廉政公署
CCAC

2025

Annual Report of the Commission Against Corruption of Macao



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The Commissioner Against Corruption, Ao Ieong Seong, submitting the *2025 Annual Report of the CCAC of Macao* to the Chief Executive, Sam Hou Fai

FOREWORD

The Legislative Assembly elections are crucial political events for Macao to implement the principles of "One Country, Two Systems" and "Patriots Governing Macao". The CCAC bears the responsibility of ensuring that the elections are carried out in a fair, just and clean environment in an orderly manner. Therefore, in 2025, the CCAC spared no effort to ensure the lawfulness and probity of the 8th Legislative Assembly Elections and made them the top priority of its annual work. During this period, it vigorously combatted electoral bribery and curbed various irregularities so as to promote a healthy election culture in society.

As always, the CCAC proactively deployed election work using a two-pronged strategy of prevention and crackdown. A "task force for supervision on elections" was established to analyse and follow up on election reports and complaints received from various channels, and to continuously inspect and comprehensively monitor all election activities. A total of over 16,000 inspections were conducted, and 30 investigation files were opened. By promptly investigating cases, the CCAC curbed early signs of irregularities and handled election cases efficiently and lawfully. Among the concluded cases, five were referred to the Public Prosecutions Office for further handling. In addition, the CCAC launched a series of clean election publicity and promotion activities to strengthen the law-abiding awareness of the public and to create a clean election atmosphere in the society. In summary, the CCAC fulfilled its responsibilities to the fullest extent and the elections were carried out in a positive and orderly atmosphere.

In addition to monitoring the elections, in 2025, the CCAC was committed to supporting the SAR Government's "upholding the rule of law in Macao" and people-oriented governance objectives, making corresponding deployment in various aspects of anti-corruption work, fulfilling its duties in corruption fighting, supervision and integrity promotion and actively implementing President Xi Jinping's important instructions and high expectations for Macao's anti-corruption efforts.

The CCAC strives to fundamentally consolidate the achievements in anti-corruption work and prevent the escalation of corruption, and is not deterred by the scale or severity of cases. Regarding the anti-corruption work, in 2025, the CCAC adopted a combined approach of prevention and crackdown,

and placed 191 cases on file throughout the year (excluding election cases). Cases in the private sector still primarily involved bribe solicitation by department chiefs of integrated resort enterprises and disputes over building maintenance and management, while multiple reports involving public servants abusing sick leave and falsifying attendance records were received in the public sector. Regarding the ombudsman's work, 172 cases were placed on file throughout the year, with public sector operations and personnel management remaining the most prominent focus, particularly issues related to internal operation and management of departments as well as the recruitment, discipline and rights of personnel.

The CCAC makes corresponding deployment based on the characteristics and trends of the cases and uses the cases to resolve related problems. For example, in response to the increasing number of cases involving public servants using false sick leave certificates and corruption cases in the financial system in recent years, in addition to cracking down on these issues rigorously, the CCAC also conducts targeted education work for relevant departments or institutions so as to address the root causes. Furthermore, the CCAC intends to further strengthen communication and cooperation with public sectors and entities, to encourage leadership-driven efforts to build a culture of integrity, and to carry out risk management based on the Macao SAR's development, thereby proactively addressing and preventing corruption risks.

As regards external exchange, the CCAC has strengthened its internal and external connections, actively "going global" to enhance Macao's international influence and competitiveness. It organised delegations to visit key central ministries and commissions as well as supervisory and judicial bodies in various provinces and cities, as well as received visits from overseas anti-corruption agencies. In addition, at the invitation of the Independent Commission Against Corruption of Hong Kong, the CCAC sent personnel to Brasília, the capital of Brazil, to jointly conduct a training programme for local anti-corruption and law enforcement agencies of Brazil, during which the corruption fighting history of Macao, the functions of the CCAC and the relevant laws, cases solved by the CCAC and its investigation measures, among other information, were shared with the trainees, which showcased the achievements of the Macao SAR's successful implementation of "One Country, Two Systems" and its anti-corruption experience. It also actively cooperated with the country in the review of the implementation of the United Nations Convention against Corruption.

As regards promotion and education, in addition to providing diverse educational content for the public and private sectors, the CCAC also created platforms for the public, especially young people, to participate in integrity building, including selecting a team representing Macao to participate in international anti-corruption programming competitions. Macao's youth, through their tireless efforts and outstanding talent, repeatedly won honours in the competitions. They will also assist the United Nations Office on Drugs and Crime in developing AI teaching tools, aiming to leverage innovative technology to support global integrity education. They have lived up to the high regard of the country and the SAR for Macao's youth, which is inspiring and brings glory to Macao.

We should build on the past and anchor the future. The rule of law is the cornerstone for social stability and development, and improving the legal systems helps enhance public confidence in the SAR Government's governance according to law and integrity building. In the new year, the CCAC will remain committed to its responsibilities, combatting and preventing corruption, strengthening oversight and carrying out key tasks in an orderly manner. It will also continue to earnestly achieve the Chief Executive's policy visions of "following the right path, innovating and embracing reform" and "upholding the rule of law in Macao", and will support the country's "15th Five-Year Plan" and the Macao SAR's "3rd Five-Year Plan" to provide the safeguard of integrity for the national development strategy and the moderate diversification of the Macao SAR's economy.

March 2026

The Commissioner Against Corruption

Ao Ieong Seong

Statistics on major work in 2025

Anti-corruption and ombudsman actions

- The CCAC received a total of **971** complaints, reports and sources of information, of which **153** involved the 8th Legislative Assembly Elections.
- Following consolidation of the complaints or reports according to the subject matters, in 2025, there were a total of **427** cases placed on file and **334** cases which did not meet the conditions to be placed on file and were sent to the Complaint Management Centre for handling.
- Along with the cases carried forward from 2024, the CCAC concluded a total of **292** investigation files in 2025.
- A total of **1,366** requests and enquiries were received.
- As regards anti-corruption actions, a total of **191** cases were placed on file for investigation and **34** cases were placed on file for mutual assistance.
- A total of **30** cases related to the 8th Legislative Assembly Elections were placed on file.
- A total of **63** mutual assistance cases were followed up, including **54** cases at the requests for case assistance received from counterparts outside the region and **9** requests for case assistance made by the CCAC to counterparts outside the region.
- A total of **14,422** submissions of declaration of assets and interests were received and a total of **118** overdue notices were sent to those who failed to submit the declaration within the statutory period.

Anti-corruption and ombudsman actions

As regards ombudsman actions, the Ombudsman Bureau concluded investigation and archived a total of **130** cases.

Of the **172** cases newly placed on file by the Ombudsman Bureau, **171** were under inquiry and **1** was under comprehensive investigation.

There were a total of **11** cases included in the list of "retrospective review" that were newly-added or those requiring follow-up actions.

Promotion and education

A total of **547** seminars, talks and activities of different types were held, which recorded **34,557** participants.

The two Branch Offices provided **612** people with the services of receiving complaints, reports and requests for consultation in 2025.

PART I

CASE PROCESSING SUMMARY

PART I
CASE PROCESSING SUMMARY

I. Overview of cases handled

In 2025, the CCAC received a total of 971 complaints, reports and sources of information, of which 153 involved the 8th Legislative Assembly Elections. Judging from the sources, 919 were lodged by residents, 20 were referred by other departments, 23 were followed up by the CCAC upon gathering information on its initiative, two involved information related to cases received from judicial bodies and seven involved information obtained from internal information exchange between the Anti-Corruption Bureau and the Ombudsman Bureau. Meanwhile, at the request from law-enforcement agencies outside the Macao SAR, the CCAC placed 34 cases on file for mutual assistance. In addition, the CCAC received a total of 1,366 requests and enquiries throughout 2025.

Statistics on sources of information recorded in 2025

Sources of information	2025	
	Total	Percentage
Complaints or reports lodged by residents	919	94.64%
Cases referred by other public bodies	20	2.06%
Cases followed up on the CCAC's initiative	23	2.37%
Cases placed on file for investigation by judicial bodies	2	0.21%
Cases intervened by both the Anti-Corruption Bureau and the Ombudsman Bureau	7	0.72%
Total	**971**	**100%**

In 2025, the CCAC optimised its complaint and report handling work. Firstly, it strengthened the resources of the Complaint Management Centre by deploying personnel from within the CCAC. Secondly, the handling of in-person complaints was centralised at the Complaint Management Centre, replacing the previous multi-channel approach. This has made the methods and standards for handling in-person complaints more reasonable and standardised and has streamlined the workflow.

After receiving complaints or reports from different channels, the Complaint Management Centre conducts a preliminary analysis and then forwards them to the Commissioner Against Corruption of the CCAC to determine the follow-up procedure based on their content and nature: cases probably involving criminal offences are referred to the Anti-Corruption Bureau for investigation; those involving

administrative violations are referred to the Ombudsman Bureau for follow-up; if the content of the complaint or report is uncertain or difficult to investigate, the whistleblower will be notified to provide more information to determine whether the case can be further followed up or should be archived by the Complaint Management Centre. If the matter alleged in the report falls outside the CCAC's jurisdiction, it will be referred to other relevant departments for follow-up, depending on the circumstances.

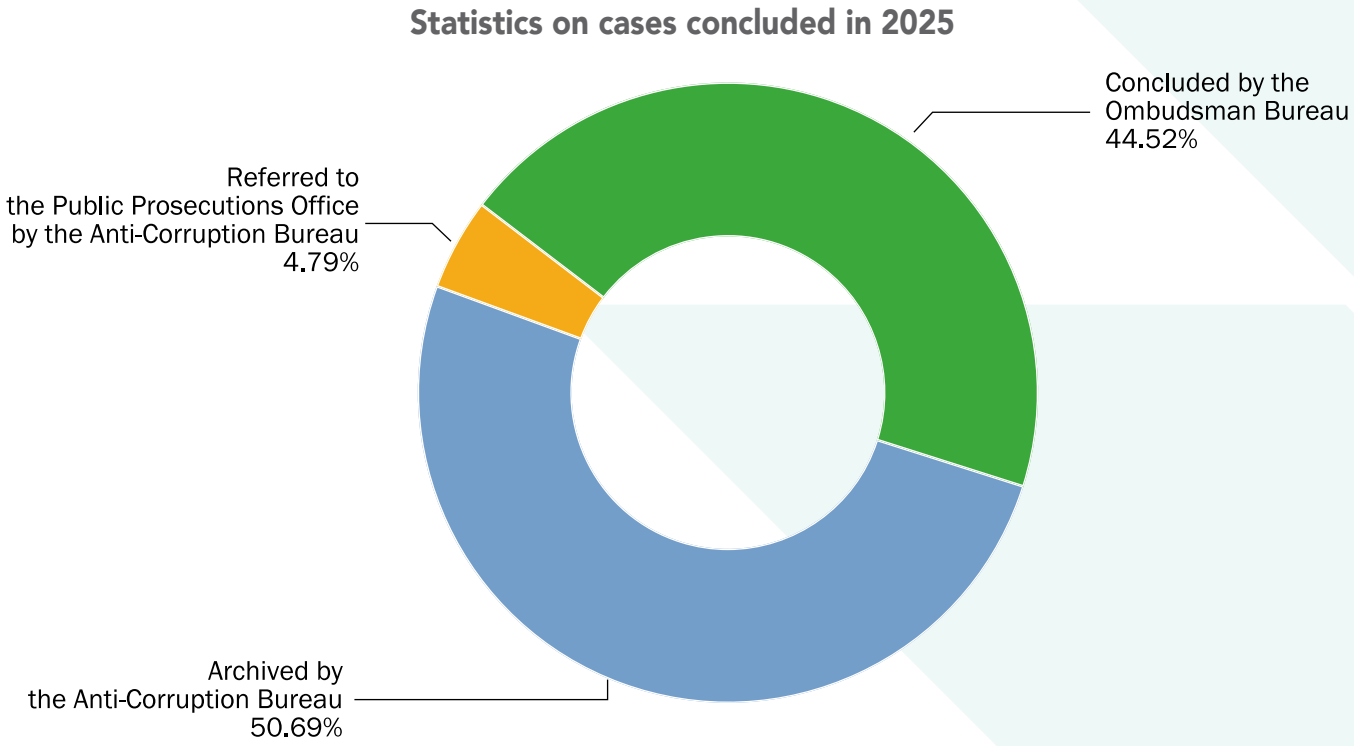
In 2025, the CCAC placed a total of 427 cases on file, including 34 requests for case assistance, 191 cases (excluding election cases) placed on file by the Anti-Corruption Bureau and 172 cases placed on file by the Ombudsman Bureau. A total of 30 cases related to the 8th Legislative Assembly Elections were placed on file.

In addition, there were a total of 334 cases which did not meet the conditions to be placed on file and were sent to the Complaint Management Centre for handling, of which 238 were archived and the remaining 96 were referred to competent departments for follow-up.

Statistics of the Complaint Management Centre in 2025

Type		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Requests/enquiries of different nature		122	107	127	118	133	124	123	103	150	84	82	93	**1,366**
Sources of complaints	Complaints or reports lodged by residents (together with cases referred by other public bodies)	63	45	79	72	72	114	103	74	117	81	56	63	**939**
	Complaints or reports from other sources	2	1	4	1	1	3	11	2	4	2	1	0	**32**
Distribution of complaints	Cases placed on file by the Anti-Corruption Bureau	18	12	26	17	13	32	25	15	23	15	8	17	**221**
	Cases placed on file by the Ombudsman Bureau	10	11	10	18	21	18	22	14	11	18	6	13	**172**
	Cases handled by the Complaint Management Centre	26	17	24	28	25	29	35	29	35	33	30	23	**334**

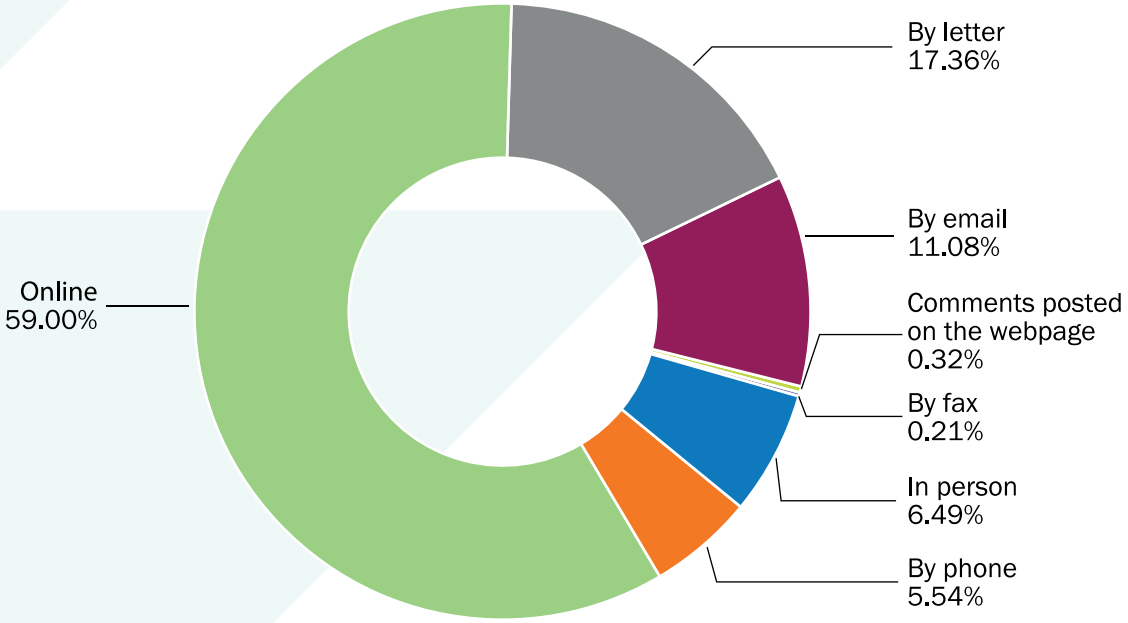
Along with the cases carried forward from 2024, the CCAC concluded a total of 292 cases in 2025. Among the 162 cases concluded by the Anti-Corruption Bureau (including 142 corruption or election cases and 20 mutual assistance cases), 14 were referred to the Public Prosecutions Office and the remaining 148 were archived. Among the 130 cases concluded by the Ombudsman Bureau, 34 cases had been improved and optimised by the departments concerned and 11 cases were included in the list of "retrospective review" in order for another review.



II. Main channels for receiving cases

The numbers and percentages of the complaints and reports received by the CCAC in 2025 through different channels are as follows: 61 lodged in person; 52 received through the complaint hotline; 554 received through the online complaint system; 163 received by letter; 104 received by email; three comments posted on the webpage and two received by fax (See the percentages in the following chart).

Statistics on methods to lodge complaints and reports in 2025[1]



1. In-person complaints/reports

The CCAC always encourages residents to file real-name complaints in person. In-person complaints allow the CCAC to gather more clues, which facilitates smoother investigations. When it comes to in-person real-name complaints, residents may choose to be named or request anonymity. The CCAC will, according to the whistleblower's wish, properly and effectively protect the whistleblower's identity procedurally. By improving the protection mechanisms, the CCAC aims to create a safe and reliable reporting environment for residents, so as to eliminate their concerns and encourage more people to bravely report corruption or file complaints to protect their rights.

To manage its work more reasonably, the CCAC encourages those filing complaints in person to make appointments online in advance to decide the time and place of filing their complaints. In recent years, the usage rate of the online appointment system has been steadily increasing, and the CCAC has been continuously optimising and improving the relevant appointment system.

According to statistics, 129 appointments were made through the system in 2025 and the complainants showed up for 113 appointments, accounting for 87.6% of all appointments made through the system throughout the year. Walk-in in-person complaints without an appointment may increase waiting time, and therefore the CCAC hopes that residents will make better use of the aforesaid system.

[1] Including those referred by public entities.

2. By the online platform for filing complaints/reports

In order to facilitate residents to file complaints or reports online, the online complaint platform was launched on the webpage of the CCAC in 2015 and its usage rate has been continuously increasing. In 2025, there were 554 complaints or reports lodged by residents through the online complaint system, making up the highest proportion of all methods to lodge complaints or reports throughout the year (59%).

Given that online complaints will remain one of the CCAC's primary methods for receiving complaints and reports, the CCAC will continue to optimise the content, interface and operational procedures of the online complaint system as well as the enquiry code system, so as to facilitate appropriate communication with complainants and allow them to track the progress of their cases in a timely manner.

According to statistics on the issuance and use of enquiry codes, the CCAC issued a total of 1,302 enquiry codes in 2025 due to complaints or reports (including supplementary complaints). Records showed that nearly 45% of these enquiry codes had been used, and about 65% of them were used for supplementary complaints at the same time. This shows that residents who use enquiry codes to track the progress of their cases also frequently use this convenient method to supplement their complaints.

3. By email

In 2025, the CCAC received 104 complaints or reports by email, accounting for about 11.08% of the total complaints received. As compared with emails, the online complaint system is more convenient and efficient because it can effectively integrate the content of the complaints, the relevant information and other files submitted and uploaded by residents. This not only facilitates the initiation of investigation procedures but also allows whistleblowers to immediately receive enquiry codes for tracking the case follow-up progress or receiving information. The CCAC therefore encourages residents to opt for the online complaint system to enhance the complaint handling efficiency.

4. By letter and other methods

Letters, a traditional reporting method, remain one of the important channels for the CCAC to receive complaints or reports. In 2025, a total of 163 cases were reported by letter, accounting for 17.36% of the total complaints received. These included letters from whistleblowers by mail, as well as cases referred by various government departments and judicial organs in accordance with their authority. In addition, there were also complaints or reports made through online comments posted on the webpage or by fax.

III. Real-name and anonymous reports under the principle of confidentiality of cases

1. Confidentiality system

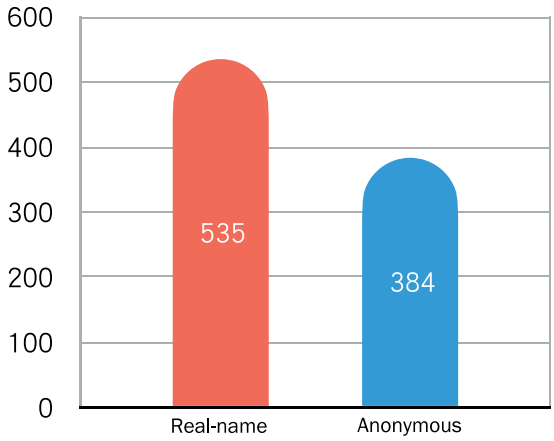
The principle of confidentiality has always been a crucial rule upheld by the CCAC, and a bottom line consistently adhered to by the personnel of the CCAC of Macao. This principle is maintained throughout the entire process of a case - from receiving a clue to placing a case on file, investigating it and concluding it, confidentiality is a legal obligation that all investigators must abide by. In fact, the law also provides protection for whistleblowers. The *Penal Code*, the *Penal Procedure Code*, the *Personal Data Protection Law*, the *Legal Regime of Declaration of Assets and Interests*, and the CCAC's legal systems - all stipulate confidentiality obligations from different perspectives.

The CCAC attaches great importance to protecting the identity of whistleblowers and has a very strict confidentiality system. No one unrelated to the process has the right to access the whistleblower's identity information or the content of the complaint. Furthermore, investigators must adhere to the principle of independent working and recusal procedures to ensure the confidentiality of complaints, which allows whistleblowers to confidently report corruption crimes.

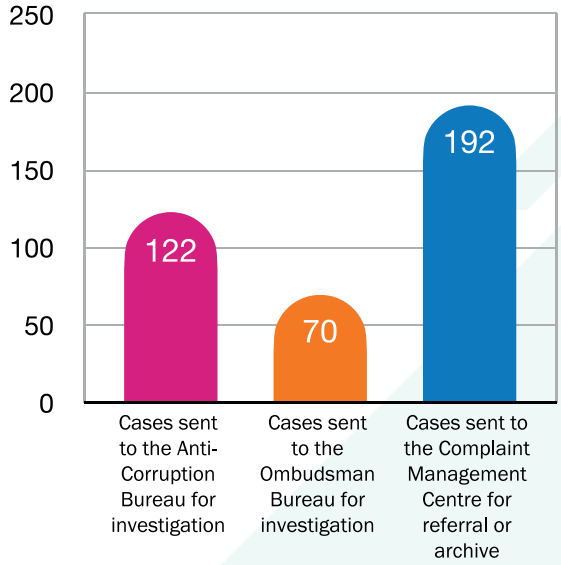
2. Real-name and anonymous complaints or reports

Among the complaints or reports in 2025, 535 were made under real names (including those requesting anonymity), while 384 were made anonymously. The CCAC also hopes that more residents will choose to make reports using their real names on the online complaint platform to facilitate case investigation and evidence collection.

Statistics on real-name and anonymous complaints or reports in 2025



Anonymous complaints or reports handled in 2025



The CCAC continues to fully promote the computerisation of case processing. Up to December 2025, computerisation of around 99.77% of the cases under processing was completed, while around 80.41% of the archived cases over the years have been completely computerised.

PART II

EFFORTS IN UPHOLDING INTEGRITY OF THE 8TH LEGISLATIVE ASSEMBLY ELECTIONS

PART II
EFFORTS IN UPHOLDING INTEGRITY OF THE 8TH LEGISLATIVE ASSEMBLY ELECTIONS

The 8th Legislative Assembly Elections, the first Legislative Assembly elections held in accordance with the newly amended *Electoral Law of the Legislative Assembly*, took place in 2025. This serves as a major political event in Macao. As the CCAC profoundly understood its significant responsibility to safeguard the integrity of the elections, it set the ensuring of the legality, integrity, impartiality and justice of the running of the 8th Legislative Assembly Elections as the priority of the year. The whole team of the CCAC spared no effort to carry out the statutory functions of supervision, promotion and education of the elections according to their duties.

According to the legal regime of the CCAC and the *Electoral Law of the Legislative Assembly*, the CCAC carries out the supervision and promotion of electoral integrity with a holistic and multi-level approach, which effectively suppressed irregularities related to the elections, proactively fostered a good atmosphere of clean elections in society, ensured the successful running and completion of the Legislative Assembly elections, thus providing a strong safeguard of integrity for the full implementation of the principle of "Patriots Governing Macao" and propelled the Macao SAR towards law-based governance and a new journey of democratic development from the new starting point.

I. Supervision of electoral integrity

Prioritising the safeguard of integrity of the 8th Legislative Assembly Elections, the CCAC deployed key investigative resources to and put the investigative focus on the supervision of the elections. The whole team spared no effort to carry out supervision of election activities in a holistic manner so as to ensure the smooth running of the Legislative Assembly elections in a law-based, clean, impartial and just environment. During the election period, the CCAC made targeted deployment and carried out effective supervision according to different phases and characteristics of election activities.

Prior to the Chief Executive's announcement of an administrative order on 3rd March 2025 to set the date of the Legislative Assembly Elections as 14th September 2025, the CCAC proactively took actions to prepare for the supervision work, including arranging for its personnel to study the newly amended *Electoral Law of the Legislative Assembly*, forming the "task force for supervision on elections", collecting intelligence and information about the elections and optimising the filtering of reports and complaints and the mechanisms of analysis and referral, so as to ensure timely handling of complaints about the elections.

As soon as the the Chief Executive announced the date of the Legislative Assembly elections on 3rd March 2025, the CCAC launched the "online electoral complaint platform" jointly established with the Electoral Affairs Commission for the Legislative Assembly Elections (hereinafter the "Electoral Affairs Commission") and activated the "24-hour reporting hotline for the Legislative Assembly Elections" in order for residents to file reports and complaints. When the reports or complaints involved the functions of the Electoral Affairs Commission or other departments, the CCAC would quickly and effectively refer the cases to the departments concerned for follow-up actions through the internal "case referral platform". At the same time, the CCAC launched a thematic webpage on the promotion of clean elections in order to provide residents with the information about electoral integrity.

As various types of works related to the elections officially commenced in March 2025, individuals and groups intending to run for the elections successively collected nominations and formed their nomination committees. In order to prevent crimes involving electoral corruption, the CCAC carried out holistic supervision through both overt actions and covert investigations, stepped up inspections at catering establishments and took the initiative to intervene into and investigate the suspicious activities where benefits were given away. Prioritised inspections were carried out on activities intended for granting food and beverage benefits and activities involving distribution of cash, gifts or gift vouchers held by civic associations. As to the irregular and even illegal acts carried out through the activities granting benefits, the CCAC took the initiative to exercise its functions to intervene into the situations or refer them to the competent entities for follow-up. Also, the CCAC gave timely admonition to rectify the activities with improper intentions in order to nip the illegalities in the bud.

In addition, the CCAC, on its own initiative and according to actual situations, contacted the civic associations that intended to organise catering events or give away various kinds of benefits in order to explain to them the provisions and requirements regarding declaration under the *Electoral Law of the Legislative Assembly* and inform them that the CCAC might, according to its powers and actual situations, inspect their activities where benefits were given away. Also, the CCAC requested all civic associations to strictly comply with the stipulation that activities granting benefits and electoral campaigns should not be related to each other.

During the campaign period, the CCAC stepped up the inspections of catering establishments and venues where activities granting various benefits took place. It inspected the declared situations of such activities held by civic associations, as well as those in which the candidates participated, and monitored the relevant declared activities. Once irregularities were detected, the CCAC investigated them immediately in order to suppress explicit or implicit electoral campaigns and canvassing acts in such activities.

On 13th September 2025, the day before the polling day, which was the cooling-off day of the Legislative Assembly elections, the CCAC closely monitored the reports received through various channels and stepped up the inspection and supervision in various locations in Macao and on the internet. It dispatched personnel to carry out holistic inspections at different streets and alleys, premises of civic associations and catering establishments, among other places, and deployed information technology personnel to closely monitor the internet. On 14th September 2025, the polling day of the Legislative Assembly elections, the CCAC mobilised all of its personnel to carry out holistic and continual inspections at the outside of polling stations, campaign headquarters, premises of civic associations, different streets, alleys and gathering spots in Macao, which holistically covered various districts of the city. Meanwhile, the CCAC also kept on monitoring the internet so as to discover illegalities in a timely manner and handle them immediately. The CCAC treated all candidate groups equally and impartially in terms of supervision and ensured that the voting was carried out with integrity in an orderly manner and eradicated all crimes of electoral corruption through a series of supervisory approaches mentioned above.

Coordinated by the Electoral Affairs Commission, with the preliminary preparation and advanced planning made by the CCAC and the public departments, the whole polling process ran in an orderly manner on the election day. Every polling station operated in a smooth and orderly manner. The voters actively and enthusiastically exercised their civil right to vote. The total voter turnout of the direct election reached 53.35%, with over 175,000 voters casting their votes, recording an increase of voter turnout by nearly 11% and an additional of around 38,000 voters who casted their votes compared with that (42.38%) of the previous Legislative Assembly elections, showing that voters generally recognised the Legislative Assembly elections held in accordance with the newly amended *Electoral Law of the Legislative Assembly*. The successful running of this year's Legislative Assembly elections was of significant importance to the ensuring of successful implementation of "One Country, Two Systems".

Regarding the statistics related to electoral supervision, the CCAC, through a two-pronged approach focusing on both prevention and suppression, strengthened the supervision online and offline. In particular, it carried out on-site inspections on activities intended for granting food and beverage benefits and the relevant venues where electoral irregularities were very likely to occur. Over 16,000 inspections were conducted. On 14th September 2025, the polling day, over 2,600 inspections were carried out at catering establishments, the outside of the polling stations, premises of civic associations, gathering spots and different streets and alleys. Meanwhile, over 5,600 inspections on the internet and posts on social networks were carried out.

The CCAC curbed early signs of irregularities through investigating cases in a timely manner. During the entire election period, the CCAC received a total of 153 complaints related to the elections (of which 17 were received on the polling day) and placed 30 cases on file. Up to 31st December 2025, the CCAC

concluded the investigations of 28 cases, of which five were referred to the Public Prosecutions Office for follow-up and one involved misdemeanour. Among the five criminal cases referred to the Public Prosecutions Office upon completion of investigation, two cases involved electoral corruption through offering of money and other advantages to entice voters to sign the "nomination form" during the nomination period, one case involved a resident who issued public posts on the internet in order to solicit bribes, one case involved campaign on the polling day and one case involved coercive and fraudulent acts related to a nomination committee. The case of misdemeanour involved campaigning on the day before the elections.

Some of the cases are summarised as follows:

(I)

The CCAC concluded the investigation of a case involving requesting others to sign the "Application Form for the Endorsement of a Nomination Committee of the Legislative Assembly Elections" (hereinafter referred to as "nomination form") by offering advantages. The case was referred to the Public Prosecutions Office for follow-up.

It was revealed in the investigation that a manager of a civil engineering company allegedly requested a subordinate to collect nomination forms. In order to induce others to sign the forms, the manager offered each of the individuals who had signed the nomination forms MOP1,000 as reward afterwards. The subordinate, in the course of collecting the nomination forms, only offered those who had signed the forms MOP500 as reward and then pocketed the difference of MOP500. The subordinate involved expanded the network to collect more nomination forms through a few friends by pecuniary temptation. Some of the individuals involved even forged the signatures of others on other nomination forms. The number of bribe givers and receivers involved in the case reached over 50. The individuals involved allegedly committed electoral corruption under the *Electoral Law of the Legislative Assembly* and document forgery under the *Penal Code*.

(II)

The CCAC concluded the investigation of another case involving requesting voters to sign the nomination form by offering advantages. The case was referred to the Public Prosecutions Office for follow-up.

In the investigation, it came to light that the individual involved allegedly promised to offer a voter pecuniary advantage and job position in order to induce the voter to sign the nomination form according to the former's preference. In order to obtain the pecuniary advantage, the voter even forged the signatures

of his relatives on other nomination forms in addition to providing his own nomination form. The individuals involved allegedly committed electoral corruption under the *Electoral Law of the Legislative Assembly* and document forgery under the *Penal Code*.

(III)

The CCAC concluded the investigation of a case involving bribe soliciting through social networks. The case was referred to the Public Prosecutions Office for follow-up.

It was revealed in the investigation that the individual subject to investigation allegedly issued posts and left comments on the internet in order to solicit pecuniary advantage from others, promising that he would cast a vote according to an indicated preference. During the investigation, the individual admitted committing the crime and claimed that he hoped to obtain pecuniary advantage through such acts. The individual involved allegedly committed electoral corruption under the *Electoral Law of the Legislative Assembly*.

(IV)

When carrying out supervision on the polling day of the Legislative Assembly elections, the CCAC found that an individual canvassed for a certain candidate group in multiple messaging groups (involving several hundred group members in total) on social media by sending campaign images and texts of the candidate group to the groups and even urged the group members to cast their votes for the candidate group. The individual involved allegedly committed an offence of campaign on the election day under the *Electoral Law of the Legislative Assembly*. The case was referred to the Public Prosecutions Office for follow-up.

(V)

The CCAC received real-name reports from several workers of a company indicating that on 13th September 2025 (the cooling-off day before the polling day), their chief urged workers to vote for a certain candidate group through texting and sending an image of the candidate group's poster to a working group on WeChat.

The chief allegedly committed a misdemeanour of campaigning on the day before the election day under the *Electoral Law of the Legislative Assembly*. The CCAC initiated a sanctioning procedure against the chief concerning the misdemeanour and he voluntarily paid the fine.

(VI)

The CCAC received a report indicating that a civic association required its members to sign the nomination forms before they could receive benefits such as gift bags and food gift packs.

It was revealed in the investigation that in March 2025, the civic association made phone calls to inform its members that they might collect the birthday cake vouchers which were given away regularly and register for collection of gift bags, but it never requested them to sign nomination forms during the phone calls, nor did it imply the idea that signing the nomination form was the requirement for receiving benefits such as gift bags and food gift packs. In addition, when distributing the relevant gift bags or other gifts to the members, it did not force any of them to sign the nomination forms before they could receive those benefits.

Since the investigation verified that there was no situation of forcing someone to sign the nomination form or forcing someone to sign the nomination form under the guise of registration for and distribution of gift bags as mentioned in the report, the case was archived.

II. Promotion and education on clean elections

Apart from supervising the elections, the CCAC carried out publicity work related to clean elections in an orderly way based on the motif "A Clean Vote Lights Up Macao". Various promotion activities with the theme of clean elections targeting the general public and young people were carried out in order to promote the importance of clean elections in a holistic manner.

(1) Obstacle challenge competition "A Clean Vote Lights Up Macao"

On 8th June 2025, the CCAC held an obstacle challenge competition entitled "A Clean Vote Lights Up Macao" in order to enable residents to experience the importance of fair competition and deepen the public and community's attention to and knowledge of clean elections, whereby fostering an atmosphere of supporting clean elections in the entire society. Featuring team competitions and side events, the activity attracted around 700 participants.

(2) "A Clean Vote Lights Up Macao – Promotion Tour in the Community"

On 27th July, 10th, 23rd and 24th August 2025, the CCAC held four sessions of "A Clean Vote Lights Up Macao – Promotion Tour in the Community" at the leisure area of Edf. Lok Yeong Fa Yuen, Iao Hon Market Park, beside Flower City Park and in the forecourt of Parknshop shopping mall in Taipa respectively. The event featured diversified games, photo taking spots, interactive installations, stage drama about clean

elections and flash mob stage performances, among others, in order to disseminate the message of clean elections among residents in different ways and consolidate their awareness of clean elections in a holistic way. The "simulated electoral corruption scenario experiential area" simulated several situations of electoral corruption, which enabled residents to distinguish right from wrong and know the common forms of electoral corruption and the consequences. The four sessions of the promotion tour attracted over 9,000 participants.

In addition to the promotion tour, the CCAC organised the "Exhibition on Information about Clean Elections" between 25th and 29th August 2025 beside Flower City Park, where residents were able to know the information through the installation "Breaking the Myths about Elections" and the experiential area of detecting electoral corruption.

(3) Seminars on "Clean Elections 2025"

At the invitation of schools, civic associations and organisations, the CCAC dispatched personnel to hold seminars on clean elections for students and members and employees of the associations and organisations. Through commonly seen examples of electoral corruption, the CCAC explained the stipulations newly introduced to the *Electoral Law of the Legislative Assembly* and reminded first-time voters and the general public to be vigilant to the traps of electoral corruption, to cherish their votes and to prevent themselves from contravening the law inadvertently. In 2025, the CCAC organised four seminars on clean elections targeting residents.

In addition, the CCAC especially introduced the content of "Clean Elections 2025" to the regular seminars on integrity targeting public servants, senior secondary students and adults in order to strengthen the promotion of the relevant stipulations to voters and voters-to-be.

(4) School drama tour "Learn More about Clean Elections: Knowledge 'Express' on Clean Elections"

Between March and June 2025, the CCAC organised a school drama tour "Learn More about Clean Elections", of which a total of 26 sessions were held at 20 secondary schools and two higher education institutions in Macao. Featuring analysis of commonly seen acts of electoral corruption and relevant misunderstanding, the activity aimed to urge young people in Macao to join hands together to safeguard electoral integrity. A total of 3,824 students attended the activity.

(5) Encouraging young people to assist in promotion of clean elections

In order to encourage young people to participate in integrity building, the CCAC invited them to assist in promotion activities on clean elections, including a flash mob activity "Power Up for Clean Elections" organised with the assistance of the ambassadors of integrity for the 2023/2024 academic year at various schools to promote electoral probity, which enhanced young people's awareness of clean elections and strengthened their knowledge of the relevant stipulations through simple quiz games. The trainees of the "UNI Project – Integrity Promotion Programme for Higher Education Students" created posts and video clips under the theme of "Clean Elections in the Eyes of Higher Education Students" and participated in the shooting of the advertisements entitled "Clean Elections". In addition, the students who joined the higher education students' internship programme assisted in multiple actions of electoral probity promotion carried out by the CCAC, exerting young people's power to the safeguard of clean elections in Macao.

(6) Promotion featuring a famous local cultural and creative design character

In order to spread the message of clean elections to young people, the CCAC, for the first time, carried out promotion actions featuring a famous local cultural and creative design character "Ho Sio Chong", including launching booth games, souvenirs, posters and bus body advertisements and releasing four one-minute animated short clips, which conveyed the message of clean elections in a light-hearted manner that better appealed to young people. The four animated short clips got over 2,140,000 views on social media.

(7) Multimedia sticker collection activity "Take Action for Clean Elections"

The CCAC organised a multimedia sticker collection activity "Take Action for Clean Elections" in order to encourage the public to assist in the dissemination of the message of clean elections through creating and sharing stickers on social media. A total of 420 stickers from 185 participants were collected.

(8) Quiz game on WeChat "Light up for Clean Elections"

Between 5th and 29th August 2025, the CCAC held a quiz game on WeChat named "Light up for Clean Elections", which asked residents questions about the *Electoral Law of the Legislative Assembly* and scenarios related to clean elections, with the aim of enhancing their awareness of clean elections, jointly safeguarding the impartiality and integrity of the elections. Over 6,300 participants participated in the activity.

(9) Integration of promotion of electoral integrity into other activities

In order to actively encourage all strata of society to join hands together to safeguard electoral integrity, the CCAC especially integrated promotion of clean elections into regular activities or annual thematic promotion activities on integrity, including:

1. The CCAC recruited more volunteers to assist in the promotion work on clean elections, including shooting of the TV advertisements on clean elections 2025 and multiple promotion activities on clean elections.

2. The topic of the thematic school activity "New Inspirations in Integrity Education from Children" was especially set as "clean elections". Students made use of the knowledge they learnt from the STEAM curriculum to produce games based on the topic of "clean elections" by computer coding.

3. Contestants of the Macao preliminary round of the "Coding4Integrity Asian Youth Anti-Corruption Hackathon 2025" were required to develop a prototype under the theme of "clean elections".

4. The promotion of the relevant stipulations targeting voters and voters-to-be were strengthened in the activity "Integrity Tour Classroom – Integrity Experience Programme for Young People" held at the Branch Office in Taipa.

5. The content about clean elections was introduced to the activity "A Chat with Friends of Integrity" targeting members of civic associations, where the messages of integrity including clean elections were disseminated among voters and the elderly through simple and light-hearted games and situational drama.

6. A special teaching module on the topic of "clean elections" was introduced to "Integrity Lesson Plan Design Collection Activity for the Academic Year 2024/2025" so as to enable professionals from different fields to think about the importance of electoral integrity. In addition, the micro-lesson videos on honesty and integrity under the theme of clean elections were launched.

7. Supplementary materials for integrity education under the theme of "clean elections" were created for teaching staff and parents in order to enable students to know the importance of fairness and impartiality to clean elections at an early stage through animated videos, worksheets for reflection and extended activities as well as to remind parents to avoid falling into the traps of electoral corruption.

8. An exhibition of information about clean elections and interactive games were featured in the "Launch Day for Campaigning of the Legislative Assembly Elections" held on 30th August 2025 in order to disseminate the message of clean elections among the candidate groups, electioneering teams and voters.

9. A promotional booth under the theme of clean elections was set up in the event "Crime Prevention Week" held by the Macao Polytechnic University in order to disseminate the message of electoral integrity among higher education students as well as deepen their understanding of the knowledge of the legislation related to the elections through the information on the display boards.

(10) Publicity of message of electoral integrity through multiple channels

The CCAC also disseminated the message of electoral integrity through multiple channels in order to urge residents to join hands together to safeguard the fairness, justice and integrity of the Legislative Assembly elections in a holistic manner. The actions included: launching the "Thematic Webpage on Clean Elections 2025"; developing the "Guidelines on Integrity for Voters" to explain the stipulations related to electoral corruption newly introduced to the *Electoral Law of the Legislative Assembly*; producing TV videos and radio advertisements entitled "Nominate Prudently" and "Say No to Electoral Corruption", which were broadcast on different publicity platforms; producing animated videos and infographics about the legal information under the theme of "clean elections"; putting up posters and outdoor advertisements under the theme of "clean elections 2025", promotion on smartphone applications catering to Macao residents' smartphone using habits, sending multi-media messages to local mobile phone users through local telecommunication service providers on and before the election day, and sending diversified information about clean elections through the internet and media.

PART III
ANTI-CORRUPTION

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ANTI-CORRUPTION

I. Introduction

The year 2025 marked the beginning of the new term of the SAR Government and the ending of "The Second Five-Year Plan for Economic and Social Development of the Macao Special Administrative Region (2021-2025)". In addition to carrying out anti-corruption work in a pragmatic way to earnestly achieve the Chief Executive's policy vision of "upholding the rule of law in Macao", the CCAC completed the established objectives for fighting corruption defined in the 2nd Five-Year Plan and also monitored the full process of the 8th Legislative Assembly Elections satisfactorily.

The CCAC took the guidance given by President Xi Jinping to Macao, namely "Four Aspirations" and "Three Expectations", as its action plan and transformed it into the thoughts and approaches to take forward its anti-corruption work. It has strived to improve the integrity monitoring system, insisted on carrying out investigations of every case and cracking down on every corrupt act, firmly carried out anti-corruption work in line with the principles of attaching importance to both public and private sectors as well as through a combined approach of prevention and crackdown.

The anti-corruption work which was carried out regularly in 2025 had the following characteristics:

In 2025, the number of cases investigated by the Anti-Corruption Bureau of the CCAC had a significant increase as it was influenced and driven by the Legislative Assembly Elections, with a total of 221 cases registered in the year (including election cases). Among them, even though cases in the private sector involved various areas, they primarily involved bribe solicitation by department chiefs of integrated resort enterprises and disputes over building maintenance and management, among others.

As for the cases in the public sector, there was a higher proportion of cases involving areas of security and social and cultural affairs. The number of cases in these two areas occupied more than 60% of the total number of cases investigated in the public sector. Therefore, it is necessary to strengthen integrity education for personnel in the aforesaid areas so that they will always be alerted.

In 2025, the CCAC constantly received and followed up multiple reports involving police officers departing Macao without having complied with the declaration procedures. The involved officers failed to fulfil the duties of obedience and availability provided for in the *Statute of Personnel of Security Forces and Security Services* and the internal guidelines. The CCAC notified relevant departments of the concerned situations and requested them to follow up the cases and review relevant regulations. It received a positive response from the departments.

In addition to investigating cases, the CCAC also explained the law through case studies and adopted a combined approach of prevention and crackdown. In response to the increasing number of cases involving public servants using false sick leave certificates in recent years, not only did the CCAC crack down on the cases rigorously, it also further strengthened integrity promotion targeted at medical institutions, particularly laying stress on the professional duties and the statutory obligations of doctors with a view to striving to address the root causes. Moreover, in view of the corruption cases in the financial system investigated in recent years, the CCAC also adopted an integrated approach of prevention and crackdown. As relevant cases were successively tried in court, in addition to holding integrity seminars for various financial institutions, the CCAC also collaborated with the financial regulatory department to hold themed seminars for the sector so as to jointly discuss issues related to combatting corruption and promoting integrity within the sector. It achieved a satisfactory result.

II. Criminal reports and cases filed for investigation

In 2025, the CCAC placed 191 cases on file for investigation (excluding election cases), including 109 related to the public sector and 82 related to the private sector. Among the 114 cases with investigations concluded in the year, 73 were related to the public sector and 41 were related to the private sector. Among the 114 cases with investigations concluded, nine were referred to the Public Prosecutions Office and 105 were archived.

Meanwhile, in 2025, there were 34 mutual assistance cases placed on file and 20 mutual assistance cases with follow-up actions concluded.

III. Summaries of some of the cases

Among the cases in the anti-corruption area concluded in 2025, some of the cases which were referred to the judicial bodies for follow-up have been selected and summarised as follows:

(I)

The CCAC received a report claiming that a fire station chief of the Fire Services Bureau (CB) returned to his department to clock out after his shift ended in the afternoon, raising suspicions of fraudulent attendance records.

It was found in the investigation that, between December 2023 and May 2024, the chief left the territory twice during work time or an additional work period (commonly known as "supplementary shift"). In addition, he was absent from the operational post three times and went back to the post to clock out over

one hour later. He claimed to his department that he was carrying out overtime work on the said occasions in an attempt to conceal the untrue situations of attendance.

The aforesaid chief of the CB was suspected of committing the crime of forgery by a public servant provided for in the *Penal Code*. The case was referred to the Public Prosecutions Office in February 2025 and the CB was notified to follow up.

(II)

The CCAC received a report claiming that a deputy sergeant in the Public Security Police Force (PSP) defrauded family allowances using false information.

It was found in the investigation that the aforesaid deputy sergeant, despite knowing that his parents were employed and that their annual income from 2013 to 2021 exceeded the requirements for receiving family allowances, deliberately concealed the relevant situation. As a result, the department, unknowingly, continued to pay his parents family allowances. As a result, a total of more than MOP140,000 was defrauded.

The deputy sergeant was suspected of committing the crime of fraud involving a high value under the *Penal Code*. The case was referred to the Public Prosecutions Office in June 2025 and the PSP was notified to follow up.

(III)

The CCAC received a report claiming that a police officer from the Public Security Police Force (PSP) was suspected of fraudulently obtaining sick leave. He was found to have travelled to the Chinese mainland for meals during his absence due to illness and not to rest at home during this period.

It was found in the investigation that the aforesaid police officer had reported a wrist injury caused by a work-related accident in 2015, resulting in nearly four consecutive years of absence from work between 2015 and 2019, during which he received nearly MOP900,000 in salary from the PSP. During this period, the police officer had all along been telling the doctors that his wrist injury made him unable to work, thus obtaining sick leave from them successfully. However, the investigation discovered that the police officer maintained a habit of driving heavy motorcycles during his sick leave, took a heavy truck driving test twice, and continuously participated in bowling competitions from 2016 to 2019 as well as won awards on multiple occasions. The investigation also revealed that the police officer had joined the Macao bowling training team since 2017 and frequently left the territory more than 300 times during his sick leave, including trips abroad by plane with his family.

The investigation found that the officer had already sought medical advice for injuries to the same part of the body before reporting his work injury. Multiple medical specialists determined that the injuries he claimed were not new, and the activities he engaged in during his sick leave demonstrated a certain level of work capability. These activities clearly contradicted to his supposed inability to work, suggesting a long-term deliberate exaggeration of his condition to fraudulently obtain paid sick leave.

The police officer was suspected of committing the crime of fraud involving considerably high value under the *Penal Code*. The case was referred to the Public Prosecutions Office in July 2025, and the PSP was notified to follow up.

(IV)

The CCAC received a report claiming that a deputy superintendent of the Public Security Police Force (PSP) abused his power by repeatedly using the internal staff channel and the vehicle lanes for entry and exit at the checkpoint under his supervision.

It was found in the investigation that between 2020 and 2024, the deputy superintendent, working at the checkpoint's immigration station, entered Macao alone or with family members over 100 times. He then abused his police identification card to use the staff channel within the restricted area to leave the border control building with his family. The deputy superintendent also repeatedly violated internal regulations by using the departure lanes to complete departure procedures without driving or being a passenger.

The deputy superintendent was suspected of committing the offence of power abuse under the *Penal Code*.

Investigation of the case was concluded and it was referred to the Public Prosecutions Office. The relevant disciplinary violations were also reported to the PSP for follow-up.

(V)

The CCAC received a report claiming that a doctor who worked in the Correctional Services Bureau abused the sick leave system to deceive his department. In fact, he was outside Macao during periods of sick leave.

The investigation revealed that between 2018 and 2024, the doctor, under the circumstances that he or his parents not being sick, contacted multiple friends who worked as doctors in public or private medical institutions of Macao in advance so that they could assist in the issuance of multiple medical certificates of

his own or medical certificates for accompanying his sick family members in order for him to apply for leave to his department to handle his private affairs. The said doctors, even knowing that they were not sick, still provided cooperation in order for him to deceive his department into approving his sick leave. Over the years, the doctor defrauded wages with a total amount of nearly MOP150,000.

During the investigation, the CCAC also found out that the doctor involved in the case engaged in other paid part-time jobs without the knowledge and consent of his department.

The public servant involved in the case, the relevant relatives and the doctors of the private medical institutions were suspected to have committed the crime of fraud and the crime of document forgery provided for in the *Penal Code*. The public servant involved in the case and the doctors of the public medical institutions were also suspected to have committed the crime of forgery by a public servant. The case was referred to the Public Prosecutions Office in September 2025 and the relevant departments were notified.

(VI)

The CCAC received a report from a non-resident security guard of a security service company in December 2023, claiming that he was appointed by the company to work as a security guard in the University of Macau between 2017 and 2020. During the period, he was notified by the team leader of the night shift that the company had paid him more than he was entitled to that month and that he had to refund the excess amount in cash. He suspected that the company had falsely declared the number of security guards who went to work by creating false attendance records of the employees.

Upon investigation, the CCAC found out that the University of Macau, between August 2019 and February 2020, requested the security service company to arrange for additional security guards to guard key areas of the university and carry out patrol. Therefore, the security service company had to arrange six additional security guards to carry out extra patrol in the campus every day.

During the period when the aforesaid security service company was supposed to provide extra patrol in the campus, five individuals including some on-site chiefs and deputy chiefs of the security service company failed to provide corresponding additional security guards based on the request of the University of Macau. Instead, they created false attendance records of additional security guards so that they could keep the overtime work wages for themselves, which resulted in a loss of more than MOP580,000 to the University of Macau.

The aforesaid five individuals were suspected to have committed the crime of fraud and the crime of document forgery provided for in the *Penal Code*. The case was referred to the Public Prosecutions Office for handling in November 2025.

(VII)

The CCAC received a report claiming that a functional chief of the Municipal Affairs Bureau was suspected of, between 2021 and 2023, repeatedly leaving his office without approval with the excuses of performing duties and monitoring his subordinates outside the office in order to handle his private affairs.

After investigation, it came to light that the personnel took advantage of his position as a functional chief who could arrange for outdoor duties on his own, repeatedly left his office without approval to handle his family affairs and return to his home. In order to avoid his superior from finding out that he had left his office without approval, the functional chief falsely declared work items and work locations in multiple outdoor duty record sheets. He had also falsely declared to his department that he failed to clock in on those days and made false entries in his attendance records and requested his superior to confirm his declaration. In addition, he produced multiple work record sheets with untrue content in the computer system of his department and made false entries in his attendance records.

The functional chief involved in the case was suspected of committing the crime of fraud and the crime of forgery by a public servant provided for in the *Penal Code*, and the crime of computer forgery by a public servant in the performance of duties provided for in the *Law on Combatting Computer Crimes*. The case was referred to the Public Prosecutions Office in November 2025 and the relevant departments were notified.

(VIII)

The CCAC received a report indicating that the executive chef of the food and beverage department of an integrated resort enterprise was suspected of soliciting bribes from his subordinates.

Upon investigation, it came to light that the executive chef had the power of recommending and recruiting employees, assessing the performance of his subordinates and even providing opinions of renewal of contracts. The executive chef had, between 2023 and 2024, breached his duty and integrity by repeatedly taking advantage of his power derived from his position and the chances of recruitment, probation periods of employees and job appraisal relevant to renewal of contracts of employees, attracted his fellow countrymen in the Chinese mainland to enter the company, received "placement fees" or requested his subordinates to "know the hidden rules", among others. He solicited advantages such as cash and gifts from multiple fellow countrymen and subordinates explicitly or implicitly as kickback for recommending them to enter the company, assisting his subordinates to pass the probation periods or for renewing their contracts.

The executive chef and the four other employees involved in the case were suspected of committing the crime of passive bribery and the crime of active bribery in the private sector respectively under the law of *Prevention and Suppression of Bribery in the Private Sector*. The case was referred to the Public Prosecutions Office for handling in December 2025.

IV. Mutual case assistance in cross-border investigation

In 2025, the CCAC initiated investigation of 34 mutual assistance cases. Along with the cases carried forward from the previous year, the CCAC had to follow up 63 mutual assistance cases, including 54 cases at the requests for case assistance received from counterparts outside the region, of which 40 were made by agencies of the Chinese mainland and 14 by the Independent Commission Against Corruption (ICAC) of Hong Kong. Meanwhile, the CCAC of Macao made nine requests for case assistance to counterparts outside the region, of which three were made to agencies of the Chinese mainland, three to the ICAC of Hong Kong and three to both agencies of the Chinese mainland and the ICAC of Hong Kong. In 2025, among 63 mutual assistance cases handled by the CCAC, 20 were concluded and 43 were still being followed up (see the following table).

<table>
<tr><th rowspan="2">Item</th><th colspan="2">Case assistance requests made by agencies outside the region to the CCAC</th><th rowspan="2">Total</th><th colspan="2">Case assistance requests made by the CCAC</th><th rowspan="2">Total</th></tr>
<tr><th>Places</th><th>Hong Kong</th><th>Chinese mainland</th><th>Hong Kong</th><th>Chinese mainland</th></tr>
<tr><td>Cases placed on file for investigation in 2025</td><td>5*</td><td>29*</td><td rowspan="3">54</td><td>2</td><td>1</td><td rowspan="3">9</td></tr>
<tr><td rowspan="2">Cases in 2025 including those carried forward to 2025</td><td rowspan="2">9</td><td rowspan="2">11</td><td>1</td><td>2</td></tr>
<tr><td colspan="2">3 case assistance requests made to both Hong Kong and the Chinese mainland</td></tr>
<tr><td rowspan="2">Cases being followed up</td><td rowspan="2">4*</td><td rowspan="2">30</td><td rowspan="2">34</td><td>3</td><td>3</td><td rowspan="2">9</td></tr>
<tr><td colspan="2">3 case assistance requests made to both Hong Kong and the Chinese mainland</td></tr>
<tr><td>Cases archived (case assistance completed)</td><td>10</td><td>10</td><td>20</td><td>0</td><td>0</td><td>0</td></tr>
</table>

* Including one case reopened at the request of a law enforcement agency outside the region

V. Court verdicts

According to the statistics provided by the courts, a total of 111 criminal cases processed by the CCAC were tried in 2025, involving 287 suspects. Among those cases, there was a case solved by the CCAC involving fraud committed by a bank worker in collusion with a crime syndicate, which was divided into 96 cases by judicial agencies, involving 117 suspects. In addition, there was another case about a subsidy scam involving the Continuing Education Development Plan committed by a training institution, involving 112 suspects.

In 2025, there were 90 cases with final judgements rendered and three cases in which final judgements had been rendered on some of the charges. Such cases involved crimes such as active bribery, passive bribery to perform illicit acts, forgery committed by a public servant, power abuse, inaccurate data, computer forgery, illegitimate collection, use or provision of computer data, money laundering, fraud, fraud involving a high value, fraud involving a considerably high value, document forgery, unlawful economic advantage, breach of secrecy, falsity of testimony or statement, falsity of testimony, use of someone else's identification document.

VI. Declaration of assets and interests

The legal regime of declaration of assets and interests is an important and integral part of integrity building of the Macao SAR and is also a cornerstone of the integrity system of the modern society. In order to effectively prevent and suppress corrupt acts amongst public servants, the CCAC has been, as always, committed to carrying out the work of declaration of assets and interests, which is in line with its duties to carry out acts of investigation and inquiry with regard to crimes of corruption and related fraud crimes committed by public servants according to the penal legislation and the penal procedure legislation, producing effective preventive and deterrent effect against potential corrupt acts. Among the cases tried by the courts in 2025, three involved the crime of inaccurate data in asset declaration. The three individuals who involved in the cases were found guilty.

Being one of the depository entities of the declarations, the CCAC carries out daily work receiving and processing declarations of most of the workers of public administration and their spouses or cohabiting partners. In 2025, a total of 14,422 persons submitted their declarations to the CCAC (See Table I), of which a small number of persons failed to complete their declarations within the statutory period such that the CCAC had to urge them to submit their declarations. The CCAC sent overdue notices to them according to the established procedures in order to remind them to submit their declarations as soon as possible. In 2025, the CCAC sent a total of 118 overdue notices (See Table II). Upon receiving the overdue notices sent by the CCAC, the declarants were normally able to submit their declarations in time and provided

reasonable justification in writing for the late submission of the declarations. Nevertheless, the CCAC still makes a strong appeal to all workers of public administration that they should comply with the code of public servants to perform the duties and obligations of public servants according to the relevant law, take declaration of assets and interests seriously and ensure the declaration procedures be completed within the statutory period.

Table I
Statistics of submission of declaration of assets and interests in 2025

Reason for submitting declaration	Total number of submissions
Appointment	1,683
Change of position	4,712
Termination of office	1,576
Renewal every five years	3,975
Renewal with that of spouse	647
Pursuit of data-provision	1,529
Voluntary renewal	300
Total	**14,422**

Table II
Statistics on overdue notices sent in 2025
(Recipients: declarants)

No.	Department/entity in which the declarant works	No. of overdue notices sent
1	Monetary Authority of Macao	1
2	Fire Services Bureau	9
3	The Islands Healthcare Complex – Macao Medical Center of Peking Union Medical College Hospital	1
4	Public Security Police Force	11
5	Gaming Inspection and Coordination Bureau	1
6	Labour Affairs Bureau	2

No.	Department/entity in which the declarant works	No. of overdue notices sent
7	Marine and Water Bureau	2
8	Transport Bureau	1
9	Government Headquarters Affairs Bureau	3
10	Correctional Services Bureau	5
11	Statistics and Census Service	2
12	Education and Youth Development Bureau	5
13	Financial Services Bureau	3
14	Public Security Forces Affairs Bureau of Macau	4
15	Environmental Protection Bureau	1
16	Macao Government Tourism Office	1
17	Land and Urban Construction Bureau	3
18	Cultural Development Fund	1
19	Science and Technology Development Fund	1
20	Government Information Bureau	1
21	Municipal Affairs Bureau	9
22	Social Welfare Bureau	2
23	Cultural Affairs Bureau	7
24	Sports Bureau	1
25	Judiciary Police	6
26	Customs of Macao Special Administrative Region	3
27	Health Bureau	20
28	University of Macau	12
Total		**118**

In addition to receiving and processing declarations of workers of public administration and their spouses or cohabiting partners, the CCAC also manages the preservation and destruction of declaration dossiers in a timely and appropriate manner. In 2025, the CCAC analysed and collated a total of 3,179 declaration dossiers according to relevant laws (See Table III). Those which met the conditions to be destructed were selected and the destruction work is expected to be carried out in the first half of 2026.

Table III
Statistics on declaration dossiers to be destructed upon collation and analysis in 2025

Reason for destruction of declaration dossiers	No. of declaration dossiers
10 years after termination of office	2,794
5 years after death	385
Total	**3,179**

In addition to handling regular work of declaration of assets and interests, the CCAC has also been attaching importance to electronic management and continuously updating and optimising the electronic systems related to declaration of assets and interests. When it comes to the practical use of the external electronic systems, currently the "notification processing system of declaration of assets and interests" (hereinafter referred to as "electronic notification platform") developed by the CCAC is being used by a total of 73 departments/entities. Through the platform, departments are able to simultaneously send electronic notifications to the two statutory depository entities, namely the CCAC and the Office of the Court of Final Appeal. Not only does it save the costs of administration and human resources, but it also significantly enhances efficiency of the work. In 2025, the CCAC received a total of 4,543 letters/notification letters, of which 4,456 were uploaded through the platform, representing 98% of the total number of letters/notification letters received (See Table IV). It can be seen that the usage rate of the electronic notification platform has been very satisfactory, which almost replaces traditional means of document delivery. Its implementation shows significant effectiveness.

Table IV
Use of the "notification processing system of declaration of assets and interests" in 2025

Number of notification letters received through the "notification processing system of declaration of assets and interests" in 2025	4,456
Total number of notification letters of declaration of assets and interests received in 2025	4,543
Percentage of notification letters received through the "notification processing system of declaration of assets and interests" in 2025	98%

Moreover, since the implementation of the "online appointment system for the declaration of assets and interests" (hereinafter referred to as "appointment system") at the end of 2021, until now, the actual number of people making appointments has been more than expected. Declarants only need to access to the appointment webpage on the webpage of the CCAC, then they can make appointments for submitting the declaration of assets and interests in person, as well as enquire about, change or cancel appointments. The process is very simple and convenient. According to statistics, in 2025, a total of 1,763 people used the system to make appointments for submitting the declaration of assets and interests, representing an increase of 35% in the usage rate of the system compared to the previous year (See Table V). Of those who made appointments through the system, 1,463 people turned up as scheduled, representing 83% of the total number of people who made the appointments; 99 people cancelled the appointments and 201 people did not turn up, representing 6% and 11% of the total number of users of the online appointment system respectively (See Table VI). Despite the fact that the attendance rate related to the appointments needs to be increased, overall, the appointment system plays an important role not only in the effectiveness of the work of the CCAC and resource allocation but also in the experience of users, bringing real positive impact on the work related to the declaration of assets of interests. The CCAC hopes that users will continue to make good use of the appointment system in order to make effective time management for the declaration of assets and interests in person. If they expect that they are not able to turn up after making appointments, they are advised to change or cancel the appointments on the appointment webpage in order that the system can effectively reflect the real situation of the appointments such that the CCAC can allocate its resources on handling the work related to declaration more effectively.

Table V
Statistics regarding the number of people using the "online system for the declaration of assets and interests" in 2024 and 2025

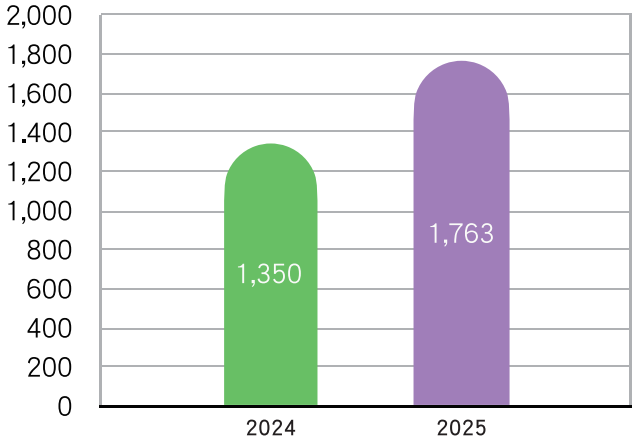
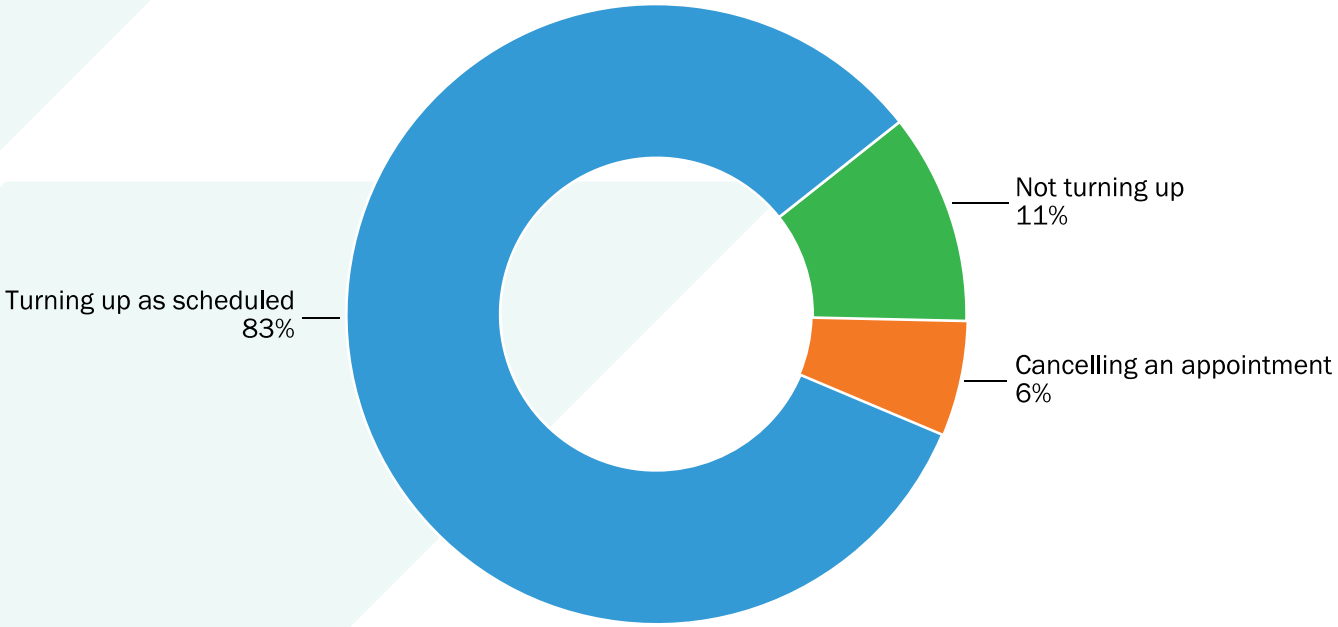


Table VI
Use of the "online system for the declaration of assets and interests" in 2025



The CCAC fully understands the importance of promoting the information related to declaration of assets and interests. In order to strengthen public servants' knowledge of declaration of assets and interests and ensure they clearly understand "why it is necessary to make the declaration", "how the declaration should be made" and "the consequences of not making declaration", the CCAC has stepped up efforts in the promotion and education work of the relevant area. In 2025, at the invitation of the Academy of Public Security Forces of Macao, the CCAC held a session on declaration of assets and interests for over 150 trainees of public security forces. During the session, the CCAC personnel gave the trainees detailed explanations and guidance on completing the declarations. Through a question-and-answer session, trainees were able to clarify frequently asked issues on declaration of assets and interests. Moreover, the CCAC also updated and revised the current guidelines and samples on declaration of assets and interests in a hope to give declarants an in-depth understanding of the declaration and to enhance public servants' awareness of integrity, observance and law-abidingness through enabling them to understand the correct ways of completing declarations and the relevant legal responsibilities, thereby building a culture of integrity.

To conclude, the work related to declaration of assets and interests is carried out in an orderly manner. The overall implementation of the declaration regime is satisfactory.

PART IV

OMBUDSMAN ACTIONS

PART IV
OMBUDSMAN ACTIONS

I. Introduction

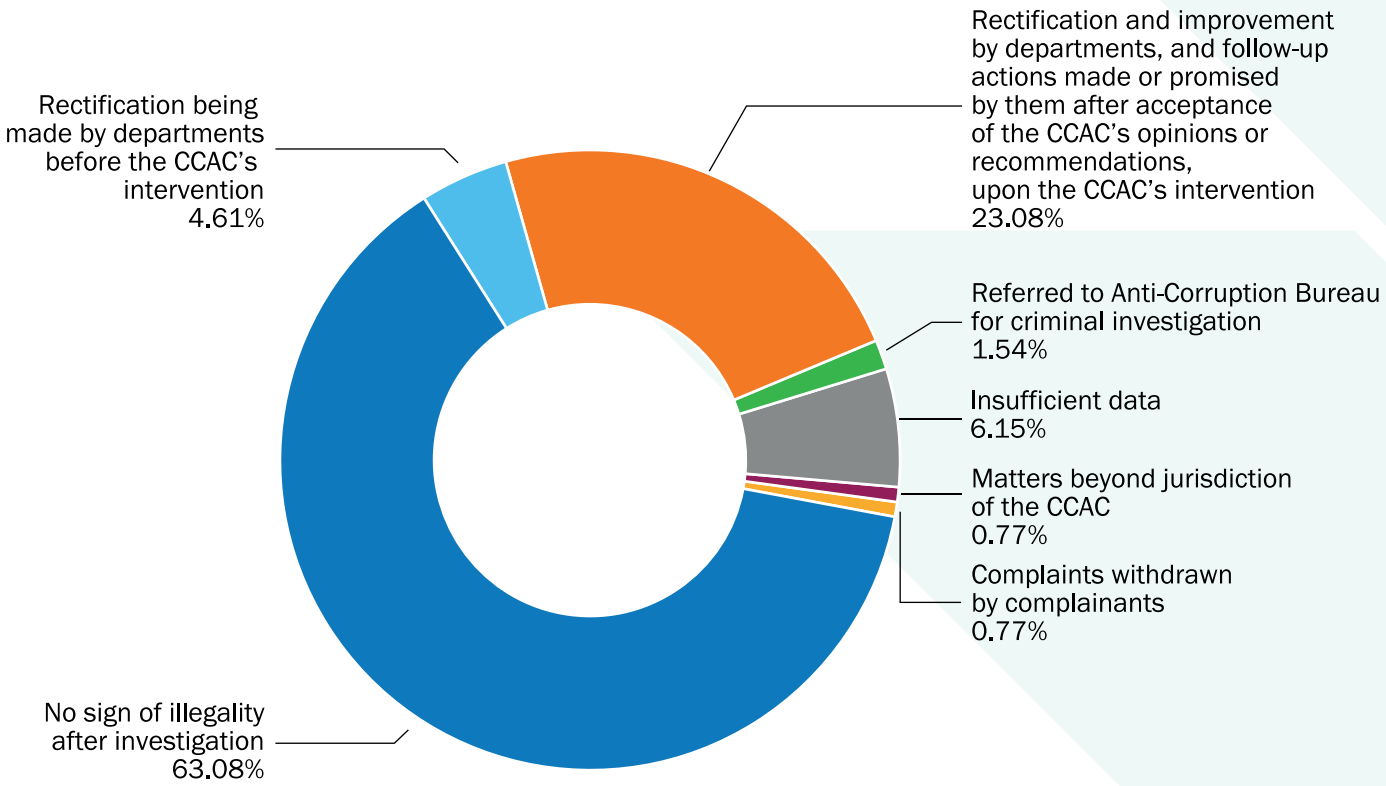
In 2025, the CCAC acted with a high sense of responsibility and dedication in alignment with the SAR Government's philosophy of increasing the capacity of public administration and the level of governance, upholding good governance and demonstrating fairness and righteousness, among others, to achieve the objectives of "upholding the rule of law in Macao" and fully exert its supervisory function. From the perspective of integrity building, it continued to propel the development of rule of law through lawful governance and administration.

As regards ombudsman actions, in 2025, the CCAC initiated investigation of 171 new inquiry files and one comprehensive investigation file. Along with the cases carried forward from the previous year, the CCAC had to follow up a total of 316 inquiry files. Moreover, the CCAC concluded investigation and archived a total of 130 inquiry files in the area of ombudsman actions. Of these, six cases involved rectification by departments before the CCAC's intervention; while 30 cases involved rectification and improvement and processing by departments, and follow-up actions made or promised by them after acceptance of the CCAC's opinions or recommendations, upon the CCAC's intervention; 82 cases showed no sign of administrative illegality or impropriety; eight cases involved insufficient data; one case was beyond the jurisdiction of the CCAC; one case involved withdrawal of the complaint by the complainant and two cases involved referral by the Ombudsman Bureau to the Anti-Corruption Bureau.

The ombudsman functions of the CCAC not only serve as a channel to solve disputes involving cases of administrative impropriety or illegality, but they can also systematically identify institutional weaknesses and blind spots that may exist in the management of public departments. In addition, the CCAC has set up the "retrospective review" mechanism. Regarding cases where investigations have been completed and suggestions have been made, some of them will be included in the list of "retrospective review". After a period of time, the CCAC will carry out review with some relevant departments in order to verify if they have effectively carried out improvement measures with a view to promoting substantive improvement in governance. In 2025, there were a total of 11 cases included in the list of "retrospective review" that were newly-added or those requiring follow-up actions. Six cases were removed from the list after retrospective review.

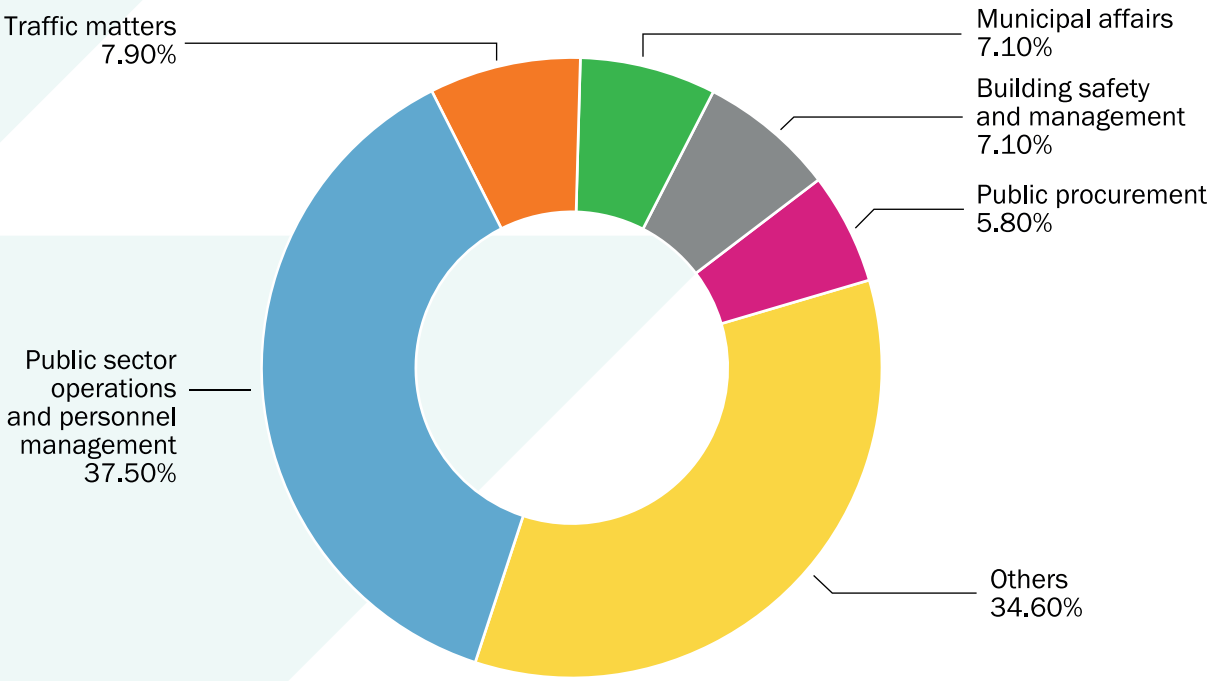
In 2025, the CCAC initiated and followed up a total of five comprehensive investigation files, of which two have been concluded and one with the interim report completed.

Cases concluded by the Ombudsman Bureau in 2025



The cases received by the Ombudsman Bureau of the CCAC involved a single subject matter or various subject matters, which meant that one case might involve subject matters related to various areas, departments or demands. According to statistics, in 2025, most of the newly opened cases involved five areas, namely public sector operations and personnel management, public procurement, building safety and management, municipal affairs and traffic matters, which took up 65% of the total number of cases (See the chart below).

Subject matters involved in cases handled by the Ombudsman Bureau in 2025



Among the cases, public sector operations and personnel management remained the most prominent focus, taking up almost 40% of the total number of cases and particularly involving internal operation and management of departments, as well as recruitment, discipline and rights of personnel, among others. As regards municipal affairs, they mainly covered environmental hygiene, hawker operation, administrative licences, occupation of public places and so forth. Regarding building safety and management, the major issues involved illegal works, fire safety, water leakage in buildings, management of common parts of private buildings and so on. On the front of traffic matters, they mainly involved vetting and approval of taxi licences, operation of taxi licences, traffic planning, traffic offences, driving licences and vehicle inspection, among others.

The CCAC has been monitoring the administrative operation of public departments and creating mechanisms to propelling the development of mechanisms through lawful governance and administration, particularly through the "retrospective review" mechanism. It has been continuously monitoring situations in respect of governance improvement made by competent departments or bodies so as to effectively respond to the society's demands and produce practical effects. In response to legal and reasonable acts, a pragmatic approach has been adopted and due recognition has been given to encourage self-confidence of the administration.

When it comes to processing ombudsman cases and enhancing administrative effectiveness, the CCAC will continue to uphold the principles of legality, adequacy and proportionality and encourage administrative departments to proactively improve their law enforcement and operation management. During the investigation processes, the CCAC has always been immediately presenting its opinions and positions to relevant departments or entities in order for them to take the initiative to internally seek room for improvement in their operations. As such, the departments or entities can be encouraged to accept its opinions as soon as possible, so that they may proactively adjust their own operating mechanisms and further improve the development of their respective systems without having to wait passively for the opinions or recommendations from the CCAC for subsequent follow-up actions.

In addition, regarding issues of the most public concern, the CCAC will make informal intervention and jointly discuss with relevant departments to introduce viable improvement measures with a view to responding to the demands of the society about increasing the effectiveness of governance and safeguarding good governance of public administration.

In fact, the efforts of the departments or entities to make rectification or improvement, regardless of the way the CCAC intervenes, demonstrate their commitment to good governance.

II. Comprehensive investigation summaries

(I)
"Comprehensive investigation report on the Housing Bureau's implementation of duties in the management of private buildings"

The CCAC received multiple complaints concerning the management of private buildings. To ensure a unified investigation into the Housing Bureau (IH)'s performance of its duties in coordinating and assisting in the management of condominiums, the CCAC consolidated the relevant complaints and conducted a comprehensive investigation to follow them up.

Currently, Macao's legal framework for the management of common areas of buildings is primarily governed by the *Legal Regime of the Management of Common Areas of Condominiums*. As regards the legislative process of this law in the past, one of the main reasons the legislators separated relevant provisions from the *Civil Code* to create a separate law was to intentionally introduce appropriate intervention from the public authority – the IH – in private building management affairs. However, such intervention is limited and is a policy decision based on factors such as the private property nature of buildings and the characteristics of building management affairs.

Therefore, the legislation in force stipulates that the IH's main responsibilities in the management of private buildings include providing technical coordination and assistance, and encouraging and assisting in the implementation of regulations governing private building management.

The CCAC's investigation revealed that, among the cases of building management disputes received by the IH, complaints mainly concern issues such as building procurement procedures, the use of the common reserve fund, control of accounts and mismanagement by management companies. During follow-up, if the complainant provides insufficient information but has left contact information, the IH will generally arrange a meeting with the complainant to understand the situation and, as needed, coordinate and arrange a meeting between the complainant and the party complained against to resolve the dispute.

Depending on the types of complaint, the IH will adopt different approaches to handle them and give recommendations accordingly. For example, if the complaint involves the management of common areas of a building, the IH will advise the complainant to report the issue to the management body and discuss solutions through a meeting convened by all owners of the condominium. If the complaint involves the management body's implementation of its duties, the IH will advise the complainant to file a complaint with

all owners of the condominium at a meeting convened by them. If the complaint involves the management of the management company, the IH will conduct an investigation and take appropriate action in accordance with the *Law on Commercial Activity of Condominium Management* and its *Regulations of the Law on Commercial Activity of Condominium Management*. After reviewing all the specific complaints received, the CCAC did not find any instances of non-compliance with its statutory duties or improper handling by the IH.

However, the CCAC believes that according to the *Legal Regime of the Management of Common Areas of Condominiums*, the management of private buildings is essentially a private law issue, which means owners should jointly formulate condominium management regulations and manage condominium affairs based on them. Nevertheless, the lack of understanding among the general public regarding the effectiveness and operability of these regulations prevents them from achieving their intended purpose. Therefore, the IH should strengthen publicity and education on the importance of the condominium management regulations, encourage owners to make good use of the regulations to deal with building management issues, and encourage all buildings to post the regulations in the common areas of the building so that all owners can know and abide by them.

Regarding the content of condominium management regulations, although current regulations do not regulate the procurement procedures for private buildings, given the increasing public concern and attention to private building procurement issues, the IH should take appropriate measures to urge buildings to include provisions on procurement procedures in their management regulations. They should also establish provisions that personnel of the management body or company participating in the procurement process must submit written declarations of their conflicts of interest with suppliers as well as those on recusal situations, which may provide procurement personnel with more concrete operational procedures to follow, thereby enhancing the fairness and transparency of the procurement process. Furthermore, it is advisable to encourage buildings to include explicit "arbitration clauses" in their management regulations to promote the adoption of faster and more convenient mediation and arbitration procedures to resolve building management disputes.

The IH accepted the multiple suggestions made by the CCAC and is taking a series of improvement measures to strengthen the fulfillment of its responsibilities. These measures include creating the *Model Regulations for the Management of Condominiums* and uploading it to the bureau's website, and strengthening publicity regarding the effectiveness and important role of the condominium management regulations. The bureau also stated that it would further study and promote the building management regulations submitted by owners of the work of newly constructed private buildings to the government for the issuance of use permits. These regulations will be developed with reference to the aforesaid model regulations, thereby ensuring that the model regulations are implemented more widely and effectively.

(II)
"Comprehensive investigation report on processing of issues related to illegal works at the common parts of economic housing buildings"

The CCAC received multiple complaints related to the occupation of the common parts of economic housing buildings and illegal works, including illegal alteration and occupation of underground carparks of the buildings and alteration of the common parts of the buildings to shops, among others. In order to comprehensively review the mechanism for processing the issues concerning illegal works at the common parts of economic housing buildings and the relevant situations, the CCAC decided to consolidate the relevant complaints and initiate a comprehensive investigation case file for follow-up actions.

According to Decree Law no. 41/95/M, the *Legal Regime of Management of Economic Housing*, and the relevant provisions, the Housing Bureau (IH) is a department responsible for monitoring the management of the common parts of economic housing buildings which has the duties to require owners of housing units, management bodies and management entities to carry out obligations stated in relevant regulations. The Land and Urban Construction Bureau (DSSCU), in accordance with the *Legal Regime of Urban Construction*, has the competence to implement coercive enforcement measures against illegal works including the banning of construction works and the ordering of demolition of construction works.

According to the investigation, it was found that although the IH had carried out follow-up actions and penalty procedures regarding relevant complaints according to law and notified the DSSCU of further follow-up actions, while the DSSCU had also informed the IH about initiating a case file for investigation concerning the complaints and carrying out the on-site inspection, the DSSCU failed to show any initiative or effort in coordination. In addition, the IH considered that according to law, the DSSCU was the competent department to implement coercive enforcement measures to monitor and restore the previous situation of urban buildings and that the IH itself did not have such competence, so the IH was comparatively passive when processing the issues.

The CCAC believes that since the IH has the responsibility to monitor the management of the common parts of economic housing buildings, it should proactively make good use of the legal means vested in Decree Law no. 41/95/M in order to strengthen law enforcement and motivate offenders to stop occupying the common parts of the buildings and carry out the necessary demolition of unauthorised construction as soon as possible in order for them to be restored to the previous situation. Moreover, the IH should also show more initiative and efforts to negotiate with departments including the DSSCU so as to strengthen communication and cooperation with them.

Following the CCAC's opinions and continued efforts, the IH introduced monitoring measures in various specific cases and successively referred cases to, or requested collaboration from, management bodies of relevant buildings, the DSSCU and some other departments. Moreover, at the request of the IH, the DSSCU increased the number of inspections of illegal works in relevant economic housing buildings and carried out penalty procedures, issued public notices of demolition orders and carried out coercive demolition procedures and so forth. From various perspectives, they jointly followed up and solved issues related to illegal occupation and unauthorised construction at the common parts of economic housing buildings. Such measures and actions had achieved certain results.

Meanwhile, after the IH had looked into and reviewed the existing work procedures and law enforcement standards, it standardised and improved the penalty ways regarding violations of Decree Law no. 41/95/M. In addition, it also set out internal guidelines on law enforcement mechanisms and standards regarding cases of illegal works in economic housing buildings with a view to stepping up monitoring efforts and enhancing efficiency.

(III)
"Comprehensive investigation of the Public Administration's selection of operators of vending machines"

The CCAC received a complaint indicating that the Sports Bureau allowed a certain operator to install vending machines at its facilities without carrying out any tender processes.

Following a preliminary investigation, it was found that there were vending machines installed at many facilities and places managed by the Public Administration for use by residents or staff members and the issue involved verification of the legality of the same type of administrative acts carried out by various departments of the SAR Government. In this regard, the Commissioner Against Corruption issued an order to place the case on a file of comprehensive investigation. Hence the CCAC, by sampling, obtained a lot of documents and information successively from the Cultural Affairs Bureau, the Education and Youth Development Bureau, the Judiciary Police, the Municipal Affairs Bureau, the Public Security Police Force, the Public Security Forces Affairs Bureau of Macau, the Labour Affairs Bureau, the Health Bureau and the Financial Services Bureau in order to understand and study the procedures and methods adopted by the departments in terms of selection of vending machine operators and to carry out a law-based analysis of whether there were administrative illegalities or irregularities existing in the relevant procedures.

It was found in the investigation that each of the departments subject to the random inspection had different ways of vending machine operator selection and even different subordinate units of the same department did not do it in a standardised way. Some of the departments did not initiate the relevant procedures until they received proposals from operators who expressed their willingness to cooperate, while some of them even directly invited or consulted certain operators after verifying the need for vending machines. Only a few departments acquired the services of vending machine operation in accordance with the current public procurement law. The investigation also revealed that even though there were departments having entered into agreements with operators regarding provision of vending machines, some of them did not draw up any proposals or reports on which the decisions were based. Moreover, such agreements contained clauses including automatic renewal or granted the operators the right of first negotiation, which were unfavourable to the departments. The clauses concerning duration of service stipulated in some agreements were even totally ignored in practice just as the operation was performed entirely in automatic renewal mode.

The CCAC agreed on the Public Administration's practice of installing vending machines at the facilities or spaces under its administration for the sake of convenience to the general public. However, as this matter does not fall into the category of public procurement, the current public procurement law cannot directly apply to such situation. Under such circumstances, when selecting vending machine operators, the Public Administration should still strictly comply with the principles of equality, justice, impartiality and pursuing the public interest enshrined in the *Administrative Procedure Code*.

Following the analysis, the CCAC considered that when there is a need for vending machines, the Public Administration should, to the greatest extent possible, seek possible interested bidders in the market so as to carry out an objective comparison and analysis of the respective conditions of service provision, select the best operator among them and implement the arrangements through written contracts.

Furthermore, with the changing social and business environment, departments should review and optimise the legal relationship with the operators in a timely manner instead of unconditionally maintaining such relationship. In particular, they should also, especially after the expiration of contracts, take measures to understand the latest market environment or reconsider whether there are other better operators in the market, and avoid applying clauses that are unfavourable to them, such as automatic renewal or grant of the right of first negotiation to operators, so as to ensure the rational allocation and utilisation of public resources and achieve better result in pursuing the public interest.

The CCAC believed that departments should plan, organise, and be proactive when carrying out activities, taking into account the needs of various subordinate units for vending machines and the respective administrative mechanisms in a standardised manner and should also prepare proposals or reports on these matters so as to fulfil the responsibilities as good managers and to ensure the legality and fairness of procedures.

Regarding the aforesaid matter, the departments that were inspected by sampling and did not select vending machine operators in a fair way agreed on the CCAC's suggestion and pledged to seek suitable operators through a competitive mechanism in the future, and to re-evaluate the existing demand for and quantity of vending machines. Prior to the CCAC's formal intervention, some of the departments had already reviewed and optimised their practices, particularly with regard to fair selection of operators.

III. Inquiry case summaries

(I)
Applying the law accurately and clarifying the powers and responsibilities

The CCAC received two complaints regarding the exercise of powers of the Municipal Affairs Bureau (IAM). One complaint argued that the IAM failed to follow up on the handling of electric scooters long parked on pavements according to its powers; the other questioned the IAM's prosecution of a resident for parking a bicycle on a pavement under the *General Regulations Governing Public Places*, deeming the punishment inappropriate.

After investigation, it was confirmed that the IAM considered electric scooters to fall under the definition of "vehicles" in the *Road Traffic Law* and that enforcement should be carried out by the Public Security Police Force (PSP) according to the *Road Traffic Law*. Therefore, the IAM did not follow up or refer the case to the PSP for handling. As for the bicycle locked on the pavement, the IAM considered it an object placed in a public place and thus punished the resident according to the *General Regulations Governing Public Places*.

The CCAC believes that although the *Road Traffic Law* prohibits the riding of motorised and non-motorised scooters on public roads and this is subject to enforcement and prosecution by the PSP, Article 3 of the law does not include electric scooters in its definition of "vehicles". Therefore, electric scooters parked on pavements should not be treated according to the provision on illegally parked vehicles. Instead, the IAM should treat such situations as illegal occupation of public places and impose penalties according to the *General Regulations Governing Public Places*.

As for bicycles, as they meet the definition of "vehicles" under the *Road Traffic Law*, the PSP should be responsible for law enforcement against illegally parked ones.

Following the CCAC's intervention, the IAM proactively followed up on the complaints and took corresponding measures, including revoking the previous charge sheet issued on an erroneous ground, re-prosecuting the relevant resident for other illegal acts and referring the issue of illegal parking on a pavement to the police for follow-up within the statutory time limit and in accordance with the correct legal basis, and proactively coordinating and communicating with the PSP to clarify the scope of their respective powers and responsibilities and the legal basis for law enforcement, so as to ensure that the relevant law enforcement work complies with the aforesaid legal provisions and clarify the handling methods for the two departments when encountering relevant issues in the future, thereby strengthening their coordination and cooperation in law enforcement.

(II)
Inspection and examination must comply with legal regulations

The CCAC received a complaint claiming that the Transport Bureau (DSAT) required owners of vehicles that failed the light vehicle inspection for 2024 but intended to continue using them to submit a "vehicle structure notarisation report" issued by a "notary office" (i.e. an independent third-party professional organisation) along with their repair plans. The complaint raised concerns that this practice increased the burden of vehicle inspection for residents and lacked legal basis.

The investigation confirmed that the vehicle in question failed the 2024 mandatory inspection due to defects. The inspection record only stated that "given the damage to the main structure of the aforesaid vehicle, if the owner wishes to repair the vehicle and continue using it, a repair plan for the main structure of the vehicle or other technical documents that can prove the safety of the vehicle structure may be submitted to the vehicle inspection centre before the re-inspection. The repair plan should at least include detailed repair method instructions, drawings, a list of equipment and materials to be used, and a professional qualification and liability statement of the repairman", without specifying that a third-party vehicle structure report was required.

However, taking into account that a third-party vehicle structure report is more convincing in ensuring that the repair meets safety requirements, which helps the vehicle inspection centre approve the feasibility of a repair plan and the safety of the vehicle structure, the DSAT has implemented the requirement that a third-party vehicle structure report must be attached to a repair plan since 2024.

After analysing relevant traffic regulations, especially Article 75 of the *Road Traffic Law*, Article 51 of the *Road Traffic Regulations* and the *Vehicle Inspection Regulations* currently in force, the CCAC believes that current regulations do not expressly stipulate that repair plans submitted during vehicle inspection must be accompanied by a third-party vehicle structure report. Furthermore, the DSAT's internal and external information releases do not provide written guidelines on the administrative procedures and standards for requiring third-party reports in special inspection or re-inspection procedures.

Following the intervention and opinions of the CCAC, the DSAT agreed that a third-party vehicle structure report was indeed not a legally required document for approving vehicle repair plans. Measures were therefore taken to optimise the public's access to information on the administrative procedures and required documents for vehicle inspection, particularly clarifying the mandatory content of repair plans, so as to ensure the legality, necessity and transparency of the requirements.

(III)
Proactively taking responsibility and strengthening coordination

The CCAC received a complaint from a resident who was dissatisfied with the Identification Services Bureau (DSI) which failed to take the responsibility for following up the matter concerning the discrepancy between the data contained in his identity card and that in his birth registration. Therefore, he requested the CCAC to follow up the matter.

According to the complainant, during the process of renewal of his identity card with the DSI, he was informed that since the romanisation of his surname on his identity card was not consistent with that on his birth registration, if he intended to maintain the romanisation of his surname on his identity card, he had to go to the Civil Affairs Registry on his own to alter his birth registration. Otherwise, the DSI would, when issuing his new identity card, register the romanisation of his surname as it appeared on his birth registration according to law. The complainant believed that the responsibility for the discrepancy in the romanisation of his surname was due to the fault made by the government many years ago. Therefore, he was dissatisfied with the way the DSI handled the matter.

The investigation found that the complainant's first identity card was issued by the Public Security Police Force before handover. However, at that time, the department issued an identity card in which the romanisation of the complainant's surname was not consistent with that on his birth registration. In subsequent replacements and renewals of the complainant's identity cards, the former and current

Identification Services Bureau issued his identity cards without having vetted and verified the data on his birth registration, resulting that the matter of wrong romanisation of his surname had not been identified and rectified.

Upon analysis, the CCAC believes that the current law indeed regulates that the name on the holder's identity card should be consistent with that on his birth registration and it is the duty conferred by law on the DSI to ensure that both names are consistent. However, in the specific case, the responsibility for discrepancy between the romanisation of the surname on the identity card and that on the birth registration lies primarily with the Public Administration. Therefore, the competent departments should, upon verifying the facts, shoulder the responsibilities and take the initiative to communicate and collaborate with other competent departments if their intervention is deemed necessary, with a view to jointly seeking appropriate and legal solution to the relevant matter.

After the CCAC had intervened and given its suggestions, the DSI admitted its responsibility to follow up the case relating to the fault on the romanisation of the complainant's surname and thus, ex officio, exempted the complainant from paying the fee for replacing his identity card. The DSI promised that it will, if similar cases will occur in the future, take the initiative to notify the Civil Affairs Registry of the situation for appropriate follow-up actions.

(IV)
Labour creditor's rights should be protected reasonably

A resident lodged a complaint to the CCAC, claiming that he was dismissed without just cause by his former employer and that there were defaults on payment of wages and dismissal compensation by the latter. Therefore, the complainant raised an "application for payment" and an "application for advance payment" to the Labour Creditor's Rights Protection Fund (hereinafter referred to as the "Fund"). However, the Fund failed to approve relevant applications.

In accordance with the *Labour Creditor's Rights Protection System*, the aim of setting up the system is to establish a system to protect creditors' rights arising from labour relations and to ensure payment of creditors' claims when there is default by the debtors. The mechanism for protecting the employees is divided into the "application for payment" and the "application for advance payment". The former is a request to the Fund for a full payment of the creditor's claims guaranteed by the aforementioned law if it is impossible to recover the owed amount, in whole or in part, through judicial proceedings. The latter is a request for advance payment not exceeding half of the guaranteed amount within 45 days after the

termination of labour relations. The law regulates that a request for advance payment should be made together with a request for payment and should not be made separately.

According to the investigation, it was found that the Fund's refusal of the complainant's application for advance payment was due to the fact that, although the involved company had already ceased operation, one of the members of the administrative management bodies had promised to, on an individual basis, pay part of the amounts owed to the employees on behalf of the company. Therefore, the Fund considered that the employer still had the ability to settle the creditor's claims. As such, the condition for advance payment was not fulfilled. In addition, regarding the suspension of the procedure of "application for payment", the vetting and approval procedures can only procced if the complainant has a "final and unappealable court decision" and a "declaration of bankruptcy or insolvency of the debtor issued by the court".

Upon analysing relevant legal regulations and the practical operation of the Fund, the CCAC considers that the payment promise obtained by the complainant was merely a personal act of the representative of the involved company and that the complainant's claims were not paid in whole. Therefore, it was inappropriate for the Fund to consider that the company still had the ability to settle the claims. On the other hand, during the period when the application was processed, the involved company had already registered its liquidation and extinction. Due to the lack of a defendant, basically, it was impossible for the complainant to request for the relevant company to settle the debts through judicial proceedings. In other words, he was not able to obtain the "final and unappealable court decision" and the "declaration of bankruptcy or insolvency of the debtor issued by the court". Moreover, the aforesaid documents are not the ones explicitly required to be submitted by law for the application. According to the relevant law, when deciding whether to approve the relevant "application for payment", the crucial point lies in whether the party concerned is unable to recover the owed labour debts through judicial proceedings. Therefore, the way the Fund handled the issue may probably make the purpose of establishing the Labour Creditor's Rights Protection System hard to be adequately fulfilled.

Following the CCAC's intervention, the relevant department accepted its opinions. After discussing with the Public Prosecutions Office, the way for processing the applications was determined. When it is not possible to file a lawsuit due to extinction of the legal entity as an employer, the party involved is allowed, in these situations, to obtain the protection of the creditor's rights.

(V)
Communication is important to internal management

The CCAC received a complaint indicating that the Cultural Affairs Bureau (IC) failed to guarantee its shift workers' statutory rights regarding rotational days off, annual leave and attendance at training courses.

The complainant pointed out that a then functional chief of the IC failed to arrange the shift workers' rotational days off according to the law. The CCAC discovered that the functional chief misinterpreted the requirement set forth in the rules of shift work provided by the *Statute of Personnel of the Public Administration of Macao* in force. After the functional chief realised the correct meaning of the relevant rules, he promptly rectified the situation and offered compensation.

In addition, the complainant stated that the shift workers were unable to take their annual leave as planned in the vacation schedule. Following the investigation, the CCAC did not find any situations that the workers were unable to take their annual leave as planned in the vacation schedule, nor was it found that the arrangements of rotational days off during annual leave periods affected or diminished the shift workers' right to rest.

The complainant also stated that the IC did not arrange the schedule for the shift workers to take the compulsory targeted promotional training courses and, as a result, they needed to, at times, take the courses in their spare time. The CCAC considered that according to the *Recruitment, Selection and Promotional Training of Public Service Personnel* in force, when it comes to targeted promotional training courses, workers are entitled to be excused from work by the leadership of the department for attendance at the training, provided that they take place during working hours.

In fact, the IC exempted the worker concerned from work for attendance at the course for an entire day. Following an internal investigation, the IC decided to compensate the worker for the extra hours of work performed following a half-day training.

Following the CCAC's intervention, the IC formally established the *Guidelines on Shift Personnel Management*, which, in explicit compliance with the principle of good faith and without prejudice to the operation of the department, introduced the coordinative mechanism for shift roasters and the planning and taking of annual leave. In addition, the guidelines also provide rules about shift workers' attendance at the two types of mandatory training courses for promotion, and, particularly, safeguard their right to rest to the greatest extent, as well as set up a communication mechanism for such situations.

(VI)
Transparent information about cooking fume inspections

A resident affected by cooking fume filed a complaint with the CCAC, claiming that he had filed complaints with the Municipal Affairs Bureau (IAM) and the Environmental Protection Bureau (DSPA) respectively regarding the cooking fume emissions from a certain catering establishment, but the two departments' test results differed. Furthermore, the complainant came to know that the IAM had arranged tests outside of business hours, thus querying about the bureau's scheduling of tests and its refusal to disclose the testing time.

According to the laws in force, the IAM has the authority to monitor whether the cooking fume emissions from catering establishments meet its standards and to impose penalties for violations. The DSPA's responsibilities include preventing and controlling environmental pollution, and it has formulated the *Guidelines for the Control of Cooking Fume, Black Smoke and Odour Pollution in the Catering Industry and Similar Establishments* to regulate the operation and management of cooking fume treatment equipment and related facilities in catering establishments.

The investigation revealed that after receiving the complaint, the DSPA repeatedly dispatched personnel to follow up and understand the implementation of relevant guidelines for cooking fume pollution control at the establishment in question. During this process, it was found that the establishment's cooking fume filtration equipment and its maintenance did not meet the DSPA's recommended requirements. Therefore, in addition to referring the complaint to the IAM, the DSPA repeatedly advised the person in charge of the establishment to take effective measures to improve the situation and continuously monitored the establishment's operation and improvement situation.

In addition to conducting its own cooking fume tests at the establishment, the IAM also proactively coordinated with the DSPA for joint inspections. Regarding the complaint, after detecting excessive emissions of the establishment, the IAM initiated prosecution and administrative penalty procedures against it and convened an inspection committee composed of multiple departments, including the DSPA, to conduct an on-site inspection. The person in charge of the establishment replaced the equipment as promised, and the IAM conducted a final on-site re-inspection. No illegal actions or negligence in follow-up were found in the IAM's handling of the matter.

Regarding the testing time, according to the data, the IAM repeatedly sent personnel to the establishment during business hours to visually observe the cooking fume emissions from the chimneys and to measure the cooking fume concentration using the gas detector tube method during non-business hours.

The investigation revealed that the IAM arranged for the measurement of cooking fume concentration using the gas detector tube method during non-business hours to avoid disrupting the operation of the establishment. Furthermore, the IAM required the person in charge of the establishment to adjust the stoves to the cooking temperatures identical to those of business hours to simulate peak business conditions of the establishment for sample collection and comparison. Therefore, the IAM's on-site measurements with the gas detector tube method during non-business hours did not affect the accuracy of the results.

In fact, the complainant, upon learning that the IAM conducted testing during non-business hours, questioned the results and repeatedly requested the latter to specify the exact testing time. However, the IAM did not provide the specific testing time as requested or explain the testing method currently used, leaving the complainant's doubts about the IAM's failure to fulfil its responsibilities unresolved.

Following the intervention of the CCAC, the IAM agreed that it should provide as much information as possible in its responses to residents and strengthen communication to dispel their concerns.

(VII)
Standards of tender evaluation should be impartial and comprehensive

When handling a complaint, the CCAC found that a company was awarded two service contracts by the Sports Bureau (ID) in March 2024 through public tenders, including "management and lifeguard services at outdoor swimming pools and sports facilities with swimming pools under the ID in Macao" and "management and lifeguard services at outdoor swimming pools and sports facilities with swimming pools under the ID in the islands", with the period of service from 1st April 2024 to 31st March 2026. However, the company, after being awarded the contracts, was not able to employ sufficient number of lifeguards and fulfil the obligations it promised in the tendering process. Also, it failed to pay the final guarantee by the specific deadline. As a result, the provisional guarantee was forfeit and the respective contracts were declared void.

In August 2024, the ID reorganised the said public swimming pools and initiated four public tenders for the same kind of services, namely "management and lifeguard services at the D. Bosco College Sports Centre and the Lin Fong Sports Centre under the ID", "management and lifeguard services at the Olympic Sports Centre - Aquatic Centre and the Taipa Central Park Swimming Pool under the ID", "management and

lifeguard services at the Tamagnini Barbosa Sports Centre and the Dr. Sun Yat Sen Swimming Pool under the ID" and "management and lifeguard services at the Carmo Swimming Pools, the Cheoc Van Swimming Pool and the Hac Sa Park Swimming Pool under the ID". All of the tender schemes specified the situations in which the tenderers would be considered unqualified, namely "having been punished with a fine or having the contract terminated by the awarding authority due to failure to fulfil the contractual obligations". However, the ID eventually concluded that there was no situation that would make it consider that the said company failed to meet the requirements to be a tenderer. Thus, it continued to adopt the same tender evaluation standards and, once again, awarded the company the contracts to provide management and lifeguard services at some of the public swimming pools, with the period of service from 1st December 2024 to 30th November 2026.

The CCAC understood that based on the principle of objective stability or stability of procedural documents, the information and rules indicated in the tender scheme or specifications should remain unchanged throughout the process. However, regarding the selection of evaluation items and specific definition of the evaluation standards by the ID, obviously, there is room for optimisation and in-depth consideration. The fact that a tenderer who was awarded a contract recently but failed to provide the due service was awarded the contract of the same kind of service again within a short period of time is incomprehensible and unacceptable. In order to ensure the impartiality of public administration, the CCAC considered that the ID should adopt appropriate measures in advance to optimise the evaluation items and standards in future public tendering processes. In particular, a comprehensive assessment of tenderers' strengths and weaknesses in terms of their performance and the quality of services they provided in the past should be carried out. Only in this way can the true quality of the tenderers be fully understood and the evaluations be fairer, more reflective of reality and convincing to the public.

The ID agreed on the CCAC's opinions and stated that it would adopt proper measures for optimisation in future public tendering processes, including introducing a "point deduction" mechanism to the evaluation standards indicated in tender schemes and reviewing the records of service contracts awarded to tenderers by the bureau in the previous 24 months. If non-fulfilment of the obligations promised in the tender proposal, violation of contractual rules or irregularities subject to fines, among other situations, is found, a "point deduction" will be applied to the evaluation item regarding the experience of service provision, thus fully reflecting a tenderer's past experience and service quality in the evaluations.

(VIII)
Important information should be published according to law

The CCAC received a complaint claiming that the Macau Urban Renewal Limited (MUR), in the course of selecting a property agency for providing services for the sale of the project of "Macau New Neighbourhood" in Hengqin, failed to publish the reasons for the awarding of the contract of the relevant tender. He doubted if there was "black box operation" which led to injustice.

Upon investigation, it was found that the scoring criteria and the scoring proportion of the evaluation factors had already been laid down when the tender was drafted. The tender evaluation committee also stipulated the evaluation rules and the calculation method. Moreover, the qualification requirements and the evaluation criteria were clearly specified in the letters which required the four largest chambers of commerce of property agencies in Macao to notify their members of the relevant tender invitation information. After the tender closing date, the tender evaluation committee selected five tenderers out of 110 qualified ones with the highest scores in accordance with the established evaluation criteria mentioned above for contract awards. Additionally, the awarded company calculated the service fee based on the established method and thus they were not able to influence the selling price of the relevant housing unit and the parking space. Therefore, the circumstances of impartiality were not seen.

In addition, according to the *Legal Regime for Publicly-Owned Companies*, regarding information on "the major procurement project", information pertaining to wholly government-owned companies and their subsidiaries should be published on the webpage set up and managed by the competent department (hereinafter referred to as the "Platform") and any webpages of the relevant companies or through other appropriate means. The guidelines for publication of information issued by the competent department require that publicly-owned companies and their subsidiaries should publish the following information: "A brief summary of the relevant procurement project and any results of the opening of the tender and the contract award if the value of the acquisition of goods and services exceeds MOP4,500,000 or the amount of works exceeds MOP15,000,000". In other words, even the project falls within the category of the "major procurement project", the tender evaluation criteria and the reasons for awarding the contract are not necessarily the content that requires publication.

The procurement involved in the case was initiated by a wholly-owned subsidiary of the MUR. The intermediary service fee of the relevant property agency was above RMB100,000,000, which is far exceeding the procurement service amount required for publication in the guidelines. Therefore, a brief summary of the procurement project and any results of the opening of the tender and the contract award should have

been published, according to law, within 90 days upon the completion of the procurement process on the "Platform" set up and managed by the competent department and on the "MUR" webpage or through other appropriate means. However, more than 90 days upon the completion of the procurement process, the relevant information has still not been published either on the "Platform" or on the "MUR" webpage.

After the CCAC had given its opinions and exchanged views with the competent department, the latter specified in the reply letter that it agreed with the stance of the CCAC. Therefore, the CCAC had already required the "MUR" by mail to instruct the subsidiary involved in the case to "immediately carry out remedial measures and rectify the improper act of not publishing the information about the procurement project" and to make the information of the relevant procurement project public through the "Platform". The competent department urged "the MUR, being the parent company, to strengthen the supervision on its subsidiary and training of its personnel in order to avoid repeated situations such as non-compliance with the laws and guidelines". Meanwhile, it was mentioned in the reply letter that the relevant information was published on the "Platform" by the subsidiary involved in the case on 30th April 2025. In addition, it was also specified in the reply letter that the competent department will, in order to strengthen supervision on the publication of information by publicly-owned companies, require companies to strictly comply with the guidelines and carry out a comprehensive review, periodic communication and assessment, improve the content of minutes of the meeting of the bodies, urge companies to strengthen internal management and hold briefing sessions, among other measures, in order to raise awareness of compliance with the law among relevant companies and avoid occurrence of similar situations in the future.

IV. Retrospective review

In 2025, to effectively exercise the CCAC's power of supervision conferred upon by the law, the CCAC sustained its efforts in implementing the "retrospective review" mechanism. As to the public departments or entities that have promised to make improvement in the course of ombudsman case handling, the CCAC follows up their progress of improvement in a timely manner, such as whether they have taken optimisation measures according to the CCAC's opinions or suggestions, in order to review the efforts made to improve the certain matters and whether they keep making efforts to satisfy the demand of the public and society, with an aim to continuously enhancing good governance of public departments or entities.

The results of the retrospective review reflect that the departments of the SAR Government generally respect and accept the conclusions and suggestions made by the CCAC in the ombudsman case files and they have taken real measures to make improvement.

Some of the cases included in the list of "retrospective review" in 2025 are summarised as follows:

(I)

A resident told the CCAC that he had made several complaints to the Municipal Affairs Bureau (IAM) over occupation of public places. However, the IAM replied that its inspection personnel could only initiate a prosecution based on the facts they witnessed and sufficient evidence proving the existence of violation. Therefore, the complainant questioned the bureau's inaction.

It was discovered in the investigation that after receiving the complaints, the IAM repeatedly dispatched personnel to the location mentioned by the complainant for follow-up and inspection, but the inspection personnel did not witness any situations of illegal occupation of public places and therefore did not initiate any sanctioning proceedings. Then the IAM replied to the complainant that it would continue to carry out random inspections and would take follow-up actions when illegal situation was found.

The CCAC considered that the *General Regulations Governing Public Places* empowers law enforcement personnel to immediately initiate prosecutions once they witness administrative violations punishable by the regulations, with an aim of speeding up prosecution procedures and enhancing the efficiency of law enforcement. However, the *General Regulations Governing Public Places* does not prohibit the IAM from gathering evidence of the reported facts that are not witnessed by the relevant personnel so as to ascertain whether there are any administrative violations liable to sanction within the reported period of time.

Upon obtaining the CCAC's opinions, the IAM carried out a comprehensive review of the relevant law enforcement process and improved the internal guidelines and law enforcement procedures regarding the follow-up on the witnessed and unwitnessed violations. At the same time, it also strengthened the internal training for its law enforcement personnel.

In order to continuously keep tabs on the implementation of the relevant improvement measures of the IAM and the progress, the CCAC included the case in the list of "retrospective review" for regular follow-up.

(II)

According to a complaint received by the CCAC, during a follow-up consultation at the Conde S. Januário Hospital (hereinafter "CHCSJ"), a patient found that his medical record contained untrue entries and thus questioned if there were illegalities or irregularities existing in the matter.

It was discovered in the investigation that the Health Bureau (SS) initiated an inquiry process and verified that the incident was mainly caused by the problems concerning communication and handover of work in a certain department. It was also verified in the inquiry that the mistake in the medical record in question neither materially harmed the complainant nor affected his future medical treatment plan.

Due to the impossibility to attribute disciplinary responsibilities to a certain doctor in the inquiry process in question and the fact that the evidence obtained did not allow for the initiation of a severer process, the SS decided to archive the case and adopted proper measures to rectify and review concrete cases.

The CCAC considered that even though the medical record in question had already been corrected, the optimisation of accuracy of medical records should not be superficial and on a case-by-case basis. It is more necessary to conduct a comprehensive review and implement optimisation measures applicable to doctor-patient communication, the mechanism of correction of medical records and the mechanism of patient handover of the CHCSJ in order to guarantee the accuracy of medical records and patients' health.

Following the CCAC's intervention, the SS stated that it had already carried out a systematic reform of the CHCSJ. The actions included continuous reinforcement of doctor-patient communication, requesting doctors to correctly work on patient handover, enhancing medical personnel's precision in the writing of medical records through training and verification of medical records and establishing a strict system of revision and verification of medical records.

In order to continuously keep tabs on the implementation and progress of the systematic reform of the CHCSJ, the CCAC included the case in the list of "retrospective review" for regular follow-up.

Some of the cases removed from the list of "retrospective review" in 2025 are summarised as follows:

(I)

In the course of handling a complaint, the CCAC found that in the 2014 version of the traffic violation ticket (hereinafter referred to as "ticket") from the Public Security Police Force (PSP), only the legal term "report" was kept on the front of the ticket. However, the back of the ticket still contained the relevant points to note on "report (misdemeanours)" and "accusation notification (administrative violations)", which reflected a problem concerning inappropriate use of legal terms and inadequate notification on the ticket.

Misdemeanour and administrative violation are of different natures in terms of legality and thus subject to two different defence procedures respectively. In particular, if the offender fails to voluntarily pay the criminal fine/administrative fine by the designated deadline, in the former case, the offender will be referred to the court for trial. However, in the latter case, coercive collection will be enforced under the tax execution process. Residents generally have difficulty distinguishing which sanctioning procedure applies to the traffic offences they have committed, thus losing a potential opportunity for defence. Therefore, the CCAC reported the case to the PSP and included it in the list of "retrospective review" in 2025 in order to follow up on the relevant review and improvement progress.

Following a review of the content of the ticket, in April 2025, the PSP fully adopted the revised version of the traffic violation ticket, which allows the officers to, when filing charges against misdemeanours, select the options of "report" and "criminal fine", and, when filing charges against administrative violations, select the options of "accusation notification" and "administrative fine". Furthermore, the information on the back of the ticket was updated in order to ensure the accuracy of its content, its compliance with the law and the safeguard of the rights and interests of the individuals involved. Therefore, the CCAC removed the case from the list of "retrospective review".

(II)

Regarding the case that the China-Macau Dragon Boat Association (CMDB) charged fees from users of dragon-boats at the Nam Van Lake Nautical Centre, the CCAC found in the investigation that the Sports Bureau (ID) did not carry out a detailed assessment of the information submitted by the CMDB when approving the relevant proposals. It also failed to verify that some of the leased dragon-boats were assets owned by the government and did not adopt any supervisory measures. The ID stated that it would improve the situation according to the CCAC's opinions. In order to review the improvement progress, the CCAC included the case in the list of "retrospective review" in 2024 and commenced the retrospective review in 2025.

According to the information provided by the ID, the bureau has taken a new inventory of the dragon-boats and related facilities and confirmed the ownership of the relevant assets and the sharing of responsibilities of repair and maintenance. At the same time, the ID, through the signing of an agreement with the Municipal Affairs Bureau on the lake range of the Nam Van Lake used by the ID, the purpose of the lake range used by the ID and the rights and duties of both parties have been clearly defined and the insurance for the personnel participating in competitions and pre-competition training has been purchased. In addition, in order to satisfy the need for training, the ID extended the pre-competition training periods for the "Macao International Dragon-Boat Races" and the "Association Cup Small Dragon Boat Races" and requested the CMDB to submit the budget of the competitions and pre-competition training and the report of the budget execution and the use of relevant facilities so that the ID may carry out the supervision. As the spending on the pre-competition training in 2025 was sponsored by enterprises, the CMDB did not charge the users any fees.

Given that the ID has adopted several measures to improve the supervision and optimise the arrangements of activities, the CCAC has removed the case from the list of "retrospective review".

(III)

The CCAC received a report indicating that an individual from the Chinese mainland obtained a Macao SAR Non-permanent Resident Identity Card by marrying a Macao resident. However, the individual did not reside in Macao permanently and therefore was not eligible for permanent residency. Therefore, the complainant requested the CCAC to supervise whether the Identification Services Bureau (DSI) had effectively performed its duties of vetting and approval.

In the investigation carried out by the CCAC, it was substantiated that the reported situation was true. However, at that time, the individual's non-permanent resident identity card had not yet expired and he had not yet applied for a permanent resident identity card. Therefore, the vetting and approval procedure had not been commenced. In order to continuously supervise the legality of the relevant vetting and approval procedure, the CCAC included the case in the list of "retrospective review".

In 2025, the DSI informed the CCAC that it received the application for a permanent resident identity card from the individual involved in the previous year. After the processing, the DSI verified that the individual did not meet the requirement regarding the period of habitual residency in Macao and therefore decided to reject the application. Since the bureau has already performed its duties in accordance with the law, the CCAC has removed the case from the list of "retrospective review".

V. Departments or entities that proactively followed up on the CCAC's suggestions

In the course of handling ombudsman cases, many departments or entities paid attention to the issues involved and followed them up prior to or during the process of the CCAC's intervention. Alternatively, during the CCAC's investigation or the communication process with the CCAC, they took the initiative to accept the CCAC's stance or opinions and took actions to follow up on and/or improve the issues. Such proactive attitude to the improvement of the governance deserves recognition. The CCAC hopes that public departments and entities will maintain the positive work attitude, enhance the quality of law enforcement, implement government actions according to the law and adhere to the principle of "people-oriented governance". These public departments or entities that demonstrated such proactive attitude in 2025 are listed as follows (in no particular order):

Departments or entities	Involved issues	Responses to CCAC's opinions	Follow-up actions by the departments
Macao University of Tourism	Insufficient information disclosed to the public regarding the awarding of a written consultation.	The department has taken appropriate actions.	The department has adopted measures to optimise the content of the awarding of the written consultation disclosed to the public.
Education and Youth Development Bureau	Overtime work compensated by time off.	The department has taken appropriate actions.	The department has reinforced internal promotion and communication in order to eliminate the personnel's possible misunderstanding of the rules of overtime work compensation.
Sports Bureau	Refunds for tickets purchased in advance for access to sports facilities in the situations where typhoon signal no. 8 is about to be hoisted.	The department accepted the CCAC's opinions and has taken appropriate actions.	The department has refunded the complainant and those who encountered the situations of similar nature and refined the provisions of purchase of tickets for access to the sports facilities.
Municipal Affairs Bureau	Supervision of operation of hawkers and the enforcement of sanctions.	The department accepted the CCAC's opinions and has taken appropriate actions.	The department has adopted measures to strengthen the supervision of the situations of operation of hawkers and effectively implemented the relevant legal provisions.

Departments or entities	Involved issues	Responses to CCAC's opinions	Follow-up actions by the departments
Personal Data Protection Bureau	Obligation of personnel to submit application for allocation of the contribution time bonus under the Provident Fund Scheme.	The department accepted the CCAC's opinions and has taken appropriate actions.	The department has cancelled the requirement for the application in question and will strengthen personnel training in order to ensure that the procedures are carried out in accordance with the law.
Public Security Forces Affairs Bureau of Macau	Requirement for police officers who got married outside Macao to submit a certificate of marriage registration transcription when they are applying for family allowance.	The department has taken appropriate actions.	The department has reviewed and handled the matter and refined the relevant execution procedures in accordance with the law.
Customs of Macao Special Administrative Region	A worker's engagement in private business in violation of legal provisions.	The department has taken appropriate actions.	After ascertaining the facts, the department found a disciplinary offence and applied a disciplinary sanction.
Gaming Inspection and Coordination Bureau	A worker's engagement in part-time job in violation of legal provisions.	The department has taken appropriate actions.	After ascertaining the facts, the department found a disciplinary offence and applied a disciplinary sanction.

Departments or entities	Involved issues	Responses to CCAC's opinions	Follow-up actions by the departments
Correctional Services Bureau	Inappropriate request made by personnel of the Youth Correctional Institution (IM) to detainees for assistance in the preliminary evidence gathering within the facilities of the IM for an alleged disciplinary offence committed by personnel of the IM.	The department accepted the CCAC's opinions and has taken appropriate actions.	The department has taken measures to strengthen the training of custodial staff and improve their performance of law enforcement duties and the relevant code of conduct and has set up an internal reporting system in order to optimise the relevant procedures.
	Limitation of prison officers' annual leave to only 17 working days in 2025, with the remaining five working days being mandatorily carried forward to 2026.	The department has taken appropriate actions.	The department has reviewed and adjusted the arrangements of the annual leave of the personnel of the Corps of Prison Guards, allowing a total of 82 prison officers to take 22 working days of annual leave in 2025.
Public Security Police Force	A public security police officer allegedly violated the duty of exclusivity by working for a private company concurrently and participating in the preparation, operation and promotion of a local restaurant.	The department has taken appropriate actions.	After ascertaining the facts, the department found a disciplinary offence and applied a disciplinary sanction.
	A public security police officer allegedly held the position as the president of the general assembly of a civic association without proper declaration and authorisation and sought benefits from the activities organised by the association.	The department has taken appropriate actions.	Following the CCAC's notification, the department verified that the police officer had committed a disciplinary offence and applied a disciplinary sanction against him.

PART V

PROMOTION AND EDUCATION

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PROMOTION AND EDUCATION

In 2025, in addition to focusing on the promotion of clean elections, the CCAC actively cooperated with the national anti-corruption policy and objectives, continuously conducting integrity education for all sectors of society, providing diverse educational content for the public and private sectors, and striving to enhance the integrity atmosphere in Macao society.

As regards its regular education work, in 2025, the CCAC held a total of 547 seminars, talks, training workshops and activities of different types, which recorded 34,557 participants who were mainly public servants, personnel of private entities, teenagers, students of higher education institutions, secondary schools, primary schools and kindergartens, and the general public. The statistics are shown in the following table:

Statistics of education on corruption prevention in 2025

Topic	Target	No. of sessions	No. of participants
Seminars on Integrity and Observance, Public Procurement, Noble Character and Righteous Conduct, High Righteousness and Professional Integrity, Integrity and Law-Abiding Awareness, Declaration of Assets and Interests	Public servants	71	4,192
E-learning course entitled "Uphold Your Integrity"	Public servants	4	327
Talks/training workshops on the law of *Prevention and Suppression of Bribery in the Private Sector*	Private entities, public departments, education institutions	59	3,605
Seminars/activities on integrity awareness	Civic associations, public departments, education institutions	54	1,734
Seminars on clean elections	Civic association members and residents	4	126
Seminars/activities on integrity education	Teenagers, students of higher education institutions, secondary schools, primary schools and kindergartens, and members of associations	355	24,573
Total		**547**	**34,557**

I. Education on corruption prevention for the public sector

The CCAC actively conducts corruption prevention education for the public departments, regularly holds anti-corruption lectures on various themes, and launches learning videos on different themes on the "Webpage on Information about Integrity for Public Servants". By combining online and offline approaches, the CCAC enhances public servants' understanding of anti-corruption regulations and their vigilance for corruption risks. At the same time, the CCAC maintains close cooperation with the public departments to strive to jointly build a model of honesty and law-abidingness for public servants.

(1) Seminars on integrity for public servants

In order to consolidate the probity culture of public departments and the integrity awareness of public servants, the CCAC continuously organises integrity seminars for public servants and public departments on various themes, including the "Integrity and Observance", "Noble Character and Righteous Conduct", "Public Procurement", "Declaration of Assets and Interests", a promotion course on "Integrity and Law-Abiding Awareness" and a seminar entitled "High Righteousness and Professional Integrity" for directors and chiefs. In 2025, 71 seminars were held for 4,192 public servants from 17 departments/institutions. The CCAC will adjust the course content appropriately based on feedback from participating public servants to ensure that they better grasp the integrity requirements.

(2) Special legal training session for directors and chiefs of public medical institutions

The CCAC held a special legal training seminar entitled "High Righteousness and Professional Integrity" for directors and chiefs of public medical institutions in Macao, aiming to strengthen their awareness of integrity and legal knowledge. The training focused on the types of duty-related crimes committed by public servants and their legal liabilities under the *Penal Code* of Macao, and explored bribery prevention and handling in depth. Through case analysis, the legal consequences of bribery were explained to the participants, and suggestions were provided to help establish the integrity management culture.

(3) Ongoing launch of an e-learning course entitled "Uphold Your Integrity" and update of the "Webpage on information about integrity for public servants"

The CCAC has been continuously updating the column "Academy of Integrity" in the "Webpage on Information about Integrity for Public Servants", where videos of different topics adapted from cases detected by the CCAC are regularly uploaded, with a view to introducing to public servants the provisions about exclusiveness under the legal regime of public service and those about other commonly seen duty-related crimes, such as power abuse, document forgery, embezzlement and breach of secrecy.

In addition, to tie in with the SAR Government's promotion of online learning, the CCAC continues to launch the e-learning course entitled "Uphold Your Integrity" in collaboration with the Public Administration and Civil Service Bureau to strengthen the integrity and law-abiding awareness of public servants. In 2025, a total of four sessions of the aforesaid e-learning course were launched, recording 327 participants from 47 departments/institutions.

II. Education on corruption prevention for the private sector

The CCAC strives to establish partnership with private entities in corruption prevention. It strengthens communication with the sectors and carries out relevant corruption prevention education so that a probity culture may take root in society.

(1) Seminars on integrity for the private sector

The CCAC continuously organises talks for the private sector on the law of *Prevention and Suppression of Bribery in the Private Sector*. It also provides professional training courses at the invitation of education institutions in Macao. In addition to introducing the provisions of the law, it also designs the content of seminars or courses according to the needs of individuals or institutions from different sectors. In 2025, the CCAC held a total of 59 talks for small and medium enterprises, personnel of subsidised institutions, leaders and employees of banks, leaders of hospitals, and administrative staff of higher education institutions, which recorded a total of 3,605 participants.

(2) Thematic seminar on corporate governance and integrity building for financial industry leaders

To enhance the financial industry's awareness of compliance with legislation and its integrity building capacity, the CCAC and the Monetary Authority of Macao jointly organised a thematic seminar on "Corporate Governance and Integrity Building for Financial Institutions". Representatives from both the CCAC and the Monetary Authority of Macao provided in-depth explanations on topics such as the financial integrity defence line and compliant development, key requirements for corporate governance in credit institutions and insurance companies, the formulation and implementation of codes of conduct, the promotion of a probity culture and the handling of conflicts of interest. More than 70 financial institutions, including banks, insurance companies, private pension fund management companies, financial leasing companies and payment institutions participated, recording nearly 300 mid- to senior-level managers from financial institutions.

In addition, the CCAC was invited to conduct a thematic seminar on "Anti-Corruption and Integrity in the Banking Industry" for the leaders and management of some banks in Macao. By focusing on the special

provisions of different laws applicable to corruption crimes committed by personnel of credit institutions, the seminar aimed to help the banking industry gain a deeper understanding of the original intent of the laws. In addition, through case analysis, it aimed to raise awareness of prevention, promote integrity management through leadership and improve the internal governance systems of banks.

(3) Providing legal training on integrity awareness for leaders of private medical institutions

The CCAC was invited to conduct a special legal training seminar for private medical institutions in Macao focusing on the law of *Prevention and Suppression of Bribery in the Private Sector* so as to explore bribery prevention and handling in depth. Through case analysis, the CCAC clarified the legal consequences of bribery in the public and private sectors and provided suggestions to help establish an integrity management culture.

(4) Continuing to host the "Workshop on Value of Integrity" for private sector management and staff

The CCAC started to launch the "Workshop on Value of Integrity" for private sector management and staff at the Branch Office in Taipa in 2024, which received positive response. In 2025, it continued to receive enquiries from enterprises and they incorporated the workshop into their regular training programmes for new recruits. The CCAC held a total of 13 sessions of the workshop throughout the year, which recorded a total of 357 participants.

(5) Other relevant promotion

The CCAC, in a timely manner, uploads learning videos of different topics on its dedicated webpage of the law of *Prevention and Suppression of Bribery in the Private Sector* and introduces the functions of the CCAC, the aforesaid law and the relevant corruption prevention laws related to duty-related crimes through WeChat infographics and other channels.

III. Integrity education for young people

The CCAC continues to collaborate with the education sector to promote a culture of integrity and honesty. Through diverse methods and multi-faceted promotion ideas, it promotes correct moral values to young people as well as students of higher education, secondary schools, primary schools and kindergartens.

Statistics of integrity education work for young people in 2025

Programme	No. of sessions	No. of participants
Thematic Seminars on Integrity and Honesty Education for Higher Education Students	15	812
Education Programme on Honesty for Teenagers	93	6,775
A Talk on Honesty for Graduates	19	1,519
"New Generation of Integrity" – Education Programme on Honesty for Primary Students	112	3,368
"Spend the Children's Day with the Messenger Bear William 2025: Guardians of Integrity" On-Campus Music Workshop Activity	30	2,963
"Love Integrity" – On-Campus Activity for Primary Students	11	3,770
Integrity Study Tour – Integrity Experience Programme for Young People	49	1,542
"Learn More about Clean Elections" School Drama Tour	26	3,824
Total	**355**	**24,573**

(1) Integrity and honesty education for higher education students

1. Thematic seminars on integrity and honesty education for higher education students

The CCAC has all along been maintaining liaison and collaboration with higher education institutions of Macao. In 2025, together with the University of Macau, the City University of Macau, the Macau University of Science and Technology and the Macao Polytechnic University, it held a total of 15 sessions of the

"Thematic Seminar on Integrity and Honesty Education for Higher Education Students", which recorded the participation of 812 students. With the law of *Prevention and Suppression of Bribery in the Private Sector* as the theme and complemented by situational short films, the seminar aims to explain the constitutive elements of the crimes of active bribery and passive bribery in order to make students reflect on the harmful impact of corruption on society and individuals and develop a zero-tolerance attitude towards corruption.

2. "Integrity and Creativity – A Creative Series on Integrity for Higher Education Institutions"

To continuously promote integrity education among young people and strengthen cooperation with higher education institutions in Macao, the CCAC and higher education institutions jointly launched a collaborative project entitled "Integrity and Creativity – A Creative Series on Integrity for Higher Education Institutions". Through the creativity of young people, the project encourages other young people to put the spirit of the law into practice in their lives. The first phase was a collaboration with the Faculty of Humanities and Arts of the Macau University of Science and Technology to produce a series of short films on the theme of corruption prevention in the private sector. The content of the series of works is based on the concerns of higher education students in their daily lives and popularises the relevant provisions of the law of *Prevention and Suppression of Bribery in the Private Sector*, which resonates with today's youth through cross-disciplinary approaches. These creative short films have been uploaded to the integrity awareness learning website "Become a Person of Integrity through Self-Study".

3. "Higher Education Students Internship Programme"

To strengthen the integrity and honesty education for young students, enable them to directly participate in promoting integrity and expand cooperation models among higher education institutions, the CCAC continues to provide internship opportunities for students of higher education institutions of Macao. In 2025, a total of seven students from the University of Macau, the Macao Polytechnic University and the Macau University of Science and Technology joined the "Higher Education Students Internship Programme". The internship periods lasted from four to eight weeks depending on the course requirements of the institutions. During their internships, the interns disseminated the messages of integrity and honesty to secondary and primary school students and the general public with the CCAC's personnel in school campuses. They also assisted in devising integrity promotion activities specifically for higher education students, actively participating in the CCAC's integrity education efforts.

4. Continuously updating the integrity awareness learning website for higher education students entitled "Become a Person of Integrity through Self-Study"

The CCAC continuously updates its integrity awareness learning website for higher education students. Through animations and case studies, the website helps them understand the basic legal provisions and responsibilities for corruption and bribery in the private sector and raises their vigilance against corruption. Through early anti-corruption education, young people gain a basic understanding of corruption prevention laws and regulations before entering society or starting their own businesses, which guides them towards a path of integrity.

5. "Integrity Study Tour – Youth Integrity Experience Programme"

The Branch Office in Taipa continues to launch the "Integrity Study Tour – Youth Integrity Experience Programme", receiving students organised by secondary schools or higher education institutions to participate in experiential activities at the integrity education base, where they learn about the functions of the CCAC and corruption prevention knowledge. In 2025, the Branch Office in Taipa held 49 sessions of the programme, which recorded a total of 1,542 participants.

(2) Integrity and honesty education for secondary and primary school students

1. Education Programme on Honesty for Teenagers

The "Education Programme on Honesty for Teenagers", which has been carried out in secondary schools for many years, has gained the supports and cooperation of schools and become the "compulsory lesson" for many schools. The CCAC sends its workers to introduce the topics related to honesty to secondary school students. The topics have been designed according to the different developmental stages. Through diversified approaches including video clips of real cases, daily life examples and current affairs, secondary school students are guided to discuss and think about the importance of integrity, which will help teenagers build good character.

In 2025, there were 17 schools/sections joining the "Education Programme on Honesty for Teenagers". A total of 93 seminars were held, which recorded the participation of 6,775 students.

2. Theme-based seminars entitled "A Talk on Honesty for Secondary School Graduates"

The theme-based seminars entitled "A Talk on Honesty for Secondary School Graduates" mainly introduce to secondary graduates about the practical integrity guidelines so as to enable them to clearly

understand the anti-corruption laws currently in force in Macao and corruption prevention knowledge before they graduate from school and step into the society and hence they will understand and abide by the law and live a positive life. In 2025, a total of 19 seminars were held for 1,519 students from ten schools/sections.

3. "Love Integrity" – On-Campus Activity for Primary Students

The CCAC persisted its efforts to send its workers to hold the "Love Integrity" – On-Campus Activity for Primary Students. In order to flexibly tie in with the teaching arrangements of the schools, activities were held during lunch breaks or lessons to disseminate the integrity and honesty messages amongst primary students through booth games, curricular activities, stories and video clips of honesty, VR games, quiz games on exhibition panels and so forth. In 2025, the activity was further expanded to different education phases of special education of Macao. By providing appropriate on-campus activities, the CCAC created diversified opportunities for students to learn about integrity. In 2025, the CCAC held 11 sessions of the aforesaid activity, which recorded the participation of a total of 3,770 students.

4. Interdisciplinary thematic school activity on the theme "New Inspirations in Integrity Education from Children"

In the academic year 2024/2025, the CCAC continued to hold the thematic school activity entitled "New Inspirations in Integrity Education from Children" and the number of schools jointly holding the activity increased to five, namely Pui Ching Middle School, Primary Section of Salesiano School, Macau Baptist College, the Affiliated School of the University of Macau and Sacred Heart Canossian College (English Section).

A total of 41 excellent entries for the theme "clean elections" were received from five schools. The CCAC held an award presentation ceremony at the Branch Office in Areia Preta on 8th March to commend the students, who then shared the insights behind their creation.

5. "New Generation of Integrity" – Education Programme on Honesty for Primary Students

In 2025, the Branch Office in Areia Preta held a total of 112 sessions of the "New Generation of Integrity" – Education Programme on Honesty for Primary Students for 3,368 students from 20 schools.

The CCAC continuously optimised the "New Generation of Integrity" – Education Programme on Honesty for Primary Students. In 2025, in addition to providing new lessons taught in English, based on the actual situation of students, the CCAC also included internet integrity in the primary three teaching materials under the topic "honesty and loyalty" with a view to teaching students the correct values of using internet.

Moreover, the CCAC also updated the primary four teaching animations under the topic "righteousness and law-abidingness" to discuss the topic of law-abidingness and the importance of adhering to public morals with students.

Moreover, some of the excellent entries of the thematic school activity on the theme "New Inspirations in Integrity Education from Children" have been integrated in the teaching activities of the "New Generation of Integrity" – Education Programme on Honesty for Primary Students as interactive games to introduce the lessons, which increases students' understanding of the functions of the CCAC and the topics in the lessons, thereby enhancing learning effectiveness. Moreover, it provides opportunities for students to directly participate in integrity education activities for primary education.

6. "Spend the Children's Day with the Messenger Bear William 2025" – On-Campus Music Workshop

In order to celebrate the Children's Day and disseminate the values of honesty amongst kindergarten and lower primary students, the CCAC organised 30 sessions of the activity "Spend the Children's Day with the Messenger Bear William 2025" – On-Campus Music Workshop for 29 schools between May and June, which recorded the participation of 2,963 students.

In 2025, the Children's Day activity was held in a novel way. Through a cross-disciplinary mode integrating music and moral education, instructors acted in decision-making scenarios and led students to sing four children songs about honesty originally composed by the CCAC, namely "Little Honest Warriors" (theme song of the activity in 2025), "Don't be Greedy", "A Fair Competition" and "Commitment to Honesty" and guided the students to understand the importance of honesty and fairness. The CCAC also produced the MV of the children song "Little Honest Warriors" for schools and parents to have a preview of the song for the students. The aforesaid activity, which was well received by the participating students, produced anticipated educational effects.

IV. Promotion actions targeting young people

To align with the direction of the country and the Macao SAR which attaches importance to youth development, the CCAC has been continuously holding learning activities and providing practice opportunities for young people with a view to encouraging and supporting them to further participate in the work of integrity building and expand their international horizons about integrity.

(1) Selection of Macao youth representatives to demonstrate their award-winning anti-corruption solution at the United Nations conference

The CCAC, which proactively responded to and tied in with the strategy of the country and the Macao SAR to develop information technology, held the Macao preliminary round of the "Coding4Integrity Asian Youth Anti-Corruption Hackathon" in 2025. Teams were selected to go to Hong Kong to participate in the "International Contest" and "Regional Contest" of the Grand Finale of the "Coding4Integrity Asian Youth Anti-Corruption Hackathon 2025" jointly organised by the United Nations Office on Drugs and Crime (UNODC), the International Association of Anti-Corruption Authorities (IAACA) and the Independent Commission Against Corruption (ICAC) of Hong Kong. During the preparation of the Grand Finale, the CCAC and the Macao Productivity and Technology Transfer Center specially organised professional training for the teams. Eventually, the Macao Team, "Just do", with the prototype of an AI-powered public procurement analysis platform "BidTrust", stood out from the competing teams from 14 countries and regions and won the gold award and the Audience's Favourite Award in the International Contest and secured the opportunity to demonstrate their awarded-winning solution at the relevant United Nations Conference.

The Macao Team attended a special event of the Conference of the State Parties to the United Nations Convention against Corruption (UNCAC) in Doha, Qatar, in December where it presented to anti-corruption experts and representatives from different places their winning digital anti-corruption solution and shared what they learned and experienced during the course of the competition, which was highly commended by the participants.

During the period in Doha, the Macao team also participated in the anti-corruption solution design competition "Hackathon of Hackathons" organised by the UNODC and Knowledge Foundation where it competed and exchanged with 12 previous winning teams. Once again, the team achieved excellent results and was awarded "Super Team" and "The Best Team". In the future, it will assist the UNODC in the development of AI teaching tools, aiming to leverage innovative technology to support global integrity education.

(2) "UNI Project – Integrity Promotion Programme for Higher Education Students 2025"

To encourage higher education students to participate in integrity building, the CCAC recruited young people to participate in the "UNI Project – Integrity Promotion Programme for Higher Education Students 2025" and successively provided trainees with training on corruption prevention knowledge, opportunities for dialogues with leaders of the CCAC and some other professional development activities. In January 2025, the team "U Leader", which was comprised of the trainees of the programme and outstanding trainees from the previous programme, went to Zhongshan to visit the integrity education base of China – the Museum of

Dr. Sun Yat-Sen, with a view to deepening their understanding of the development of China and the building of integrity.

During the period when the programme was launched, the trainees, under the guidance of the CCAC personnel, were divided in groups to carry out integrity promotion practice work, including holding micro-movie screening in schools, promotion and education activities on simulating the investigation of anti-corruption cases and support in the operations of relevant social media platforms such as Xiaohongshu and Instagram.

In addition, the trainees organised eight "final projects" in higher education institutions between March and May including a volleyball competition on the theme "fair competition" and a challenge involving the "micro-movie on the fight against corruption" and flash mob activities such as acting challenge and "tongue twister" challenge related to the "micro-movie on the fight against corruption".

The programme ended on 10th May. 41 trainees from five local higher education institutions were awarded certificates, of which 11 trainees who showed excellent performance were even awarded outstanding trainee certificates.

In September 2025, the CCAC also arranged for the outstanding trainees of the UNI Project 2024 and 2025 to visit the headquarters of the Independent Commission Against Corruption (ICAC) of Hong Kong and exchange with members of the "ELITE Youth Leadership Programme".

(3) "Dissemination of Integrity in Schools" – Training of Teenage Ambassadors of Integrity and Practice Plan in Schools

To encourage young people to proactively participate in the integrity work of Macao, in the academic year 2025/2026, the CCAC held the activity "Dissemination of Integrity in Schools" – Training of Teenage Ambassadors of Integrity and Practice Plan in Schools which recruited 83 Form Two to Form Five students from ten local schools to participate.

The ambassadors of integrity, together with the instructors, participated in the kick-off ceremony cum basic training on 18th October 2025. In addition to writing down their expectations for the aforesaid programme, they also participated in the first integrity dissemination mission where they created posts to promote ambassadors of integrity and uploaded them to social media platforms.

The aforesaid programme lasts for nine months. Upon receiving training, the ambassadors of integrity have to hold appropriate integrity activities in schools in order to further disseminate the messages of integrity and honesty to various schools. Moreover, in order to strengthen young people's understanding

of the national conditions and the integrity development of the country and nurture their awareness of integrity and law-abidingness, on 8th November 2025, the ambassadors of integrity and the instructors visited Guangzhou where they learned about the integrity development of the country. They successively visited the patriotic education base of Guangzhou – Guangzhou Luxun Memorial Hall, and carried out team building activities so that the team spirit and the sense of belonging of the ambassadors of integrity could be enhanced.

Other online or on-site training activities provided by the CCAC for the ambassadors of integrity included "Course on Event Planning Techniques", a series of online training courses such as "Course on Event Budgeting and Invoice Reimbursement", "Course on Basic Legal Knowledge", "A Test on Knowledge of the law on *Prevention and Suppression of Bribery in the Private Sector*" and "Course on Creative Copywriting" with a view to supporting ambassadors of integrity to carry out various integrity activities in their schools.

(4) Holding creative themed collection activity to respond to the International Anti-Corruption Day

To promote the "International Anti-Corruption Day" which was designated by the United Nations to be on 9th December every year, the CCAC carried out a series of publicity activities including dedicated webpage, video clips, advertisements on radio and buses starting from mid-November 2025. On 22nd November and 6th December, the Branch Office in Taipa held two sessions of "Enjoy creativity with coffee – a collection activity featuring clean coffee bean collages", which allowed participating young people to, through seminars, understand the origins of the "International Anti-Corruption Day", the content of the United Nations Convention Against Corruption (UNCAC) and the anti-corruption work of the CCAC. During the activity, they also created coffee bean collages on the theme "integrity". This allowed the young generation to interpret the meaning of integrity while injecting creativity into anti-corruption work.

(5) Special thematic activities of integrity promotion in community for young people

In 2025, the CCAC continued to hold popular activities including "Enjoy a Real Coffee Treat at the CCAC – Youth Integrity Promotion Activity", "What Investigators Actually Do – Youth Integrity Experience Activity" and "Looking for the Ideal Job" at the Branch Office in Taipa to disseminate the message of integrity. A total of five sessions of the aforesaid activities were held.

V. Cooperation with the education sector

The CCAC has all along been attaching importance to the cooperation with the education sector. Through proactively providing support to integrity education and creating more exchange platforms, the

CCAC has formed a good mode of cooperation for mutual promotion with the education sector with a view to continuously increasing the effectiveness of honesty education among teenagers in Macao.

(1) Commending teachers and students for excellent lesson plans in "Integrity Lesson Plan Design Collection Activity for the Academic Year 2024/2025"

In order to promote professional exchange on education and enhance the quality of design of integrity education curriculum, the CCAC held the "Integrity Lesson Plan Design Collection Activity" in the academic year 2024/2025. In May 2025, it held the award presentation ceremony in order to commend the award-winning teachers and students. The activity received overwhelming response and 111 teachers and students from 37 schools or higher education institutions were attracted to join the activity. Many of the lesson plans collected were cross-curricular involving various subjects including Chinese, history, English, mathematics, science and information technology. In addition, there were also lesson plans jointly developed by different schools.

Several professional judges selected 24 excellent lesson plans and 37 commendable lesson plans from the works submitted by the participants in the "open group" and "student group" of the activity. In this academic year, the activity featured two additional items, namely "teaching on the topic of clean elections" and "original videos for micro-lessons on honesty and integrity". The former encouraged teaching staff to properly incorporate contents about awareness of clean elections into teaching in order to strengthen the connection between students and society. The latter, which was intended to cater to the society's and students' habit of receiving information, encouraged teaching staff to provide students with learning content which could be understood easier via short clips.

(2) Organising "Practical Workshop on Education Video Clip Production" for teaching staff training

In order to elevate the quality of short clips produced by teachers and students of education institutions, the CCAC organised three sessions of "Practical Workshop on Education Video Clip Production", where the professional instructors introduced the skills of creation and planning of teaching video clips, the forms of conveying information and the AI technologies for collecting and generating source materials as well as demonstrated the key points of post-production so as to enhance teachers' standard of producing teaching materials on integrity with a practical approach. The trainees recognised the effectiveness of the course and thought that the content of the course was practical and might enhance the application of AI to teaching and therefore it met teachers' teaching needs and was in line with social development.

(3) Providing training for foreign teaching staff in order to optimise integrity education

The CCAC continued to hold the school-based training activities about "education on integrity awareness and honesty" for teaching staff in order to deepen their awareness of integrity. The training consisted of two parts, namely the deepening of integrity awareness and the application of integrity education. The contents included an introduction to the law of *Prevention and Suppression of Bribery in the Private Sector* and stipulations related to bribery and corruption in the *Penal Code*, identification of conflicts of interest related to work and suggestion of solutions, as well as suggestion of application of the online resources in the "Resource Database for Integrity Education" of the CCAC to classroom teaching, with an aim to enriching teaching staff's knowledge of local corruption prevention system and ethics and conduct.

In 2025, the CCAC held three sessions of the school-based training about "integrity awareness and honesty education" for a total of 106 teachers. One of the sessions were held at the invitation of the Saint John de Brito School (English Section) for its foreign teaching staff in order to further support their work of integrity education in Macao.

(4) Adding a new video column in the "Resource Database for Integrity Education"

In order to continue to provide various types of integrity education teaching materials for non-tertiary institutions in Macao, the CCAC added a new video column entitled "Micro-lessons on Honesty and Integrity" in the "Resource Database for Integrity Education". This column, which is in the form of short videos, serves to introduce the important points and relevant knowledge about lesson plans of different themes, so that teachers might apply them flexibly as a complement to the corresponding complete lesson plans according to actual teaching needs, whereby continuously assisting them in the work of integrity and moral education for teenagers.

In addition, the CCAC continued to enrich the resources in the "Resource Database for Integrity Education", including moral education teaching materials, short videos, stories and publications about integrity for children. According to statistics, in 2025, the webpage "Resource Database for Integrity Education" got nearly 400,000 views.

(5) Continuously cooperating with the "panel of advisors for teaching materials on integrity"

The "panel of advisors for teaching materials on integrity" was established in 2021. The lesson plans on integrity regularly provided by its members serve as stable and quality resources in the "Resource Database

for Integrity Education". In the academic year 2025/2026, 91 members of the panel were serving teachers covering the areas of secondary and primary education, kindergarten and special education from 35 schools in Macao. Moreover, there were eight members who were experts from higher education institutions and education organisations in Macao.

In November 2025, the first work meeting of the "panel of advisors for teaching materials on integrity" for the academic year 2025/2026 took place, where the CCAC introduced to the members the concepts of its work of integrity education for teenagers, the operation of the panel and the relevant work arrangements, with a view to further enhancing the quality of the teaching materials in the "Resource Database for Integrity Education" through this inter-school and cross-curricular teaching material collaboration platform, deepening the work of integrity education and joining hands with the education sector to foster a new generation of Macao with good academic performance and conduct.

VI. Media publicity

The CCAC continues to raise public awareness of integrity through various media and channels, including press releases, various kinds of advertisements, internet, leaflets and publications.

(1) Screening of micro-movie on the fight against corruption entitled "Arabica"

The micro-movie on the fight against corruption entitled "Arabica" produced by the CCAC was publicly screened in 2025. The CCAC held the premiere at the Small Auditorium of the Macao Cultural Centre on 17th February. The CCAC also held a screening event at the Cinematheque • Passion and screening sessions for secondary and higher education students and workers of private enterprises. A total of 15 screening sessions (including the premiere) took place. Apart from screening "Arabica", during the screening sessions, the CCAC's representatives also introduced to the audience the functions of the CCAC, the process of the production of the micro-movie and case handling, among other information, with a view to enabling the audience to deeper understand the real corruption case that the story was based on and the CCAC's spirit of corruption fighting and to draw lessons on the case and inviting the public to join hands with the CCAC to build a cleaner society. In addition, the CCAC also arranged public screening of "Arabica" on TV channels of the Teledifusão de Macau, S.A.

(2) Launching information videos about integrity on various online platforms

The CCAC has been dedicated to producing a multi-media short-video programme on integrity entitled "Corruption Cases", which explains the real cases provided by the Anti-Corruption Bureau and the Ombudsman Bureau in order to deepen the audience's understanding of the CCAC's functions, corruption

and bribery crimes and the relevant laws. In 2025, five episodes were launched on the WeChat official account, the WeChat channel and the YouTube channel of the CCAC, and the breaking news webpage, the mobile application and the social platform of "Macao Daily News". Moreover, other promotion videos of the CCAC were also broadcast on the channels mentioned above.

(3) Continuously promoting integrity message on social platforms

The CCAC has been continuously releasing infographics on its WeChat official account in order to widely disseminate integrity message in different sectors of society and encourage residents to incorporate the awareness of integrity and law observance into their life. The concepts of some infographics are inspired by hot topics in the society of Macao or the Chinese mainland in a hope to further attract and resonate with the readers. In 2025, the CCAC launched 98 infographics on WeChat, where it disseminated the information on anti-corruption work, ombudsman actions and relevant legislations of the CCAC to the public through light-hearted writing style, comics, animations and short videos, among others. Throughout the year, they were viewed 45,114 times and the number of followers of the WeChat account was 15,905.

(4) Launching TV advertisements entitled "No Need to Hesitate to Report Corruption" to promote report and complaint channels

In December 2025, the CCAC launched a new series of TV advertisements entitled "No Need to Hesitate to Report Corruption" produced by itself, which completely introduced to residents all report and complaints channels of the CCAC, including the locations of receiving in-person complaints, the ways to make an appointment for lodging a complaint, the online complaint platform and the report and complaint hotline.

VII. Promotion in the community

(1) Branch offices

The CCAC has two Branch Offices, which provide residents with more convenient channels for lodging complaints and reports and making requests for consultation and serve as the integrity education base for the CCAC to carry out community education actions. In 2025, the two Branch Offices provided 612 people with the services of receiving complaints, reports and requests for consultation. A total of 231 sessions of seminars on integrity education for the community, training courses, visits, workshops and integrity promotion activities took place at the Branch Offices, recording 6,649 participants.

In order to provide the public with services of better quality, the CCAC continued to optimise the hardware and software facilities of the Branch Offices, including the induction coil system installed in July at

the reception desks for the hearing impaired. On 1st August, the "Access Assistant Officer Scheme" organised by the Social Welfare Bureau was implemented at the Branch Office in Taipa in order to better serve and support people with disabilities and special needs who used the services provided by the Branch Office. In addition, the CCAC also re-planned the tour route and exhibition items of the multi-media exhibition area at the Branch Office in Taipa so that visitors would have a better learning experience.

(2) Expansion of community relations

1. Visiting civic associations and receiving visitors

In order to strengthen the connection with civic associations and discuss with them the room for cooperation, in 2025, the CCAC visited the Pou Tai Youth and Family Service Complex and the Lazarus Youth Centre, where it introduced its publicity and education work, obtained the opinions of the civic associations about integrity work and discussed with them the room for cooperation on integrity education.

2. Participating in community activities

The CCAC set up booth games at both the "International Children's Day Bazaar 2025" and the "56th Caritas Macau Charity Bazaar" in order to disseminate the messages of integrity and law observance among residents and teenagers. In addition, the CCAC also organised for its staff and volunteers to participate in activities including the "Walk for a Million of Macao 2025".

3. Volunteer activities for a clean society

The CCAC continued to organise activities for members of the "Integrity Volunteer Team" so that they might improve their personal skills while assisting the CCAC in the promotion works. In 2025, the CCAC held a total of 25 activities for the volunteers, including assistance in promotion activities carried out by the CCAC and participation in training courses, visits and social charity activities, among others.

PART VI

EXTERNAL EXCHANGE

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In 2025, the CCAC consolidated its internal foundation and expanded its external influence. On the one hand, it strived to maintain close ties with supervisory authorities in different countries and regions as well as international and regional organisations, continuously fulfilling its obligations as a member of these organisations. It sent personnel to attend various meetings, seminars and workshops to exchange work experience and strengthen cooperation. On the other hand, it proactively enhanced its professional capabilities and actively showcased the achievements of Macao's successful implementation of "One Country, Two Systems" and its anti-corruption experience to the international community. It sent personnel abroad to jointly conduct anti-corruption courses and successfully expanded its connections and practical exchanges with anti-corruption agencies in Portuguese-speaking countries.

I. External visits

In 2025, the CCAC organised several delegations for external visits, where special visits were paid to central ministries and commissions as well as supervisory and judicial bodies in various provinces and cities. The aim was to further deepen cooperation mechanisms and strengthen the coordination and exchange on law enforcement and supervisory practices. These included:

- A visit to Beijing in March, where visits were paid to the Hong Kong and Macao Affairs Office of the State Council, the Supreme People's Court, the Ministry of Public Security, the National Commission of Supervision, and the Supreme People's Procuratorate.

- A visit to Nanjing in September, where a visit was paid to the Jiangsu Provincial Commission of Supervision.

- Visits to Guangzhou, Shenzhen and Zhuhai in November to meet with the Guangdong Provincial Commission of Supervision and the supervisory commissions of the three cities.

- A visit to Hangzhou in November, where a visit was paid to the Zhejiang Provincial Commission of Supervision.

II. Receiving visits

In 2025, the CCAC received delegations from the Chinese mainland, Hong Kong, and other countries and regions. Through in-depth face-to-face exchanges and site visits, they exchanged views on their system design, law enforcement experience and practical operations in the field of anti-corruption, including:

- The reception of the delegation from the Corruption Practices Investigation Bureau of Singapore in March to exchange experience on corruption fighting and prevention.

- The reception of a delegation from the Independent Commission Against Corruption (ICAC) of Hong Kong in March to jointly promote exchange, cooperation and external liaison among anti-corruption agencies in the Guangdong-Hong Kong-Macao Greater Bay Area.

- The reception of a delegation from the Guangdong Provincial People's Procuratorate in April to exchange views on how procuratorial organs and law enforcement agencies in both places handle cases and on case-handling procedures.

- The reception of a delegation from the Office of the National Anti-corruption Commission of Thailand in May for them to learn about the institutional framework of and practical experience in integrity building of Macao.

- The reception of a delegation from the Fujian Provincial Commission of Supervision in June and arranging for them to visit the integrity education base located in the Branch Office in Taipa and to gain a deeper understanding of Macao's specific practices and achievements in combatting corruption.

- The reception of a delegation from the United Arab Emirates Accountability Authority in September to exchange views on integrity building in both places.

III. Participation in international and regional meetings

In 2025, international and regional organisations continued to host online and offline meetings. The CCAC sent personnel to attend these meetings in person or through videoconferencing so as to actively fulfil its obligations as a member and contributing the results of its participation to the systems and law enforcement work of Macao. These included:

- The participation in the "14th General Meeting of the International Association of Anti-Corruption Authorities (IAACA)".

- The participation in the "International Seminar Commemorating the 25th Anniversary of the Establishment of the Ombudsman of Thailand".

- The participation in the "6th Plenary Meeting and the 10th Steering Committee Meeting of the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network)" in Baku, Azerbaijan.

- The participation in the 18th General Assembly and International Workshop of Asian Ombudsman Association (AOA) in Nanjing, Jiangsu.

- The participation in the International Ombudsman Institute (IOI) Asian Regional Meeting 2025 & International Conference in Lahore, Pakistan.

- The participation in the INTERPOL Global Conference on Anti-Corruption and Asset Recovery in Abu Dhabi, United Arab Emirates.

- The participation in the 15th Annual Conference and General Meeting of the International Association of Anti-Corruption Authorities (IAACA) in Doha, Qatar.

- The participation in the 11th Steering Committee Meeting of the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network) in Doha, Qatar.

- The participation in the 11th session of the Conference of the States Parties to the United Nations Convention against Corruption in Doha, Qatar, as a member of the Chinese delegation.

IV. Work on the implementation of the United Nations Convention against Corruption

The CCAC actively cooperated with China in the review of the implementation of the United Nations Convention against Corruption (UNCAC). At the invitation of the Office of the Commissioner of the Ministry of Foreign Affairs of the People's Republic of China in the Macao Special Administrative Region, in September, the CCAC sent representatives to Vienna, Austria, to attend the second resumed meeting of the 16th Session of the Implementation Review Group of the UNCAC", the "19th Session of the Open-ended Intergovernmental Working Group on Asset Recovery, and the "14th Session of the Open-ended Intergovernmental Expert Meeting to Enhance International Cooperation".

V. Providing training to relevant agencies in other regions

To showcase the achievements of Macao's successful implementation of "One Country, Two Systems" and its anti-corruption experience to the international community, the CCAC actively expands its connections and practical exchanges with anti-corruption agencies in Portuguese-speaking countries. At the invitation of the ICAC of Hong Kong, the CCAC sent personnel to Brasília, the capital of Brazil, to jointly conduct a training programme entitled "Capacity Building Programme for the Office of the Comptroller General of the Union, Brazil" for over 80 personnel from local anti-corruption and law enforcement agencies of Brazil. In the training programme, the corruption fighting history of Macao, the functions of the CCAC and the relevant laws, cases solved by the CCAC and its investigation measures, among other information, were shared with the trainees.

PART VII

PERSONNEL TRAINING

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The CCAC attaches great importance to personnel training. In 2025, through providing national education and various training programmes for its personnel, the CCAC aims to strengthen team building and their professional capabilities, enhance global thinking and consolidate its foundation so as to propel the work of integrity building.

I. Strengthening personnel's national security perspective

To further consolidate and deepen personnel's understanding and awareness of the overall national security perspective, the CCAC organised visits to the National Security Education Exhibition in 2025, which allowed its personnel to more comprehensively learn and comprehend the overall national security perspective, thereby enhancing all personnel's awareness and sense of responsibility for safeguarding national security.

In addition, the CCAC also arranged for personnel to visit the exhibition "For National Liberation and World Peace - Commemorating the 80th Anniversary of Victory in the Chinese People's War of Resistance Against Japanese Aggression and the World Anti-Fascist War" to deepen their understanding and awareness of the relevant historical period and strengthen their patriotism.

II. Enhancing professional capabilities of personnel

In response to increasingly discreet and evolving criminal methods, the CCAC places great emphasis on and is committed to enhancing the law enforcement capabilities and professional knowledge of its personnel. To this end, it actively arranges for personnel to participate, both online and offline, in various training programmes and workshops organised by multiple international and regional organisations, including those hosted by the International Association of Anti-Corruption Authorities (IAACA), the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network), the International Ombudsman Institute (IOI) and the Asian Ombudsman Association (AOA).

To further broaden personnel's professional horizons and strengthen their practical skills, the CCAC sent personnel to the ICAC of Hong Kong and the Hong Kong International Academy Against Corruption in 2025 for professional training. It also arranged for personnel to attend thematic courses at the Zhejiang Police College to gain a deeper understanding of national development and enhance their criminal investigation skills, thereby better addressing corruption crimes and strengthening law enforcement effectiveness.

Throughout the year, the CCAC also actively arranged for personnel to participate in various training courses or activities on different themes, including the internal training for its promotion and education personnel on "improving vocal and dubbing skills" to enhance the professionalism of the CCAC's supplementary promotional content, such as promotional videos, animated teaching materials and promotional radio announcements.

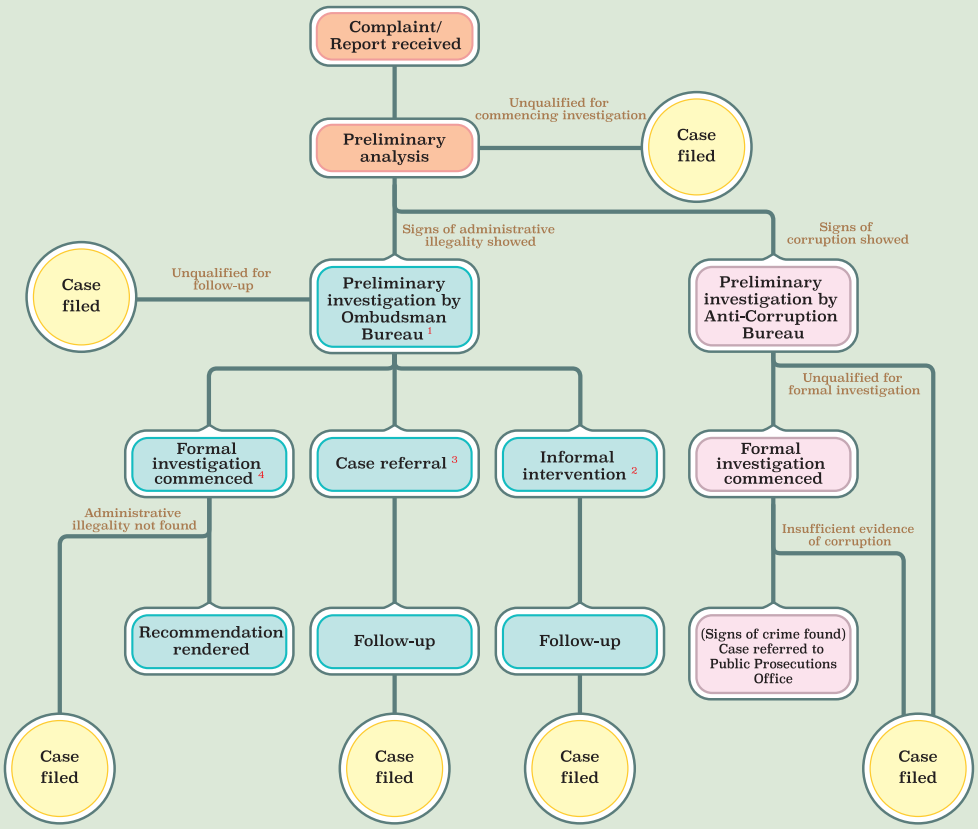
PART VIII

APPENDICES

PART VIII

APPENDIX I

The CCAC's Complaint Handling Procedure



Notes:

[1] Preliminary investigation by Ombudsman Bureau

It is conducted under the stipulation of Law no. 10/2000 (*Commission Against Corruption of the Macao Special Administrative Region*) and the *Administrative Procedure Code*. In particular, the principle of defence shall be observed. That is, both the complainant and the complained side have the chance of pleading.

[2] Informal intervention

If the procedure has not been completed or the relevant act has not yet entered into effect, the CCAC will guide the relevant departments or entities in this way so that they will make prompt correction.

[3] Case referral

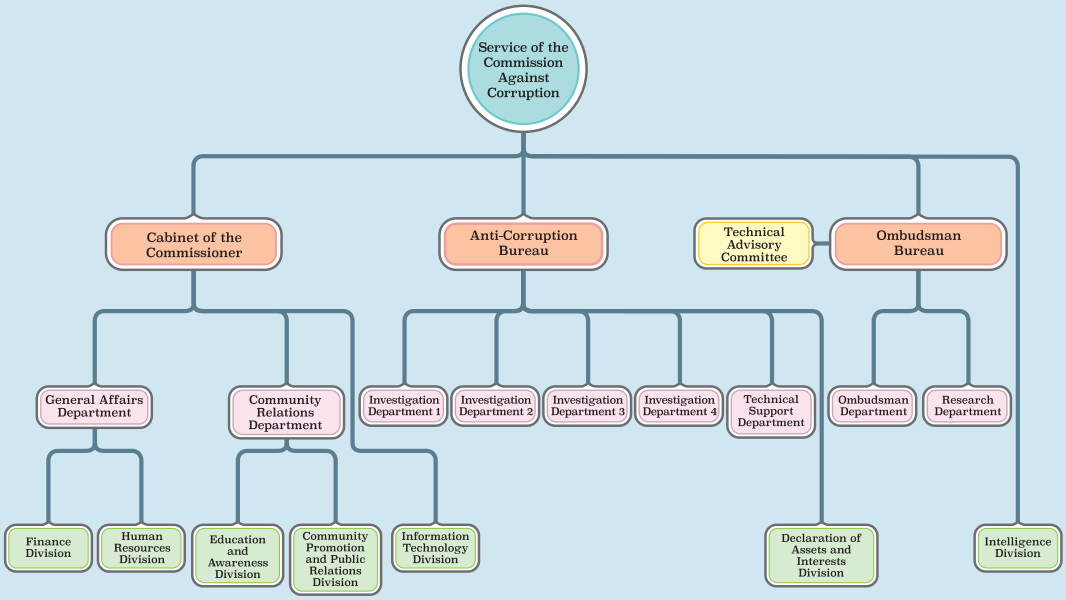
In some cases, since the relevant administrative departments are the competent departments that possess related information (the CCAC only has the information provided by the complainants, which may not be sufficient or detailed), it is appropriate for the relevant departments to handle the cases according to statutory procedures. With the complainant's consent, the CCAC will refer these cases to the competent departments or entities and will follow up their progress.

[4] Formal investigation

Due to the severity of the case and the scope involved, the CCAC will commence a formal investigation. Under Subparagraph 13) of Article 4 of Law no. 10/2000 (*Commission Against Corruption of the Macao Special Administrative Region*), the CCAC directly renders recommendation to the competent administrative department for the purpose of rectifying illegal or unfair administrative acts or procedures. Under Article 12 of the same law, in case of non-acceptance of any recommendation, under normal circumstances, the competent department or entity shall give the CCAC its reasoned reply within 15 working days. Meanwhile, the CCAC may also report the case to the Chief Executive or reveal it to the public after communicating with the hierarchical superior or supervisory entity of the competent department or entity about the situation.

APPENDIX II

Organisation Structure of the Commission Against Corruption



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