

Research note:

From regulation to reputation: the EU's anticorruption directive as public diplomacy

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Abstract: This research note examines the European Union's 2026 Anticorruption Directive —Directive (EU) 2026/1021 — as both a regulatory instrument and an expression of anticorruption public diplomacy. It argues that the directive's significance extends beyond internal legal harmonisation to the external projection of normative standards and integrity governance models. Beyond introducing definitions of corruption offences, preventive obligations, compliance, and accountability frameworks, the directive can be interpreted as reflecting a broader shift from punitive anticorruption approaches towards systemic integrity governance. Through the lens of anticorruption public diplomacy, legal instruments operate not only as regulatory frameworks but also as vehicles of normative projection, identity construction, and reputational positioning. In this perspective, the directive contributes to shaping the European Union's external identity as a promoter of transparency, accountability, rule of law, and institutional integrity within the global anticorruption regime. The note advances three main arguments. First, the directive functions as a mechanism of normative socialisation by institutionalising shared expectations of conduct and aligning Member States with broader international anticorruption standards. Second, it contributes to the consolidation of a European anticorruption identity through the projection of common governance and integrity principles. Third, it strengthens the Union's reputational security by signalling institutional commitment to integrity and reinforcing international trust in the EU as a normative actor. By framing European anticorruption law as a form of public diplomacy, this research note seeks to bridge legal scholarship and international relations, offering a conceptual framework through which regulatory developments may be understood as constitutive elements of contemporary international order.

Keywords: anticorruption public diplomacy; anticorruption directive, Directive (EU) 2026/1021, normative socialisation; global anticorruption regime

Introduction

The Directive (EU) 2026/1021 of 29 April 2026 reflects a shift in the European approach to corruption, moving beyond fragmented approaches

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criminalisation towards a broader model of governance. Although designed to harmonise corruption-related issues across Member States, the directive aligns with scholarship that frames corruption as a systemic threat to democracy, the rule of law, economic stability, and public trust (Hough, 2013; Kubbe & Johnston, 2025). It should, therefore, be understood not only as an instrument of law harmonisation, but also as part of a broader process through which the EU projects anticorruption standards externally. The analytical contribution of this note is to conceptualise the directive as a mechanism of normative projection operating within the broader framework of anticorruption public diplomacy.

The EU has progressively strengthened its anticorruption agenda, with the 2026 directive representing the most ambitious attempt so far to consolidate a common anticorruption framework. Its innovations include the expansion of corruption-related offences, the broadening of the concept of public official, the criminalisation of trading in influence, stronger corporate liability regimes, and preventive integrity measures. The emphasis on compliance systems, whistleblower protection, investigative journalism, and specialised anticorruption bodies, signalling a transition towards a systemic model of integrity governance, is particularly significant.

This research note argues that the significance of the Directive (EU) 2026/1021 extends beyond internal legal harmonisation. Building on the concept of anticorruption public diplomacy (Santos, 2026), it contends that the directive also functions as an instrument of normative projection and international socialisation. Legal frameworks do not merely regulate behaviour; they also communicate values, construct identities, and shape international expectations (Finnemore & Sikkink, 2001; Finnemore & Wendt, 2024; Wendt, 1999). The directive, therefore, contributes to the consolidation of a European identity grounded in integrity, accountability, and rule of law, reinforcing the EU's credibility within the global anticorruption governance architecture.

This work advances three interconnected arguments. First, the directive operates as a mechanism of normative socialisation by establishing shared standards of conduct and aligning Member States with anticorruption norms. Second, it contributes to the external projection of a European integrity identity through the institutionalisation of common anticorruption frameworks. Third, it strengthens the EU's reputational security by signalling institutional commitment to integrity and enhancing international trust in the EU as a normative actor.

Methodologically, the note adopts a qualitative interpretive approach based on doctrinal or normative legal analysis. It examines the directive's provisions, situating them within the broader literature on normative socialisation, and public diplomacy. The analysis focuses on the normative and symbolic implications of the directive as a governance instrument. The note is also informed by Europeanisation scholarship (Börzel & Risse, 2003; Grünhut, 2017; Schimmelfennig, 2009; Zemanová, 2012). This body of knowledge understands

Europeanisation as a process through which supranational norms, rules, policies, and governance practices are diffused, institutionalised, and adapted across different domestic, regional contexts.

The public diplomacy perspective is particularly relevant because anticorruption policies increasingly function as vehicles through which states and international organisations communicate governance values, project normative commitments, and cultivate international legitimacy. Examining the directive through this lens allows exploration of its broader communicative and reputational functions beyond its immediate legal effects. By approaching the directive as an instrument of anticorruption public diplomacy, this note seeks to bridge legal scholarship and international relations. It offers a framework through which regulatory developments may also be understood as constitutive elements of contemporary international order.

1. The Directive (EU) 2026/1021 within the Global Anticorruption Regime

The Directive (EU) 2026/1021 emerged within a broader international context characterised by the expansion of global anticorruption norms, institutions, and governance mechanisms. Understanding the directive therefore requires situating it within the evolution of the global anticorruption regime and the wider processes through which integrity standards are diffused and legitimised internationally.

1.1. The globalisation of anticorruption

Over recent decades, corruption has progressively evolved from a domestic governance concern into a central issue of global governance. The consolidation of the global anticorruption movement since the 1990s contributed to the emergence of dense transnational regulatory frameworks involving states, international organisations, corporations, financial institutions, and civil society actors (Hough, 2013; Harris, 2019). This reflected the perception that corruption undermines not only economic development, but also democratic legitimacy, market stability, institutional trust, and the rule of law.

International instruments played a central role in this transformation. The United States Foreign Corrupt Practices Act, adopted in 1977, represented the first major attempt to regulate transnational bribery and significantly influenced subsequent international initiatives (Spalding, 2012). At the multilateral level, the United Nations and OECD conventions established common obligations concerning the criminalisation of bribery in international transactions, international cooperation, and asset recovery, while monitoring mechanisms reinforced transnational enforcement expectations (Hough, 2013). In Europe, the Council of Europe's Group of States against Corruption (GRECO) further strengthened regional monitoring and peer-review mechanisms.

This expanding anticorruption architecture contributed to a broader governance turn in anticorruption policy. Corruption came to be understood as a structural governance risk requiring preventive, institutional, and regulatory responses (Johnston, 2005). Within this context, integrity, transparency, accountability, and compliance became closely associated with democratic resilience and institutional sustainability.

1.2. Anticorruption public diplomacy and normative socialisation

The globalisation of anticorruption also transformed the political and symbolic dimensions of integrity policies. Anticorruption increasingly operates as a process of normative socialisation through which states and international organisations diffuse standards of appropriate conduct, construct legitimacy, and shape international expectations (Finnemore & Sikkink, 2001; Finnemore & Wendt, 2024). In this context, anticorruption public diplomacy (Santos, 2026) involves the use of anticorruption norms, policies, and narratives as instruments of international projection, reputation-building, and normative influence.

From this perspective, legal and institutional anticorruption frameworks perform functions extending beyond regulation. They communicate values, reinforce identities, and contribute to the construction of reputational legitimacy within the international system (Cull, 2024; Zaharna, 2022). States increasingly seek to project images of transparency, accountability, and integrity as markers of responsible governance and normative credibility. Anticorruption policies thus become intertwined with broader concerns surrounding reputational security (Cull, 2024), understood as the preservation of international trust, legitimacy, and reliability.

Within this broader process, the EU has progressively consolidated its role as a normative actor in global governance. Through anticorruption regulation, the Union projects a model of integrity governance closely linked to democratic values and institutional accountability. The Directive (EU) 2026/1021 should therefore be understood as part of the EU's broader normative and reputational projection within the global anticorruption regime.

2. From criminalisation to systemic integrity: main innovations of the directive

The new directive introduces a series of innovations that reflect the evolution of European anticorruption policy from a predominantly criminal-law approach towards a broader model of integrity governance. Beyond harmonising offences and sanctions, the directive expands the scope of accountability, strengthens preventive mechanisms, reinforces corporate compliance obligations, and promotes greater involvement of civil society and transnational enforcement actors. The following sections examine these innovations, highlighting how the directive implicitly

interprets corruption as a systemic and multidimensional challenge requiring coordinated legal, institutional, and societal responses across the EU.

2.1. Harmonising corruption as a transnational threat

The directive harmonises corruption-related offences across the EU. Moving beyond fragmented approaches, it establishes common definitions (Art. 2) and minimum rules (Art. 1) concerning both public (Art. 3) and private corruption (Art. 4), reducing legal asymmetries that have historically complicated transnational investigations and judicial cooperation (Recitals 2 and 42). In so doing, it strengthens the European anticorruption framework while aligning Member States more closely with international standards.

The directive expands the catalogue of corruption offences beyond public, private, active, and passive corruption to encompass misappropriation (Art. 5), trading in influence (Art. 6), obstruction of justice (Art. 8), concealment (Art. 10), and illicit enrichment (Art. 9). Particularly noteworthy is the explicit criminalisation of trading in influence, including situations where the alleged influence is merely claimed rather than effectively exercised. By extending criminal liability to indirect and intermediary corruption, the directive reflects the growing perception that corruption operates through complex transnational and networked structures rather than isolated bilateral exchanges.

This broader harmonisation signals an important shift: corruption is no longer treated exclusively as a domestic issue, but as a transnational systemic threat capable of undermining democratic stability across borders. The directive therefore contributes to consolidating a common European understanding of corruption as a structural challenge requiring coordinated supranational responses.

2.2. Expanding public authority in hybrid governance contexts

Another major innovation concerns the directive's expanded definition of *public official*. It encompasses national and EU officials, members of international organisations, international courts, persons performing public functions in state-owned and state-controlled enterprises, and individuals exercising public functions without formal public office (Recital 11 and Art. 2[2]). This broader definition reflects contemporary transformations in governance structures, where public authority is increasingly exercised through hybrid institutional arrangements involving public, private, and transnational actors.

The directive thereby acknowledges the progressive blurring of boundaries between the public and private spheres within global governance. In areas such as infrastructure, finance, public procurement, and strategic services, private actors frequently perform functions traditionally associated with state authority. Limiting anticorruption obligations exclusively to formal state agents would therefore create

significant accountability gaps. By incorporating hybrid and function-based approaches to public authority (Abbott & Snidal, 2021), the directive strengthens regulatory coherence within increasingly complex governance environments.

This expanded understanding also aligns the European framework with trends in global regulation, where accountability increasingly focuses on the exercise of public functions rather than merely on formal institutional status (Webb, 2005). In this sense, the directive reflects a more flexible and functional conception of public authority adapted to contemporary realities.

2.3. From punitive logic to preventive governance

The directive moves from a predominantly punitive model towards a preventive and institutional approach to anticorruption governance. Rather than focusing exclusively on criminal prosecution and sanctions, the directive requires Member States to adopt national anticorruption strategies (Art. 21), periodic risk assessments (Art. 20[5]), specialised anticorruption bodies (Art. 22), and institutional integrity policies (Art. 20[2][3]). These requirements introduce permanent governance structures within national administrations, exemplifying how anticorruption policy moves beyond case-by-case enforcement towards continuous institutional oversight.

The directive also addresses structural governance vulnerabilities, including conflicts of interest, transparency obligations, and revolving-door practices between public and private sectors (Recitals 1 and 5). Such provisions demonstrate an important conceptual evolution in which corruption is taken as a structural governance risk capable of eroding democracy and institutional resilience.

This governance-oriented approach confirms that prevention, compliance, transparency, and institutional integrity have become central pillars of anticorruption policy (Rose-Ackerman & Palifka, 2016; Rothstein, 2018). The directive consequently aligns democratic governance agendas, reinforcing the notion that integrity constitutes a foundational condition for institutional sustainability.

2.4. Corporate compliance and the Europeanisation of integrity standards

The directive also significantly strengthens the role of corporate compliance programmes (Recital 5 and Art. 16[c][d]). Compliance mechanisms, including internal controls, risk assessments, auditing, codes of conduct, and third-party evaluations, are explicitly recognised as relevant elements in preventing corruption and may be considered when assessing corporate liability and sanction mitigation. The recognition of compliance programmes as mitigating factors is an example of incentives for corporations to integrate anticorruption controls into routine governance and risk-management processes.

At the same time, the directive reinforces the liability of legal persons (Art. 13) through stronger sanctioning mechanisms, including substantial financial penalties, exclusion from public procurement procedures (Art. 14), and asset confiscation (Art. 27). It also seeks to prevent corporations from avoiding responsibility through the use of intermediaries (Recital 27) or inadequate supervision and control mechanisms.

This demonstrates the growing convergence between European regulation and transnational models such as the American Foreign Corrupt Practices Act, the French *Loi Sapin II*, and the United Kingdom Bribery Act. The directive incorporates those frameworks into a broader European governance logic that links corporate integrity to accountability. In this sense, the directive contributes to the further consolidation and adaptation of global integrity standards within the European legal order.

2.5. Civil society, journalism and transnational enforcement

The directive further reinforces the role of civil society, investigative journalism, and transnational cooperation (Recitals 36, 37, 39, 40). It explicitly links anticorruption enforcement to whistleblower protection, freedom of expression, investigative reporting, and societal participation, recognising that accountability depends on broader democratic ecosystems rather than exclusively on state institutions. The inclusion of whistleblower protection and investigative journalism illustrates how accountability is distributed across a broader network of actors extending beyond traditional law-enforcement institutions.

Simultaneously, the directive strengthens cross-border cooperation through information exchange, digital investigative tools, harmonised statistical data collection, and greater use of Europol structures, including the Secure Information Exchange Network Application (SIENA) (Art. 28). These measures reflect the digitalisation and transnationalisation of corruption schemes, frequently involving complex financial flows, intermediary networks, and cross-border institutional coordination.

Taken together, these provisions reveal a broader transformation in European anticorruption policy. The directive reflects a democratic integrity ecosystem in which criminal enforcement, institutional prevention, corporate compliance, civil society participation, journalism, and digital cooperation become interconnected components. Corruption is therefore approached not simply as an isolated criminal phenomenon, but as a multidimensional challenge across the European and international orders.

3. From regulation to reputation: the directive as EU anticorruption public diplomacy

While the Directive's legal and institutional innovations are significant in their own right, their implications extend beyond the domain of regulatory harmonisation. Anticorruption has become increasingly intertwined with processes of norm diffusion, governance legitimacy, and international reputation. The Directive (EU) 2026/1021 can therefore be examined as a vehicle through which the EU communicates values, projects standards of integrity, and reinforces its position within the global anticorruption regime. This perspective opens the way for analysing the Directive through the lens of anticorruption public diplomacy, highlighting its role in processes of normative socialisation, identity construction, and reputational projection.

3.1. The directive as a mechanism of normative socialisation

Beyond its legal and institutional dimensions, the directive may also be understood as a normative socialisation mechanism through which the EU promotes and consolidates shared expectations concerning integrity. Therefore, legal harmonisation also performs a socialising function (Finnemore & Sikkink, 2001; Kostanyan & Vandecasteele, 2013), contributing to the construction of common understandings of appropriate conduct among Member States and reinforcing the diffusion of broader international anticorruption norms. From a Europeanisation perspective, these processes involve the diffusion, adaptation, and institutionalisation of common frameworks across different levels of governance (Zemanová, 2012). Through repeated interaction with shared standards, actors become increasingly familiar with, and progressively internalise, norms and values that come to be perceived as legitimate and appropriate forms of conduct (Kostanyan & Vandecasteele, 2013). As such, it functions not only as a legal instrument but also as a vehicle for normative convergence within the Union.

This dynamic is particularly visible in the directive's alignment with international frameworks such as the United Nations and OECD anticorruption conventions and GRECO standards. By incorporating principles already embedded within the global anticorruption regime into binding European legislation, the directive strengthens normative convergence between the EU and broader international anticorruption expectations. Harmonisation therefore operates not merely as legal coordination, but as a process through which common standards of integrity become institutionalised within European governance structures.

In this context, the directive also illustrates how law may function as an instrument of anticorruption public diplomacy. Legal frameworks communicate values and reinforce normative commitments beyond their immediate legal effects

(Santos, 2026). Through the directive, the EU publicly signals its commitment to transparency, democratic accountability, and institutional integrity, positioning itself within the international anticorruption architecture as an active promoter of integrity governance. The directive thus contributes to the diffusion of anticorruption norms not only internally, but also externally, reinforcing the EU's normative presence within global governance debates.

3.2. Constructing a European anticorruption identity

The directive also contributes to the construction of a European anticorruption identity grounded in transparency, accountability, and rule of law. Identities within international politics are not fixed attributes, but socially constructed understandings shaped through interaction, norms, and institutional practices (Wendt, 1999). In this sense, anticorruption regulation becomes part of a broader process through which the EU defines and projects itself as a normative actor committed to democratic governance and institutional integrity.

This identity-building dimension is particularly important in the contemporary European context, where rule of law concerns increasingly occupy a central position within both internal governance and external relations. By establishing common anticorruption obligations and preventive standards, the directive reinforces integrity as a defining component of European governance legitimacy. Transparency, institutional accountability, compliance mechanisms, and democratic oversight are presented not merely as administrative tools, but as constitutive elements of the European political and legal order.

At the same time, the directive contributes to the external projection of this identity. Anticorruption policies increasingly function as symbolic markers of responsible governance within international politics (Hough, 2013). Consolidating a common integrity framework, the EU strengthens its ability to project institutional reliability and normative consistency in its relations with international organisations, partner states, corporations, and global markets. Integrity thereby becomes part of the Union's external political identity and international positioning.

This process also reflects broader dynamics of anticorruption public diplomacy, in which states and international organisations seek to shape international perceptions through the projection of governance standards and ethical commitments (Santos, 2026). The directive therefore operates simultaneously as a regulatory instrument and as a symbolic expression of European normative aspirations.

3.3. Reputational security and international credibility

From the perspective of public diplomacy, the directive further contributes to strengthening the EU's reputational security and governance credibility within the

international system. In contemporary global governance, reputation functions as an important source of legitimacy, trust, and political influence (Cull, 2024). States and international organisations increasingly depend on perceptions of institutional reliability, transparency, and normative consistency in order to maintain international credibility and sustain cooperative relationships.

Within this context, anticorruption policies acquire an important reputational dimension. Corruption scandals, weak enforcement systems, and institutional opacity may significantly undermine international trust, economic credibility, and political legitimacy. Conversely, strong integrity frameworks can reinforce perceptions of stability, predictability, and responsible governance. The directive therefore serves not only to regulate corruption internally, but also to strengthen external confidence in the EU's institutional commitments.

This reputational dimension is closely linked to symbolic projection and normative authority. By adopting a comprehensive anticorruption framework combining criminalisation, prevention, corporate compliance, democratic safeguards, and transnational cooperation, the EU reinforces its position as a global promoter of integrity standards. Such projection contributes to consolidating normative authority within broader international anticorruption debates, particularly at a time when governance credibility and democratic resilience have become increasingly central to international legitimacy.

In this sense, the directive illustrates how anticorruption regulation may operate simultaneously as law, governance strategy, and public diplomacy. Its significance extends beyond legal harmonisation itself, contributing to the construction of shared norms, institutional identity, and international reputation within the evolving global governance architecture of anticorruption.

Conclusions

The Directive (EU) 2026/1021 represents more than a new stage in the harmonisation of European criminal law. As this research note has argued, the directive reflects the consolidation of a broader European model of systemic integrity governance combining regulatory, preventive, reputational, and diplomatic dimensions. By expanding corruption-related offences, strengthening prevention, reinforcing corporate compliance, and promoting transnational cooperation, the directive moves beyond punitive approaches towards a governance model centred on integrity, rule of law and democratic resilience.

At the same time, the directive operates as a mechanism of normative projection within the global anticorruption regime. Through the institutionalisation of shared standards concerning transparency, accountability, and compliance, the EU reinforces its identity as a normative actor committed to integrity governance. In this sense, anticorruption law also functions as a form of anticorruption public diplomacy, contributing to processes of international socialisation, legitimacy

construction, and reputational positioning. The directive therefore strengthens not only legal convergence within the Union, but also the EU's governance credibility and symbolic authority internationally.

Nevertheless, important challenges remain. Effective implementation will depend on the capacity of Member States to operationalise preventive frameworks, ensure institutional independence, strengthen enforcement mechanisms, and balance harmonisation with diverse national legal traditions. The effectiveness of the directive will also be shaped by broader political dynamics surrounding democratic backsliding, rule of law disputes, and uneven institutional capacities across the Union.

Despite these challenges, the directive possesses significant global relevance. It contributes to the ongoing transformation of anticorruption from a narrow criminal law issue into a broader framework of governance, integrity, and democratic legitimacy. Ultimately, this note seeks to bridge legal scholarship and international relations, highlighting how regulatory instruments increasingly participate in the construction of contemporary international order.

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