PART II ANTI-CORRUPTION

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I. Introduction

The year 2021 experienced the beginning of the National 14th Five-Year Plan and the second Five-Year Plan of the Macao SAR as well as the 7th Legislative Assembly Elections. The CCAC closely complemented the policies of the Macao SAR Government, deepened the effective implementation of the policy of "One Country, Two Systems" and strictly adhered to the basic principles of acting in accordance with law. Also, it spared no effort to supervise the Legislative Assembly Elections and the Government's execution of policies and protect the commercial environment of Macao.

In 2021, the CCAC performed the duty to supervise the Legislative Assembly Elections in accordance with law so as to enhance the fairness, justice, openness and integrity of the process of the 7th Legislative Assembly Elections. Regarding the Government's execution of policies in 2021, the CCAC carried out holistic supervision, from case investigation to systemic examination. As to combat of corruption crimes, the CCAC, for the first time, succeeded in hunting a fugitive down under the framework of "One Country, Two Systems". Under the novel coronavirus pandemic, it is very important to protect the vulnerable commercial environment of Macao. Therefore, in 2021, in addition to the crackdown on corruption cases in the private sector, the CCAC attached great importance to the safeguard of legitimate interests of enterprises and protection of a fair commercial environment.

Throughout 2021, the anti-corruption works were carried out at a reasonable pace in an orderly manner and thus the goals related to integrity set in the Government's policies were achieved. The anti-corruptions work in 2021 had the following features:

Firstly, although the supervision of the elections was the focus of anti-corruption work, the CCAC did not slack off in regular anti-corruption actions. Before mid-September 2021, the CCAC deployed major resources to supervise the elections. After the elections, the CCAC quickly completed the investigation of the cases related to the elections and dealt with the cases involving illegal conducts related to the elections in accordance with law. Subsequently, the focus was shifted back to regular crackdowns on corruption cases.

Secondly, in 2021, there was an increase in the detected cases involving occupational crimes and disciplinary offences committed by police officers. Meanwhile, there was an evident decrease in frauds over various public funds that used to be rampant over the previous years, proving the effectiveness of the forceful crackdowns on fraud over public money that the CCAC has been carrying out for many years and the constant improvement of system building.

Thirdly, the CCAC, again, persisted in acting with perseverance. With great support by the public security departments of the Chinese mainland and the Judiciary Police of Macao, the CCAC succeeded in hunting down a former leader of the former Land, Public Works and Transport Bureau (currently the Land and Urban Construction Bureau) who had been living in the Chinese mainland for a long time.

In 2021, the CCAC completed the intensive 11th recruitment of and training for investigators, injecting new blood for corruption fighting. The investigators who completed the entire training programme timely joined the supervision on the elections.

II. Criminal reports and cases placed on file for investigation

Among the complaints or reports involving corruption received by the CCAC in 2021, 119 were placed on file for investigation, which included seven mutual assistance cases and 28 cases related to the Legislative Assembly Elections. The statistics on corruption cases handled by the CCAC between 2019 and 2021 are shown in the following table:

ltem	2019	2020	2021
Corruption cases handled	111	107	119
Cases of which the investigations have been concluded	187	149	125

Statistics on cases handled between 2019 and 2021

Of the corruption cases of which the investigations were concluded in 2021, 13 have been referred to the Public Prosecutions Office for the purpose of commencing criminal investigation, while 112 have been archived.

III. Supervision on the elections

(1) Overview

The year 2021 experienced the Legislative Assembly Elections of Macao. In cooperation with the Legislative Assembly Elections Affairs Management Committee and other law enforcement departments, the CCAC deployed all resources to conduct all-out supervision on the 7th Legislative Assembly Elections in accordance with law. Specific deployments were made accordingly for the supervision of different phases of the elections.

2021 Annual Report of the Commission Against Corruption of Macao

Before 8th March 2021, the focus was to perfect and equip the team. Therefore, the leaders and chiefs of the CCAC formed the antielectoral corruption task force to make proactive planning, precisely collect intelligence and data related to the elections and carry out quick screening and preliminary analysis of related complaints and reports.

As of 8th March 2021 when the Chief Executive determined the date of the Legislative Assembly Elections, the CCAC launched the "Webpage on clean elections 2021", a 24-hour



CCAC spared no effort to safeguard the integrity of the 7th Legislative Assembly Elections

complaint hotline and an online complaint platform on the Legislative Assembly Elections in order to receive citizens' complaints and enquiries about illegalities related to the elections. Up to 10th September 2021, the CCAC received a total of 137 complaints and 113 enquiries. Meanwhile, in order to prevent and monitor electoral bribery, the CCAC carried out supervision through various means openly and secretly. It intervened into and investigated suspicious activities where advantages were given and focused on catering activities and activities where civic associations gave gifts and elderly allowance. Regarding the alleged irregularities, the CCAC actively exercised its competence to intervene into the situations and request the civic associations or individuals involved to rectify them.

In August when the elections were approaching, the leadership of the CCAC invited all candidate teams running for the direct election to the CCAC, where they explained to the teams the details about electoral bribery and the points that they should pay attention to during the electoral campaign period prescribed in the *Electoral Law* of the Legislative Assembly. In particular, clear advice was given to the civic associations involving distribution of various advantages before the elections.



"Webpage on clean elections 2021"

During the electoral campaign period of the Legislative Assembly Elections that started on 28th August 2021, the CCAC dispatched personnel to supervise the activities organised by every candidate team and those attended by the candidates in order to supervise if there were any illegal actions and investigate and handle them immediately once any of them were detected.

On 11th September 2021 when electoral campaign was banned, the CCAC dispatched personnel to carry out inspections in the city in order to check whether there were electioneering activities and materials and immediately take actions against the alleged illegalities or refer them to the competent entities for follow-up. On the day, the CCAC received seven complaints and four enquiries about the elections.

On the cooling-off day and the polling day, the CCAC sent all personnel to carry out holistic and ceaseless inspections in every corner of the city, from the polling stations to the campaign headquarters, from the sites of civic associations and relevant streets and buildings, and immediately dealt with the problems found. The 14 candidate teams and the related civic associations were treated and supervised equally and impartially. On the polling day, the CCAC received 23 complaints and 23 enquiries about the elections.

The all-round supervision carried out by the CCAC has safeguarded the fairness, justice, transparency and integrity of the process of the 7th Legislative Assembly Elections.

(2) Effectiveness of electoral supervision and related cases

Between 8th March and 12th September 2021, the CCAC carried out a total of 13,089 on-site inspections, including 765 on 11th September and 4,186 on the polling day on 12th September.

Meanwhile, the CCAC carried out inspections against illegal propaganda on the internet. In particular, on 11th September 2021, a total of 2,617 internet inspections were carried out and 84 alleged illegal acts were detected. On the polling day on 12th September, 4,132 internet inspections were carried out and 16 alleged illegal acts were detected.



All-round supervision of the Legislative Assembly Elections in accordance with law

When conducting supervision on the elections, the CCAC put a total of 28 cases on file for investigation, including four on file for inquiry and two on file for misdemeanour. Some of the cases are summarised as follows:

(I)

On 3nd August 2021, the CCAC completed the investigation into a case involving a staff member of a concessionaire who had allegedly violated the duty of neutrality provided by the *Electoral Law of the Legislative Assembly* and referred it to the Public Prosecutions Office for follow-up.

Bound by the guidelines issued by the Legislative Assembly Elections Affairs Management Committee, the concessionaire involved shall remain neutral in the Legislative Assembly Elections. However, it was found in the investigation that a managerial member of the concessionaire gave the employees the nomination forms of a group that intended to run for the elections and asked them to sign the forms in the course of his duty. He even instructed a department under his charge to collect the forms signed by the employees. Therefore, his acts have constituted violation of the duty of neutrality and aggravated disobedience.

(II)

On 26th October 2021, the CCAC completed the investigation into a case of alleged electoral bribery and referred it to the Public Prosecutions Office for follow-up.

It came to light in the investigation that a relative of a candidate called on others to vote for the candidate group and promised to offer money as reward through posts from two accounts on WeChat during the electoral campaign period. Although his act was not masterminded by anyone and the posts had been deleted within a short time, it has allegedly constituted electoral bribery under the *Electoral Law of the Legislative Assembly*.

(III)

During the electoral campaign period, the CCAC found in an inspection that a clansmen association held an activity with the purpose of giving advantages to its members, but it did not declare to the Legislative Assembly Elections Affairs Management Committee the fact that the honorary president of the association was a candidate running for the Legislative Assembly Elections in accordance with Article 75-C of the *Electoral Law of the Legislative Assembly*, thus constituting illicit acts related to the duty of declaration under the same law. The CCAC laid charge against the clansmen association. Then the latter voluntarily paid a fine of MOP10,000 within the statutory time limit.

Moreover, it was found in the investigation that the trustee of a candidate group gave the electoral campaign materials of the group to the said clansmen association so that it would help distribute them to its members. Since this was an electoral propaganda activity held in the electoral campaign period, the

Legislative Assembly Elections Affairs Management Committee should have been notified in accordance with Article 75-B of the *Electoral Law of the Legislative Assembly*. It was discovered that the trustee did not give the notification, thus constituting a misdemeanour of failure to give notification of electoral propaganda activity under the *Electoral Law of the Legislative Assembly*. The CCAC laid charge against the trustee involved. Then the latter voluntarily paid a fine of MOP10,000 within the statutory time limit.

(IV)

The CCAC received a report alleging that a local bus company suddenly gave each employee MOP6,500 for the reason that the company had been upgraded to be a second grade company and requested them to support a certain candidate group. Also, the parent company of the bus company gave its employees MOP9,000 and requested them to support a certain candidate group, giving rise to suspicion of vote buying.

Following the investigation, it was substantiated that the company mentioned above gave the employees of the bus company an "anti-epidemic subsidy" amounting to between MOP6,500 and MOP9,000 respectively in 2020 and 2021. However, the said subsidy was merely a welfare benefit for the employees and it neither mentioned anything about electoral propaganda to them nor implicitly or explicitly requested them to support a certain candidate group. Therefore, the case has been archived.

(V)

During the election period, the CCAC received a report alleging that a clansmen association held an electoral propaganda activity in its site during the electoral campaign period and distributed the electoral campaign materials of a certain candidate group to its members during the activity, giving rise to suspicion that the association influenced voting intention through distribution of electoral campaign materials and that the case might involve electoral bribery.

It was found in the investigation that the electoral propaganda activity mentioned in the report had been declared to the Legislative Assembly Elections Affairs Management Committee beforehand. Therefore, the suspicion of failure of declaration was unfounded. Moreover, following an estimation of the value of the materials distributed to the participants and an analysis of the speeches given and what was done during the activity, there was no sufficient sign showing influence on voting intention through the electoral campaign materials. Therefore, the case has been archived.

(VI)

The CCAC received an online report alleging that a service centre, as an organisation which had been providing service procured by the Government for a long time, called on people to sign nomination forms and vote for a certain group who intended to run for the elections through sending SMS messages. The report also mentioned that the workers of the centre requested seniors to vote for the relevant candidate group after signing the nomination forms.

It was discovered in the investigation that the centre had sent SMS messages to the service users and their relatives in order to assist a certain group who intended to run for the elections to collect nomination from citizens, but it did not request the receivers or seniors to vote for any candidate groups. The money spent on the sending of the messages was paid by a civic association and did not involve public fund, while the act of sending the SMS messages mentioned above had been defined by the Legislative Assembly Elections Affairs Management Committee as not involving illegal campaign. Therefore, the case has been archived as it did not involve illegality or irregularity.

Since the said service centre has assisted the civic association in sending SMS messages to the service users and their relatives for collection of nomination, the Social Welfare Bureau has reported to the Office for Personal Data Protection the fact that the centre failed to appropriately handle the contact information of the service users and their relatives.

IV. Summaries of some of the cases

Among the corruption cases of which the investigations were completed in 2021, except the cases related to the elections, the CCAC has selected some of the cases referred to judicial entities for follow-up or request for judicial measures and some of the archived cases. They are summarised as follows:

(I)

In early 2021, the CCAC cracked down a case involving bank workers who colluded with a crime syndicate to defraud over loans from banks.

It was discovered in the investigation that the syndicate masterminded by a Macao citizen apparently engaged in real estate brokerage, but actually, they secretly provided personal loans and charged high interest rates. When the borrowers were unable to repay the loans, they would be requested to participate in document forgery for application for bank mortgage loans, which would serve as the repayments. In addition, those borrowers were charged large amounts of handling fees. The syndicate also looked for citizens who desperately needed money in casinos or through third parties or newspaper advertisements for "speedy loan approval" in an attempt to defraud the banks into approving the fraudulent mortgage applications with falsified proofs of income and passbook copies. Some bank manager even falsified some documents on his own and used them to apply for loans from different banks, which were then spent on investment in and operation of the syndicate and purchase of borrowers' properties at a price lower than the market price.

Between 2010 and 2020, the syndicate already defrauded the banks into approving 362 loan applications made by 378 persons, involving at least MOP770 million. It received illicit gains totalling over MOP219 million.

Meanwhile, it came to light in the investigation that some bank workers involved had violated the provisions of confidentiality of financial institutions by illicitly revealing customers' data to members of the syndicate.

The CCAC referred the case to the Public Prosecutions Office for follow-up in January 2021 and reported the situations to the banks involved so that they would strengthen the supervision, vetting and approval of applications for mortgage loan.

(II)

In February 2021, the CCAC cracked down a case involving a public servant who defrauded over public fund. There was a report mentioning that the public servant allegedly purchased goods at a low price through an online shopping platform from the Chinese mainland when procuring public goods and submitted a fake receipt issued by a local supplier for claiming back the expense in attempt to earn the price differences.

Following an investigation, the CCAC found that an assistant officer of the Juvenile Reformatory School under the Correctional Services Bureau was responsible for the sale of products in a trade fair organised by the bureau every year. The assistant officer purchased goods through an online shopping platform from the Chinese mainland on his own and asked a local shop to issue a receipt. Subsequently, he submitted the receipt to the Correctional Fund to claim back the expenses in order to pretend that the goods were bought from the local shop. It was also found in the investigation that the quantity and price of the goods purchased by the public servant through the online shopping platform did not accord with those stated for expense claiming. The quantity and price of the purchased goods were overstated.

The perpetrator has allegedly committed one count of fraud in accordance with the *Penal Code*. The case was referred to the Public Prosecutions Office for follow-up in February 2021. The CCAC has reported the case of disciplinary offence allegedly committed by the public servant to the Correctional Services Bureau for follow-up and requested the Juvenile Reformatory School to review the process of procurement and management of goods in order to ensure reasonable use of public fund.

(III)

The CCAC received a report from the University of Macau (UM) indicating that an administrative officer of the Construction and Engineering Section of the UM participated in the tendering, tender evaluation and construction stages of the construction project of two colleges of the UM. However, he prepared the tender document for the company that won the tender and part of the works was subcontracted out to a company in which he had a shareholding. Moreover, the administrative officer neither made any declaration nor recused himself from the situations. In July 2020, the UM disciplined the administrative officer with justifiable dismissal.

Following an in-depth investigation, the CCAC discovered that the administrative officer colluded with two men from the Chinese mainland. They reached an agreement with the branch company of a state-owned construction company in Macao that they would be responsible for assisting the company in preparing the tender document and a fake "list of relevant construction experience" in order to falsely claim that the company had experience in campus construction works. They also suggested the company bidding for the relevant college construction project with a price lower than the budget internally determined by the UM, resulting in the company winning the construction contract with a value of MOP220 million. Following tender opening, the said construction company newly established by the administrative officer and the two men from the Chinese mainland right before the tender opening.

The three persons mentioned above and the two persons in charge of the company that won the contract have allegedly committed passive bribery to perform illicit acts, active bribery and document forgery in accordance with the *Penal Code*.

In addition, it was also found in the investigation that in July 2016, the administrative officer sent confidential information about a connecting corridor construction project of the UM to a person in charge of another construction company limited by his personal email so that the latter knew in advance that the university would soon commence the project. As a result, the company gained an advantage over the open tendering and eventually won the contract. His act has allegedly constituted breach of secrecy in accordance with the *Penal Code*.

The case was referred to the Public Prosecutions Office for follow-up in September 2021.

(IV)

According to a complaint made to the CCAC in person by a resident, a senior police officer of the Public Security Police Force (CPSP) allegedly accessed his and his friend's immigration records, which constituted a breach of professional ethics that uphold integrity and self-discipline.

After investigation it was found that, in 2018, a senior police officer of the CPSP, who did not have the right to access immigration records, borrowed the account from another senior police officer and secretly logged in the relevant system to access the immigration records of the aforesaid resident and his friend. The act of the senior police officer, which was not authorised or intended for investigation of cases, was carried out to achieve his personal purposes.

The acts of the aforesaid two senior police officers not only constituted a breach of obligations of public servants, but also the crime of undue access provided for and punishable by the *Personal Data Protection Act* and the crime of illegitimate acquisition, use or provision of computer data provided for and punishable by the *Law on Combating Computer Crime*. The case was referred to the Public Prosecutions Office in October 2021 and the relevant situation was notified to the CPSP so that disciplinary liability of the relevant personnel may be pursued.

(V)

In the course of the investigation into a bribery case, the CCAC discovered that a former leader of the former Land, Public Works and Transport Bureau (currently the Land and Urban Construction Bureau, hereinafter referred to as the former DSSOPT) allegedly received advantages of high value from businesspersons personally and through his relative and abused his power by illicitly approving some applications for construction works permits during his tenure.

The investigation of the case revealed that during his tenure, the former leader of the former DSSOPT, knowing that the street alignment plan of a construction project had already expired, still allowed application of the expired street alignment plan to the construction project, so that the project did not need to be subject to discussion by the Urban Planning Committee. At the same time, although the former leader knew that the construction project went against the provisions under the relevant architectural administrative instructions, he still allegedly instructed his subordinates to approve the construction project, so that the application was finally approved.

It was also found in the investigation that a businessperson involved allegedly assisted a relative of the former leader to falsely buy a share in a subsidiary of his group in the name of investment of the company, through which the relative applied for residency by major investment to the Macao Trade and Investment Promotion Institute, and the application was eventually approved.

Moreover, it was found that the former leader allegedly received advantage of high value from another businessperson in return for bypassing the statutory procedures and speeding up the inspection and acceptance of the relevant construction works. Finally, the use licence was issued just before the expiry of the land use period. The former leader was also suspected of requesting his subordinates to give favourable opinions in the analysis in the process of the vetting and approval of a combined land development project so that the developer was awarded the land concession and subsequently gained massive profit by selling it at a high price.

The former leader allegedly committed passive bribery to perform illicit acts, money laundering and document forgery, while the businesspersons and individuals involved allegedly committed active bribery, money laundering and document forgery. After the case was referred to the Public Prosecutions Office for criminal measures in December 2021, the CCAC continued to probe into it and gather evidence.

(VI)

The CCAC received a report claiming that some public relation employees of a casino conspired with club members of the casino to privately increase the conversion rates for cash coupon redemption so that those club members could receive cash coupons or supermarket cash coupons with a value higher than the actual amount they were entitled to. The aforesaid PR employees were therefore suspected to have contravened the company rules by receiving undue advantages and defrauding the casino.

After investigation it was found that the aforesaid PR employees did not violate the rules of the casino by increasing the conversion rates for cash coupon redemption for the club members without permission. However, they were found to have taken possession of the coupons to which some regular customers of the casino were entitled. The PR employees concerned allegedly contravened the code of conduct and committed criminal deception. Nevertheless, as the victims (holders of the right of complaint), that is, the regular customers of the casino, said they would not pursue criminal liabilities against them, there was no condition to carry out any follow-up work in this aspect. The CCAC notified the casino of the violation of the code of conduct and the acts of deceiving customers by the employees concerned.

(VII)

In the course of investigating a complaint involving the private sector, the CCAC found that a company providing repair and maintenance service to the Macao Frontier Post of the Hong Kong-Zhuhai-Macao Bridge declared to the relevant department that it had hired 24 local employees. However, it was found that a few of them had abnormal entry and departure records and seldom stayed in Macao during the period of making contributions to the social security system. Some was even found to have never entered Macao since leaving the Region in 2015. Some employees admitted that they had never worked in the company involved or received any salaries. Their payment of contributions was only for the purpose of receiving old-age pensions from the Government in the future.

It was found in the investigation that there were strong indications that the relevant employees were fake staff. The company involved allegedly committed document forgery and the CCAC already reported the case to the Public Prosecutions Office. Moreover, in 2020, each local employee of the aforesaid company was granted a payment of MOP15,000 under the anti-pandemic support fund. The CCAC already informed the Financial Services Bureau about the case of relevant employees unjustifiably receiving the fund for follow-up actions.

(VIII)

The CCAC received an anonymous report claiming that some intermediary, jointly with a committee member of the Cultural Development Fund (FDC), provided assistance to private companies in applying for subsidies or interest-free loans from the FDC. In return, they received 50% of the approved subsidies as rewards. The complainant doubted that someone had stolen the information of the successful cases from the FDC and passed it to the companies intending to make the relevant applications as a reference and defrauded government subsidies with unfinished film planning projects.

After investigation it was found that the film planning projects reported had finished shooting and that the intermediary and the committee member mentioned in the report were not evaluation committee members, people in charge or staff responsible for subsidy applications of the FDC. In fact, the aforesaid committee member reported was only a member of the consultative body. They had nothing to do with the granting of subsidies and had no power to intervene in the evaluation procedures.

Despite that there were no criminal acts in the case as claimed in the report, it was found during the investigation that there were loopholes in the process of subsidy granting by the FDC. Despite that the amount of subsidy granted should be linked to the estimated expenditure declared in an application, it is not lowered accordingly even though the estimated expenditure declared in an application is less than the

actual expenditure. Moreover, as regards the free financing method, as there is no guarantee mechanism as such, if the company of the applicant goes bankrupt or is wound up, the possible risk is that the subsidy supposed to be returned by the applicant will be irrecoverable. As regards the loopholes existing in the process of subsidy granting, the CCAC notified the situation to the FDC so that the latter may review it and make improvement in a timely manner. Afterwards, the CCAC archived the case.

V. Mutual case assistance in cross-border investigation

In 2021, the CCAC continued to maintain smooth communication and cooperation with its counterparts of the Chinese mainland and Hong Kong. In the beginning of 2021, the Commissioner Against Corruption led the directors and chiefs of the CCAC to visit the Guangdong Provincial Supervisory Committee and anticorruption agencies from nine Greater Bay Area cities, including Guangzhou, Shenzhen and Zhuhai, with which the CCAC has established effective communication channels and achieved satisfactory effects. Due to the pandemic, the resumption of cross-boundary travel between Hong Kong and Macao is still subject to the isolation measures. The CCAC and Independent Commission against Corruption (ICAC) of Hong Kong held a videoconference in the beginning of the year, where both parties profoundly and honestly exchanged views on their cooperation and communication and decided the fundamental aspects of cooperation in case assistance.

Due to the pandemic, part of the case assistance work has yet to be carried out at full steam. There was a slight increase in the number of requests made to the CCAC in writing for case assistance compared to that of the previous year. There was however a significant drop in the number of requests made by the CCAC to counterparts outside the Region to three from 11 of the previous year.

(1) Requests for case assistance to the CCAC from law enforcement agencies outside the Region

In 2021, the CCAC placed seven cases on file for investigation at the requests for case assistance received from counterparts outside the Region. Along with the cases carried forward from 2020, there were a total of 16 requests for case assistance in 2021, of which 10 were made by agencies of the Chinese mainland and six by the ICAC of Hong Kong. Up to the end of 2021, seven cases were completed while the remaining nine are still being followed up.

(2) The CCAC's requests for case assistance to agencies outside the Region

In 2021, the CCAC made three requests for case assistance to counterparts outside the Region, of which one was made to an agency of the Chinese mainland and two to the ICAC of Hong Kong. Along with the cases carried forward from 2020, there were a total of 14 cases. Up to the end of 2021, seven requests have been completed and replied while the remaining seven are still being followed up.

ltem	Case assistance requests made by agencies outside the Region to the CCAC		Total		sistance made by CCAC	Total
Place requesting case assistance	Hong Kong	Chinese mainland		Hong Kong	Chinese mainland	
Number of cases placed on file for investigation in 2021	1	6		2	1	
Total number of cases	5 4	16	3	6	14	
in 2021 including those carried forward to 2021		4		2 case assistance requests made to both Hong Kong and the Chinese mainland		
				3	2	
Number of cases being followed up	5 4	9	2 case assistance requests made to both Hong Kong and the Chinese mainland		7	
Number of cases archived (case assistance completed)	1	6	7	2	5	7

Statistics of mutual case assistance in 2021

VI. Court verdicts

According to the statistics published by the court, a total of 24 criminal cases processed by the CCAC were tried in 2021 and 100 suspects were involved. Final judgements have been rendered on 10 cases and some of the charges of two cases, while the remaining cases are still at the appeal stage.

After analysis and consolidation of the 10 cases with final judgement, the CCAC made allegations of document forgery, fraud, fraud involving a high value, active bribery, passive bribery to perform illicit acts, power abuse, forgery committed by a public servant, inaccurate data in declaration of assets and interests against the suspects involved. Among these 10 criminal cases, nine were handed down the sentences by the Court of First Instance for the same convictions.

Also, there were two cases on which final judgements had yet to be rendered and they were appealed to the Court of Second Instance. Afterwards, in one case, after the sentences were handed down by the Court of First Instance against some suspects for the convictions including participation in triads, fraud and money laundering, only some of the convictions of the case were remanded for retrial by the Court of Second Instance and the original judgements of the remaining convictions were upheld. In the other case, the sentences were handed down by the Court of First Instance addition, document forgery, breach of secrecy, inaccurate data in declaration of assets and interests and power abuse. The Court of Second Instance only changed the judgement and decided that a suspect was acquitted of the charge of breach of secrecy and that the sentence for the charge of inaccurate data in declaration of assets and interests was reduced. The original judgements of the remaining convictions were upheld.

VII. Declaration of assets and interests

The implementation of the declaration of assets and interests for public servants has been playing an important part in the work of integrity building of the CCAC. As the law contains explicit provisions on the legal responsibilities for violating the relevant rules, they have a warning and binding effect on the public servants, which lays positive impact on the corruption prevention. In 2013, with the entry into force of the newly amended legal regime of declaration of assets and interest, public disclosure of assets of officials also commenced. The mechanism of moderately disclosing assets not only promotes the participation of the public in



Overall execution of the work related to declaration of assets and interests is efficient

the fight against corruption but also facilitates the effective implementation of integrity building policies, which helps to achieve the vision of building a clean government.

The year 2021 marked the 23th year of the implementation of the legal regime of declaration of assets and interests. The overall implementation of the declaration system has been satisfactory and each piece of work has been conducted in an orderly manner. There has not been any case of punishment arising from failure to submit a declaration without justification by a declarant or anyone who needs to fulfill the obligation of providing information.

In 2021, the CCAC detected a case where a police officer committed the crimes of unexplained wealth and inaccurate data in declaration of assets and interests. The case was referred to the Public Prosecutions Office. In addition, there were nine cases relevant to assets declaration with verdicts of guilty by the court in 2021, including eight cases of inaccurate data in declaration of assets and interests and one case of unexplained wealth.

In 2021, the CCAC recorded a total of 11,779 submissions of declaration forms (see Table I) and sent a total of 156 overdue notices to those who failed to submit the declaration within a statutory period (including declarants and their spouses and cohabiting partners) (see Tables II and III). The relevant data are shown in the following tables:

Reason for submitting declaration	Total number of submissions
Appointment	1,211
Change of position	3,820
Termination of office	1,364
Renewal every five years	3,420
Renewal with that of spouse	445
Pursuit of data-provision duty	1,191
Voluntary renewal	328
Total	11,779

Table I Statistics of submission of declaration of assets and interests in 2021

Table IIStatistics on overdue notices sent in 2021(Recipients: Declarants)

No.	Department/entity in which the declarant works	No. of overdue notices sent
1	Health Bureau	29
2	Public Security Police Force	23
3	Municipal Affairs Bureau	13
4	Cultural Affairs Bureau	10
5	Macao Customs Service	9
6	University of Macau	9
7	Education and Youth Development Bureau	7
8	Correctional Services Bureau	5
9	Fire Services Bureau	4
10	Macao Post and Telecommunications Bureau	4
11	Land, Public Works and Transport Bureau (currently Land and Urban Construction Bureau)	4
12	Government Headquarters Affairs Bureau	3
13	Financial Services Bureau	3
14	Identification Services Bureau	3
15	Social Welfare Bureau	3
16	Sports Bureau	3
17	Gaming Inspection and Coordination Bureau	2
18	Economic and Technological Development Bureau	2
19	Office of the President of the Court of Final Appeal	2
20	Macao Polytechnic Institute (currently Macao Polytechnic University)	2
21	Public Administration and Civil Service Bureau	2
22	Legal Affairs Bureau	1
23	Transport Bureau	1
24	Cartography and Cadastre Bureau	1

Total		155
34	Judiciary Police	1
33	Macao Trade and Investment Promotion Institute	1
32	Macao Institute for Tourism Studies	1
31	Social Security Fund	1
30	Pension Fund	1
29	Macao Foundation	1
28	Cultural Development Fund	1
27	Academy of Public Security Forces	1
26	Public Security Forces Affairs Bureau of Macau	1
25	Statistics and Census Service	1

Table IIIStatistics on overdue notices sent in 2021

(Recipients: Spouses or cohabiting partners of declarants)

Recipient	No. of overdue notices sent
Spouses or cohabiting partners of declarants	1

To tie in with the development trend of electronic governance, the CCAC has made good use of technology and has been actively involved in the building of an e-government so as to increase the efficiency of carrying out its work in declaration of assets and interests with lower administrative costs. The CCAC added real-time queue status for declaration submission to its website in early November 2021 and launched an online appointment system for the declaration of assets and interests in early December so that declarants may make appointments on their own and arrange a reasonable time to submit their declarations. Moreover, the number of people who make online appointments for declaration provides concrete data for the CCAC to allocate resources in a more reasonable and balanced way. In addition, the "notification processing system of declaration of assets and interests" developed by the CCAC also substantially facilitates the relevant work. Since its launch in 2013, over 27,000 notification letters have been received through the system. Among the 3,839 official letters/notification letters of declaration of assets and interests received by the CCAC in 2021, over 3,600 were received through the aforesaid system, which accounted for over 90% of the total number of official letters/notification letters received. This demonstrates that effective results have been achieved.

2021 Annual Report of the Commission Against Corruption of Macao

Up to 31st December 2021, a total of 62 public administrative departments or entities, autonomous services, autonomous funds, public legal persons or public corporations, corporations wholly or mainly public funded and concessionaires of public property (hereinafter referred to as "departments/entities") that frequently communicated with the CCAC by official letters already registered for the "notification processing system of declaration of assets and interests" developed by the CCAC, of which 61 departments/ entities have officially used the system and one has made registration but has yet to put it into use officially. Among the said 61 departments/entities, four applied for registration and started to use it in 2021 and one department/entity applied for registration a long while ago but only started to use it in 2021. The number of users took up over 70% of all departments. Nine departments/entities have been invited by the CCAC to use the aforesaid system but had yet to apply for registration (see Table IV). The CCAC hereby encourages more departments/entities to become a user and hopes that it may increase the participation in e-governance.

Table IVDepartments/entities that had yet to apply for registration for the notificationprocessing system of declaration of assets and interests

No.	Department / Entity	
1	Academy of Public Security Forces	
2	Public Security Police Force Welfare Association	
3	Macao Investment and Development Limited	
4	Macau International Airport Co. Ltd.	
5	Macao Science Center Limited.	
6	Macau Productivity and Transfer Center	
7	Macao Industrial Parks Development Co., Ltd.	
8	World Trade Center Macau	
9	The Policy Research and Regional Development Bureau	

As regards external exchange and cooperation, the CCAC positively cooperates with its counterparts, including holding some meetings with the Secretariat of Court of Final Appeal on establishing an information sharing platform for declaration of assets and interests where they discussed and put forward proposals on how to improve the relevant work. The objective is to increase work efficiency and to make efforts to increase the utilisation rates of e-governance through communication, coordination and information sharing. The CCAC also strives to promote communication and exchanges with other entities. As the pandemic situation

improved, the CCAC, through introducing the positive impact of the assets declaration work of Macao on the governance of the SAR Government, made visitors understand more about the fight of the Government against corruption, where it also exchanged views with them on mutually concerned issues in order to better understand the relevant work systems.

As regards external promotion, the CCAC continues to promote the significance of assets declaration among public servants through different ways. It also continuously provides more complete information on assets declaration for declarants, including the updated webpage of declaration of assets and interests. The newly added pages, that is, "Q&A", "Document required for declaration" and "Submission deadline calculator", enable the entire webpage to promote its content to the declarants in a more targeted way and to further heighten the law-abiding awareness of declarants.



The new dedicated webpage on declaration of assets and interests provides more complete information