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Review of implementation of the United Nations Convention against Corruption

Executive summary

Note by the Secretariat

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II. Executive summary

Cabo Verde

1. Introduction: overview of the legal and institutional framework of Cabo Verde in the context of implementation of the United Nations Convention against Corruption

The Republic of Cabo Verde signed the United Nations Convention against Corruption on 9 December 2003, ratified it on 1 April 2008 and deposited its instrument of ratification with the Secretary-General of the United Nations on 23 April 2008.

Under article 12 of the Constitution, duly ratified or approved treaties, once published, take precedence over domestic legislation.

Cabo Verde is an island State of West Africa comprising an archipelago of ten volcanic islands. Located in the Atlantic Ocean off the coasts of Mauritania and Senegal, Cabo Verde covers an area of approximately 4,000 square kilometres and has 500,000 inhabitants. Cabo Verde is a representative, semi-presidential democracy.

Cabo Verde was reviewed during the first review cycle ([CAC/COSP/IRG/I/2/1/Add. 36](#)).

National laws implementing chapters II and V of the Convention include, in particular, Decree-Law No. 4/2015 of 11 November 2015 approving the Criminal Code, Decree-Law No. 5/2015 of 11 November 2015 approving the Code of Criminal Procedure, the Electoral Code, the Code of Ethics and Conduct for Public Officials, Act No. 88/VII/2015 approving the Public Procurement Code, Act No. 18/VIII/2012 on asset recovery, Act No. 6/VIII/2011 on international judicial cooperation in criminal matters, Act No. 120/VIII/2016 of 24 March 2016 on money-laundering and Act No. 139/IV/95 on public oversight of the wealth of holders of political office.

The main institutions responsible for preventing and combating corruption are the Ministry of Justice, the national police, the Financial Intelligence Unit and the Bank of Cape Verde, the Court of Audit and the General Inspectorate of Finance.

2. Chapter II: preventive measures

2.1. Observations on the implementation of the articles under review

Preventive anti-corruption policies and practices; preventive anti-corruption body or bodies (arts. 5 and 6)

Cabo Verde has not established a national strategy for the prevention of corruption. Nevertheless, certain bodies in Cabo Verde have implemented general prevention policies which include components relating to the prevention of corruption and to good governance. Those bodies include, inter alia, the criminal investigation police, the Public Prosecution Service, the Justice Ombudsman, the Court of Audit, the General Inspectorate of Finance and the anti-fraud unit of the Directorate-General of Customs. However, the policies of those bodies are not specific to corruption and are not coordinated accordingly.

Although Cabo Verde has not established a national strategy, a number of corruption assessments have been conducted, including an assessment by the African Development Bank of the anti-corruption mechanism in 2012 and an assessment by AfroSondage of perceptions of corruption in 2013 and 2015.

Cabo Verde is a party to the African Union Convention on Preventing and Combating Corruption and participates in the African Union Advisory Board on Corruption. The country is also a party to the Economic Community of West African States (ECOWAS) Protocol on the Fight against Corruption. The customs administration of Cabo Verde is a member of the World Customs Organization.

A national authority responsible for combating corruption was previously established, but has since been dissolved. Cabo Verde has not created a new specialized body responsible for the implementation of preventive anti-corruption policies.

Cabo Verde was reminded of its obligation to inform the Secretary-General of the United Nations of the name and address of its authorities that may assist other States Parties in developing and implementing specific measures for the prevention of corruption.

Public sector; codes of conduct for public officials; measures relating to the judiciary and prosecution services (arts. 7, 8 and 11)

The Basic Civil Service Act (Act No. 42/VII/2009 of 27 July 2009) establishes the general criteria for the recruitment of all public officials (art. 26). Positions are filled through a public competitive recruitment procedure.

The rules relating to the selection and training of successful applicants are established by provisions specific to the various categories of public officials. For example, in the area of customs, six months of academic training is provided upon selection, followed by one year of technical training (art. 22 of the Post, Career and Salary Plan), during which customs officers are made aware of issues related to ethics and morality.

The Post, Career and Salary Plan for Public Officials establishes the criteria relating to the remuneration of officials and the formal criteria for their recruitment, such as the mandatory submission of birth certificates, criminal records and other documents that make up the relevant files. The Chair of the Financial Intelligence Unit is appointed for a period of three years, renewable once (art. 6 of Decree-Law No. 9/2012).

The Constitution establishes the general criteria relating to the eligibility of the President of the Republic and deputies of the National Assembly (arts. 110 and 117). Specific eligibility and ineligibility criteria are established by the Electoral Code (arts. 405 et seq.). However, only holders of political office who have received a criminal conviction become ineligible, for a period of 10 years, for election to the National Assembly (art. 405).

The Electoral Code establishes strict criteria relating to the funding of presidential candidates, political parties, coalitions, lists proposed by groups of citizens as well as representatives and election administrators (arts. 125 and 127). Natural persons who provide or accept prohibited funding will incur the same penalties as those applicable to corruption (art. 297 of the Electoral Code). However, that does not apply to legal persons.

Members of public authorities, civil servants and public officials are required to declare any situation that may represent a conflict of interest to their supervisor or to the president of the body that they belong to, and must not participate in proceedings in which they may have a personal interest (arts. 23-25, 29 and 30 of Legislative Decree 2/95 of 20 June). Any legal act or contract in which a conflict of interest is identified may be annulled (art. 30 of Legislative Decree 2/95).

In addition, the aforementioned persons are prohibited from engaging in professional activities in the private sector that are concurrent with, or conflict with, their public duties (art. 24 of Legislative Decree 2/95). However, Cabo Verde has not established any general rules relating to the prohibition of former public officials from exercising professional activities or taking up employment in the private sector where such activities or employment relate directly to their former functions. Nevertheless, such prohibitions exist in some internal regulations. For example, a minister was prevented from taking up a position at the Central Bank immediately after completing his term of office.

In 2015, Cabo Verde adopted a code of ethics and conduct for public officials, which was distributed among the various public authorities. The code establishes general guidelines bringing together the general principles applicable throughout the public

service. However, each authority is responsible for adopting its own code containing specific rules applicable to its staff. Furthermore, the code is not applicable to elected members, as they are excluded from the definition of “public official” (art. 362 of the Criminal Code).

Cabo Verde has established an annual declaration of interests, assets and income for holders of political office (art. 3 of Act No. 139/IV/95 of 31 October 1995). However, according to the definition provided by article 2 of Act No. 85/III/90 of 6 October 1990, only a small group of public officials is subject to the declaration requirement.

The legislation of Cabo Verde enshrines the principle of independence of all members of the judiciary and the principle of security of tenure of judges (art. 211 of the Constitution and art. 4 of Act No. 88/VII/2011 of 14 February 2011). The Judges’ Statute (Act No. 2/VIII/2011 of 14 February 2011) lays down detailed rules relating to the selection and recruitment of judges, their obligations with respect to integrity, the prohibition of conflicts of interest and the procedure for their disqualification (arts. 28 and 29).

In the event of infringement of the rules concerning integrity, disciplinary measures are taken by the High Council of the Judiciary. Those measures may extend to dismissal. The High Council of the Judiciary is also responsible for reviewing the files of applicants shortlisted following the public competitive recruitment procedure. Those files contain, inter alia, applicants’ criminal and police records.

Prosecutors do not report to the Minister of Justice but to the Attorney General. The Attorney General is appointed by the President of the Republic, but reports neither to the President of the Republic nor to the Government (art. 226 of the Constitution). In addition, prosecutors lack security of tenure.

Public procurement and management of public finances (art. 9)

The Public Procurement Code establishes the conditions of public procurement in Cabo Verde. The public procurement procedure is decentralized. The Code provides that any tendering procedure must be advertised by any means considered appropriate (art. 24). Accordingly, Cabo Verde is developing an electronic procurement system (e-procurement) to establish paperless tendering procedures and ensure that those procedures and their conduct are advertised as widely as possible (art. 199).

The Public Procurement Code also establishes the obligation to prepare and approve documents (art. 41) and the obligation to set the conditions for participation in advance. The Code establishes the criteria (art. 30), information (arts. 45 to 53) and types of documents required for each category of contract (art. 40).

An internal dispute procedure is provided for. Disputes are brought before the Dispute Resolution Committee of the Public Procurement Regulatory Authority (art. 183). The Committee may decide to suspend the tendering procedure or performance of the contract. However, that decision is not automatic; rather, it is taken if there is a conflict with the public interest when the tendering procedure is under way, or on the basis of the consequences of contract performance.

The budget is adopted on the basis of Act No. 78/V/98, known as the Basic Act on Adoption of the Budget. Decree-Law No. 29/2001, known as the Public Accounting Act, establishes the obligation to obtain and store supporting documents relating to all operations concerning budgetary, financial or property-related management of public goods for 10 years (arts. 90 and 123). Internal (self-monitoring and audit) and external systematic administrative control and judicial oversight, particularly by the Court of Audit (arts. 110 and 120 of Decree-Law No. 29/2001), are provided for (art. 28 of Act No. 78/V/98).

Cabo Verde has an electronic system for storing supporting documents in order to prevent their falsification. In addition, originals must be kept for a period of 10 years.

Information regarding the budget and financial management is disseminated periodically, including through electronic means available to the public (art. 89 of Decree-Law No. 29/2001).

Public reporting; participation of society (arts. 10 and 13)

The Public Procurement Code establishes the principle of publication of the procedures relating to public procurement (arts. 24 and 25). Decisions taken in that regard may be challenged (art. 182). Those challenges are brought before the Dispute Resolution Committee of the Public Procurement Regulatory Authority (art. 183). Decree-Law No. 29/2001 establishes the principle of publication of information relating to the budget and to financial management.

Furthermore, the “Citizens’ House” government office was created to serve as a “one-stop shop” for relations between members of the general public and their government administration (Decree-Law No. 35/2007 of 29 October). Citizens are invited to submit their claims and requests for access to information to that body.

Cabo Verde has also created several mobile applications to facilitate public access to the information of most importance to the general public.

The legislation of Cabo Verde has enshrined the principle of freedom of association and the right to join a trade union since 1981. Any body that represents civil society is free to form and express itself. There is also freedom of the press. In addition, the Financial Intelligence Unit carries out training and awareness-raising campaigns relating to the combating of money-laundering, for civil society. A television commercial has also been created to raise public awareness of the fight against money-laundering.

Lastly, a freephone line has been set up by the customs authorities to facilitate the reporting of offences, including anonymous reporting.

Private sector (art. 12)

The Code of Commercial Companies contains provisions on the obligation of private companies to keep accurate accounting books and records in such a way as to ensure the integrity and authenticity of entries (arts. 92 and 93).

Act No. 120/VIII/2016 of 24 March 2016 on money-laundering (hereinafter “the Money-Laundering Act”) also establishes the obligation of private companies to provide information to and collaborate with the prosecution and judicial authorities, particularly with regard to freezing and confiscation measures (art. 31) and the obligation to report suspicious transactions (art. 34).

The establishment of off-the-books accounts, the making of off-the-books or inadequately identified transactions, the recording of non-existent expenditure or the entry of liabilities with incorrect identification of their objects, the use of false documents and the intentional destruction of bookkeeping documents earlier than foreseen by the law are not directly punished with criminal sanctions. However, such acts are regarded as a breach of the obligation, for any business or trader, to adopt good accounting practices (arts. 80, 102 and 103 of the Code of Commercial Companies). The breach of that obligation is punishable: Businesses risk incurring a fine of between 100,000 and 10,000,000 Cabo Verde escudos, i.e. approximately 980 to 9,800 United States dollars (art. 559 of the Code), while members of governing bodies are regarded as individually and jointly liable for such activities (art. 171 of the Code).

The Code of Commercial Companies and the Tax Code make no reference to the prohibition of tax deductibility of expenses that constitute bribes. However, none of the acts constituting criminal offences under the law of Cabo Verde are subject to tax deductibility, as is the case with regard to the bribery of national and foreign public officials (arts. 363 (3) and 364 (4) of the Criminal Code).

Measures to prevent money-laundering (art. 14)

The Money-Laundering Act covers all aspects of money-laundering and in principle complies fully with international anti-money-laundering standards. The Act provides for a risk-based approach, with three levels of due diligence (standard, enhanced and simplified). Under article 2 (o) of the Money-Laundering Act, any illegal act punishable by a custodial sentence constitutes a predicate offence to money-laundering.

Cabo Verde has established a financial intelligence unit. The legal basis for the Unit, which is an administrative-type financial intelligence unit, is Decree-Law No. 9/2012 of 20 March 2012, which repealed previous Decree-Law No. 1/2008.

The supervisory authorities are listed in article 5 of the Money-Laundering Act. The Bank of Cape Verde (Central Bank) is the supervisory authority for financial institutions, the bar association and other institutions specifically referred to in article 4 of the Money-Laundering Act as designated non-financial businesses and professions. The Financial Intelligence Unit is the supervisory authority for all other entities. However, at the time of the country visit, the Unit did not have sufficient capacity to conduct inspections in relation to the implementation of anti-money-laundering standards in the entities under its supervision, as provided for by article 5 (j) of the Money-Laundering Act. In addition, given the small size of the country, it seems inappropriate that 10 authorities should share the task of oversight in relation to money-laundering (art. 5 (a) to (j)).

Articles 9 and 11 of the Money-Laundering Act provide for measures to detect and monitor the cross-border movement of cash and negotiable instruments. In particular, those articles oblige individuals and businesses to report cross-border movements of cash exceeding 1,000,000 Cabo Verde escudos (approximately 10,000 United States dollars). Articles 9 and 27 of the Money-Laundering Act regulate the electronic transfer of funds in general.

Cabo Verde is a member of the Intergovernmental Action Group against Money Laundering in West Africa (GIABA), a regional body similar to the Financial Action Task Force (FATF). As a member of the Intergovernmental Action Group against Money Laundering in West Africa, Cabo Verde implements the recommendations of the Financial Action Task Force.

2.2. Successes and good practices

- Natural persons who provide or accept prohibited funding incur the same penalties as those applicable to corruption (art. 7 (3))
- The originals of digitized supporting documents must be kept for a period of 10 years (art. 9 (3))
- A freephone line has been set up by the customs authorities to facilitate the reporting of offences, including anonymous reporting (art. 13 (2)).

2.3. Challenges in implementation

It is recommended that Cabo Verde:

- Consider adopting a national strategy to ensure that the various anti-corruption policies are effective and coordinated (art. 5 (1))
- Consider establishing and promoting specific anti-corruption practices, such as awareness-raising and education campaigns (art. 5 (2))
- Ensure the existence of a body or bodies that prevent corruption (art. 6)
- Endeavour to strengthen the application system for certain positions vulnerable to corruption and, where appropriate, ensure rotation for certain positions (art. 7 (1) (b))

- Ensure that criteria relating to candidature for public office are established with a view to preventing corruption (art. 7 (2))
- Consider establishing penalties applicable to legal persons in the event of violation of the rules relating to the funding of presidential candidates, political parties, coalitions, lists proposed by groups of citizens as well as representatives and election administrators (art. 7 (3))
- Consider establishing a general prohibition on the exercise of professional activities by, or employment of, former public officials in the private sector, for a reasonable period of time, where such activities or employment relate directly to the functions held or supervised by those public officials during their tenure (art. 7 (4) and art. 12 (2) (e))
- Endeavour to include elected members in the definition of “public official” in order to ensure that the Code of Ethics and Conduct adopted in 2015 also applies to them fully, or adopt specific codes for them (art. 8 (2))
- Endeavour to extend the scope of application of the declaration of interests, assets and income to a broader category of public officials (art. 8 (5))
- Continue efforts to enhance transparency in its public administration, particularly with regard to the right of citizens to access information, the simplification of procedures for that purpose and the publication of information (art. 10)
- Take measures to strengthen the prevention of corruption involving the private sector, in particular the enhancement of cooperation between law enforcement agencies and private entities beyond money-laundering issues, the promotion of standards and procedures designed to safeguard the integrity of private entities, the promotion of transparency among private entities, the prevention and criminalization of the misuse of procedures regulating private entities, and the prevention of conflicts of interest (art. 12 (1) and (2))
- Strengthen the active participation of individuals and groups outside the public sector and expand anti-corruption awareness campaigns (art. 13)
- Consider establishing a single financial supervisory authority, or entrusting that role to the Bank of Cape Verde, and providing it with the necessary resources (art. 14 (1))
- Consider giving the Financial Intelligence Unit the power to order administrative freezing or the power to block the execution of a transaction for a specific period (arts. 14 (2), 54 (2) (b) and 58).

2.4. Technical assistance needs identified to improve implementation of the Convention

- Capacity-building for the institutions mandated to prevent corruption so that they are able to assess the situation of the country in that regard, develop a national strategy and implement it effectively (art. 5)
- Assistance with the establishment of a body that prevents corruption (art. 6)
- Assistance with the move to paperless procedures and information and the simplification of access to information (arts. 9 and 10)
- Collection of statistical data.

3. Chapter V: asset recovery

3.1. Observations on the implementation of the articles under review

General provision; special cooperation; bilateral and multilateral agreements and arrangements (arts. 51, 56 and 59)

In principle, two agencies are involved in asset recovery: the Asset Recovery Office and the Office for the Administration of Property, both established by Act No. 18/VIII/2012 of 13 September 2012. The Asset Recovery Office is overseen by the National Criminal Investigation Directorate and has functions similar to those of the criminal police bodies, in accordance with article 2 of the aforementioned Act. However, at the time of the country visit, the Office was not yet fully operational. The Office for the Administration of Property is part of the Office of the General Justice Fund, the role of which is to manage seized property within the framework of national procedures or instruments relating to international judicial cooperation (art. 11 of Act No. 18/VIII of 2012).

The Financial Intelligence Unit may exchange information upon request and without prior request (art. 53 of the Money-Laundering Act).

Cabo Verde has already signed and ratified a number of conventions on international cooperation, including in particular the ECOWAS Convention on Mutual Assistance in Criminal Matters of 1992.

Prevention and detection of transfers of proceeds of crime; financial intelligence unit (arts. 52 and 58)

The concept of “beneficial owner” is defined in article 2 (1) (e) of the Money-Laundering Act. Verification of the identity of customers and beneficial owners is provided for in articles 12 to 15 of the Money-Laundering Act. Article 12 establishes the obligation to verify the identity of the beneficial owner at the outset of a business relationship. Article 15 addresses the obligations of customer due diligence.

Politically exposed persons are defined in article 2 (1) (t) and (2) and are the subject of article 24 of the Money-Laundering Act. The definition includes domestic politically exposed persons. Under article 22 (3) of the Money-Laundering Act, politically exposed persons are subject to enhanced due diligence. However, the identification of foreign politically exposed persons remains problematic because the authorities do not use sophisticated screening or search software tools to identify them. The Ministry of Foreign Affairs does transmit lists of foreign politically exposed persons to the supervisory authorities, but that applies only to the Consolidated United Nations Security Council Sanctions List. That approach does not enable an up-to-date and comprehensive list of foreign politically exposed persons to be maintained.

The Money-Laundering Act provides for an approach with three levels of due diligence (standard, enhanced and simplified). Enhanced due diligence is provided for in article 22 of the Act. It is always applicable to remote transactions, including those that could facilitate anonymity, and to transactions involving politically exposed persons, related banking transactions with financial and banking institutions located in third countries and any other transactions designated by the respective regulatory and supervisory authorities (art. 22 (3) of the Act).

The obligation to keep documents for at least seven years is provided for in article 25 of the Money-Laundering Act. “Shell banks” (banks that have no physical presence) are prohibited in Cabo Verde (art. 17 of the Act).

Declarations of assets do not include foreign assets.

The Financial Intelligence Unit has the capacity to receive, process and analyse reports of suspicious financial transactions and to refer them to the Attorney General. In the majority of cases, suspicious transactions are reported by the banking sector. Since 1 February 2017, the Unit has been a member of the Egmont Group of Financial Intelligence Units. As a member of that group, the Unit can cooperate with the other

members without the need for a specific cooperation agreement. Nonetheless, the Unit has concluded agreements with several financial intelligence units (including, inter alia, those of Portugal, France, Nigeria, Angola and Brazil). The Unit does not have the power to order administrative freezing or the power to block the execution of suspicious transactions for a specified period. Only prosecutors have the power to block the execution of a suspicious transaction (art. 32 (2) the Money-Laundering Act).

Measures for direct recovery of property; mechanisms for recovery of property through international cooperation in confiscation; international cooperation for purposes of confiscation (arts. 53, 54 and 55)

Under the Code of Civil Procedure, foreign States have the same status as any other legal person. As such, they may be a party to legal proceedings like any person and are subject to the general internal rules of procedure, including with regard to the need to demonstrate a legitimate interest. In addition, a foreign State may also bring a civil suit under the Code of Criminal Procedure. The capacity to act as a party to legal proceedings includes the capacity to initiate civil action before the national courts in order to establish title to or ownership of property and to claim compensation or damages.

Articles 91 et seq. of the Act on International Judicial Cooperation (Act No. 6/VIII/2011) of 29 August 2011 govern the enforcement of foreign judgments. A confiscation order issued by a foreign court may be enforced under article 94 of the Act on International Judicial Cooperation, as well as under article 20 of the ECOWAS Convention on Mutual Assistance in Criminal Matters of 1992.

The Code of Criminal Procedure contains provisions on the seizure of property and assets that are the proceeds of crime (arts. 243 et seq.). Articles 98 and 99 of the Criminal Code contain provisions on confiscation. The Money-Laundering Act establishes freezing and confiscation measures that are specific to money-laundering (arts. 45 to 59). In accordance with article 57 (2) of the Money-Laundering Act, property, deposits or assets are presumed to be of illicit origin where it is impossible to determine their licit origin or where the person accused provides false information to the judicial authorities on his or her economic and financial situation.

The legislation of Cabo Verde does not provide for the direct enforcement of a freezing or seizure order issued by a foreign court. However, Cabo Verde may freeze or seize property at the request of another State Party. In accordance with article 108 of the Act on International Judicial Cooperation, a judge may order, at the request of the Public Prosecution Service, any provisional measures necessary for the preservation and maintenance of items seized and in order to ensure the enforcement of the judgment regarding confiscation.

The content of requests for mutual legal assistance is determined by the Act on International Judicial Cooperation (arts. 23 and 149). Article 4 of the Act provides that international cooperation is governed by the rules of the international treaties, conventions and agreements to which Cabo Verde is party or, in the absence of such instruments, by the provisions of the Act. Therefore, the Code of Criminal Procedure applies on a secondary basis. The primacy of international treaties, conventions and agreements over domestic legislation is established in article 12 of the Constitution. Accordingly, the Convention may be used as a legal basis.

Article 6 of the Act provides for cases in which cooperation requests are denied, and article 23 establishes the circumstances under which such requests may be granted.

The legislation of Cabo Verde does not provide for the possibility, before lifting any provisional measure, to give the requesting State Party an opportunity to present its reasons in favour of continuing the measure. The rights of bona fide third parties are protected by article 56 of the Money-Laundering Act, article 28, paragraph 3, of the Act on International Judicial Cooperation and article 20 of the ECOWAS Convention on Mutual Assistance in Criminal Matters.

Return and disposal of assets (art. 57)

Cabo Verde can return confiscated property pursuant to articles 31 or 55 of the Convention against Corruption (arts. 47 (3) and 49 (4) of the Money-Laundering Act and arts. 106 and 158 of the Act on International Judicial Cooperation). Under article 47 (3) of the Money-Laundering Act, confiscated property is usually divided equally between the requesting State and Cabo Verde. However, that rule applies only in the absence of a treaty or convention that stipulates otherwise. The Convention can be considered as such a convention.

The rights of bona fide third parties and the rights of legitimate owners are protected by article 56 of the Money-Laundering Act and article 28 of the Act on International Judicial Cooperation. Article 26 of the latter Act provides that cooperation requests are, in principle, executed free of charge. However, there is nothing to prevent Cabo Verde from deducting reasonable expenses incurred in investigations, prosecutions or judicial proceedings leading to the return or disposition of confiscated property.

3.2. Successes and good practices

- The definition of politically exposed persons includes domestic politically exposed persons (art. 52 (1))
- Under the Code of Civil Procedure, foreign States have the same status as any other legal person.

3.3. Challenges in implementation

It is recommended that Cabo Verde:

- Introduce an adequate mechanism to ensure full identification of all foreign politically exposed persons (art. 52 (1))
- Ensure that the competent authorities, notably the anti-money-laundering supervisory authorities (including the Financial Intelligence Unit and the Inspectorate-General of Casino Games), have the resources they need to carry out their functions (art. 52 (1))
- Consider taking such measures as may be necessary to require public officials having an interest in or signature or other authority over a financial account in a foreign country to report that relationship to the appropriate authorities (art. 52 (6))
- Provide for the direct enforcement of a freezing or seizure order issued by a foreign court (art. 54 (2) (a))
- Provide that, before lifting any provisional measure, Cabo Verde shall, wherever possible, give the requesting State Party an opportunity to present its reasons in favour of continuing the measure (art. 55 (8))
- Consider granting the Financial Intelligence Unit the power to order administrative freezing or the power to block the execution of suspicious transactions for a specified period (art. 58).

3.4. Technical assistance needs identified to improve implementation of the Convention

- The development of procedures for the revaluation of seized property and its sale at public auction.