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OLAF'S SUITABILITY TO GLOBAL FINANCIAL CRIME GOVERNANCE ON COMBATING TRANSNATIONAL FINANCIAL CRIME IN EUROPEAN UNION (2011 – 2015)

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ABSTRACT

Frauds and corruptions are connective crimes considered to be extraordinary in many countries. The damages are not limited to certain societies but could also bring harm to national or even regional spheres. It raised awareness and leads to the inception of Global Financial Crime Governance reflected in a number of international institutions i.e. FATF, UNCAC and OECD of which providing international standards of anti-fraud and anti-corruption body. An institution currently in operation is European Union (EU)'s anti-fraud office known as OLAF, tasked to protect EU's funds. This research aims to take a closer look at OLAF and to examine the extent to which the institution has been suitable with Global Financial Crime Governance. To do so, this research highlight the imminent features of common international bodies in combatting frauds and corruptions and afterwards will match the features on OLAF. These features come down to 6 respects: 1) Prevention; 2) Detection and Investigation; 3) Freezing, Seizing, Prosecution or Confiscation; 4) Cooperation; 5) Independence and Accountability; and 6) Asset recovery. This research reveals that OLAF has been suitable with the works of other international bodies evolving mostly on four of six common features.

***Keywords**: OLAF, fraud, corruption, Global Financial Crime Governance, European Union*

INTRODUCTION

Fraud and corruption are two related and dangerous crimes that could harm company, organization, country or any unity which have funds or cash flow inside. Fraud schemes are used to commit corrupt activities, such as asset misappropriation, corruption and financial statement fraud. (Association of Certified Fraud Examiners, 2016)

Fraud and corruption has become global issues, which raised global awareness of them. It is also an impact of globalization, because globalization brings out two phenomenon. First, strengthening non-state actors as the new center of power in international relations interaction. Second, emerged of new problems that have large implication. These two phenomenon from globalizations make a concept called Global Governance. (Winarno, 2011)

Global Governance can be defined as the sum of laws, norms, policies, and institutions that define, constitute, and mediate trans-border relations between states, cultures, citizens, intergovernmental and nongovernmental organizations and the market (Ralph Bunche, 2009).

This study would take example of a regional organization, European Union. As a union, they have plans, projects or anything which need funds of their 28 member states. Any union which has asset, funds, cash flow has risk of fraud also corruption. In respond to this situation, European Union established OLAF (*Office européen de lutte antifraude*), European anti-fraud office.

This study would like to explain and analyze the suitability of OLAF to international standards of anti-fraud and anti-corruption body. These international standards consist of the merge of Global Financial Crime Governance sample, including international standards by FATF (The Financial Action Task Force), UNCAC (United Nations Convention against Corruption) and OECD (Organization for Economy Cooperation and Development) on establishing anti-corruption body.

Based on the research background, this research employs neoliberal institutionalism, specifically using Vinod K. Aggarwal's institutional nesting theory. Aggarwal stated that international institutions are rarely created in a vacuum. When new institutions are developed, they often must be reconciled with existing ones. One approach to achieve such reconciliation is by nesting broader and narrower institutions. (Aggarwal, 1998)

Another means of achieving harmony among institutions is through an institutional division of labor or parallel linkages. The challenge of institutional reconciliation is not as unique as creating new institutions. In creating new institutions, policymakers might also modify the existing institutions for new purposes so they have to focus on issue of institutional compatibility. Moreover, bargaining over institutional modification is likely to be strongly influenced by existing institutions. (Aggarwal, 1998)

With respect to reconcile institutions, there are two types of linkage as mentioned above, nested or parallel. The first option, nested, is when a new institution has similarities of these three elements to existing institution, including perceive inherent spillovers; there are connections among issues; and there are hierarchical relationships among issues with existing institution. Thus related actors could determine and consider to merge or nest the new institution to the existing one. (Aggarwal, 1998)

In contrast, the second option, parallel linkage, is when a new institution has narrow issue area or regional-based accords; salience of issue compared to broader issue area; and consistent goal ordering. This kind of institution could work separated from existing ones, deal with separate but related activities. (Aggarwal, 1998)

Another scholar, David S. Meyer argued that nested institutions are look like Russian dolls-several dolls can be placed within progressively narrow to larger but similar containers. Similar with nested institutions, smaller organization or institutions nested within larger social and political institutions. Meyer mainly argued that when political institutions are nested in larger international context, the tightness or looseness of that nesting institutions affects the range of possible alliances and policy options available for actors. (Meyer, 2003)

DISCUSSION

OLAF (*Office européen de lutte antifraude)* from its French name, also known as European Anti-fraud Office, is an independent institution under the European Commission, which is tasked to fight frauds affecting European Union budget, as well as corruption and any other irregular activities including misconduct, within the institutions of European Union, in an accountable, transparent and cost-effective manner. (OLAF, About Us, 2016)

The European Union budget finances a wide range of programmes and projects which improve the lives of citizens across the EU and beyond. Improper use of funds provided by the Union budget or the evasion of the taxes, duties and levies, which fund the

Union budget directly harms European citizens and prejudices the entire European project (OLAF, About Us, 2016).

There are connections between Global Financial Crime Governance, European Union and OLAF. European Union as a global actor has significant role to promote Global Financial Crime Governance. Therefore European Union has to implement normative value of Global Financial Crime Governance on its union policy.

The establishment of OLAF as the union institution to combat frauds, including the financial crimes and guarding the common interest of the community considerate as the internalization of the normative value of Global Financial Crime Governance.

This study took three examples of Global Financial Crime Governance, including FATF (The Financial Action Task Force), UNCAC (United Nations Convention against Corruption) and OECD (Organization for Economic Cooperation and Development), which provide international standards of establishing and operation of anti-fraud and anti-corruption bodies.

First, FATF is an intergovernmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. (FATF, 2016)

Although FATF focusing on money laundering, but it's recommendations or measures, international standard for combating of money laundering and the financing of terrorism and proliferation of weapons of mass destruction, is a powerful tool to combat corruption. Money laundering is the further step after corruption, to prevent the corruptor to get caught by make their corruption blurry. (FATF, 2013)

FATF provides five measures, including prevention; detection, investigation, prosecution; freezing, seizing, confiscation; international cooperation; and asset recovery.

Second, UNCAC also plays an important role in Global Financial Crime Governance because UNCAC is the first global legally binding international anti-corruption instrument. UNCAC is a multilateral convention negotiated by members of the United Nations. In its 71 articles divided into 8 chapters, UNCAC requires state parties to implement several anti-corruption measures which may affect their laws, institutions and practices. These measures aimed to prevent corruption, including domestic and foreign bribery, embezzlement, trading in influence and money laundering. Furthermore, the UNCAC is intended to strengthen international law enforcement and judicial cooperation, providing effective legal mechanisms for asset recovery, technical assistance and information exchange, and mechanisms for implementation of the anti-corruption measures. (UNCAC, 2004)

UNCAC provides seven measures, including prevention; criminalization; freezing, seizing, confiscation; protection of witnesses, experts, victims; specialized authorities; cooperation; and asset recovery.

Third, OECD is an international organization also a unique forum when governments of 30 democracy countries work together to address the economic, social and environmental challenges of globalization. OECD is at the forefront of efforts to understand and help governments respond to new developments and concerns, such as corporate governance, economy information and the challenges of an ageing population. OECD provides a setting where governments could compare policy experiences, seek answers to common problems, identify good practice and work to coordinate domestic and international policies. (OECD, 2008)

OECD provides five measures about anti-fraud and anti-corruption bodies, including functions of anti-corruption body; preventive functions; independence &

accountability; adequate resources & power; and cooperation with civil society, private sector, inter-agency.

These measures from three examples of Global Financial Crime Governance are complete each other, some of them aims for similar measures. Based on those measures, this study could summarize into six international standards of anti-fraud and anti-corruption bodies, including 1) Prevention; 2) Detection and Investigation; 3) Freezing, Seizing, Prosecution or Confiscation; 4) Cooperation; 5) Independence and Accountability; and 6) Asset recovery.

First, prevention measure. FATF on preventive measure require financial institutions to properly vetted their owners, controllers and employees. Financial institutions also have to screen their employees to ensure high standards to help prevent corruptors from infiltrating or otherwise criminally abuse financial service provider. (FATF, 2016)

UNCAC require financial institutions to implement proper management of public affairs and public property, integrity, transparency and accountability. UNCAC require countries to collaborate each other and with relevant international and regional organization in promoting and developing anti-corruption policies and practices. On recruitment, hiring, promotion and retirement of civil servants and other non-elected public officials, financial institutions have to set a high qualification too, also training on the personnel is important too to enhance their awareness of corruption. Last preventive measure is transparency, that requires countries to enhance transparency on its public administration, by publishing information that include the periodic reports of the institutions. (UNCAC, 2004)

OECD requires anti-corruption bodies to prevent the conflict interest, declare the assets, watch their ethics and provide transparency of their public services. OECD also require anti-corruption bodies to implement developing educational and training programs, organizing public awareness campaign, working with media, civil societies and business, also make international cooperation. (OECD, 2008)

OLAF has implemented those measures. OLAF's ability to fulfill its mandate relies on the wealth of professional backgrounds, expertise and commitment of its 421 staff members. In 2012, OLAF also succeed on internal reorganization which makes OLAF works better than before, as explained in chapter two. (OLAF, 2015)

Fighting against fraud and corruption also protecting EU's financial interests require a strong knowledge of OLAF staffs. OLAF's staffs come from 27 EU member states, enriching OLAF with deep knowledge each of their national anti-fraud legal proceedings and wide range of language skills. Experts with varied backgrounds boost the fight against corruption by OLAF. (OLAF, 2015)

Another effort of OLAF in increasing the quality of their staffs is training programs, divided into internal and external training. Internal training conducted by sharing expertise and knowledge from the most experienced members of the team to their junior team members. The external training conducted by hired external experts to provide training which included presentations on the general legal setting of criminal investigations on each countries, explanations of relevant infringement cases also presentations of OLAF's national counterparts in criminal and administrative investigations. OLAF's forensic experts and operational analysts also regularly participate in specialized external training sessions, sharing their knowledge by training OLAF's staffs on the use of open sources. (OLAF, 2015)

Transparency and accountability also complied by OLAF by publishing annual reports each year. These annual reports are available on OLAF's official website.

Including regulations, case studies and all publically-accessible documents are provided by OLAF. (OLAF, 2015)

Second, detection and investigation, FATF requires anti-corruption bodies to provide valuable tools for tracing assets, conducting financial investigations and facilitating confiscation of proceeds of corruption and related offences. FATF also give measures to country to alert the anti-corruption bodies on suspicious activities in the financial system, and provide with sufficient powers to investigate, prosecute such activities, also seizure or freezing and confiscation of criminally derived proceeds. (FATF, 2016)

UNCAC innovates by criminalizing corruption in wider meaning, such as bribery, embezzlement, trading influence, abuse of functions, illicit enrichment, money laundering and obstruction of justice. (UNCAC, 2004)

OECD also provide measures supporting these issues for anti-corruption bodies, that their main functions are for investigation, prosecution, prevention, education and awareness raising, coordination, also monitoring and research. (OECD, 2008)

In order to protect corruption and fraud reporters, OLAF developed new system to report corruption and fraud anonymously. In 2010, OLAF provided an easier and safety way to report fraud and corruption, such crimes can now be reported via the internet also by phone, free-call, even anonymously. A new electronic system called Fraud Notification System (FNS) will make it easier and more secure for citizens and EU civil servants to report suspicious cases to OLAF. (Horvath, 2016)

After receive information of frauds or corruption, OLAF then could open an investigation. On opening an investigation, OLAF may open it when there is sufficient suspicion, based on information provided by any third party or anonymous information, that there has been fraud, corruption or any illegal activities affecting the financial interests of EU. The decision on opening investigation shall be taken by OLAF's Director-General, by his own initiative or following a request from member states or any institution, body, office or agency of EU. (European Union, 2013)

There are two kinds of investigation, external and internal investigation. First, external investigation is administrative investigation outside the community organs for the purpose of detecting fraud or other irregular conduct of natural or legal persons (Markosek, 2008).

Second, internal investigation is administrative investigation within the community organs for the purpose of detecting fraud, corruption, and any other illegal activity affecting the financial interests of the European Communities also serious matters relating to the discharge of professional duties that constitute a dereliction of the obligations of officials and other servants, members of the institutions and bodies, heads of offices and agencies, or members of staff, and liable to result in disciplinary or criminal proceedings.

Third, freezing, seizing and confiscation, FATF requires anti-corruption bodies to enable their functions of freezing, seizing and confiscation on proceeds of corruption, stolen assets and laundered properties. These bodies also need a strong domestic and international cooperation to facilitate and help each other on foreign freezing, seizing and confiscation orders. (FATF, 2016)

UNCAC requires anti-corruption bodies to enable confiscation of proceeds of corruption, property, equipment or other instrumentalities used in or destined for use in corruption. They also have to enable identification, tracing, freezing or seizure of mentioned crimes above. If such proceeds of corruption have been transformed or converted into other property, such property shall be liable to this measure. (UNCAC, 2004)

OLAF does not have capacity to conduct the freezing, seizing or confiscation of the proceeds of frauds. OLAF's main functions are to detect, select, investigate and the final step is providing recommendations. After conducting investigation and finished the case, which proofed there was fraud, corruption or any illegal activities affecting EU funds, OLAF then give recommendations to the parties concerned on the case. It is depend on the parties, whether they want to proceeds and apply OLAF recommendation or no. the freezing, seizing and confiscation could only done by the competent authorities, which is not OLAF's capability. (OLAF, 2015)

Fourth, cooperation, FATF recommends anti-corruption bodies to establish international cooperation in order to handle cross border corruption and grand corruption cases that involve international aspects, for example corruptors move their proceeds of corruption abroad to avoid detection. And effective and timely international cooperation is needed for asset recovery. (FATF, 2016)

UNCAC recommends three main cooperation, first, cooperation with law enforcement authorities, country should take measures to encourage persons who participate in anti-corruption bodies to supply information that will be useful for competent authorities for investigate, evidentiary purposes and to provide factual, specific help to competent authorities that may contribute to depriving corruptors also asset recovery. Second, cooperation with national authorities, anti-corruption bodies should encourage cooperation between public authorities, as well as public officials and authorities that responsible for investigating and prosecuting corruption offences. Third, anti-corruption institution should encourage cooperation between national investigating and prosecuting authorities and entities of the private sectors, in particular financial institutions relating to corruption offences. (UNCAC, 2004)

OECD recommends anti-corruption bodies to establish cooperation with civil society, private sector and inter-agency because they cannot function and perform all tasks relevant for the suppression and prevention of corruption alone by themself. They need to cooperate to exchange information and establish other works on combating corruptions. (OECD, 2008)

OLAF also agreed the important of cooperation. As a part of the European Commission, OLAF works in partnership with the European Union institutions, bodies and agencies, as well as with many administrative, judicial, police and customs authorities in the member states. (OLAF, The OLAF Report 2015, 2016)

Regulation (EU, Euratom) No. 883/2013 of The European Parliament requires all Member States to set up Anti-Fraud Coordination Services (AFCOS). The role of the AFCOS is to facilitate effective cooperation and exchange of information, including information of an operational nature with OLAF. However, the legislation is general in nature, so there are considerable differences among the national Coordination Services in terms of relative size and powers. Some have limited coordinating roles, while others have full investigative powers. OLAF organizes an annual meeting of AFCOS to facilitate mutual understanding and to exchange views and best practices. Furthermore, OLAF assists national authorities in improving their capacity to identify and prevent fraud against EU funds, providing them with training and practical tools to identify signs of fraud. (OLAF, The OLAF Report 2015, 2016)

OLAF is a member of several anti-fraud and anti-corruption bodies, such as the European Partners against Corruption/ European Contact-Point-Network against Corruption, the Economic Crime Agencies Network and the International Association of Anti-Corruption Agencies. (OLAF, The OLAF Report 2015, 2016)

OLAF also establish cooperation with Europol and Eurojust in order to facilitate cooperation and synergies between investigations at national and EU level, in 2015, OLAF

and Europol continued the process of reviewing the existing working arrangements. In its work with Eurojust, the emphasis was on identifying cases of common interest. (OLAF, The OLAF Report 2015, 2016)

While OLAF has the power to investigate allegations of fraud against the EU Budget within EU bodies, and also other allegations of serious misconduct involving Members of staff of EU institutions and bodies, the recovery of funds and the initiation and conduct of disciplinary proceedings are the responsibility of the EU institution or body concerned. Criminal proceedings against Members or employees can only be undertaken by a Member State which has jurisdiction over the individual in question. (OLAF, The OLAF Report 2015, 2016)

To improve OLAF investigative capability, OLAF need to be up-to-date into any kinds of unexpected frauds and corruptions tricks. So OLAF has to exchange views, sharing to any relevant institutions. Also OLAF has to attend Inter-institutional exchange of views on OLAF's investigative policies. The Regulation governing OLAF foresees an annual exchange of views at political level between the Parliament, the Council, the Commission and the Director-General of OLAF, with the participation of the OLAF Supervisory Committee. The second annual exchange took place on 28 September 2015. The discussions focused on OLAF's Investigation Policy Priorities and on the conclusions drawn by the European institutions from the 2014 OLAF Report and the Supervisory Committee's Activity Report for 2014. (OLAF, The OLAF Report 2015, 2016)

Fifth, independence and accountability, independency of anti-corruption bodies is important in order to make sure there is no thread or pressure from public officials or any person that have power to fulfill their personal interests. UNCAC recommends anti-corruption bodies to be independence, which means they are able to carry out their functions effectively without any undue influence. Well-trained personnel are also important for anti-corruption bodies. (UNCAC, 2004)

OECD recommends five factors that could determine the independence of anti-corruption bodies. First, legal basis, an anti-corruption bodies should have clear legal basis governing these areas, mandate, institutional placement, appointment and removal of its director, internal structure, functions, jurisdiction, powers and responsibilities, budget, personnel-related matters such as selection and recruitment of personnel, relations with other institutions, accountability and reporting. Second, the appointment and replacement of the director have to be transparent. Third, selection and recruitment of the anti-corruption bodies have to be transparent too and objective. Fourth, budget and fiscal autonomy, if full independent financial could not be achieved and government prepared the funds, this funding need to be secured to prevent corruption from this fund. Fifth, accountability and transparency, which recommends anti-corruption institutions to publish the report of their activities to high level executive, legislative body, also public, for example through their official website. (OECD, 2008)

OECD recommends any anti-corruption institutions to professional train their employees, exchange knowledge with other national or international bodies. Anti-corruption bodies should not only employ prosecutors and investigators, but also forensic specialists, financial experts, auditors, information technology specialists and other needed professions. (OECD, 2008)

To ensure the independence of OLAF, investigation should be conducted under the authority of OLAF Director-General, by his own initiative, in full independence from the institutions, bodies, offices, agencies and from the supervisory committee. Director General should be able to adopt guidelines on investigation procedures for OLAF's staffs. The guidelines itself should provide practical guidance on the conduct of investigations and the procedural guarantees and rights of persons concerned or witnesses and details on

the internal advisory also control procedures, including a legality check. Those guidelines are available for public on OLAF's website in order to provide greater transparency (European Union, 2013).

Sixth, asset recovery means return, repatriation or sharing of corruption proceeds, where those proceeds could located in foreign countries. FATF recommends countries to consider the full range of legal avenues to ensure that their asset confiscation framework is effective in asset recovery. (FATF, 2016)

Asset recovery is a fundamental principle on UNCAC. UNCAC provides whole asset recovery measures in chapter V. Prevention and detection of transfer of proceeds of crimes, requires financial institutions to verify the identity of customers and maintain adequate records, including owners of high-value deposit accounts to enhanced scrutiny and detect suspicious transactions. UNCAC also recommends countries to establish effective financial disclosure systems for appropriate public officials, to permit its competent authorities to share information with other competent authorities even in other countries when necessary to investigate, claim and recover proceeds of corruptions. Countries should also take measures to permit their courts to order corruptors to pay compensation or damages to other countries that has been harmed by corruption offences. (UNCAC, 2004)

UNCAC also provides mechanism for recovery of property through international cooperation in confiscation. First, it requires countries to take measures to permit competent authorities to order confiscation of corruption proceeds of foreign origin by adjudication of money laundering offences or others. Second, countries should take measures to permit their competent authorities to freeze or seize proceeds of corruption, this order issued by court or competent authorities of other countries that provides a reasonable basis for the requested country to believe that there are sufficient reasons for taking this action. (UNCAC, 2004)

While OLAF in itself does not have the power to recover funds, as this is the task of competent national authorities and EU bodies, in 2015 as a result of OLAF investigations, EUR 187.3 million was recovered to the EU budget. This amount is 10.2% lower than the sum recovered in 2014, namely EUR 206.4 million, while recoveries in 2013 amounted to EUR 117 million. It is important to note that there is no correlation between amounts recommended in a year and the amounts recovered in that year. Amounts recovered often related to cases closed in previous years. (OLAF, The OLAF Report 2015, 2016)

CONCLUSION

Those three examples of Global Financial Crime Governance stated that there is no absolute standard of anti-corruption bodies establishment and operations, it all depends on the needs and situations of the parties themselves. But they provided general standards on establishing also the operation of ant-corruption bodies.

This study conclude that OLAF has completed four of six international standards of anti-corruption body based on the international standards provided by FATF, UNCAC and OECD. This is a good achievement of European Union in establishing OLAF as anti-fraud office. OLAF suitable with four of six international standards, except two including freezing, seizing and confiscation; and asset recovery.

Based on institutional nesting theory by Vinod K. Aggarwal, this study could conclude that OLAF did not nest or merged with existing global institutions, but OLAF include in parallel linkage, because OLAF mandated by European Union to focus on combating fraud and protects European Union's budget in limited regional range of European Union itself, so OLAF could not be nested with other existing anti-frauds bodies.

So far, OLAF role in combating frauds on European Union is working well, year after year, as in 2015 OLAF's proceeded recommendations resulted to EUR 187.3 million of financial recovery from actual EUR 888.1 million of recommended financial recovery.

References:

Aggarwal, V. K. (1998). *Institutional Designs for a Complex World: Bargaining, Linkages, and Nesting.* California: Cornell University Press.

Association of Certified Fraud Examiners. (2016). *Report to The Nations on Occupational Fraud and Abuse.* Austin.

European Union. (2004). Administrative Arrangement between Europol and OLAF.

European Union. (2008). Practical Agreement on arrangements of cooperation between Eurojust and OLAF.

European Union. (2013). REGULATION (EU, EURATOM) No 883/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. *Official Journal of the European Union* .

European Union. (2014). Working Arrangement between OLAF and Supervisory Commitee.

FATF. (2013). *The Use of The FATF Recommendations to Combat Corruption.* Paris: FATF.

FATF. (2016). *FATF*. Dipetik July 21, 2016, dari http://www.fatf-gafi.org/

FATF. (2016). *International Standards on Combating Money Laundering and The Financing of Terrorism & Proliferation.* Paris: FATF/OECD.

Horvath, A. (2016, July 10). *New System to Report Corruption and Fraud Anonymously*. Dipetik September 2016, 6, dari OLAF: http://ec.europa.eu/anti-fraud/media-corner/press-releases/new-system-report-corruption-and-fraud-anonymously_en

Jakobi, A. P. (2014). Global Governance and Transnational Crime: Situating The Contact Group. *Working Paper of The Lessons Learned Project of The Contact Group on Piracy Off The Coast of Somalia*, 3-4.

Markosek, B. (2008). Detection and Investigation of Fraud and Corruption in Public Procurement Procedures within European Institutions . *South – East European Regional Conference "Suppression of Corruption in Public Procurement Systems"* . Cavtat.

Meyer, D. S. (2003). Political Opportunity and Nested Institutions. *Social Movement Studies, II*.

OECD. (2008). *Specialised Anti-Corruption Institutions - Anti-Corruption Network for Eastern Europe and Central Asia.* Paris: OECD.

OLAF. (2015). *The OLAF Report 2014.* Luxembourg: Publications Office of the European Union.

OLAF. (2015). *The OLAF Report 2014.* Luxembourg: Publications Office of the European Union.

OLAF. (2016, January 28). *About Us*. Dipetik February 26, 2016, dari OLAF European Anti-Fraud Office: http://ec.europa.eu/anti_fraud/about-us/mission/index_en.htm

OLAF. (2016). *The OLAF Report 2015.* Luxembourg: Publications Office of the European Union.

Ralph Bunche. (2009, August). The UN's Role in Global Governance. hal. 1-2.

UNCAC. (2004). United Nations Convention Against Corruption. *United Nations Convention Against Corruption.* New York: United Nations.

Winarno, B. (2011). *Isu - Isu Global Kontemporer.* Yogyakarta: Caps Publishing.