

Digital Forensics

<h2>8</h2> <p>Cases Registered High-profile and complex</p>	<h2>1,544</h2> <p>Exhibits Processed Cumulative across all cases</p>	<h2>2.2M+</h2> <p>Items Processed Across 4 forensic platforms</p>	<h2>40</h2> <p>Officers Trained 12 in-house + 28 partner agency</p>
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The Digital Forensics Laboratory (DFL) outlines the activities, performance, capacity, and outcomes for the reporting period January to December 2025.

The ACCS DFL successfully supported multiple high-profile and complex investigations, processed large volumes of digital material, enhanced technical capabilities through system upgrades, and provided inter-agency forensic assistance. Despite operating with limited human resources, the laboratory maintained forensic soundness, evidential continuity, and compliance with best practices.

Staffing and Competency

The laboratory is operated exclusively by two (2) locally trained forensic analysts. Both analysts have received intensive specialist training from the UK National Crime Agency (NCA) and the Federal Bureau of Investigation (FBI) and achieved certification as forensic analysts. The analysts are completing a Masters in Cyber Security and Digital Forensics as well as Advance Paralegal Course respectively.

Competency is maintained through continuous professional development, hands-on casework, and knowledge transfer during joint operations.

Achievements

In 2025 the Unit maintained and ensured the operations of 4 high end digital systems/platforms providing digital evidence processing & review, case tracking and audit, as well as analysis. Over 2.2 million items were processed securely by the systems some concurrently within the same forensic environment.

Eight main cases were either followed up and/or registered during the year cumulatively logging **1544** exhibits acquired and processed.

The ACCS DFL also aided local partner agency based on four formal requests made mainly in device acquisition.

The Unit provided training to **12** in-house investigators on digital forensic review processes. Twenty-Eight (**28**) officers from local partner agencies were also trained on evidence reviews, disclosure compliance and forensic collaboration.

Court support and evidential outputs were provided through production of multiple forensic reports and statements for court proceedings.

Challenges

The following challenges will need to be addressed:

- Additional staff when there are high case volumes and to ensure business continuity.
- Limited technical capacity to acquire certain digital media.
- Adequate data storage processing facility.
- Network latency, inconsistent bandwidth, throughput, packet loss and jitters with local internet supply which delay delivery and quality of outputs.
- The challenges identified encompass the management of extensive and intricate digital datasets, limitations in resources, and the handling of legacy or obsolete media. These factors can significantly affect the completeness of evidence and the timelines associated with processing.

Programmes and Operations

Prevention

<p>17</p> <p>Sessions Conducted Across public entities</p>	<p>377</p> <p>Total Participants Public sector employees</p>	<p><80%</p> <p>Entity Acceptance Below recommended 80% threshold</p>	<p>1</p> <p>PPP Session Public-private partnership entity</p>
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The **Prevention Unit** of the Anti-Corruption Commission of Seychelles plays a pivotal role in the Commission's broader mandate, as established under the **Anti-Corruption Act 2016 9As amended**). The Unit focuses on the proactive dimension of this mission, stopping corruption before it occurs.

In this annual report, the Prevention Unit presents a detailed account of its activities, achievements, and challenges during the reporting period. These include outreach programs, collaborations with public and private entities, educational initiatives, and strategic interventions aimed at strengthening systemic safeguards against corruption. The Unit's work complements the Commission's investigative and enforcement functions, contributing to a holistic approach that seeks not only to punish wrongdoing but to cultivate an environment where integrity thrives and corrupt practices find no foothold.

The function of the Prevention Unit is to promote and encourage proactive actions to prevent corruption by:

1. Promoting integrity and an ethical culture in the Public Service.
2. Raising public awareness and engagement against corruption.
3. Educating youth and children on values of integrity.

Staffing and Structure

The Prevention Unit is managed by a Prevention Manager, supported by a Prevention Officer and Enforcement Officer.

Achievements

Awareness and Education Session in Public Service

One of the strategies to promote integrity and ethics in the public service is exposing public employees to awareness and education sessions on importance of integrity, understanding corruption and how to prevent it.

In the year 2025 there were 17 awareness sessions conducted, involving a total of 377 participants. One session was conducted with one public private partnership institution as represented in the below.

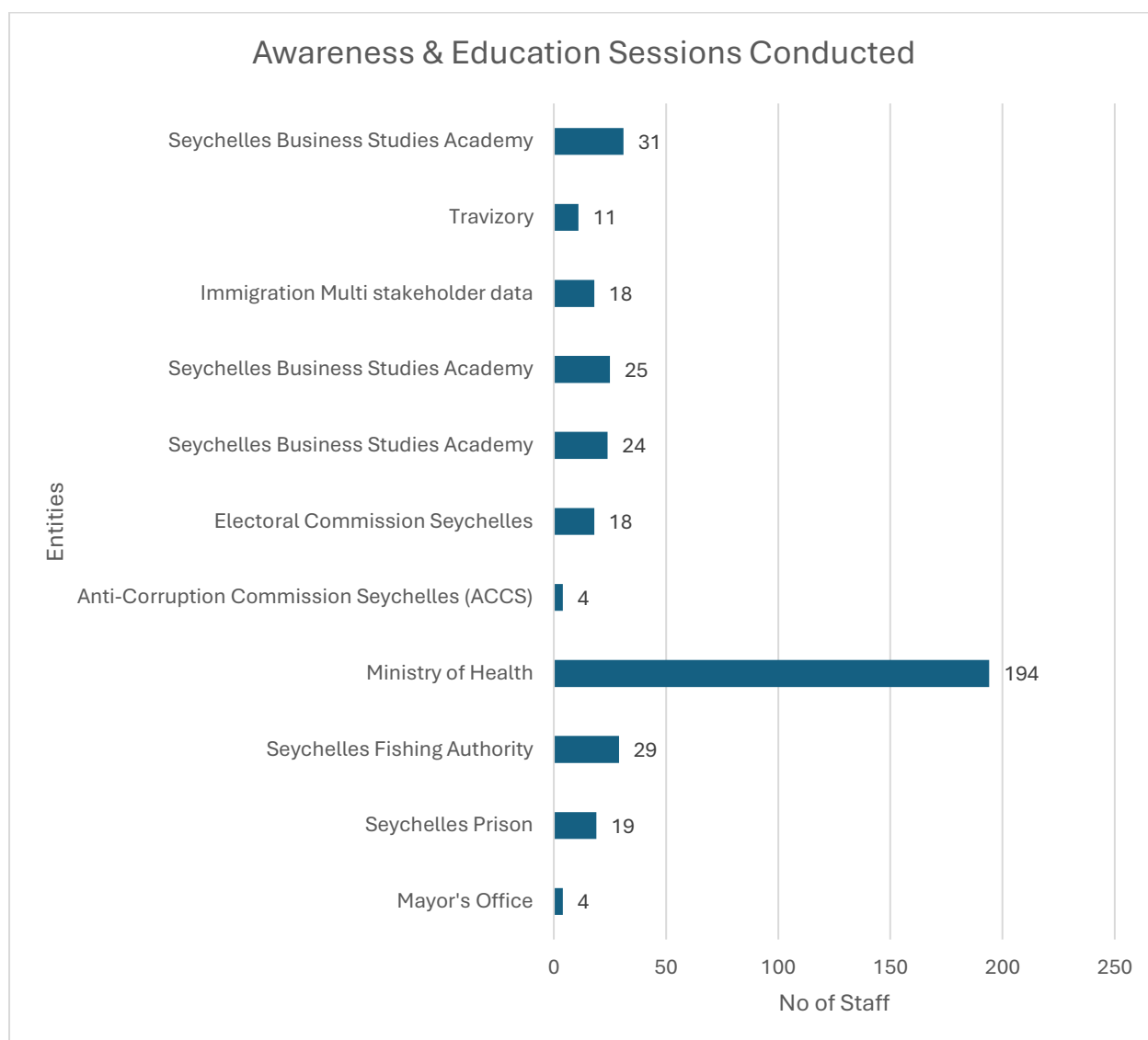


Figure 7: Number of sessions conducted and staff participation per responding entity

To plan and implement its education and awareness programme, the Prevention Unit initiates pre-sessions meetings with Public Service entities to convey the value and importance of working alongside ACCS and get their endorsement to proceed with such activities.

Unfortunately, during 2025 there has been still some reluctance from some Public Service entities to promptly response to such proposals as per the chart below.

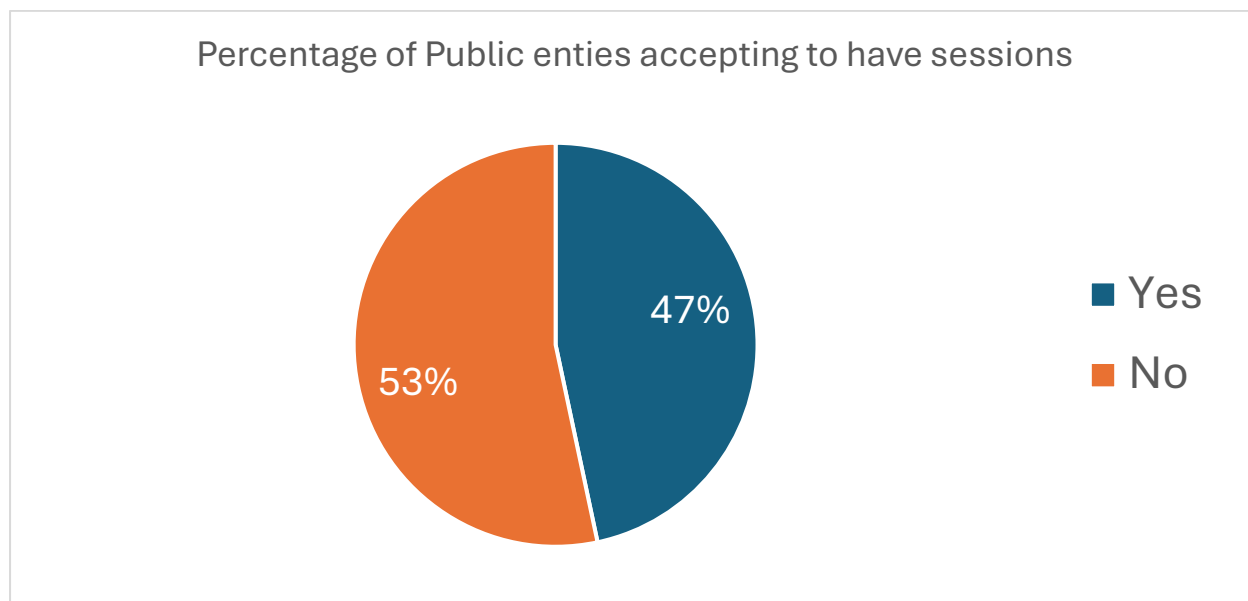


Figure 8: Entities accepting offer for prevention session by %

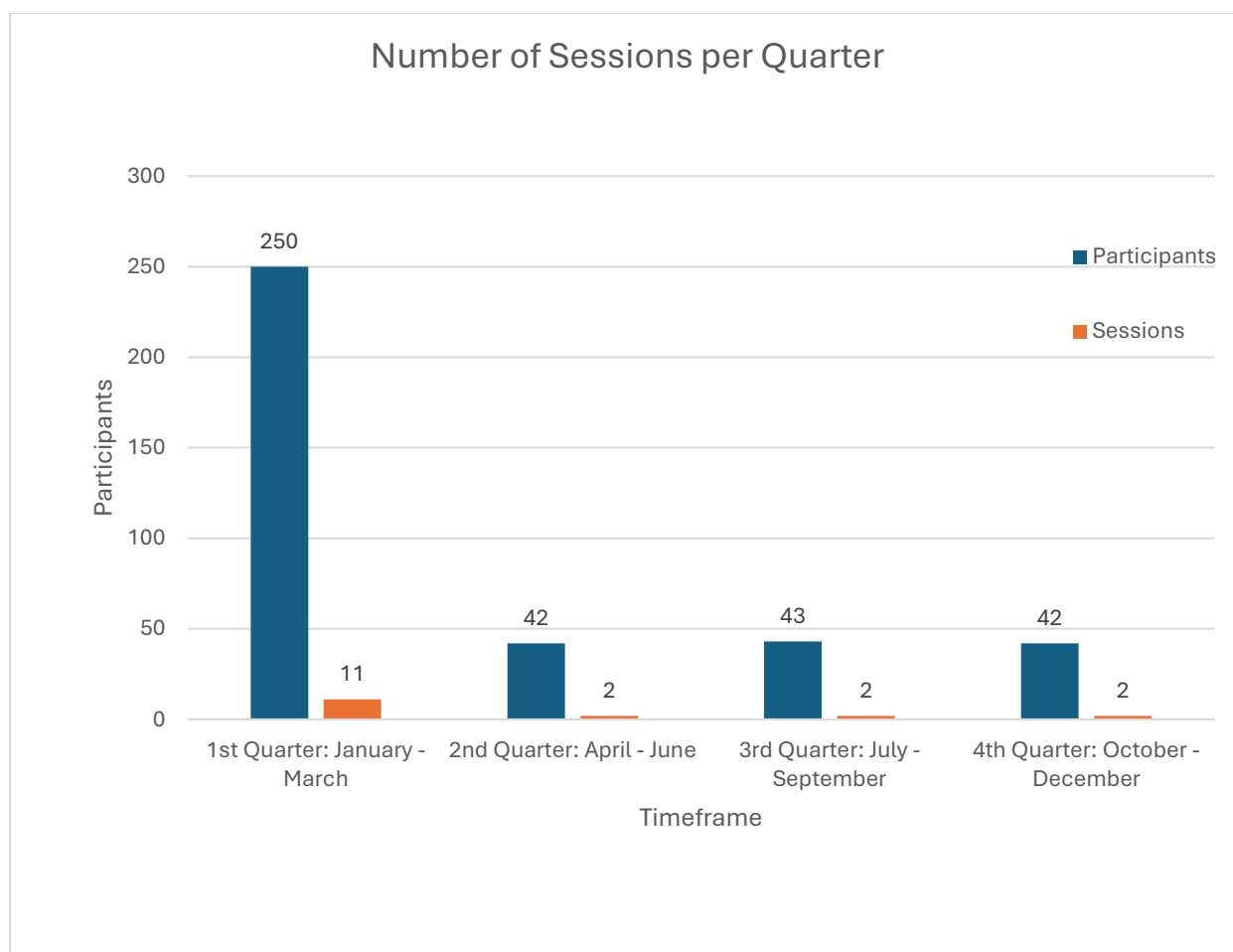


Figure 9: Breakdown of session conducted quarterly in 2025

Commemoration of International Anti-Corruption Day 2025

The UN International Anti-Corruption Day, observed annually on December 9, serves as a global platform to raise awareness about the pervasive impacts of corruption and to mobilize collective action against it. Established by the United Nations General Assembly in 2003 through Resolution 58/4, the day coincides with the adoption of the United Nations Convention Against Corruption (UNCAC), the only legally binding universal anti-corruption instrument.

Its primary purpose is to highlight corruption's role in undermining sustainable development, exacerbating inequality, and eroding public trust in institutions. By uniting governments, the private sector, non-governmental organizations (NGOs), media, and citizens, the day promotes preventive measures, ethical practices, and enforcement of anti-corruption laws.

The theme for 2025 was "Uniting with Youth Against Corruption: Shaping Tomorrow's Integrity". It emphasized the role of young people as advocates and guardians of integrity.

In Seychelles, ACCS continues to advocate for initiatives to engage young people in integrity-building activities.

To commemorate the International Anti-Corruption Day 2025, the Prevention Unit developed an audio-visual advert which was aired on the national television (SBC), national radio station (SBC Radio) and a transcript of the same published in the Nation Newspaper represented below.

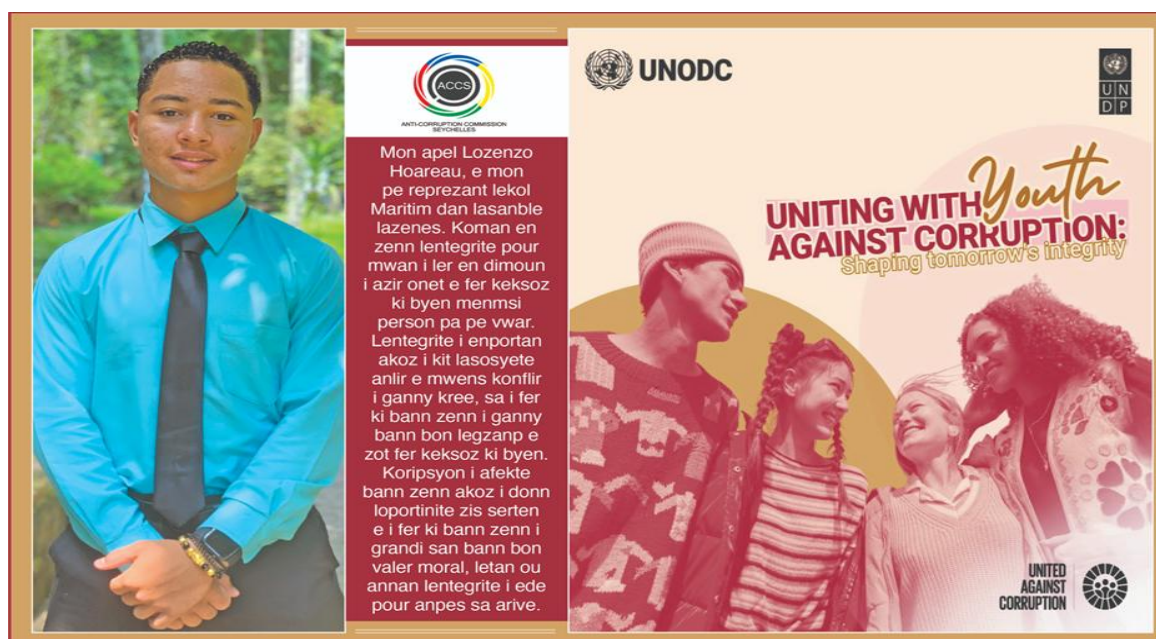


Figure 10 :Illustration for commemoration of International Anti-Corruption Day 2025

Capacity Building

Prevention Unit's Staff attended a series of training workshops to consolidate their skills and knowledge and keep abreast of new development and initiatives in the field of corruption prevention. These included:

- Commonwealth Africa Anti-Corruption Centre-Conducting Anti-Corruption Survey (Phase 1 &2.
- Ethics and Integrity Management- The role of ethics in preventing corruption.
- Strategic Planning and Management in Anti-Corruption Course.
- Multi-Stakeholder Engagement and Building Coalitions Course.
- Advanced Course in Paralegal Studies, University of Seychelles (UNISEY).

Challenges

Human resource limitation is one of the primary challenges that prevents the Unit from rolling most of its planned programmes and projects as per its strategic plan.

Limited financial resources affect the delivery of education and sensitizations initiatives, particularly related to youth and media activities. This is related to both in-house activities and out-sourcing options which are more cost effective.

The high level of effort by staff dedicated to assessment, strategizing and planning effective interventions and related activities compared to the low ratio of activities implemented due to lack of funding is a cycle that gradually leads to low staff morale and motivation.

The lack of interest or motivation from some public service entities to take up the offer of ACCS to join the initiative to be proactive in the fight against corruption through preventive measures is well below the reasonable threshold of coverage to significantly have an impact in this sector. ACCS, based on best practice, believes that an 80% coverage of all public service entities should be the minimum threshold to achieve measurable impact. To this end we are exploring new ways of working which will assist public officers in acquiring the knowledge and awareness of anti-corruption practices.

Strategic Planning and Mitigation

When considering the challenges, we conducted an extensive review of our structure, policy, framework, strategies and objectives in line with our mandate of prevention of corruption. The review proposes upgrading the Prevention Unit to Departmental level to regroup all our

units that deal with prevention work, such as risk assessment and analysis, education, awareness, asset declaration, compliance and enforcement. Results of the strategic planning exercise includes the development of:

1. Prevention Policy.
2. Seychelles Anti-Corruption Prevention Framework.
3. Compliance Framework and Rating Scheme.
4. Awareness and Education Strategic Plan including a Risk Mitigation Framework.
5. Framework for Declaration of Assets.
6. Anti-Corruption Policy for Public Officers.
7. Public Officers Online Survey Tool (to monitor knowledge, skills and practices in Anti-Corruption).

The process also included a human resource mapping and planning exercise to facilitate the implementation of the policies and objectives.

Proposed Prevention Department Structure 2026-2031

ACCS2025

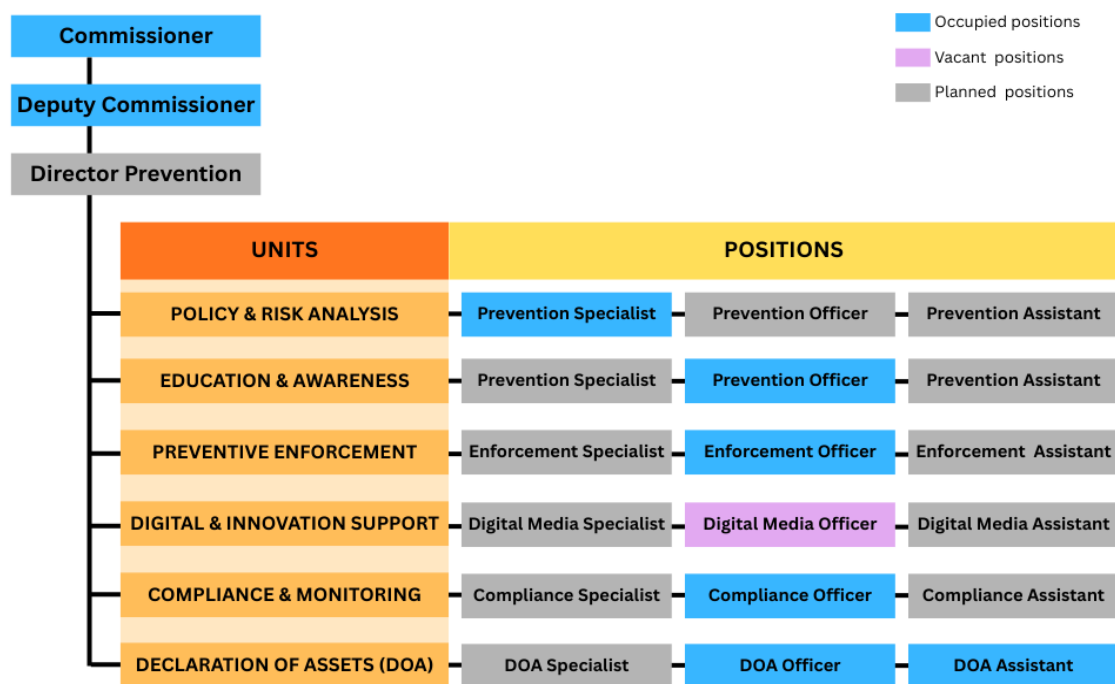


Figure 11: Proposed structure and human resource mapping

The Unit is also adopting a strategy to harness the power and advantage of new technology and AI to facilitate some of its prevention work both in terms of quality, efficiency and cost effectiveness, particularly in rolling out online tools, education products and use of social media.

Complaints

<h1>30</h1> <p>Complaints Received Consistent with 2024</p>	<h1>6</h1> <p>Referred to Investigation Including 3 from prior years</p>	<h1>7</h1> <p>Closed at Triage Insufficient evidence</p>	<h1>19</h1> <p>Active Cases At various stages of review</p>
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The **Complaints Unit** of the Anti-Corruption Commission of Seychelles (ACCS) serves as the essential gateway through which the public engages directly with the Commission's core mandate. In receiving, meticulously assessing, and referring credible complaints, either for full investigation by the Commission's investigative teams or to relevant authorities when appropriate, the Unit acts as the frontline filter that initiates the enforcement chain. It bridges the gap between public vigilance and institutional response, turning citizen reports into tangible steps toward justice, deterrence, and systemic reform.

In this annual report, the Complaints and Referral Unit details its activities over the reporting period, including the volume and nature of complaints received, referral outcomes, challenges encountered in processing reports, and efforts to enhance accessibility and public confidence in the mechanism. These statistics and narratives underscore the Unit's indispensable contribution to the ACCS's holistic strategy, one that not only investigates and punishes corruption but also relies on an engaged and empowered population to sustain long-term integrity and transparency.

Functions

The functions of the Complaints Unit are as follows.

1. Receive and register complaints made to the Commission by an individual or Authority.
2. Report Complaints made to the Complaints Sub-Committee for decisions
3. Carry out preliminary inquiry in cases upon approval and recommendation by the Director of Investigation Operations
4. Undertake intelligence work related to cases.

Staffing and Structure

The Complaints Unit is under the supervision of the Director of Investigation Operations (DIO). The Unit is manned by a Senior Investigations Officer and two Investigations Officers, one of which was recruited in July 2025.

Achievements

ACCS receives complaints in writing, posted or hand delivered, by email, by phone and walk-in complainants. An elaborate standard operating procedure is in place to receive, record and assess all complaints in total confidentiality. The Commission also receives referrals for cases from public entities in situations where a potential corrupt action may have occurred. The Commission is also empowered to investigate by its own motion as per section 52 (2) of the Anti-Corruption Act 2016 (as amended).

During the year 2025, a Complaints Assessment Matrix was designed and introduced to facilitate the assessment and analysis of complaints. The matrix is aimed at improving complaints analysis and recommendations for actions in an objective manner and helps in identifying cases that need further analysis/ information gathering, warrants preliminary enquiry or cases that do not fall within the remit of the Commission.

The Complaints Unit has recorded a total of 30 complaints received for the year 2025, 7 of those cases have been closed at triage and/or sub-committee level, 3 have been referred to the Investigations Unit, 1 has been filed as intel, and 19 cases remain active in the assessment or pre-investigation stage. 1 case reported in 2020, and 2 cases reported in 2024 have also been referred to the Investigations Unit.

Challenges

The Complaints Unit faces some noteworthy challenges related to workload, human resources and working environment. Those challenges are worth mentioning because they significantly impact the overall success of the Complaints Unit.

Human resources

Staff should be scaled to complaints inflows and caseloads to maintain effectiveness and public trust. The current staff to case ration of 3 to 15+ cases per year in the context of Seychelles creates a bottle neck in complaints processing, with risk of high backlog and burnout. Bearing in mind that complaints must go through triage, processed for either closure, referral to other agencies, preliminary investigation and referring for formal investigations. This ratio has a direct impact on the unit's delivery and how well and efficiently cases are dealt with. A human resource capacity assessment for the Complaints Unit will be considered in 2026.

Technical Resources

The Unit is currently using office-based workstation that limits flexibility and movement in this modern technologically oriented work environment. Better mobile-friendly and online technological options should be explored to facilitate operations both at hardware and software level accompanied by the necessary training.

Working Environment

The Complaints Unit is one of the first points of contact for complainants and the public in general, the space, layout and design of the offices is not ideal to facilitate such services in terms of functionality, confidentiality and safety for both staff and clients. This will need to be addressed when considering a new building for the Commission.

Financial Investigation Capabilities

Most complaints in the context of corruption imply some sort of financial aspect. A lack of financial investigation skills and /or qualified staff slows the complaints process. This can be addressed by building capacity of existing staff, recruitment or assignment of personnel with the appropriate knowledge and skills.

Stakeholders' engagement

The Complaints Unit receives support and collaboration from most entities. However, some entities fail to respond on time or not at all. The Unit continues to advocate for and strengthen such partnerships and collaboration. Such collaboration is crucial in ensuring that corruption is effectively addressed. During 2025 a total of 57 requests for information were sent to a total of 14 entities. The number of responses received in return was only 39 representing a 32% no-response rate. The unit also issued a total of 6 search warrants during the year 2025. We plan to review the follow up process with those entities and ACCS will consider issuing more Notices under section 53 (1) of the Anti-Corruption Act 2016. Notices under this section are a last resort but non-compliance could lead to a fine or conviction.

Stakeholder collaboration is essential to the effective processing of corruption complaints by the ACCS because corruption rarely exists in isolation — it cuts across institutions, sectors, and jurisdictions in ways that no single body can fully address alone. When the ACCS works alongside government agencies, law enforcement, civil society, the private sector, and the public, it gains access to broader evidence, stronger investigative support, and greater community trust, all of which are critical to building credible, well-substantiated cases. Collaboration also helps close the gaps that corrupt actors exploit, ensures that complaints are handled with the appropriate expertise and authority, and sends a clear collective signal that integrity is a shared national responsibility.

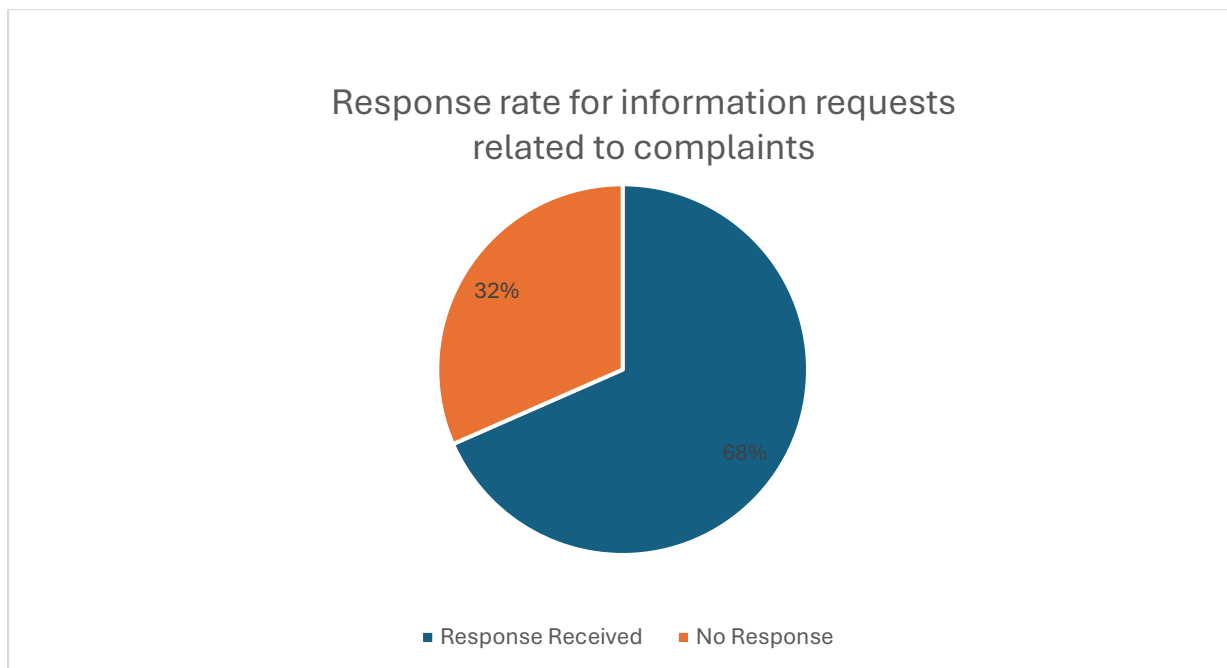


Figure 12: Response Rate for Information Request

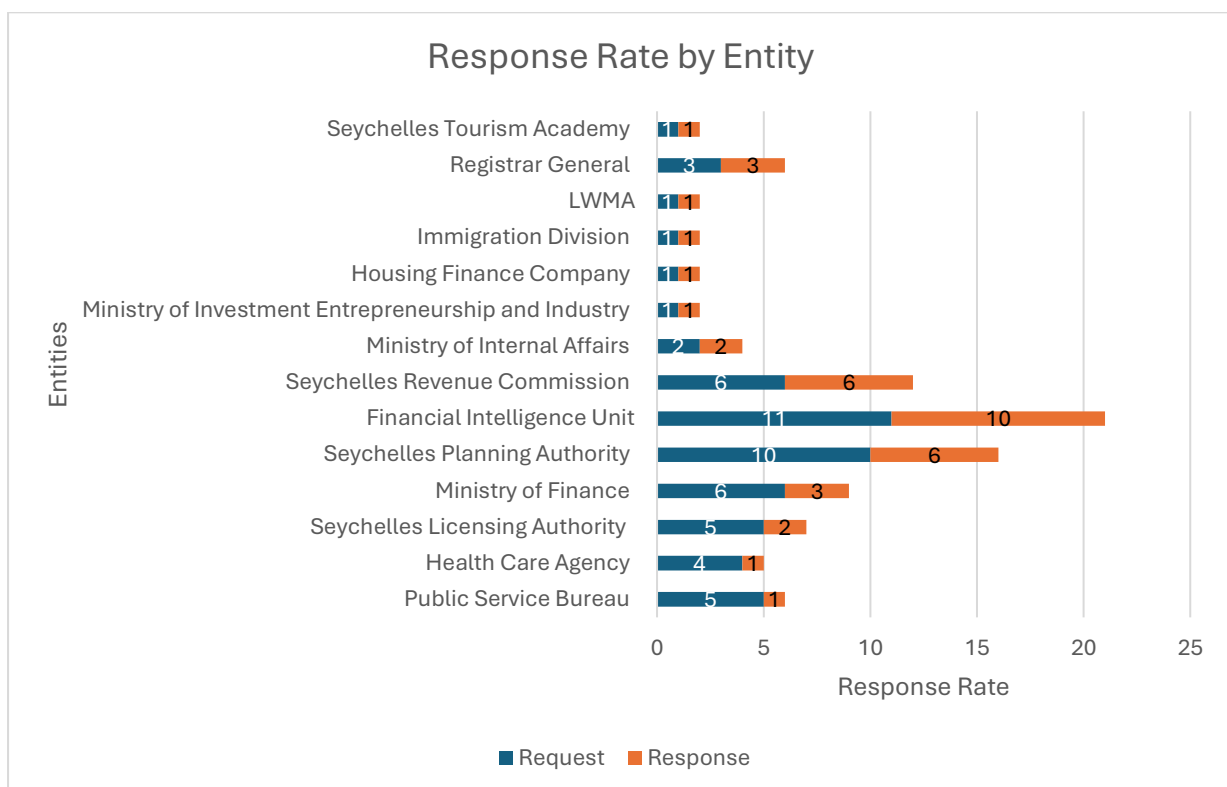


Figure 13: Response Rate by Entities during 2025

Backlogs

The Complaints Unit has significant backlogs from previous years. Though the Unit remains committed to clearing the backlog, it remains a challenge mainly due to a lack of sufficient human resources.

Statistical Review for the year in brief

Below is an overview of the statistics for the year 2025. The total number of complaints received in 2025 is 30, almost like the year 2024. Most complaints were submitted by walk-in clients (13), followed by emails (8), letters (4) and phone calls (5). There is still very low intake of complaints through the ACCS website so far.



Figure 14: Percentage of Complaints by Mode Received in 2025

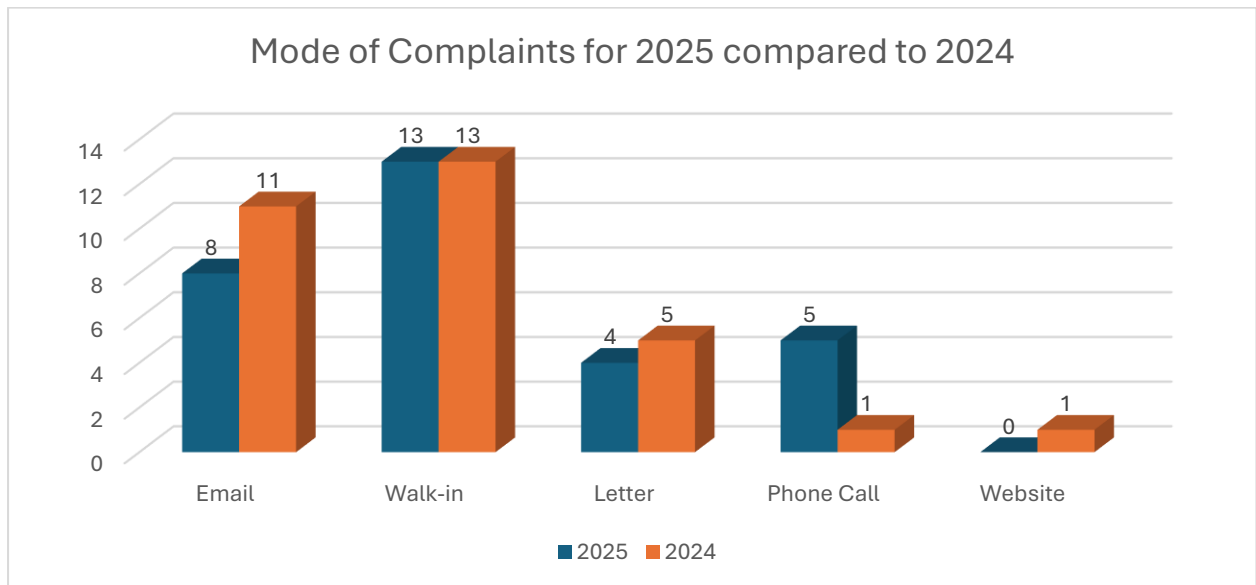


Figure 15: Comparison of Modes of Complaints 2024-2025

Eight (8) out of the 30 complaints received for 2025 were from anonymous complainants representing 27% compared to 73% who voluntarily revealed their identity.

A total number of 6 complaints were referred to the Investigation Unit for formal investigation, out of which 3 were complaints lodged prior to 2025.

Most complaints involved public entities (80) compared to private (17%) including (3%) involving public and private combined.

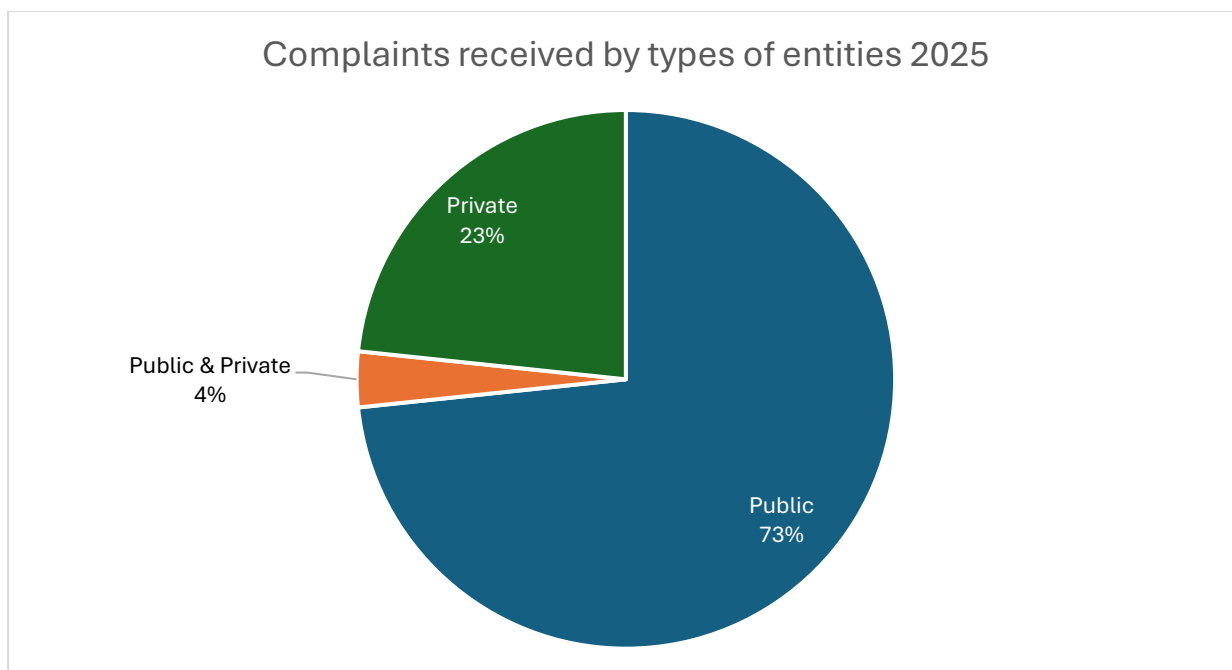


Figure 16: Complaints Received Classified by Types

The Unit, after review, closed 7 cases which lacked evidence for further investigation.

Currently 19 cases are active at various levels of review and pre-investigation.

Significant inroads have been made in 2025 to streamline internal processes, increase capacity and upgrade standards to improve efficiency and public expectations. The trends in the number of complaints received since 2017 have declined and stabilized to around 30 during the last 3 years.

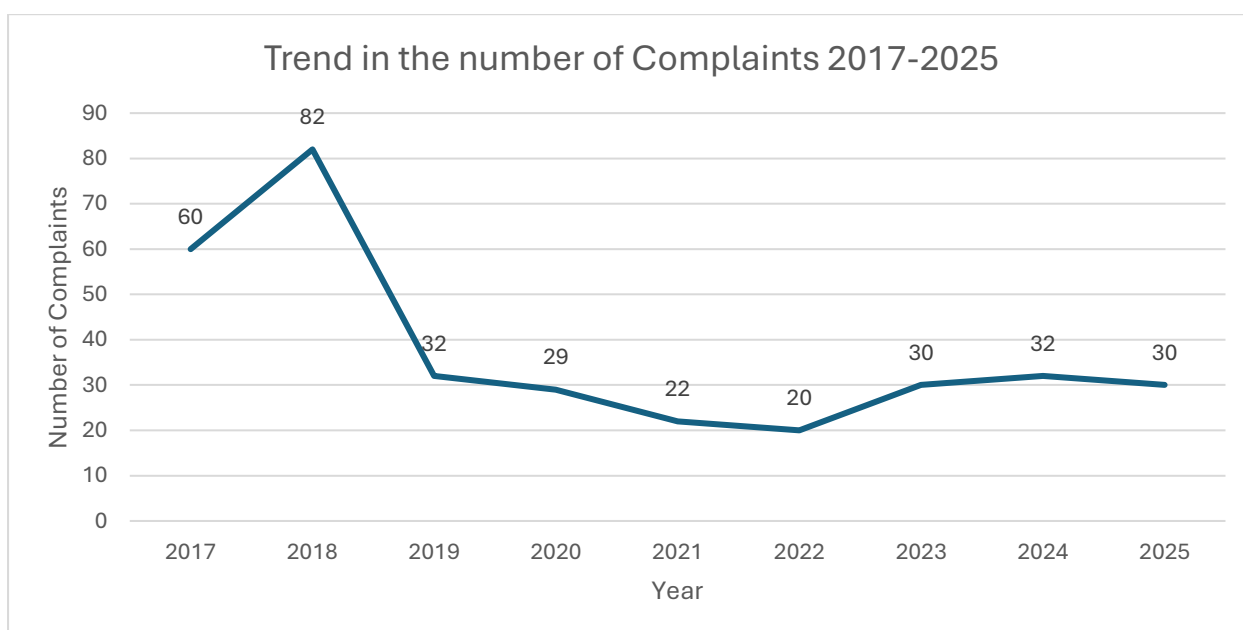


Figure 17: Complaints Reporting Trends Between 2017-2025

Recommendation

Adequate human, financial and technical resources need to strengthen the capacity of the Complaints Unit so that it can establish the required benchmark to effectively achieve objectives and deliver the expected outcome as mandated. The Unit has updated its case processing procedures to streamline operations and improve efficiency.

Corruption Case Processing Flow Chart

ACCS 2025

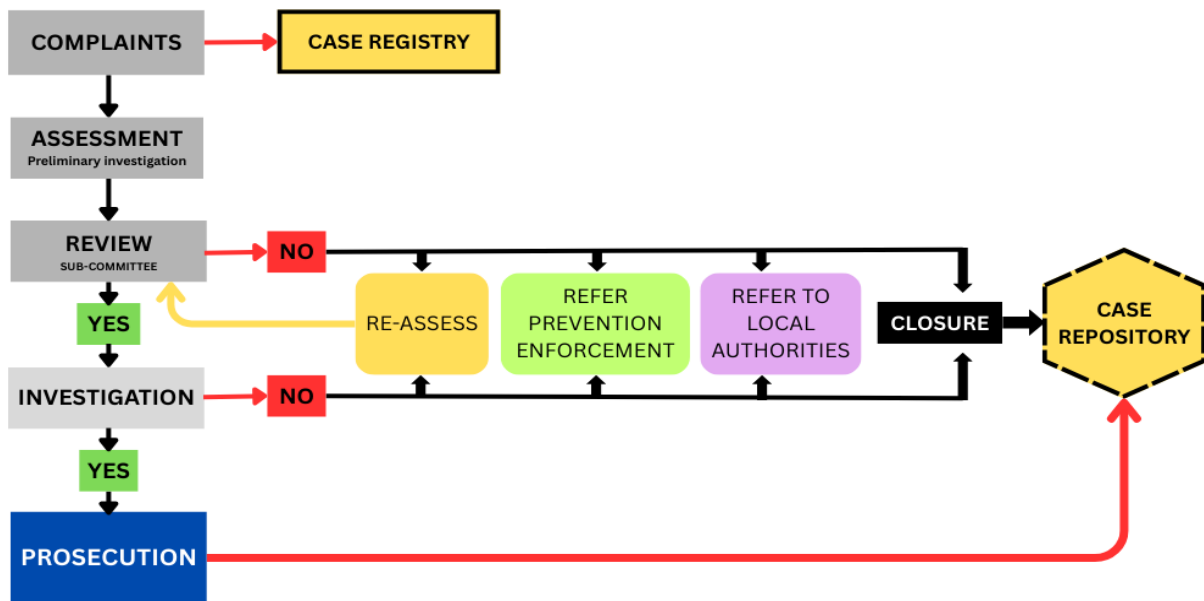


Figure 18: Corruption Case Processing Flow Chart

An effective corruption case processing flowchart is crucial because it transforms complex legal procedures into a clear, structured pathway that ensures every complaint is handled consistently, transparently, and in full compliance with the law. Without a defined process, cases risk procedural errors, delays, or inconsistent treatment that could compromise investigations, undermine prosecutions, or expose the Commission to legal challenge. A well-designed flowchart anchored in the ACCS Act provides officers with an unambiguous step-by-step guide — from receipt of complaint through assessment, investigation, and disposal — reducing the risk of oversight, protecting the rights of all parties, and reinforcing public confidence that the ACCS operates with integrity, accountability, and due process at every stage

Investigation

<p>27</p> <p>Cases Under Investigation As at end of 2025</p>	<p>15</p> <p>Investigations Unit Staff DIO, CIO, investigators, analysts</p>	<p>3</p> <p>Investigation Sub-Teams Plus Support Services section</p>	<p>6+</p> <p>International Partners FBI, UNODC, SADC, Interpol, CAACC, IACCC</p>
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The Investigations and Prosecution Unit provides a comprehensive overview of its work during the reporting period, including the number of cases investigated, key findings, prosecutions initiated or concluded, challenges such as resource constraints and complexity of financial crimes, and notable outcomes that advance justice and transparency. These efforts complement the preventive and accessibility functions of the Commission, creating a comprehensive strategy that not only punishes corruption but actively dismantles the conditions that allow it to flourish.

As Seychelles strengthens its position in regional and international anti-corruption frameworks, the Investigations and Prosecution Unit remains unwavering in its commitment to pursuing truth rigorously, delivering justice impartially, and contributing to a society where ethical conduct prevails, public trust is earned through action, and the nation's resources serve the common good of all Seychellois.

Functions

The Investigations Unit is mandated to conduct enquiries and investigations in allegations and suspected offences under the Anti-Corruption Act 2016, Section 22(2), (a).

Subject to the Anti-Corruption Act, 2016 (as amended), the ACCS may investigate or take or continue the investigation of offences provided under Chapter X and Chapter XXXVIII of the Penal Code (Cap 158). The investigations unit is also mandated to enquire into and conduct investigation of offences of money laundering committed in furtherance of corrupt practices.

Staffing and Structure

The Unit has 15 staff members, including a Director of Investigation and Operations, a Chief Investigations Officer, 7 Investigators, one Investigations Clerk, 2 Financial Crime Analysts and one Assistant Financial Analyst.

The Unit is comprised of 3 sub-investigations Teams with a Support Services section. The Unit is supervised by the Chief Investigations Officer with policy, strategic and operational oversight by the Director of Investigations and Operations.

Achievements

Case Investigation Progress

As of end of 2025 the Unit has been working on a total of 27 cases in various stages of progress as per the table below.

Table 4: Breakdown of Case Status for 2025

CASE STATUS FOR THE YEAR 2025		
Total number of cases	27	<i>Cumulative number of cases from previous years and 2025</i>
Brought Forward from previous years	20	<i>Case still in process of being investigated or on hold from previous years</i>
New cases received in 2025	7	<i>Cases referred through the Complaints Unit</i>
Cases Closed	4	<i>Cases close mostly due to insufficient evidence.</i>
Referred to Principal Counsel	1	<i>Case referred to Counsel for final review and charge before prosecution</i>
Investigations Completed	5	<i>Cases pending review by Principal Counsel pending prosecution</i>
Investigations Ongoing	22	<i>Cases in various stages of investigations</i>

Capacity Building

ACCS through the Investigations Unit invests into all possible opportunities for training and skills development, during the year 2025 staff of the Unit benefitted from the following:

- Asset Management Workshop
- Asset Recovery Training
- Anti-Money Laundering & Cyber Crime Security Course
- Investigations Technique
- Advanced Investigative Technique
- Investigating and Prosecuting Complex Financial Crimes
- Investigative Techniques for the Cash Economy (Speciality Programme)
- Building Criminal Enterprise Investigations
- Basic Book-Keeping

- Trust Maturity Model Self-Assessment Workshop
- Cyber Crime Workshop
- Intermediate Microsoft Excel
- Report Writing Skills
- Post Graduate Diploma in Law

The Investigations Unit also benefits from technical support from our local and international partners including the Federal Bureau of Investigation, UNODC, SADC, Interpol, CAACC and IACCC.

Legal and Prosecution Unit

This section of the report presents an anonymised performance analysis of the ACCS Legal Unit during 2025. It evaluates the unit's workload, case management decisions, legal advisory output, and strategic planning for 2026. All case references and personal identifiers have been removed to preserve confidentiality. The report further covers ACCS's broader institutional performance and contextual challenges documented during 2025.

The Legal Unit received six (6) investigation files during this period, two (2) ongoing court matters and four (4) completed investigation files awaiting court filing, while simultaneously providing legal advisory support across multiple active investigations and maintaining an active court-facing role in concurrent ACCS proceedings.

The introduction of an in-house prosecutor within the ACCS in 2025 represents a significant institutional advancement, as it bridges the gap between the investigative and prosecutorial functions under one roof. Previously, reliance on external prosecutors could lead to delays, loss of institutional knowledge, or dilution of prosecutorial strategy when cases were handed over. With an in-house prosecutor, the ACCS benefits from seamless continuity — the prosecutor is embedded in the investigation from an early stage, enabling evidence to be gathered with prosecutorial strategy in mind, legal weaknesses to be identified and addressed proactively, and cases to be presented in court with greater precision and depth. This integrated approach ultimately strengthens the ACCS's capacity to secure convictions, deters corrupt conduct more effectively, and reinforces public confidence in Seychelles' commitment to combating corruption.

Active High-Profile Litigation Context (2025)

Court records and published cause lists confirm that throughout 2025, the ACCS was managing significant active prosecution matters before the Supreme Court and Constitutional Court. These included:

- A long-running, high-value corruption and money laundering matter involving alleged misappropriation of approximately USD 100 million, with further amended charges filed before the Supreme Court in early 2023. The case involves a constitutional challenge filed in 2023 seeking to stay prosecution proceedings pending determination of a constitutional question related to the Anti-Corruption (Amendment) Act 2022.
- Multiple active corruption trials at both Magistrate and Supreme Court levels. Published Supreme Court cause lists confirm Counsels of the ACCS were actively appearing in ongoing proceedings during the same period covered by this annual report.
- Active civil confiscation and asset restraint proceedings before the Supreme Court, involving corporate entities, further extending the Legal Unit's workload.

This wider litigation landscape confirms that the Legal Unit's reporting-period workload operated against a backdrop of substantial concurrent institutional legal activity, making the unit's internal file review and advisory achievements during the same period all the more significant

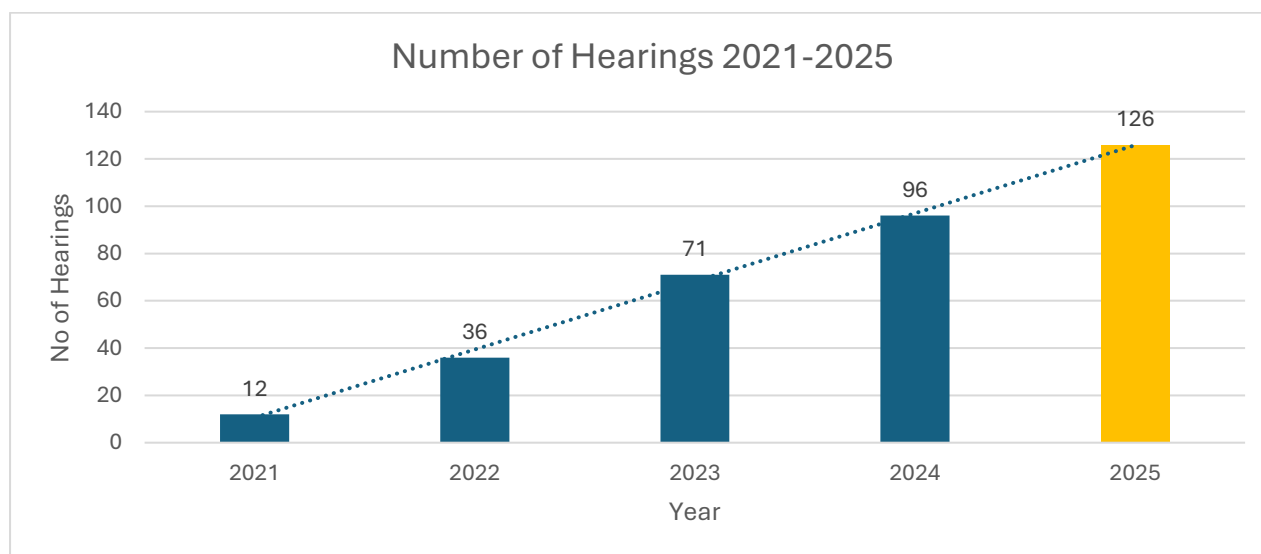


Figure 19: Number of hearings comparatively 2021-2025

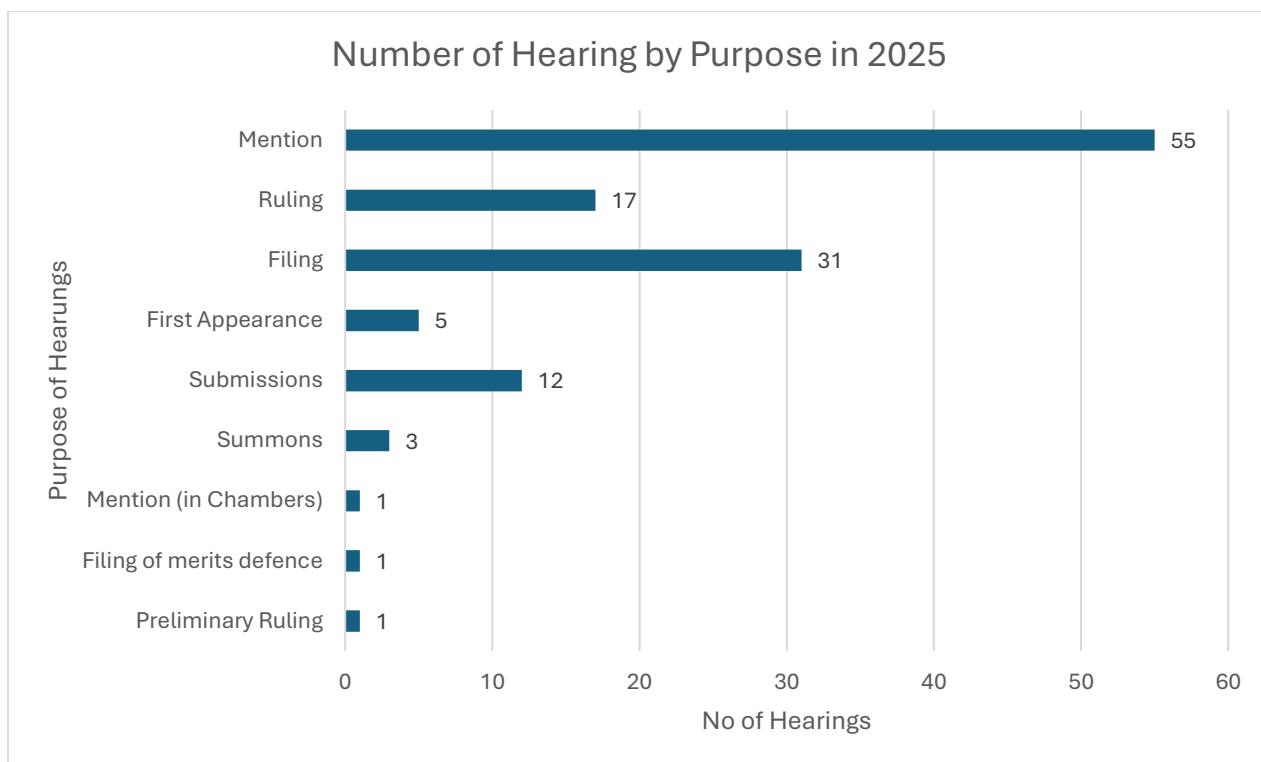


Figure 20: Number of hearings by purpose 2025

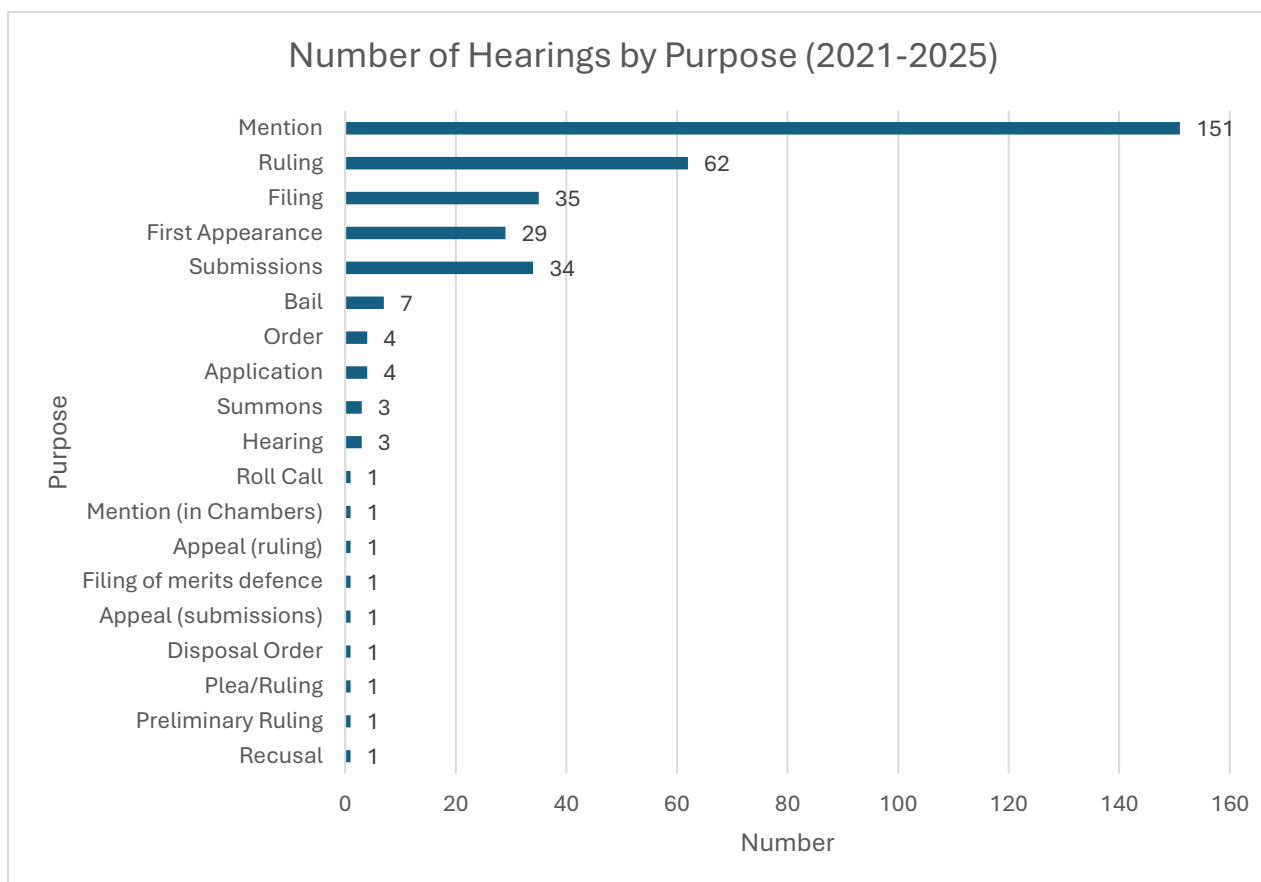


Figure 21: Number of hearings by purpose comparatively 2021-2025

Asset Recovery and Enforcement Activity

UNODC submissions from June 2025 indicate that the ACCS had secured a Global Asset Restraint Order under the AML Act 2008, preventing the dissipation of assets across more than 14 jurisdictions. This reflects the Commission’s growing cross-border enforcement capacity, which the Legal Unit is expected to directly support through its 2026 work plan objective on asset recovery legal support.

The ACCS also developed a policy paper on Unexplained Wealth which was tabled and discussed at the National AML/CFT Committee. ACCS has signed a number of MOUs with key institutional partners including the Financial Intelligence Unit, the Central Bank of Seychelles, the Revenue Commission, the Registrar General, and the Financial Services Authority — all of which generate ongoing legal advisory demands on the Legal Unit.

Legal Unit Workload Overview

The following table summarises the Legal Unit’s workload.

Category	Volume	Status
Ongoing court matters (active litigation support)	3 case files	Active – pending defense hearings
Completed investigation files awaiting court filing	4 dockets	Reviewed and dispositioned
Additional advisory matters (active investigations)	3+ matters	Ongoing legal guidance provided
Total files under active management	6+	Mixed – active / resolved

Case Management Performance

Ongoing Court Matters

Two (2) dockets were received in late September 2025. The strategic case conference identified that both files required detailed case summaries and proper sequencing before scheduled defense hearings. These requirements were fulfilled within the timeframe, demonstrating effective internal coordination and pre-trial preparation.

Completed Investigation Files – Review & Disposition

A case assessment meeting was convened with the Chief Investigating Officer and investigators evaluated 16 cases, 4 of which have been prioritized to be prosecuted.

Legal Advisory Performance

The Legal Unit provided ongoing legal advice across multiple active investigations during the reporting period. The unit also provided cross-functional legal inputs to the Complaints Unit, consistent with the ACCS's requirement for integrated legal support across operational departments.

Performance Analysis

Strengths

- All received files were actioned within the reporting period, with documented progression milestones.
- Regular engagement with junior and senior counsels ensured peer review and quality control of legal outputs, consistent with the ACCS's internationally recognised institutional standards.
- The unit simultaneously managed litigation support, pre-trial preparation, charge drafting, and legal advisory services, all while the Principal Counsels remained active in major concurrent ACCS court proceedings.
- Evidence-based decisions not to proceed in certain matters reflect the prosecutorial integrity that has contributed to Seychelles' leading CPI performance in Africa.

Challenges and Risks

- External counsel dependency: Core prosecutorial decisions remained contingent on external senior counsel, creating bottleneck risk. The ACCS's documented recruitment gap is the root cause of this structural dependency.
- International scrutiny: The CPI 2025's specific mention of prosecution delays in Seychelles Judicial process, elevates reputational risk and places added importance on the Legal Unit's 2026 court-engagement objectives.

Performance Rating Summary

Performance Area	Rating	Commentary
Case file management	Strong	All files actioned within the period; clear milestones documented
Legal advisory output	Satisfactory	Multiple matters supported; some pending into 2026
Prosecution readiness	Moderate	Charge sheets prepared
Stakeholder coordination	Strong	Effective liaison with CIO, investigators, and counsel

Performance Area	Rating	Commentary
Alignment with ACCS mandate	Strong	Consistent with ACCS's institutional court-facing and advisory roles
International performance alignment	Satisfactory	2026 plan responds directly to CPI concerns on prosecution delays

Contextual Benchmarking

The Legal Unit's performance must be assessed in light of the broader institutional context:

- Seychelles holds the highest CPI score in Sub-Saharan Africa; a position built on sustained ACCS prosecutorial activity. The Legal Unit's prosecution pipeline is central to maintaining this standing.
- The ACCS's cross-border asset recovery activity — including Global Asset Restraint Orders across 14+ jurisdictions — reflects a level of legal complexity that places significant demands on the Legal Unit's advisory and prosecutorial capacity beyond what is captured in this single reporting period.
- The CPI 2025's specific concerns about prosecution delays in Seychelles make the Legal Unit's 2026 court-engagement objectives not merely internal targets but internationally monitored performance indicators.

The ACCS's documented structural constraints, specialist recruitment gaps, external counsel dependency, are institutional rather than operational failures, and the Legal Unit's performance should be assessed with these constraints as context.

Strategic Work Plan – 2026

The Legal Unit has defined the following key deliverables for 2026, directly aligned with the ACCS's institutional priorities and the internationally identified need to advance prosecution timelines:

1. Provide legal advice and formal opinions on investigations and anti-corruption matters.
2. Draft and review charges, prosecution briefs, and legal documents for corruption cases.
3. Represent the Commission in court proceedings and ancillary legal actions.
4. Conduct legal research and review applicable legislation for compliance and law reform opportunities.
5. Provide legal support for asset recovery and enforcement actions.

These objectives represent a substantive escalation from the internal preparatory focus of the 2025 reporting period toward active courtroom engagement and enforcement, a shift that directly responds to both institutional priorities and the findings of the CPI 2025.

Recommendations

1. Strengthen pre-submission investigation quality controls: Introduce a formal joint legal-investigative pre-referral review.
2. Establish service-level expectations with external counsels: Define agreed turnaround times for external counsel reviews of charge sheets and prosecution briefs, to reduce case progression bottlenecks given the ACCS's structural reliance on external expertise.
3. Implement a case tracking register: A structured case management log should be maintained to provide real-time visibility of file status and outstanding actions, consistent with ACCS's statutory reporting obligations under section 81 of the Anti-Corruption Act 2016.
4. Prioritise courtroom engagement in Q1 2026: Files at or near charge preparation stage should be fast-tracked, directly addressing the CPI 2025 concern about prosecution delays and demonstrating institutional responsiveness to international scrutiny.

Conclusion

The ACCS Legal Unit has demonstrated commendable performance during 2025, effectively managing a diverse caseload alongside substantive legal advisory responsibilities and active court-facing duties in concurrent institutional proceedings. Strategic case conferences, timely file preparation, and sound prosecutorial judgment reflect a unit operating with professional rigour within a challenging institutional environment.

The unit's performance is contextualised by Seychelles' position as the leading anti-corruption performer in Sub-Saharan Africa, a status dependent in part on the ACCS's sustained prosecution pipeline. The CPI 2025's specific concern about prosecution delays in Seychelles creates both urgency and opportunity: the Legal Unit's 2026 work plan, focused on active court engagement and asset recovery, is precisely the response the international community and the institution require. ACCS will discuss international observations with the Judiciary, as they are mentioned in Transparency International report for 2025,

Addressing key challenges, investigative quality gaps and external counsel dependency, are structural in nature. Addressing these upstream gaps, alongside the Legal Unit’s own planned expansion of court-facing activity, will be critical to sustaining and advancing Seychelles’ anti-corruption standing in 2026 and beyond.

ACCS will work with Tertiary educational establishments, ANHRD, the Attorney General’s Office and the Judiciary in strategising on delays in the prosecution of financial crime cases. This is a long-term investment for all stakeholders concerned as there is a huge gap in specialist prosecutors in this sector.

Declaration of Assets

<h1>412</h1> <p>Declarations Received From 29 public entities</p>	<h1>29</h1> <p>Entities Covered Full compliance achieved</p>	<h1>3</h1> <p>NA Members Non-Compliant For 2024 (led to internal investigation)</p>	<h1>Dec 2025</h1> <p>Legislative Change Amended Act reinstated</p>
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The **Declaration of Assets Unit** plays a crucial role in upholding transparency, accountability, and integrity among public officials, as mandated by key legislation including the **Public Officers’ Ethics Act 2008** and the **Public Persons (Declarations of Assets, Liabilities and Business Interests) Act 2016** (Act 26 of 2016), as amended.

The Declaration of Assets Unit receives, verifies, and manages these submissions with strict confidentiality and procedural fairness, while ensuring compliance with legal timelines and requirements. By maintaining accurate records and conducting reviews where necessary, the Unit acts as a frontline safeguard against corruption, fostering public trust in leadership and institutions. This process reinforces Seychelles' commitment to good governance, ethical standards, and international best practices, including alignment with the **United Nations Convention against Corruption (UNCAC)**, which emphasizes preventive measures such as asset disclosure for public officials.

In this annual report, the Declaration of Assets Unit presents a detailed account of its activities during the reporting period, including the number of declarations received and processed, compliance rates among public persons and officers, verification efforts, challenges encountered in administration and enforcement, and initiatives to enhance awareness and accessibility of the declaration process. These efforts highlight the Unit's

indispensable contribution to ACCS's comprehensive anti-corruption strategy, but also proactively builds a culture of transparency and accountability from the highest levels of public service.

Achievements

A total of 412 public officials from 29 public entities completed their declaration of assets in 2025 as per the list below:

1. Seychelles Petroleum Company (SEYPEC).
2. Seychelles Revenue Commission (SRC).
3. Department of Police.
4. Development Bank of Seychelles (DBS).
5. Judiciary.
6. Industrial Estates Authority (IEA).
7. Seychelles Maritime Safety Authority (SMSA).
8. Office of the President.
9. Public Service Bureau (PSB).
10. Seychelles Investment Bureau (SIB).
11. Seychelles Defense Forces (SDF).
12. Enterprise Seychelles Agency (ESA).
13. Ministry of Investment.
14. Seychelles Institute of Culture, Heritage and the Arts.
15. Legal Affairs Department.
16. Seychelles Bureau of Standards (SBS).
17. Ministry of Fisheries and Blue Economy.
18. Seychelles Home Care Agency.
19. Fair Trading Commission (FTC).
20. National Council for Children (NCC).
21. Seychelles Planning Authority.
22. National Bureau of Standards.

Training

Staff of the DOA Unit benefitted from a series of training activities in 2025 in areas of Public Integrity, Development of Syllabi for Corruption Prevention and Education as well as Supervisory Skills.

Challenges

The key challenges include:

- The declaration of assets process is manual and labor-intensive.
- Slow response from some entities to identify and notify employees eligible for declaration.
- The structure of the process leaves the burden of declaration on the ACCS rather than the initiative of public officials to declare their assets.

Recommendation

The key recommendation is to digitize that process of asset declaration with self-service user-friendly online platform. In order for ACCS to achieve this, there needs to be an overhaul of the Public Officers Ethics Act 2008 and bring it into line with the declaration of assets for Public Persons (Declarations of Assets, Liabilities and Business Interests) Act 2016

In 2025 all listed public officers under this Act completed their declaration of assets as opposed to three members of the National Assembly who did not complete their declaration of assets for 2024. This led to an internal investigation on the reasons why those members did not complete their forms. A deficiency in the sanction in this Act for failure to complete the form was identified and this was highlighted by the Commissioner of the ACCS to the National Assembly Committee which was set up to review this process in 2025.

In December 2025, the Public Persons (Declarations of Assets, Liabilities and Business Interests) Act 2016 was reinstated and the amended version from 2020 was repealed. All public officers who must complete their declaration of assets form will need to declare assets for their spouse and dependent children under the age of 18.

The change in the law has meant a setback in the digitization of this process.

Policy and Compliance

The Policy and Compliance Unit outlines its activities during the reporting period, including policy developments, compliance reviews, monitoring reports, evaluation findings, contributions to international reporting obligations, and collaborative efforts to advance Seychelles' standing in global anti-corruption indices such as the Transparency International Corruption Perceptions Index. These efforts underscore the Unit's vital role in bridging policy and practice, ensuring that anti-corruption measures are not only reactive but proactive, measurable, and internationally compliant.

As Seychelles continues to build on its reputation for progress in governance and integrity—bolstered by strong international partnerships, the Unit remains dedicated to driving systemic change, upholding Seychelles' treaty obligations, and cultivating an environment where ethical standards are embedded, compliance is routine, and the nation's commitment to a corruption-free future is demonstrated through tangible, sustainable results.

Achievements

Core Objectives

During the reporting period, the office pursued three strategic objectives:

1. **Institutional Credibility:** Strengthening public and institutional trust in the ACCS while reinforcing its reputation internally and externally.
2. **Data-Driven Oversight:** Establishing systematic processes for the collection, management, and analysis of data to support accurate, evidence-based reporting.
3. **Compliance Assurance:** Ensuring full adherence to national legislation, regulatory frameworks, and international obligations governing anti-corruption practices.

National and International Engagements

National AML/CFT Committee / Technical AML/CFT Committee (NAC/TAC)

- Submitted quarterly ACCS AML/CFT statistics for national data compilation, ensuring alignment with FATF methodology.
- Supported Seychelles' readiness for Mutual Evaluation and contributed to ESAAMLG compliance processes.

National Integrity Committee (NIC)

- Strengthened inter-agency collaboration through monthly meetings, advancing the Open Governance Plan (OGP)
- Supported implementation of a comprehensive nation-wide education programme to strengthen civic literacy, promote integrity, and enhance trust in public institutions by educating students, the public, and public sector employees on constitutional mechanics, administrative justice, human rights, the rule of law, and good governance.

Southern African Development Community (SADC)

- Coordinated national and regional efforts to harmonize AML/CFT strategies.
- Secured Seychelles' acceptance into the **SADC Regional Anti-Corruption Effort Index**, reinforcing regional credibility and potential to pilot the assessment of the Regional Anti-Corruption Effort Index in Seychelles in 2026.

Organisation for Economic Co-operation and Development (OECD)

- Engaged on the Public Integrity Indicators (PII) to enhance transparency and governance and coordinated the initiative with the Ministry of Finance and the Judiciary to strengthen institutional integrity.

Other International Bodies

- Contributed to self-assessments and surveys with:
 - **UNCAC/UNODC** (United Nations Convention Against Corruption / United Nations Office on Drugs and Crime)
 - **AUABC** (African Union Advisory Board on Corruption)
 - **CAACC** (Commonwealth Africa Anti-Corruption Centre)
- Reinforced Seychelles' commitment to global AML/CFT standards and integrity frameworks.

Challenges

The potential to expand, develop and assume functions and implement objectives related to the required standards of compliance, monitoring and evaluation in anti-corruption by the Unit is limited due to the lack of the required number qualified staff and associated resources.

Recommendations

- Expand the Unit to a fully staffed department that will
- Strengthen domestic monitoring and evaluation capacity through targeted training and resource allocation, in close collaboration with the Prevention Unit.
- Enhance inter-agency collaboration to improve data quality and reporting consistency.
- Expand participation in regional and global forums to maintain Seychelles' leadership role.
- Invest in digital tools to streamline compliance tracking and reporting.

In 2025, the Compliance & Monitoring Office reinforced Seychelles' commitment to national, regional, and international anti-corruption and AML/CFT standards. Through its contributions to domestic governance processes, technical assessments, and international forums, the Unit strengthened institutional credibility and advanced Seychelles' standing as a proactive partner in the global fight against corruption and financial crime.

Looking ahead, the office will continue to consolidate its monitoring and evaluation capacity, deepen inter-agency collaboration, and leverage technology to ensure that compliance processes remain robust, effective, and aligned with international best practices.

Partnership and Collaboration

Local Cooperation and Collaboration

Role and Collaboration of the Anti-Corruption Commission of Seychelles (ACCS) in the National Integrity Coalition (NIC)

The Anti-Corruption Commission of Seychelles (ACCS) is a founding and pivotal member of the National Integrity Coalition (NIC), a multi-stakeholder platform uniting government, civil society, private sector, media, and development partners to advance integrity, transparency, and good governance across Seychelles. The ACCS supports the NIC's anti-corruption agenda by providing technical leadership, coordinating prevention initiatives, and facilitating dialogue on national integrity policies.

The ACCS's anti-corruption leadership within the NIC advocated for accountability across sectors, mitigation of systemic threats like policy capture and illicit financial flows and

empowering civil society to monitor and demand transparency. This multi-stakeholder collaboration amplifies prevention efforts, strengthens public trust, and reinforces Seychelles' position as a regional leader in good governance, safeguarding sustainable development and the rule of law for future generations.

Memorandum of Understanding with Competent Local Entities

ACCS has established and maintained, a series of Memoranda of Understanding (MoUs) with various local entities to strengthen its ability to prevent, detect, and combat corruption through enhanced collaboration, information sharing, and coordinated action. These MoUs are essential because corruption in Seychelles often involves multiple sectors and institutions—such as public procurement, financial services, law enforcement, customs, immigration, and the private sector—where no single agency can address the problem alone. By formalizing partnerships, the ACCS gains access to critical data, expertise, and operational support that improve the effectiveness of investigations, risk assessments, and prevention initiatives while ensuring compliance with national laws like the Anti-Corruption Act 2016 and international standards such as UNCAC.

The advantages of these MoUs are significant. They facilitate timely intelligence exchange (e.g., with the Financial Intelligence Unit for suspicious transactions), streamline inter-agency referrals (e.g., with the Police or Attorney General's Office for prosecution), and support joint training and awareness programs (e.g., with the Public Service Bureau or civil society organizations). This collaborative framework reduces duplication, accelerates case progression, builds institutional trust, and creates a whole-of-society approach to integrity. Ultimately, these agreements enhance the ACCS's preventive impact, strengthen public confidence in governance, and contribute to a more resilient, transparent, and corruption-resistant Seychelles.

During 2025 ACCS has worked closely with these partners in different programmes and activities both locally as well as through international collaborations and training.

Table 5: List of Competent Authorities with Active MOU During 2025

Competent authorities	Date Signed
Transparency Initiatives Seychelles	03.04.2018
Financial Intelligence Agency (FIU)	14.08.2020
Seychelles Licensing Authority (SLA)	12.10.2020
Financial Services Authority (FSA)	23.12.2020
Seychelles Revenue Commission (SRC)	09.03.2021
The Office of the Registrar General	25.03.2021
Central Bank of Seychelles (CBS)	29.03.2021
Ministry of Finance (IAD)	03.08.2021
Seychelles Prison Service	20.03.2023
Information Commission	06.08.2024

International Cooperation and Collaboration

ACCS actively participates in international and regional forums to strengthen its capacity, share best practices, and align with global anti-corruption standards. These engagements are vital for enhancing cross-border cooperation, accessing technical assistance, and contributing to the global fight against corruption under frameworks such as the United Nations Convention against Corruption (UNCAC). The table below highlights selected key international events attended or monitored by the ACCS in recent years, demonstrating the Commission's commitment to learning, networking, and advancing anti-corruption efforts through collaboration.

Table: Key International Anti-Corruption Engagements in 2025

Forum / Event	Significance
UNODC: 16th UNCAC Implementation Review Session	Platform for peer review and progress assessment under UNCAC
Corruption Hunters Network Meeting (hosted by Norway)	Focused on investigative techniques, asset recovery, and international cooperation
49th ESAAMLG Task Force of Senior Officials Meeting	Regional AML/CFT forum critical for corruption-linked financial crimes
IACCC Associate Member Scheme (AMS) Meeting	Intelligence sharing and joint operations with associate members
34th session CCPCJ (UN)	UN forum on crime prevention, criminal justice, and anti-corruption policies
50th ESAAMLG Council of Ministers	Ministerial AML/CFT compliance meeting for Eastern and Southern Africa
30th Annual IAP Conference	Global prosecutors' exchange on prosecuting corruption and financial crimes
11th session COSP to UNCAC	Highest decision-making body of UNCAC; reviews of implementation and resolutions

These forums underscore the importance of international collaboration in building technical capacity, harmonizing legal approaches, and strengthening Seychelles' role in the global anti-corruption movement. Through active participation, the ACCS enhances its capabilities while contributing to regional and international integrity standards.

Part 5 Institutional Development and Sustainability

Long-Term Vision

The **Anti-Corruption Commission of Seychelles (ACCS)** envisions a resilient, independent, and enduring institution that stands as a permanent pillar of integrity, transparency, and good governance in Seychelles for generations to come. Over the next decade, the Commission aspires to institutionalize itself fully as a self-sustaining, adaptive, and highly effective body capable of confronting the evolving forms and challenges of corruption, ranging from traditional bribery and embezzlement to sophisticated financial crimes, cyber-enabled schemes, transnational illicit flows, and emerging risks in digital governance and climate-related funding, while operating within the realities of limited resources and capacity constraints inherent to a small island developing state.

This long-term vision is anchored in a deliberate strategy of proactive institutional strengthening. The ACCS will prioritize the development and continuous refinement of robust policies, ethical standards, operational guidelines, and innovative legal instruments that align with national needs and international best practices, including full implementation of the **United Nations Convention against Corruption (UNCAC)** and relevant regional frameworks.

These instruments will encompass enhanced preventive mechanisms, whistleblower protections, asset declaration systems, digital reporting tools, risk-based monitoring frameworks, and inter-agency cooperation protocols to maximize impact with finite human, financial, and technological resources.

By embedding sustainability at its core, the Commission aims to build enduring capacity through strategic investments in staff training, succession planning, knowledge management, and partnerships with public, private, and civil society sectors. This includes fostering a culture of excellence, ethical leadership, and innovation within the ACCS itself, ensuring that the institution remains agile, evidence-driven, and responsive to emerging corruption threats without compromising its independence or impartiality.

Ultimately, the ACCS's vision for the next 10 years is to transition from an emerging anti-corruption authority into a mature, respected, and indispensable national institution—one whose existence is secured not by transient political will, but by entrenched legal safeguards,

proven effectiveness, broad societal ownership, and measurable contributions to a corruption-free Seychelles. Through this institutionalized approach, the Commission will proactively deter corruption, deliver justice equitably, safeguard public resources, and inspire a national ethos of integrity, accountability, and **collective** responsibility of all government ministries, departments and agencies.

In doing so, it will help secure a prosperous, fair, and resilient future for all Seychellois, where corruption finds no space to thrive and where trust in institutions is continuously earned and reinforced.

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ANTI-CORRUPTION COMMISSION OF SEYCHELLES · ACCS

OUR THREE FOUNDING COMMITMENTS



●

Deter Corruption

Proactively deter through institutional presence, enforcement, and societal norm-building



●

Deliver Justice

Pursue equitable prosecution and recover misappropriated public resources for all Seychellois



●

Inspire Integrity

Embed a national ethos where trust in institutions is continuously earned and reinforced

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ANTI-CORRUPTION COMMISSION OF SEYCHELLES · INTEGRITY · GOOD GOVERNANCE ·

TRANSPARENCY · ACCOUNTABILITY · TEAMWORK

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Defining Political Will and Support in the Context of the ACCS Vision

Political will refers to the sustained commitment, determination, and proactive leadership demonstrated by government officials, policymakers, and state institutions to prioritize and advance anti-corruption reforms. In the case of the Anti-Corruption Commission of Seychelles (ACCS), this manifests as a genuine resolve to embed the Commission as a permanent, independent entity within the national governance framework. It goes beyond rhetorical support or short-term initiatives, encompassing concrete actions such as enacting enabling legislation, allocating resources, protecting institutional independence, and fostering cross-sectoral collaboration. Political will is essential for overcoming resistance from vested interests, navigating bureaucratic hurdles, and ensuring that anti-corruption efforts evolve in response to emerging threats like digital corruption or transnational financial flows. Without it, even well-designed visions risk stagnation, as seen in other jurisdictions where anti-corruption bodies have been undermined by inconsistent backing or political interference.

Support and Resources Needed from the State

To realize the ACCS's vision of long-term institutionalization through robust policies, standards, and legal instruments that ensure sustainability amid evolving corruption challenges and resource limitations, the State must provide multifaceted support and resources. This includes:

- **Legislative and Policy Support:** The State should enact or amend laws to grant the ACCS enhanced powers, such as expanded investigative authority, mandatory inter-agency data sharing, and protections against undue influence. This could involve integrating ACCS recommendations into national development plans, like Seychelles' Vision 2033 or Sustainable Development Goals (SDGs), to align anti-corruption with broader economic and social objectives. Additionally, the State must champion public awareness campaigns alongside ACCS and integrate anti-corruption education into school curricula and civil service training to build societal buy-in.
- **Human and Technical Resources:** Given Seychelles' capacity constraints as a small island nation, the State needs to invest in recruiting and retaining skilled personnel for the ACCS, including **experts in forensic accounting, cyber forensics, and prosecution of financial crimes and money laundering**. This could involve funding specialized training programs, partnerships with international bodies like the UNODC, FBI, IACCC or Commonwealth Secretariat and providing access to

advanced tools such as digital forensics software, secure databases, and AI-driven risk assessment systems. Resource-sharing arrangements with other government agencies (e.g., the Financial Intelligence Unit or Attorney General's Office) would optimize limited capacities without duplicating efforts.

- **Operational and Infrastructural Support:** The State should ensure the ACCS has secure, modern infrastructure and facilities equipped for confidential operations, including regional outreach offices on Praslin and La Digue to enhance accessibility in the country. This extends to logistical support for investigations, such as transportation for field work and secure communication channels to protect whistleblowers.

Focus on Financial Autonomy

Financial autonomy is a cornerstone of the ACCS's sustainability, enabling it to operate independently without being beholden to annual budgetary limits or political pressures that could compromise its impartiality. Defined as the ability to secure, manage, and allocate funds free from external control, it ensures the Commission can pursue long-term strategies, invest in capacity-building, and respond agilely to corruption trends over the next decade.

To achieve this, the State must provide:

- **Stable and Predictable Funding Mechanisms:** Shift from discretionary annual allocations to a statutory funding formula, such as a fixed percentage of the national budget (e.g., 0.5-1% of GDP) or dedicated revenue streams from recovered assets as per the AML/CFT Act 2020 (as amended) section 94 (e), fines, or international grants.
- **Budgetary Independence with Oversight:** Grant the ACCS authority to prepare and defend its own budget directly to the National Assembly, bypassing executive interference, while subjecting it to independent audits by bodies like the Auditor General. This balance ensures fiscal responsibility without curtailing autonomy, allowing the Commission to allocate resources toward priority areas like policy development and monitoring in a resource-scarce environment.

In essence, political will and state support are interdependent: the former drives the provision of the latter, creating a virtuous cycle that institutionalizes the ACCS. By focusing on financial autonomy, the State not only secures the Commission's existence but also amplifies its impact, fostering a corruption-resilient Seychelles where integrity underpins national progress.

Making the Case for a National Anti-Corruption Strategy

International Obligations

As a State Party to UNCAC, ratified in 2006, Seychelles is required under Articles 5 and 6 to develop and implement coordinated anti-corruption policies, including national strategies that promote participation from society and reflect principles of efficiency, transparency, and accountability. A national strategic plan would facilitate Seychelles' compliance with UNCAC implementation reviews, enhance access to UNODC technical assistance, and strengthen partnerships under ESAAMLG.

In the context of Seychelles' ongoing battle against corruption, the development, approval, and implementation of a comprehensive National Strategic Plan for Anti-Corruption represent a critical step forward. As a small island developing state with a population of over 100,000 and a tourism-dependent economy, Seychelles faces unique vulnerabilities to corruption, including risks in public procurement, natural resource management, foreign investment, and transnational financial flows.

While corruption has historically posed challenges, manifesting in issues like nepotism, bribery, and misuse of public funds, the nation has made significant strides in recent years, transforming its anti-corruption landscape through institutional reforms and proactive enforcement. These achievements underscore the value of sustained, strategic action, making a national plan not just beneficial but essential to consolidate gains, address emerging threats, and fulfill international commitments.

Despite Seychelles successes so far, the evolving nature of corruption demands a forward-looking approach. Corruption is no longer confined to overt acts but increasingly involves sophisticated schemes like cyber-enabled fraud, money laundering through offshore structures, and climate finance mismanagement, challenges amplified by Seychelles' geographic isolation and limited resources. Without a unified National Strategic Plan, efforts risk fragmentation, duplication, or insufficient adaptation to these threats. Such a plan would provide a roadmap for the next decade, integrating preventive measures, enforcement enhancements, capacity-building, and monitoring mechanisms to build on current rankings and aim for sustained top-tier performance. It would ensure resource optimization in the context of financial and resource constraints, prioritizing high-impact areas like digital governance tools and inter-agency coordination, thereby preventing regression and fostering resilience.

This imperative is further justified by Seychelles' obligations under international conventions, treaties, and standards. As a State Party to the United Nations Convention against Corruption (UNCAC), ratified in 2008, Seychelles is required under Articles 5 and 6 to develop and implement coordinated anti-corruption policies, including national strategies that promote participation from society and reflect principles of efficiency, transparency, and accountability. UNCAC emphasizes preventive policies (Article 5) and the establishment of independent bodies like the ACCS (Article 6), mandating periodic reviews and international cooperation to combat transnational corruption. Aligning with these provisions through a national plan would facilitate Seychelles' compliance with UNCAC implementation reviews, enhance access to technical assistance from bodies like the United Nations Office on Drugs and Crime (UNODC), and strengthen partnerships under regional frameworks such as the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG). Moreover, it would incorporate best practices from global leaders in anti-corruption, which have thrived through strategic planning that includes risk assessments, public-private partnerships, and measurable outcomes.

In essence, proceeding with a National Strategic Plan is vital to institutionalize Seychelles' anti-corruption gains, safeguard against future risks, and honor international commitments. By doing so, the nation can elevate its global standing further, ensure equitable development, and cultivate a culture of integrity that benefits all Seychellois, proving that proactive, strategic action is the key to enduring success in the fight against corruption.

It is in that context the ACCS throughout 2025 has been advocating for action by Government as per the recommendation of the International Affairs Committee of the Seychelles National Assembly from its report dated Wednesday 27th October 2021, Point 3.1, *“That the Government of Seychelles implements a National Strategic Plan on Corruption by initiating a meeting with the Anti-Corruption Commission and other relevant stakeholders as soon as practicable”*. This matter was also tabled at the National AML/CFT Committee in 2024 and again in 2025.

Conclusion

The numbers in this report tell a compelling story, but they must not be allowed to breed complacency. These are not routine statistics. They represent 9 years of painstaking work by a Commission that operates with 40 staff, a budget that requires mid-year emergency supplementation, and no dedicated national anti-corruption strategy to anchor the whole-of-government effort this fight demands.

The ACCS has delivered results that far exceed its resources, not a cause for celebration, but an indictment of chronic underfunding. Corruption does not rest. It does not wait for adequate budgets. It does not pause while vacancies go unfilled or while charge sheets sit awaiting external counsel review. Every structural gap documented in this report is a window of opportunity for those who would exploit public office for private gain, and Seychelles cannot afford to leave those windows open.

The path forward is neither ambiguous nor optional. Government must match the Commission's resolve with the political will, legislative backing, and sustained financial investment that this mandate requires.

In-house specialist capacity in financial crime, prosecution, and digital forensics must be built, not indefinitely borrowed. The digitisation of asset declaration, the expansion of the Prevention Unit to departmental level, the provision of secure and purpose-fit facilities, none of these are aspirational extras; they are operational imperatives.

Seychelles has earned its reputation as Africa's integrity leader through hard work and institutional courage. That reputation is not permanent. It is renewed, or it is lost, in the choices made today. The ACCS stands ready. The question is whether the government, institutions, and society, will stand with it just as our international partners do.

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