



Criminal Liability of Political Parties as Legal Entities in Money Laundering from Corruption

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Abstract

Money laundering derived from corruption may involve political parties when illicit assets are received, controlled, or used through their organizational structures. The legal issue arises from the status of political parties as legal entities (*rechtspersoon*) and the absence of clear parameters for attributing money laundering conduct to the organization rather than solely to individual members or officials. This research examines the position of political parties as corporations in the money laundering regime and formulates a justice-based model of criminal liability. It employs normative legal research using statutory, conceptual, and limited comparative approaches. The findings show that criminal liability may be attributed to a political party when there is a demonstrable institutional connection between the conduct of its organs, the flow and use of illicit assets, and the interests of the organization. Such attribution is assessed through institutional benefit, the use of organizational structures or facilities, and failure of prevention or internal control. A justice-based model therefore requires a clear distinction between personal and institutional liability, accompanied by proportionate sanctions focusing on asset recovery and the strengthening of internal compliance.

Keywords: Asset recovery; Attribution; Criminal justice; Money laundering; Political parties

A. INTRODUCTION

Corruption in practice is often followed by efforts to disguise the proceeds of crime so that they can be reused in the formal economic system. This process is known as *money*

laundering, which is a series of actions to hide or disguise the origin of wealth obtained from criminal acts so that it appears legitimate and can be used without raising suspicion. The ¹anti-money laundering literature places

¹ United Nations Office on Drugs and Crime, *Model Legislative Provisions against Organized Crime* (Vienna: United Nations Office on Drugs and Crime, 2021), p. 7.

money laundering as a mechanism that allows the proceeds of criminal acts to continue to circulate in legal economic activities. The *follow the money* approach then developed as an important strategy in the eradication of corruption and economic crime, with an emphasis on tracing the flow of funds and asset recovery.²

In the political context, the need for organizational financing and electoral contestation creates a space for interaction between funds and institutional structures. The OECD points out that the high cost of politics and weak transparency of party funding increase the risk of illegal funds entering the political system.³ Funds sourced from criminal acts can flow through a variety of schemes, including donations, transactions through intermediaries, or mechanisms that are formally legitimate but make it difficult to trace their origins. This situation raises legal

problems that are not limited to individual actors, because the management and utilization of funds can take place within the scope of the institution.

Political parties are juridically recognized as legal entities that have a separate legal personality from their members and management. As *rechtspersoon*, the party has the capacity to own wealth, make decisions through internal organs, and carry out organizational policies. In legal entity theory, a collective entity is understood as a legal subject that acts through internal decision-making structures and mechanisms.⁴ This character puts political parties in a position that is functionally similar to corporations, especially in resource management and policy formation. With such a construction, when the proceeds of criminal acts come in and are used in the organizational structure, the analysis of

² United Nations Office on Drugs and Crime, *The Globalization of Crime: A Transnational Organized Crime Threat Assessment* (Vienna: United Nations Office on Drugs and Crime, 2010), p. 11.

³ Michael Levi and Peter Reuter, 'Money Laundering', *Crime and Justice* 34, no. 1 (January 2006): p. 296, <https://doi.org/10.1086/501508>.

⁴ OECD, *Financing Democracy: Funding of Political Parties and Election Campaigns and the Risk of Policy Capture*, OECD Public Governance Reviews (OECD, 2016), p. 27, <https://doi.org/10.1787/9789264249455-en>.

the subject of accountability requires a reading at the institutional level.

The development of modern criminal law reflects a broader recognition that legal entities may become subjects of criminal liability, particularly in economic crimes and offences committed through organizational structures.⁵ The theoretical basis of corporate criminal liability departs from the idea that organizational wrongdoing cannot always be reduced to the personal fault of individual actors.⁶ In corporate liability doctrine, fault may be attributed through several models, including the identification doctrine, which links the conduct of directing minds to the entity; vicarious liability, which connects the acts of agents or representatives to the organization; the aggregation model, which assesses collective knowledge and negligence within an institutional structure; and the failure to prevent approach, which focuses on

organizational failure to establish adequate preventive mechanisms.⁷

These models are relevant to political parties because party activities, including financial management and political financing, are carried out through internal organs, organizational policies, and institutional facilities.

In Indonesia, the legal framework on corporate criminal liability provides a normative basis for assessing organizational fault through indicators such as institutional benefit, the relationship between the acts of administrators and the interests of the entity, and the adequacy of internal supervision. The anti-money laundering regime also places legal entities within the scope of accountability when assets derived from predicate offences are placed, transferred, controlled, or used through organizational structures. This direction is reinforced by the Supreme Court Regulation on the handling of corporate criminal cases, which allows

⁵ Law of the Republic of Indonesia Number 2 of 2011 concerning Amendments to Law Number 2 of 2008 concerning Political Parties (2011).

⁶ Celia Wells, *Corporations and Criminal Responsibility* (Oxford, United Kingdom: Oxford University Press, 2001), p. 128.

⁷ Michael Christopher Pardamean, 'Accountability of the Board of Directors for Corporate Crime', *UNES Law Review* 6, no. 2 (2023): p. 7371, <https://doi.org/10.31933/unesrev.v6i2.1630>.

courts to assess whether a corporation obtains benefit from a criminal act, allows the offence to occur, or fails to take necessary preventive measures.⁸ At the international level, the Financial Action Task Force emphasizes beneficial ownership transparency and internal control mechanisms to prevent the misuse of legal entities for concealing illicit assets. This framework shows that the liability of political parties in money laundering cases must be tested through measurable institutional attribution, rather than merely through the political affiliation of individual offenders.

Normatively, legal entities are recognized as subjects of criminal law and can be held accountable in the crime of money laundering. However, in practice, law enforcement is more often directed at individual actors of the management or parties who conduct transactions while the placement of the organization as the subject of accountability has not developed consistently. This condition shows that there is a gap between *das sollen* and *das*

sein. The challenges that arise are related to the limits of the representation of management actions towards the organization, indicators of institutional benefits, and the measure of neglect or failure of prevention in the internal structure of the party. Without measurable parameters, the application of accountability can lose balance in practice.

Previous studies have examined issues related to money laundering, political finance, and corporate criminal liability from different perspectives. Levi and Reuter explain money laundering as a mechanism that enables criminal proceeds to circulate within lawful economic activities, but their analysis does not specifically address the liability of political parties as legal entities. Repousis examines politicians, political party funding, and the anti-money laundering regulatory framework in Greece, yet the study focuses mainly on funding vulnerability and regulatory safeguards rather than the doctrinal attribution of criminal

⁸ *Principles of the Law, Compliance and Enforcement for Organizations - FATF* (Philadelphia, Pennsylvania: American Law Institute, 2024).

liability to political parties as *rechtspersoon*. Abas Azmi and Zainudin show that money in politics may contribute to corruption through political donations, bribery, and money politics, but their study does not formulate legal parameters for distinguishing personal liability from institutional liability. Copp and Cronin discuss the development of the failure to prevent model in corporate criminality, although their analysis remains directed to corporations generally and does not address the distinctive position of political parties as democratic and representational legal entities.

This article fills that gap by integrating the discourse on money laundering from corruption, political party financing, and corporate criminal liability into a specific construction of political party liability as a legal entity. The novelty of this article lies in formulating a justice-based attribution model that does not rely merely on the political affiliation of individual offenders, but on measurable institutional indicators: institutional benefit, the use of organizational structures or facilities, and toleration or

failure of prevention and internal control. Based on this framework, this article aims to analyze the normative and dogmatic basis for placing political parties as corporations in the money laundering regime and to formulate proportional limits of criminal liability for political parties in money laundering cases originating from corruption. Its contribution is to offer operational criteria for law enforcement so that institutional accountability can be imposed consistently without producing excessive criminalization against political organizations or their uninvolved members and voters.

B. RESEARCH METHOD

This study employs normative legal research using statutory, conceptual, and limited comparative approaches. The statutory approach examines Indonesian regulations governing money laundering, political parties, and corporate criminal liability, while the conceptual approach is used to analyze *rechtspersoon*, organizational fault, institutional benefit, and the attribution of criminal responsibility. The comparative approach refers selectively to the FATF Recommendations, the

United Nations Convention against Corruption, and the United Kingdom *failure to prevent* model to examine standards concerning legal person liability, prevention, internal control, and asset recovery. Primary and secondary legal materials are collected through library research and analyzed qualitatively through grammatical, systematic, and teleological interpretation. The analysis is directed at assessing the consistency of existing norms and formulating a prescriptive model of criminal liability for political parties in money laundering originating from corruption.

C. RESEARCH RESULTS AND DISCUSSION

1. The Position of Political Parties as Corporations in the Money Laundering Regime

The link between corruption and money laundering is seen especially in the phase after the original criminal act produces wealth, namely when the property is placed, moved, or used through various transactions so that its origins are not easily traced. The

character of the *anti-money laundering* regime places wealth as the focus of analysis, so that legal judgment does not stop at the actions of individual perpetrators, but also at those who control, receive, or manage assets sourced from criminal acts.

The literature on *economic crime* enforcement emphasizes that legal entities can act as a medium for the placement and utilization of illegal assets through non-transparent control and ownership structures, especially when the identification of parties enjoying economic benefits is not adequately disclosed.⁹ In the political context, the need for organizational financing opens up the possibility of the existence of schemes that facilitate the receipt or use of funds from corruption through donations, intermediaries, and layered transactions that disguise traces. Consequently, the reading of the legal subject in the relevant money laundering case is directed to the relationship between acts, the flow of assets, and institutional interests.

⁹ Paul Beckett, *Ownership, Financial Accountability and the Law: Transparency Strategies and Counter-Initiatives* (London: Routledge, 2019), p. 168, <https://doi.org/10.4324/9780429433443>.

The position of political parties becomes significant at this point because juridically the party has the status of a legal entity. As *rechtspersoon*, political parties have a legal personality that is separate from their members and management, can have wealth, and act through organizational organs. This status indicates that the party is a legal entity that works through a power structure and decision-making mechanism.¹⁰ In *the discourse of corporate criminal liability*, the recognition of legal entities as subject to criminal liability is not separated from the fact that organizational decisions and resource management can produce legal consequences that go beyond individual actions, particularly in violations that take place through internal policies, compliance practices, and organizational governance.¹¹ With such a construction, the assessment of the

likelihood of a party being placed as a subject of criminal law in money laundering requires a measurable attribution test of the relationship between organ actions, the benefits enjoyed by the entity, and the quality of internal prevention.

At the context level, data from law enforcement agencies and corruption monitors show the involvement of politically affiliated actors in corruption cases, while the use of money laundering instruments in enforcement has not completely become mainstream. The information is not positioned to conclude that every corruption case always leads to the flow of funds to the party, but is used to emphasize the relevance of the issue of "flow" and "benefit" in corruption that intersects with political networks.¹²

With this framework, discussions about the position of political parties in

¹⁰ Martin Petrin and Christian Witting, *Research Handbook on Corporate Liability* (Cheltenham, UK: Edward Elgar Publishing, 2023).

¹¹ *Corrupt Corporations and the Facilitation of Tax Crimes: A Review of the United Kingdom's Enforcement Mechanisms* | *Law and Contemporary Problems*, 30 January 2023, <https://lcp.law.duke.edu/article/corrupt-corporations-and-the-facilitation-of-tax-crimes-bourton-vol85-iss4/>.

¹² 'ICW: The Lowest Corruption Case Prosecution in 2024 in the Last 5 Years', *coil*, accessed 25 February 2026, <https://kumparan.com/kumparannews/icw-penindakan-kasus-korupsi-2024-terendah-dalam-5-tahun-terakhir-25xGMC8BTWB>.

the money laundering regime need to be directed to dogmatic measures: when the actions of the management can qualify as an organizational action, how institutional benefits are assessed, and what indicators are adequate to assess the neglect or failure of prevention at the organizational level.

Recent literature that discusses the renewal of the legal entity accountability model shows a tendency to strengthen measures based on

organizational failure to *prevent*, in addition to the classic attribution model that relies on the identification of top perpetrators (*identification doctrine*).¹³ This direction is relevant to clarify attribution boundaries and at the same time provide an operational framework for assessing whether an entity profits, indulges, or fails to establish a viable compliance mechanism in the context of financial crime.

Table 1. The Involvement of Public Officials Affiliated with Political Parties in Corruption Crimes and Its Implications for the Vulnerability of Fund Flows to Political Parties (2004–2024)

Data Source	Period Covered	Reported Finding	Political Actor Category	Relevance to Institutional Fund-Flow Analysis	Implication for Money Laundering Liability Analysis
KPK/ACLC KPK publication	2004– July 2023	344 corruption cases involved members of the DPR and DPRD	Legislative actors affiliated with political parties	Indicates the vulnerability of political positions to corruption- related financial flows	Supports the relevance of examining asset flow, institutional benefit, and the possible use of organization al structures
KPK publication on political	2004– 2023	Corruption cases involving	Political party members and public	Shows the importance of political	Reinforces the need to distinguish

¹³ Stephen Copp and Alison Cronin, ‘New Models of Corporate Criminality: The Development and Relative Effectiveness of “Failure to Prevent” Offences’, *Company Lawyer* 39, no. 4 (January 2018): p. 111.

		party integrity	political party members occupied one of the highest categories in KPK enforcement data	officials with party affiliation	party integrity and internal financial control	personal liability from institutional liability based on measurable attribution
Indonesia Corruption Watch report	2023	791 corruption cases, 1,695 suspects, and potential state losses of Rp28.4 trillion; only a limited number of cases used money laundering provisions	General corruption suspects monitored by ICW	Demonstrate s the broader enforcement gap between corruption prosecution and the use of money laundering instruments	Supports the argument that follow-the-money and asset recovery approaches need to be strengthened in corruption cases	

Source: Processed by Author, 2026.

Table 1 is not intended to prove that every corruption case involving political actors results in the flow of illicit assets to political parties. Rather, the table is used to show the analytical relevance of examining corruption cases involving political actors through an institutional money laundering perspective. The data demonstrate that corruption involving political actors may create risks related to political financing, institutional benefit, and the possible use of organizational structures or facilities.

Therefore, the assessment of political parties as legal entities in money laundering cases must remain based on measurable attribution, including asset flow, institutional benefit, the use of organizational mechanisms, and failure of internal prevention or control.

The position of political parties as corporations in the money laundering regime departs from their status as a legal entity (*rechtspersoon*). The consequences of this status include the separation of party entities from

individual administrators, the capacity to own property, and the ability to act through legitimate organs. Within the framework of legal entity accountability, the separation of such entities is relevant to assess whether an act committed by an organ or management can be attributed as an organizational action, especially when it comes to policies, financial management, and internal oversight mechanisms. Thus, the analysis does not stop at "who made the transaction", but also includes "how the organization controls, uses, or profits" from assets connected to the original criminal act.

In the crime of money laundering, the main focus is on acts related to wealth—placement, transfer, use, or other actions that disguise the origin—as well as its relationship to the crime of origin. This orientation is in line with the policy objective of cutting the benefits of crime through tracking and asset confiscation. The asset recovery literature places *asset recovery* as an important component in the

effectiveness of anti-corruption and *anti-money laundering* regimes, especially when crimes take place over networks and involve the use of legal entities to store or transfer assets.¹⁴ The framework reinforces the dogmatic argument that relevant subjects include entities that control or enjoy benefits from property derived from criminal acts, as long as there is a testable attribution basis.

At the conceptual level, the discourse on corporate accountability reform also shows a tendency to clarify the size of organizational error through the standard of failure *to prevent* and quality of compliance, not only through the classical attribution model that relies on the identification of the organization's top perpetrators (*identification doctrine*). In the context of political parties, this direction is useful for formulating operational indicators: whether there are institutional benefits that can be linked to organizational activities, whether party organs are neglecting, and whether internal preventive measures are adequate. With

¹⁴ Theodore S. Greenberg et al., *Stolen Asset Recovery: A Good Practices Guide for Non-Conviction Based Asset Forfeiture* (Washington, DC: The World Bank, 2009), p. 53.

this footing, the position of political parties as corporations in the money laundering regime can be built through two layers of arguments that corroborate each other, namely the status of the party as a legal entity that allows analysis at the entity level, and the character of the money laundering regime that places the flow and benefits of wealth as the center of assessment, so that institutional connectedness remains relevant to be tested based on measurable attribution measures.

2. Attribution of Organizational Errors and Parameters of Political Parties' Criminal Liability

The criminal liability of political parties does not end in its recognition as a legal entity, but depends on the way in which organizational errors are constructed and tested. In corporate accountability, the point of problem lies in attribution: whose actions can be seen as the actions of the organization, under what conditions, and to what extent. Muladi and Priyatno emphasized that corporate criminalization requires a

basis of attribution that connects the actions of human beings acting as organs with the will or interests of the corporation, as well as rejecting expansion that leads to accountability without fault.¹⁵ This premise is relevant for political parties because the party's financial and operational activities are carried out through internal authority structures and procedures.

Doctrinally, corporate fault attribution is generally explained through several models. The *identification model* attributes the actions of the top management or *directing mind* as corporate acts; the *vicarious liability model* links the actions of workers or agents to the corporation when carried out within the scope of duties and for the benefit of the corporation; while the aggregation model tests organizational errors through the accumulation of knowledge, decisions, and negligence scattered in the structure. These various models show that organizational faults are not sought for abstract "collective intentions," but for the relationship

¹⁵ Starting with Dwight and Dwight Dwight. *Corporate Criminal Accountability: third edition* (Jakarta, Indonesia: Kencana, 2015), p. 132.

between authority, benefits, and the way the organization manages risk.

The operational parameters of attribution in Indonesian judicial practice are guided by the Supreme Court Regulation on the procedures for handling criminal cases by corporations, which directs the assessment on indicators such as: corporations obtain profits or benefits, corporations allow criminal acts to occur, or corporations do not take the necessary preventive measures.¹⁶ For political parties, institutional benefits do not have to be in the form of commercial gains; benefits can be in the form of funding organizational activities, financing electoral activities, the use of facilities, or strengthening organizational capacity that can be traced through the flow and use of funds.

Indicators of neglect and failure prevention can be tested from the quality of internal controls, including

procedures for receiving funds, recording, auditing, and organizational response when indicators of violation appear. In *the anti-money laundering* regime, strengthening beneficial *ownership* transparency and internal control is positioned as an instrument to prevent the abuse of legal entities, so that governance failures can be relevant in assessing attribution.¹⁷

The boundaries between personal and institutional responsibility need to be strictly formulated so that criminalization does not turn into collective punishment. Attribution to an organization is stronger when the act is carried out within the scope of the position's authority, uses organizational means, produces identifiable institutional benefits, and occurs simultaneously with demonstrable preventive weaknesses. Attribution tends to weaken when the act is beyond authority, purely for personal gain,

¹⁶ Regulation of the Supreme Court of the Republic of Indonesia Number 13 of 2016 concerning Procedures for Handling Criminal Cases by Corporations (2016), <https://jdih.mahkamahagung.go.id/>.

¹⁷ Syaifullah Noor, Kamil Ismail Banapon, and Tamboa Ketum Levis, 'Distorted Practice of Restorative Justice in the Enforcement of Criminal Law in Indonesia: Distorsi Praktik Restorative Justice Dalam Penegakan Hukum Pidana Di Indonesia', *Peradaban Hukum Nusantara* 2, no. 1 (June 2025): 17–33, <https://doi.org/10.62193/ze7dhp98>, p. 21.

contrary to effective compliance policies, and does not provide institutional benefits.

In terms of evidence, a series of facts that are commonly examined include the flow of funds, decisions or approvals of organs, the use of accounts or facilities, recording and audit patterns, and the organization's response to findings of non-compliance. This kind of evidentiary pattern is in line with the practice of *asset recovery* which places the flow and use of assets as the basis for assessing the connection between the original criminal act, *money laundering*, and the party who enjoys the benefit.¹⁸

3. Alignment of Criminal Responsibility of Political Parties Based on the Principles of Justice in the Indonesian Criminal Law System

Aligning the criminal liability of political parties requires two equally legitimate interests. First, political parties are not exempt from liability if

the organizational structure is used to receive, place, or utilize assets derived from criminal acts. Second, political parties carry out a representation function, so that criminal consequences have the potential to have a wide impact on parties who are not involved.¹⁹ The principle of justice works through two devices: strict attribution measures to distinguish between personal and institutional responsibilities, and proportionate sanctions designed so that the termination of the benefits of crime can be achieved without unnecessary social harm.

The alignment in the first stage concerns the threshold of "when" the party should be held accountable as *rechtspersoon*. The threshold needs to prevent a jump from the perpetrator's affiliation to party responsibility. The size of attribution can be formulated operationally through three interrelated elements: the existence of organ or management actions within the scope of

¹⁸ United Nations Office on Drugs and Crime and The World Bank, *Stolen Asset Recovery (StAR) Initiative: Challenges, Opportunities, and Action Plan* (Washington, DC: The World Bank, 2007), p. 5.

¹⁹ Gumilang Fuadi, Windy Virdinia Putri, and Trisno Raharjo, 'A Review of Asset Forfeiture in Money Laundering Crimes from a Justice Perspective', *Journal of Law Enforcement and Justice* 5, no. 1 (March 2024): p. 57, <https://doi.org/10.18196/jphk.v5i1.19163>.

the organization's authority; the existence of recognizable institutional benefits through the flow and use of property; as well as the existence of neglect or failure of prevention that can be assessed from the internal control system.²⁰ This approach is in line with the direction of corporate corporate accountability reform that emphasizes policy, governance, and prevention assessments, rather than simply attaching responsibilities based on personal relationships.²¹

The next alignment concerns "how" sanctions are designed. In collective entities, sanctions that are only in the form of fines risk not changing organizational behavior if they are easily treated as operational costs. Analysis of corporate enforcement shows that high fines without internal remediation often result in formal compliance, rather than governance change. On the other hand, extreme

sanctions against political organizations—such as widespread freezes or dissolution—have democratic consequences and potentially expand the burden on unrelated members and voters. The middle point is a tiered sanctions package that puts termination of benefits at the core, accompanied by actions that force governance improvements.

A more compatible sanction design could combine: asset forfeiture and the return of benefits related to criminal acts as an instrument of termination of profits; *asset recovery obligations* to recover losses; as well as compliance improvement orders such as compliance audits, improvement of fund receipt procedures, strengthening bookkeeping, and compliance supervision within a certain period of time. The asset recovery-based approach has strong support within the *international framework of the StAR* which

²⁰ Beniharmoni Harefa and Supardi, 'Asset Seizure of Money Laundering: Protection of Third Parties in Good Faith in Indonesian Legal Perspective', *Legal Treatise* 21, no. 2 (December 2025): p. 143, <https://doi.org/10.30872/risalah.v21.i2.2008>.

²¹ Zul Afiatul Kharisma, Brian Bagus Wiyan Putra, and Melasari Nurul Hidayah, 'Model of Accountability for Corruption Crimes by SOEs as Corporations: Between Corporate Responsibility and Management', *Lex Generalis Law Journal* 2, no. 12 (December 2021): p. 1046, <https://doi.org/10.56370/jhlg.v2i12.162>.

places tracking, freezing, forfeiture, and asset recovery as core instruments for cutting the benefits of crime and improving enforcement effectiveness.²² For organizations, the obligation to improve internal provides a punitive as well as preventive function, without the need for sanctions that have a broad political impact.

Procedural justice needs to be placed from the stage of constructing accountability. Proof does not rest on the assumption that the organization always benefits, but on the factual relationship between organ actions, asset flows, and institutional benefits. At the same time, an organization's defense space can be built through a *due diligence test*: whether the party has reasonable prevention procedures, whether the control mechanism is in place, and how the organization responds when indicators of violation appear. Such tests are consistent with the tendency of *anti-money laundering* regimes that emphasize risk assessment and quality of internal controls to prevent abuse of

legal entities (FATF, 2019). Alignment that combines measurable attribution, proportionate sanctions, and internal preventive tests provides a more stable basis for implementation, both to maintain the effectiveness of the termination of criminal benefits and to maintain the representation function so that it is not disproportionately affected.

D. CONCLUSION

Political parties, as legal entities (*rechtspersoon*), may be held criminally liable for money laundering originating from corruption when the offence can be attributed to the organization rather than merely to individual party members or officials. Such attribution requires a demonstrable connection between the conduct of party organs, the flow and use of illicit assets, institutional benefit, the use of organizational structures or facilities, and the party's failure to establish or implement adequate preventive and internal control mechanisms. Criminal liability should therefore not arise solely

²² United Nations Office on Drugs and Crime and The World Bank, *Stolen Asset Recovery (StAR) Initiative: Challenges, Opportunities, and Action Plan* (Washington, DC: The World Bank, 2007), p. 21.

from the political affiliation of the offender, but from evidence that the party, as an organization, participated in, benefited from, tolerated, or failed to prevent the laundering of criminal proceeds. A justice-based model of liability requires a clear separation between personal and institutional responsibility, accompanied by proportionate sanctions that prioritize asset recovery, deprivation of illicit benefits, and improvement of internal compliance. This construction enables accountability to be directed at organizational wrongdoing without extending criminal consequences to party members or voters who have no connection with the offence.

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