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A Promising Future: Angola’s Recent Efforts to Combat Corruption

Introduction

Angola has sought a path forward from its complicated past, which included nearly 40 years of dictatorship rule, a civil war, and a complicated presidential election in 2017. Such efforts include tackling widespread corruption involving the former family of President José Eduardo dos Santos and both state-owned and international companies. Since current President João Lourenço took office in late 2017, his administration has vigorously pursued one of his main promises of reform: the fight against systemic corruption. To support its anti-corruption rhetoric, President Lourenço’s administration overhauled obsolete anti-corruption and anti-money laundering laws to comply with international standards. The administration also initiated several high-profile investigations of former government officials, including an ongoing criminal and multi-jurisdictional investigation into the dealings of Isabel dos Santos—daughter of former President José Eduardo dos Santos—with the state-owned oil company Sonangol.

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This alert addresses a brief history of corruption in Angola and the rise of President Lourenço’s administration, including its commitment to end systemic corruption. This alert also summarizes recent developments in Angola’s anti-corruption legislation and domestic enforcement efforts. Finally, this alert provides a brief outlook of Angola’s promising future as a robust economic force and ethical leader in Africa.

Angola: Quick Facts¹
<ul style="list-style-type: none"> • Government Type: Presidential Republic • Capital: Luanda • Population: 33,642,646 (July 2021 est.) • GDP: \$212.285 billion (2019 est.) • Official Language: Portuguese • Main Exports: Crude petroleum, diamonds, natural gas, refined petroleum, ships (2019).

Brief History of Systemic Corruption in Angola

Angola is one of the world’s main oil producers, the second-largest in Africa, after Nigeria,² and a member of the Organization of the Petroleum Exporting Countries since 2007.³ As such, the oil sector overwhelmingly drives its economy, representing about 95% of the country’s exports.⁴ Created in 1976, the state-owned enterprise Sonangol (*Sociedade Nacional de Combustiveis de Angola*) holds an exclusive license for exploration of petroleum in the country.⁵

The extractive industries, including the oil and mining sectors, represent one in five cases of transnational bribery, and oil trading alone accounts for the majority of state public budgets in ten major Sub-Saharan African countries from 2011 to 2013.⁶ The corruption schemes that exist in the extractive sector are generally sophisticated, involving complex corporate structures, offshore transactions involving shell companies to disguise ownership beneficiaries, political capture, lobbying, and bid-rigging, among other corruption concerns.⁷

This scenario is no different in Angola. In 1975, Angola achieved independence after a colonial era of subordination to Portugal.⁸ Four years later, in 1979, former President José Eduardo dos Santos was elected and took office, representing the Popular Movement for the Liberation of Angola—MPLA (*Movimento Popular de Libertação de Angola*).⁹ His election was immediately followed by nearly three decades of civil war involving the government-controlled MPLA and the opposing party National Union for the Total Independence of Angola—UNITA (*União Nacional para a Independência Total de Angola*).¹⁰ Over decades of political conflict, combined with economic instability, systemic corruption has persisted in Angola.¹¹ Corruption schemes have been wide-ranging, including widespread petty corruption as part of the “gasosa culture” (where bribes are commonly referred to as *gasosa*¹²), lack of transparency in financing political parties, inequities in the judicial system, nepotism, cronyism, and patronage networks.¹³

Corruption schemes have been particularly pronounced in the oil sector, involving state-owned or state-controlled enterprises. For example, in 2016, Brazilian-based conglomerate Odebrecht admitted in a plea agreement with the U.S. Department of Justice (DOJ) that between 2006 and 2013, the company made about USD \$50 million in corrupt payments to government officials in Angola in order to secure public works contracts, earning benefits of approximately USD \$261.7 million.¹⁴ For example, Odebrecht paid approximately USD \$8 million in corrupt payments to an Angolan government official to obtain infrastructure projects in Angola and, in a separate incident, paid approximately USD \$1.19 million to a high-level official of an Angolan state-owned company to obtain business.¹⁵

Similarly, in 2017, the Netherlands-based company SBM Offshore N.V. entered into a settlement with DOJ to resolve alleged violations of the Foreign Corrupt Practices Act (FCPA) involving several countries, including Angola.¹⁶ The allegations mostly related to the payment of bribes to Angolan government officials from 1997 to 2012 to obtain and retain business from Sonangol.¹⁷ Between 2007 and 2011, the amount of bribes exceeded USD \$22 million.¹⁸

President Lourenço’s Political Campaign and the Fight Against Systemic Corruption

In 2017, former President José Eduardo dos Santos stepped down after an almost forty-year dictatorship.¹⁹ His legacy of a centralized government left its mark on the country’s history.²⁰ In August 2017, Angola held a new general election, and the ruling party MPLA defeated the opposing party UNITA once again.²¹ As the candidate of MPLA, the party designated João Manuel Gonçalves Lourenço—a former Defense Minister (2014-2017) and a longtime supporter of MPLA—president of Angola for a five-year term; he took office in September 2017.²² He is the third president of Angola since its independence from Portugal in the 1970s.²³

President Lourenço’s campaign platform had two major pillars: restructuring Angola’s economy to be one of the biggest economies in Africa and tackling systemic corruption.²⁴ To achieve those goals, he promised to lead an “economic miracle” by seeking help from international organizations, such as the World Bank or the International Monetary Fund,²⁵ and launched the “2018-2022 Strategic Plan for the Prevention and Fight against Corruption” (*Plano Estratégico de Prevenção e Combate à Corrupção*).²⁶

In a 2019 interview, President Lourenço defined the systemic corruption as “a phenomenon that has rooted itself in our society for decades” and underscored that his administration was adopting vigorous measures to root out corruption by improving governance practices as well as overhauling obsolete anti-corruption and anti-money laundering laws and stolen asset recovery mechanisms.²⁷ Further, to prevent undue influence, his administration replaced over sixty high-level officials in key positions, most of whom were linked to the former president.²⁸ At President Lourenço’s direction, the Angolan justice system has been investigating, prosecuting, and sentencing senior officials for corruption charges.²⁹ Most notably, President Lourenço’s administration removed the daughter and son of the former president from positions of power—Isabel dos Santos as the head of Sonangol and José Filomeno dos Santos as the chairman of Angola’s Sovereign Wealth Fund.³⁰

Despite President Lourenço's anti-corruption agenda, his administration has been facing several challenges on its implementation. While many Angolans report a decline in corruption, most classify the government's performance in the fight against corruption as weak,³¹ and the country continues to experience protests and marches against corruption.³² There is a view that President Lourenço has used his anti-corruption efforts as a political weapon, as evidenced by the current administration's actions against the former president's allies and family members.³³ Some believe that anti-corruption enforcement efforts are a thinly disguised veil for political retaliation.

Given the perceived potential for political retaliation, Angolans waiver on whether to report cases of corruption to the authorities.³⁴ The recent whistleblower protections approved by the government under Law No. 1, of January 22, 2020, are aimed at challenging—and changing—this perception.³⁵ To that end, this law provides for protections to vulnerable victims, witnesses and collaborators in criminal proceedings, including anonymity in certain circumstances, e.g., where their statements entail corruption and/or money laundering allegations.³⁶

Rooting out systemic corruption and implementing a compliance culture are not overnight changes, but it is undeniable that over the past few years Angola has made concrete efforts.³⁷

Recent Developments in Angola's Anti-Corruption Legislation

Prior to President Lourenço's election, Angola had a set of laws generally prohibiting active and passive bribery, illicit enrichment and conflict of interest, mostly under the Probity Law (*Lei da Probidade Pública*, Law No. 3 of March 29, 2010) and the former Public Procurement Law (*Lei dos Contratos Públicos*, Law No. 9 of June 16, 2016).³⁸ Nonetheless, there were no effective anti-corruption enforcement actions, and, even though facilitation payments are illegal, the "gasosa culture" remained part of doing business in Angola.³⁹

Among the international efforts to tackle corruption, Angola ratified the United Nations Convention Against Corruption (UNCAC) in 2006⁴⁰ and was subjected to the First Cycle of UNCAC implementation review a decade later. Several recommendations stemming from this review were proposed to further enhance the country's anti-corruption efforts.⁴¹ Key recommendations included amending legislation to criminalize bribery of national and foreign public officials; ensuring an appropriate balance between immunities and the ability to effectively investigate, prosecute, and adjudicate offences; encouraging and enhancing cooperation within local law enforcement authorities; and designating a central anti-corruption authority.⁴²

Although Angola signed the African Union Convention on Preventing and Combating Corruption in 2007, the country ratified the convention finally in late 2017, under President Lourenço's administration.⁴³ Additionally, Angola is a member of the Eastern and Southern Africa Anti-Money Laundering Group, part of the Financial Action Task Force.⁴⁴

Over the past four years, President Lourenço's administration revamped Angola's anti-corruption and anti-money laundering laws in order to support its anti-corruption rhetoric and to comply with international standards.⁴⁵ The most recent anti-corruption efforts include the enactment of the following laws:

Anti-Corruption Laws

- The new Criminal Law and Criminal Procedure Codes (Law No. 38/20 and Law No. 39/20, respectively) entered into force in February 2021.⁴⁶ Notable changes include corporate criminal liability, harsh penalties for active and passive corruption of public officials, criminalization of private corruption, and seizing of proceeds of a crime, among others.⁴⁷

Anti-Money Laundering Laws & Repatriation of Stolen Assets⁴⁸

- Presidential Decree No. 2, of January 9, 2018, which approved the new Organic Statute of the Angola's Financial Information Unit (*Unidade de Informação Financeira de Angola*).⁴⁹
- Law on Repatriation of Financial Resources (*Lei do Repatriamento de Recursos Financeiros*, Law No. 9, of June 26, 2018), which provided for the voluntary repatriation of financial resources domiciled abroad for a specific period of time.⁵⁰
- Law on Repatriation and Extended Loss of Assets (*Lei sobre o Repatriamento Coercivo e Perda Alargada de Bens*, Law No. 15, of December 26, 2018).⁵¹ Among other provisions, this law created the National Asset Recovery Service (*Serviço Nacional de Recuperação de Activo—SENRA*).⁵²
- Anti-Money Laundering, Countering Financing of Terrorism and Fight against Proliferation of Mass Destruction Weapons (*Lei de Prevenção e Combate ao Branqueamento de Capitais, do Financiamento do Terrorismo e da Proliferação de Armas de Destruição em Massa*, Law No, 5, of January 27, 2020).⁵³

Public Procurement Laws⁵⁴

- Between 2018 and 2019, the Ministry of Finance approved (i) the Guidelines on Ethics and Conduct in Public Contracts (*Cartilha de Ética e Conduta na Contratação Pública*),⁵⁵ (ii) the Practical Guide for the Prevention and Management of Risks of Corruption and Related Infractions in Public Contracts (*Guia Prático de Prevenção e Gestão de Riscos de Corrupção e Infrações Conexas nos Contratos Públicos*)⁵⁶ and (iii) the Guide for Reporting Corruption and Related Infractions in Public Contracts (*Guia de Denúncias de Indícios de Corrupção e Infrações Conexas nos Contratos Públicos*).⁵⁷
- Law No. 41, of December 23, 2020 revoked the Public Procurement Law (*Lei dos Contratos Públicos*, Law No. 9 of June 16, 2016) and approved a new procurement and contracting regime.⁵⁸ A key change is the elimination of a requirement for foreign investors to have a local partner, which historically elicited bribes and kickbacks to obtain and retain business opportunities.⁵⁹

The international community recognized those anti-corruption efforts. According to the Transparency International 2020 Corruption Perceptions Index, while Angola's score remains low (27/100, where zero is highly corrupt and 100 is very clean), since 2014 it has improved eight points, and it is considered one of the significant improvers of the Sub-Saharan Africa, alongside Cote d'Ivoire (36), Ethiopia (38), Tanzania (38) and Senegal (45).⁶⁰ Yet, despite this recent improvement, Angola is ranked 142nd out of 180 countries and territories included on the list,⁶¹ and Sub-Saharan Africa is the lowest-performing region with an average score of 32 out of 100.⁶²

To further strengthen its commitment to root out corruption, Angola intends to become part of the Extractive Industries Transparency Initiative, an international effort to promote and implement global transparency and accountability standards for exploration and management of oil, gas, and mineral resources.⁶³ Angola's Minister of Foreign Affairs, Tété António, praised this initiative, noting that Angola "has clearly demonstrated its commitment to promote the open and accountable management of its natural resources for the benefit of its people."⁶⁴

The international community has also engaged in anti-corruption initiatives in connection with Angola. For instance, on February 16, 2021, the U.S. Department of State, Bureau of Democracy, Human Rights and Labor opened a competition for organizations interested in assisting with a project that supports Angola's growing civil society and independent media in increasing public awareness and support for anti-corruption and transparency reform.⁶⁵ The competition seeks

to reduce corruption in Angola by equipping Angolan civil society and media with skills, tools, and access to investigate and monitor corruption as well as support advocacy efforts.⁶⁶

Recent Angola Domestic Enforcement Actions

President Lourenço's administration has pursued several corruption inquiries, and since late 2017, the Angolan State has opened over 1,500 corruption-related cases, recovered approximately USD \$5.3 billion, and seized USD \$4 billion locally and USD \$5.4 billion in foreign jurisdictions.⁶⁷ Among those cases, the Attorney General's Office's (*Procuradoria-Geral da República—PGR*) pressed charges for corruption-related allegations against several former high-ranking officials and a prominent businessman, including Norberto Garcia, former director of the External Investment Agency; Valter Filipe, former Governor of the Central Bank; Manuel Rabelais, former Minister of Social Communication; and Carlos São Vicente, former President of the AAA Group International.⁶⁸ Vicente's case is part of international cooperation initiatives with Swiss authorities for confiscation and return of ill-gotten gains.⁶⁹ The PGR was primarily assisted by the National Directorate for Preventing and Combatting Corruption (*Direcção Nacional de Prevenção e Combate à Corrupção—DNPCC*) and the National Asset Recovery Service (*Serviço Nacional de Recuperação de Activo—SENRA*).⁷⁰

The most notable enforcement actions target Isabel dos Santos and José Filomeno dos Santos, children of former president José Eduardo dos Santos, who face scrutiny both domestically and internationally.⁷¹ The former president, however, has not been charged in any corruption case and recently returned to Angola after a more than two-year exile in Spain.⁷² This scrutiny was intensified in early 2020 when the International Consortium of Investigative Journalists (ICIJ) published the "Luanda Leaks."⁷³ The leaks exposed a sophisticated corruption and money-laundering scheme through shell companies into the international financial system benefiting the family of the former President José Eduardo dos Santos, and particularly involving his daughter.⁷⁴

Isabel dos Santos was considered Africa's richest woman by Forbes, with an estimated worth of USD \$3.5 billion in 2013; she was removed from that list amidst serious corruption and money-laundering allegations.⁷⁵ One of President Lourenço's first official actions was to remove Isabel dos Santos as the head of Sonangol in November 2017.⁷⁶ A few years later, in 2020, Angolan authorities charged Isabel dos Santos with embezzlement and money laundering and froze her and her husband's assets.⁷⁷ Authorities alleged that (i) Exem Energy BV, an entity owned by Isabel and her husband, had promised to repay at least US\$75 million it owes to Sonangol but had failed to do so, and (ii) the couple and one of their business associates had caused the Angolan government to lose at least US\$1.1 billion.⁷⁸ Documents published by the ICIJ in the "Luanda Leaks" scandal supported these allegations.⁷⁹ Portugal and the Netherlands have followed similar paths and also seized bank accounts aiming to recover over US\$2 billion in stolen assets, and her shares in Exem and some Portuguese companies.⁸⁰ Recently, in August 2021, a Dutch arbitral tribunal ruled that Isabel dos Santos should return nearly US\$500 million to Angola.⁸¹ The criminal cases are still ongoing, and Isabel dos Santos is currently exiled in Dubai.⁸²

Likewise, José Filomeno dos Santos has been plagued with allegations of fraud, money-laundering and mismanagement stemming from his time as the chairman of Angola's Sovereign Wealth Fund.⁸³ In 2020, an Angolan court sentenced him to five years in prison for fraud and influence-peddling over a USD \$500 million corruption case; the court acquitted him for money-laundering.⁸⁴ The allegations are related to an irregular transfer of USD \$500 million aimed at establishing a strategic investment fund of USD \$30 billion to finance structuring projects in Angola.⁸⁵ The case is under appeal before Angola's Supreme Court.⁸⁶

Looking Ahead

The transition from the dos Santos administration to the Lourenço administration was one of the most significant political events in Angola since its civil war.⁸⁷ With that transition came many challenges, including economic turmoil due to a crash in oil prices and the COVID-19 pandemic, as well as the recent corruption scandals involving the family

and allies of the former president. Nonetheless, the country’s renewed political stability and recent focus on anti-corruption represent a promising story; the country aims to reposition itself as a robust economy and ethical country in the African continent to attract foreign investments.

Angola is classified as a low-middle income economy, heavily dependent on oil exports, with large inequality in wealth distribution at the national level.⁸⁸ One part of the current administration’s revenue diversification strategy is the 2019-2022 Privatization Program (PROPRIV).⁸⁹ This program entails the transfer of assets of nearly two hundred state-owned or state-controlled companies to the private sector—including several assets of Sonangol’s economic group—and companies in the agribusiness, finance, transportation, and telecom industries.⁹⁰ Since the PROPRIV inception, Angola’s Institute for Management of State Assets and Stakes and the Minister of Finance have been promoting “roadshow” rounds with Portuguese, Chinese, and, recently, with English investors.⁹¹ By the end of this year, two more rounds are expected with investors from Spain and Germany.⁹²

The unprecedented anti-corruption enforcement and prevention actions discussed in this alert are key to Angola successfully rooting out a systemic corruption culture and improving its business environment. Undoubtedly, such efforts are welcomed by foreign companies whose interests in investing in Angola are to grow even more. According to Angola’s Central Bank (*Banco Nacional de Angola—BNA*), in 2020 foreign direct investment increased by USD\$ 2.59 billion.⁹³ Foreign investors seeking to do business in Angola must remain mindful of the corruption risks and the extraterritorial reach of the U.S. FCPA. Moreover, companies should create and maintain a culture of compliance and assess whether and how risks translate across the world.

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