



**نزاها Nazaha**

# **Annual Report**

**2024/2025**

**1 April 2024 – 31 March 2025**

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ





His Highness

**Sheikh Meshal AL-Ahmad Al-Jaber Al-Sabah**

The Amir of the State of Kuwait

May Allah Protect Him





His Highness

**Sheikh Sabah Khaled Al-Hamad Al-Sabah**

The Crown Prince of Kuwait

May Allah Protect Him



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# Vision and Mission of Kuwait Anti-Corruption Authority "Nazaha"

## Vision



To become a trusted authority promoting a society, characterized by integrity and sustainable development.

## Mission



Our mission is to collaborate with all national partners to combat corruption through awareness, prevention, and detection.



## Preface

In the name of Allah, the Most Gracious, the Most Merciful

In continuation of its commitment to publishing data and information related to its work, and to achieve the principle of transparency in government work, Kuwait Anti-Corruption Authority (Nazaha) issued this Annual Report (2024/2025), tracking key information and data related to its work and activities.

This report is a condensed version of Nazaha's activities and work related to Kuwait's strategy to uphold integrity and combat corruption. It also details Nazaha's efforts to receive and handle complaints and reports regarding corruption incidents, as well as to receive and review financial disclosures from those covered by its provision. This is in addition to Nazaha's preventive and awareness-raising initiatives to promote the values of integrity and transparency and consolidate the anti-corruption system. Further, this Report presents Nazaha's efforts in the area of international and regional collaboration concerning to anti-corruption initiatives and the application of pertinent international and regional conventions.

Despite the encouraging outcomes and metrics reflected in this Report, we, at Nazaha, still believe that more work is still required to expand the state's anti-corruption initiatives and to accomplish our shared goal of establishing a favorable working environment for the accomplishment of sustainable development plans.

Despite the numerous obstacles, we have trust and optimism that we can accomplish our aspirations with perseverance, teamwork, and coordinated action—especially with the ongoing backing of the governmental leadership led by His Highness Sheikh Meshal Al-Ahmad Al-Jaber Al-Sabah, Emir of the State of Kuwait, may Allah protect him and grant him peace.

Therefore, as we present this Annual Report for the year 2024/2025, we pray to Allah Almighty to fulfill the purpose for which it was prepared and to guide us to what is best and right, for He is the Guardian and Able to do so.

And Allah is the Bestower of success.

**Abdulaziz Abdullatif Al-Ibrahim**

President of the Anti-Corruption Authority



## Introduction

Corruption is a serious issue, not only because of the multiplicity and diversity of its manifestations, but because it is a fundamental problem facing the development process. Corruption exceeds the loss and waste of resources to being a genuine reason for the collapse of infrastructure, destruction of the environment and abuse of power. Further, corruption constitutes one of the major means of demolishing and collapsing societies through its negative impact on aspects of life. Corruption destroys the system of religion and morals, eradicates the principles of justice and equal opportunities and disrupts all sustainable development efforts.

Kuwait Anti-Corruption Authority “Nazaha” has always been keen to develop plans and strategies that ensure reducing the harms of corruption, drying up its sources, spreading public awareness against it and creating an enabling environment for its elimination.

Most prominently, Nazaha has always been, and is still, keen to consolidate, develop and achieve the objectives of Kuwait Integrity and Anti-Corruption Strategy (KIACS). In this regard, statistics indicate a noticeable development in performance rates of most of the parties concerned with implementing KIACS’ pillars.

In view of the importance of the system of receiving and examining financial disclosures, Nazaha has developed its automated systems to facilitate the submission of financial disclosures by the persons included, ensuring their completeness and conformity with the law and accelerating the pace of examining them. Nazaha’s efforts have resulted in an increase in the rate of receipt of financial disclosures to approximately 99.6% of the total number of people addressed by its provisions.

Nazaha did not neglect the anti-corruption preventive and awareness aspect and its role in drying up its sources, Hence, workshops, seminars and awareness campaigns held by Nazaha, whether targeting special groups or society in general, were intensified.

Realizing the importance of keeping pace with the international movement in its quest to enhance and develop mechanisms and means of joint action aimed at reducing the seriousness of corruption offences, Nazaha has built an in-depth understanding of international indices by following, studying and analyzing them. Monitoring their scores and trying to diagnose the implications of the relevant reports’ content objectively, Nazaha projects the same onto the ground to determine the strengths and weaknesses, attain clear results and recommendations and to help develop applicable plans through KIACS.



## Introduction

Nazaha carried out a three-phase study to evaluate how well government agencies adhere to the Right to Access Information Law, in accordance with the implementation of the strategic initiatives of the State of Kuwait aimed at fostering integrity and fighting corruption. The study involved filling out a questionnaire, which had a 70% response rate. It also included 3597 received information requests, 73% of which were approved. The second stage involved the examination of data released on official websites, whereas the third stage was dedicated to evaluating voluntary disclosure as per Article (5) of the law, which had an average compliance rate of 72%.

The present report, in addition to an overview of Nazaha, presents details of its efforts in all aspects of its work and competencies, accompanied by illustrative and digital presentations of the data included in this report.



# Part I

## Overview of Kuwait Anti-Corruption Authority “Nazaha”



## First: Establishment

The Anti-Corruption Authority "Nazaha" is an independent, neutral body established under Law No. (2) of 2016, issued on 24 January 2016 and published on the 1st of February 2016 in the Official Gazette.

Nazaha's establishment was in response to the requirements of the United Nations Convention against Corruption (the "Convention"), which stipulates in its sixth article that "Each State Party shall consider taking, in accordance with the fundamental principles of its domestic law, disciplinary or other measures against public officials who violate the codes or standards established in accordance with this article." Also, the urgent necessity and need for the anti-corruption law has also called for the presence of Nazaha in the legislative system because it is an inevitable national entitlement required by the state's highest interest.

Thus, Decree No. (300) of 2016, issuing the Executive Regulations of Law No. (2) of 2016, Establishing Kuwait Anti-Corruption Authority and the provisions for financial disclosure, is deemed the real starting point Nazaha's work.

### 1) Objectives

Article (4) of the Law establishing Nazaha has specified its objectives as follows:

- A. Establishing the principle of transparency and integrity in economic and administrative transactions to ensure the achievement of rational management and optimal utilization of the State's funds, resources and properties.
- B. Implementing the Convention against Corruption, approved by Law No. (47) of 2006, and any anti-corruption international conventions and treaties to be approved.
- C. Seeking to combat corruption, prevent its dangers and impacts, prosecute its perpetrators, confiscate and recover funds and proceeds resulting from the practice thereof, in accordance with the law.
- D. Protecting the State's agencies from bribery, exploitation and abuse of power to achieve personal benefits and prevention of mediation and nepotism.
- E. Protecting the whistleblowers of corruption.
- F. Promoting the principle of cooperation and participation with the States and the regional and international organizations in the fields of anti-corruption.
- G. Promoting and activating the role of civil society institutions and organizations in combating corruption, educating society members of its dangers and raising awareness of means and methods of corruption prevention.

## 2) Functions and Competencies

To achieve the desired objectives of Nazaha's establishment, Article (5) of the Law specified a number of competencies as follows:

- A. Developing a comprehensive national strategy for integrity, transparency and anti-corruption, drawing up mechanisms, plans and programs for its implementation, and following up its implementation with the concerned authorities.
- B. Receiving and studying the reports, complaints and information submitted to it concerning the corruption offences, and when ascertained that they constitute a suspicion of a crime, such reports shall be referred to the competent investigative body.
- C. Receiving the statements of Assets & Liabilities and forming committees to examine such statements.
- D. Protecting whistleblowers in coordination with competent bodies.
- E. Informing the competent bodies to take the necessary legal actions to terminate any contract to which the State is a party, or to withdraw any concession or other engagement, if it is found that such contracts are concluded in violation of the laws or implemented in violation of the concluded contract, in coordination with the competent bodies.
- F. Following up actions and measures taken by the competent bodies to recover funds and proceeds resulting from corruption offences.
- G. Studying the legislations and legal instruments related to anti-corruption periodically and proposing the necessary amendments thereto to keep pace with the international conventions and treaties ratified or acceded to by Kuwait, in addition to developing the necessary measures for the prevention of corruption and updating the mechanisms and methods of combating corruption in coordination with all State's authorities.
- H. Coordinating with the Ministry of Foreign Affairs regarding cooperation with the Gulf, Arab and international states and organizations related to anti-corruption and participating in the programs, which aim at preventing corruption and represent Kuwait in the regional, Arab and international conferences and forums related to anti-corruption.
- I. Studying and assessing the reports issued by local, regional and international organizations related to anti-corruption, reviewing Kuwait's status therein and taking the appropriate action towards them.
- J. Coordinating with the media to raise society's awareness of the dangers of

corruption, corrupt practices and their impacts and how to prevent and combat such practices.

- K. Taking the necessary measures to ensure the participation of civil society organizations in raising awareness about the dangers of corruption and the impacts thereof on society, expanding the role of society in anti-corruption activities and prevention of corruption.
- L. Requesting the competent bodies to investigate incidents of financial and administrative corruption, detect the violations and irregularities and collect evidence related thereto.
- M. Developing databases and information systems and exchange of information with other agencies and organizations concerned with corruption issues inside and abroad, in accordance with the legislation in force.
- N. Requesting the competent entities to bring the necessary administrative and civil actions.
- O. Referring the incidents involving a suspicion of a criminal offense to the competent investigative body accompanied by all documents.
- P. Any other functions or competences that are consistent with the purpose of the establishment of the Authority and may be assigned thereto.

## **Second: Nazaha's Presidency and Board of Trustees**

Decree No. (89) of 2020, issued on 20 June 2020, provided for appointing the President, Vice-President and members of Nazaha's Board of Trustees, as follows:

- |   |                |
|---|----------------|
| • Mr. Abdulaziz Abdullatif Al-Ibrahim   | President      |
| • Counselor Nawaf Abdullah Al-Mahamel   | Vice-President |
| • Mr. Khaled Abdul Razzaq Al Khaled     | Member         |
| • Dr. Mashael Abdul Aziz Al-Hajri       | Member         |
| • Counselor Hossam Sayed Ali Behbehani  | Member         |
| • Mr. Nawaf Abdullah Al-Rashid Al-Bader | Member         |
| • Mr. Abdul Aziz Mansour Al Mansour     | Member         |

Article (9) of Law No. (2) of 2016 specifies the Board of Trustees' membership term at four years, renewable once. The term of the Board ended on 19/06/2024 and the Council of Ministers decided that the President and Vice President would continue to run Nazaha until a new Board of Trustee is appointed.

# Third: Organizational Structure of Anti-Corruption Authority "Nazaha"

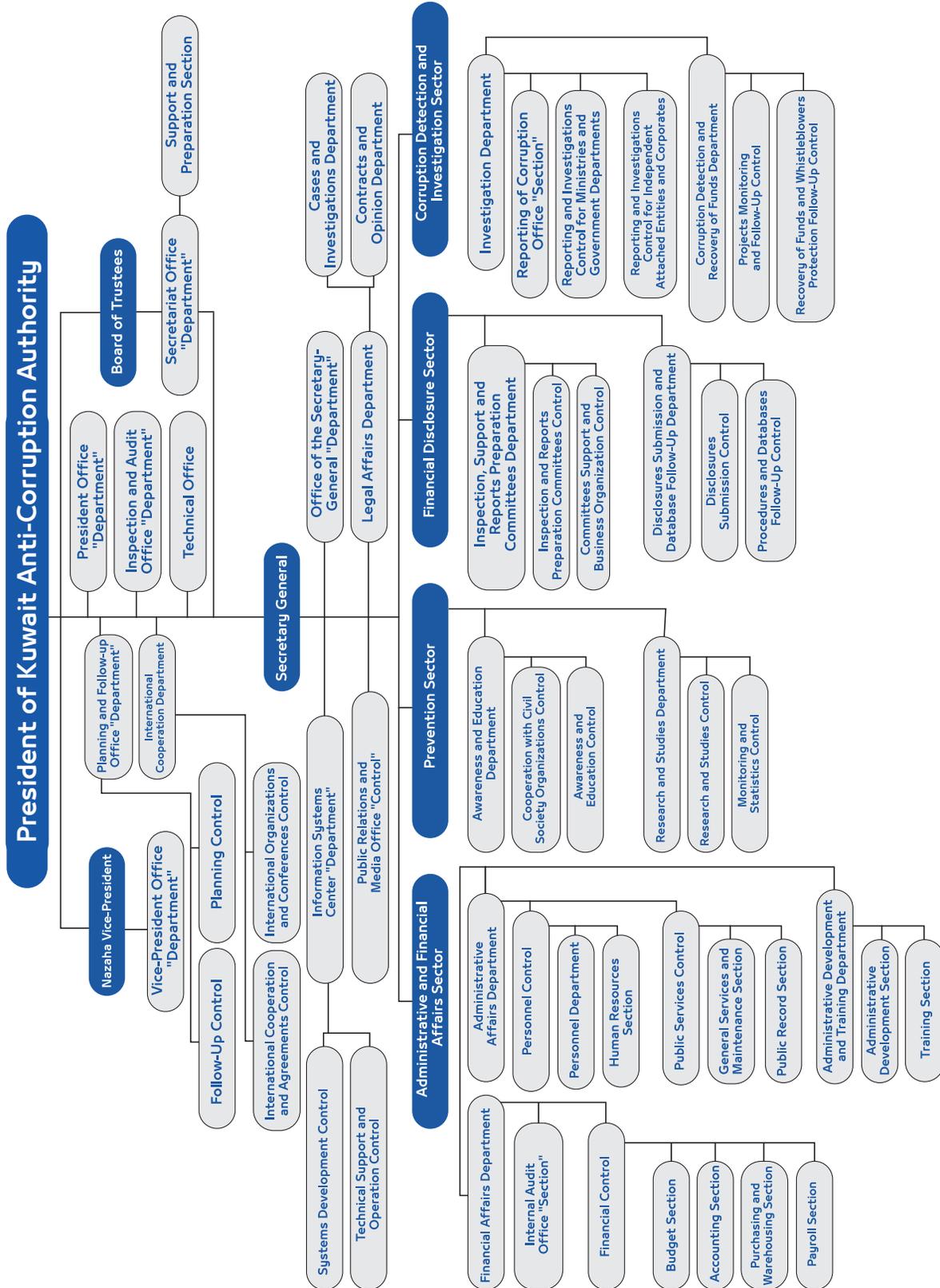


Figure (1) Nazaha's Organizational Structure

## **Part II**

# Kuwait Integrity and Anti-Corruption Strategy (2019-2025) and Kuwait Anti-Corruption Authority's Internal Strategy



## **First: Kuwait Integrity and Anti-Corruption Strategy (2019-2025)**

Kuwait Integrity and Anti-Corruption Strategy (the “National Strategy” or “KIACS”) aims to fulfil the aspirations of Kuwaiti citizens, inspired by deep-rooted values and morality embedded in the state’s culture. KIACS’ foundation is based on the principles and objectives of the Kuwaiti Constitution and its pillars align with the state’s international obligations. KIACS has been developed based on a specialized scientific methodology, through a participatory approach that involves high-level national and international experiences and representatives of stakeholders from public and private sectors and civil society. This work reflects all parties’ unity and support for the lofty goal for which the Strategy has been developed, in line with the international standards and best practices in this field. It is also consistent with the principles of democracy, which will establish a feeling of owning this strategy at the national level, thus impacting its implementation positively.

KIACS’ term is five years, starting from the year 2019 until the year 2024, yet the High Committee for Leadership and Coordination of KIACS decided to extend that term to the end of 2025. KIACS is based on four (4) pillars and main objectives, including thirteen (13) priorities, distributed over forty-seven (47) initiatives, each of which is based on selected activities, standards and indicators. All initiatives are under implementation according to KIACS schedule.

The overall completion rate of the procedures set for implementing KIACS’ initiatives in all its areas until 31 March 2024 amounted to 83%, compared to the target percentage of 95%.

KIACS is based on four pillars, where the progress achieved in each is as follows:

### **1. First Pillar: Public Sector**

The First Pillar focuses on the public sector in its broad sense, which includes the executive, legislative and judicial authorities and the institutions and individuals affiliated therewith. Given the fundamental role of that sector in the national economy, the strategic goal of this pillar is to protect the integrity of the public sector and develop the effectiveness and efficiency of the public services provided thereby within a framework of transparency and accountability.

The estimated percentage of completing the procedures set for implementing the First Pillar is (78%) till 31 March 2025, compared to (70%) for last year.

The most remarkable achievements in this Pillar include:

- Nazaha persists in executing a variety of awareness initiatives related to Law No. (12) of 2020 concerning the Right to Access Information, as well as its aims and methods of execution. In 2024, awareness programs were delivered for the following entities:

- Ministry of Social Affairs and Labor
  - Kuwait Petroleum Corporation
  - National Bureau for Human Rights (NBHR)
  - International Law School
  - Kuwait Foreign Petroleum Exploration Company
- Nazaha prepared a three-stage professional study to assess the extent to which government agencies are complying with the Right to Access Information Law. The study included (14) evaluation items. In the first stage, a questionnaire was distributed to relevant entities, with a response rate of 70% and (3597) requests for access to information, of which 73% were approved, 8% were rejected and 9% remained under review. During the second stage, the received data was verified against its presence on official websites. In the third stage, the emphasis was placed on gauging voluntary disclosure as per ten items stipulated by the Law; eight of these are applicable to most entities. The average compliance rate for the implementation of Article (5) of the Law at this stage has reached 72%.
  - Nazaha continues to conduct and implement training and awareness programs in coordination with stakeholders to ensure and enhance compliance with the submission of financial disclosures and the availability of all data. Compliance rate amounted to 99.6% and the percentage of filers whose disclosures were examined was 99% in 2024.
  - The initiative to create a guidance model for annual reports and the mechanism for preparing them to achieve transparency has been completed. The model is being approved for submission to government agencies and training thereon is recommended. The draft will be provided to government agencies so as to provide Nazaha with their input to develop the model in accordance with best practices.
  - Circular No. (14) of 2024, dated December 2, 2024, issued by the Civil Service Commission (CSC), mandates that every government agency offer training related to its area of expertise and job responsibilities. All government agencies are required to follow the subsequent guidelines:
    - Delivering the requisite training for their employees according to their field of expertise and specialized needs, aligned with their established goals and responsibilities.
    - Administrative development and training departments in government agencies shall develop a draft annual training plan, specifying all training programs and needs within the annual plan. These programs shall be categorized and approved by the CSC before being approved and incorporated into the integrated systems. All is subject to the training needs of the agency and pursuant to the needs of its employees.

- Every governmental agency will provide training for its own employees as well as for those from other agencies, focusing on programs tailored to their specific areas of expertise. Administrative and refresher programs and courses will be exclusive to the agency's employees.
- (122) trainees from the police (military) force, Ministry of Interior, out of a target of (3000), and (837) civilian trainees at the Ministry of Interior, out of a target of (5000), were trained on the Code of Professional Conduct.
- Job descriptions, performance assignment forms and the supervisory employee management report have been prepared and approved for implementation in CSC's Administrative Development Sector, starting with CSC's sectors and the entities participating in the project, pending the Council of Ministers' approval.
- Through the Integrity and Anti-Corruption Support Project, Nazaha activated inspection and audit offices by conducting practical training to activate these offices within government agencies, with a view to benefiting from the expertise of Nazaha's Inspection and Audit Office in this field. Fifteen (15) meetings were held to transfer knowledge and expertise at the request of (10) government agencies: the Public Authority for Food and Nutrition, the Environment Public Authority, the Ministry of Finance, the Ministry of Oil, the Minister of State for National Assembly Affairs, the Public Authority for Applied Education and Training, the Kuwait Institute for Scientific Research, the Central Statistical Administration, the Public Authority for Youth and the Public Authority for Sports.
- Analysis of automated and non-automated services during 2024 for all government agencies approved in the Government Services Directory System, with the preparation of a statistical report on approved services for all government agencies according to classification (individuals/private sector/government agencies).
- The Civil Service Commission implemented (19) training workshops during 2024 for selected government agencies on how to document and simplify service procedures.
- The number of government entities participating in "Sahel" application increased from (35) to (36), the number of electronic services provided by the application increased from (346) to (423) since its launch and the number of completed transactions increased from approximately (30,000,000) to approximately (49,000,000), compared to the statistics included in KIACS' Fourth Annual Report.
- Satisfaction levels among users of targeted public services regarding the ease of access to government services, without bribery and favoritism, increased from 65% in 2022 to 79%, according to the second national survey launched by "Nazaha" in 2024.

- The percentage of automated services approved in the Governmental Services Directory System for 2024 reached (59%), and the percentage of services, which process steps were included in the Governmental Services Directory for 2024, reached (67%).
- Preparing a register of corruption risks associated with the Code of Conduct's elements in some government agencies as a preliminary stage for activating the Corruption Risk Register.

## 2. Second Pillar: Private Sector

The Second Pillar focuses on the private sector, which includes all national and foreign entities that settle and work in the State of Kuwait to achieve commercial profit, as the private sector is often exposed to the risks of corruption, especially bribery. It is either an incentive thereto or a victim thereof. In both cases, special attention is required for that sector within the framework of any strategy set to enhance integrity and combat corruption. Hence, the strategic objective of this pillar is to encourage the private sector to contribute to enhancing integrity and combating corruption, in addition to the key private sector role in supporting government activities aimed at creating an investment environment attractive for capitals, stimulating economic activity and diversifying sources of national income.

The estimated percentage of completing the procedures set for implementing the Second Pillar is (88%) till 31 March 2025, compared to (84%) in last year.

Most notable accomplishments in this Pillar are:

- Granting judicial seizure powers to a number of employees in the Joint Stock Companies Department, Ministry of Commerce and Industry, continuing their training in cooperation with Kuwait Accountants Association and some accounting audit offices accredited by the MOCI on the inspection of auditors, as violations were detected and referred to MOCI's Auditors Special Investigation Committee.
- The Capital Markets Authority has implemented extensive and intensive training programs in corporate governance. Training programs included all joint-stock companies subject to the corporate governance provisions issued by the Capital Markets Authority.
- The Ministry of Commerce and Industry launched the "Electronic Real Estate Brokerage System Project", which covers all real estate sectors, after previously being limited to the residential sector. The project includes investment contracts, commercial contracts and heirship contracts, linking with the Minors' Affairs Platform through activating "Sahel" application notifications. This will reflect the actual prices of traded properties and will enhance anti-money laundering efforts in real estate market. This is in addition

to enhancing transparency and credibility in terms of accurately recording real estate transactions and trading values, ensuring the authentication of real estate owners. It will also contribute to eliminating fraud and forgery and guaranteeing the credibility of contracts through electronic authentication of the parties. The project will officially come into effect on the 1st of January 2025.

- The Capital Markets Authority launched the mandatory implementation phase of the XBRL electronic disclosure system, which is a modern platform that aims to provide an advanced technical infrastructure for managing financial and non-financial disclosure, in line with international best practices, for all listed companies, authorized persons, collective investment schemes, investment funds under liquidation, auditors registered with CMA and market participants.

### 3. Third Pillar: Society

The Third Pillar focuses on society, which includes citizens, residents and all non-profit civil entities, in addition to media channels that have been included herein due to their close connection to the contents of this Pillar, regardless of their public or private affiliation. The strategic objective of this Pillar lies in empowering society to contribute to building a culture that embraces integrity and opposes all forms of corruption.

The estimated percentage of completing the procedures set for implementing the Third Pillar is (86%) to 31 March 2025, compared to (85%) for last year.

Most notable accomplishments in this Pillar are:

- Nazaha launched a second national survey to measure awareness in the following areas and topics:
- Citizens and residents' awareness of KIACS and its connection to the New Kuwait Vision 2035, during the fiscal year 2023-2024. The percentage of the public who reported understanding of KIACS and its connection to Kuwait Vision 2035 increased from 21% in 2022 to 24% in 2024.
- Measuring community awareness level to determine the percentage of the public who reported changing their behavior after learning about anti-corruption values. This percentage increased from 60% in 2022 to 78% in 2024.
- Measuring community awareness level to determine the percentage of the public who reported understanding of the concept of corruption, anti-corruption measures and values. The percentage remained at 52%.
- Measuring the level of awareness of all participants who are aware of Nazaha's role, responsibilities and activities, as well as the role of citizens. Relevant percentage increased from 61% in 2022 to 70% in 2024.

- The Public Authority for Applied Education and Training has established a mechanism to motivate faculty members to complete courses and link them to the annual performance report. PAAET has also launched several training programs during the 2024/2025 training season in the field of promoting transparency and combating corruption at the Ibn Al-Haytham Center and its affiliated Center for Measurement, Evaluation and Professional Development. The most prominent training programs include: (Training on the Application of Corporate Governance, Integrity in Education and Training, Integrity in Educational Institutions: Values and Behavior, Corporate Governance in Government Sector, Financial Fraud, Cheating and Forgery, Capacity Building for Employees in Corporate Governance, Anti-Money Laundering and Combating the Financing of Terrorism, Work and Professional Ethics, Promoting Integrity and Combating Administrative Corruption).
- Kuwait University offers several courses in the field of promoting professional ethics and public services across various colleges, most notably:
  - Promoting the spirit of citizenship and a sense of responsibility through adherence to professional values in the public service.
  - Emphasizing the concept of public service and public office aiming at achieving public interest.
  - Raising awareness of the values of transparency, integrity, accountability and whistleblowing.
  - Identifying the role of ethical considerations in avoiding potential conflicts of interest.
  - Emphasize the importance of developing codes of ethical conduct and raising employee awareness of their significance.

#### **4. Fourth Pillar: Specialized Bodies**

The Fourth Pillar focuses on the bodies specialized in promoting integrity and combating corruption, including judicial and supervisory bodies, in addition to Nazaha, due to its crucial significant in the success of any national strategy in anti-corruption field due to the special nature of corruption practices and the difficulty of working to prevent, detect and prosecute them in light of the steady technological development, the increasing speed and flexibility of the movement of people and capital across borders and the ability of the corrupt to hide information and protect themselves. The strategic goal of this Pillar lies in enhancing the efficiency and effectiveness of the entities concerned with promoting integrity, combating corruption, monitoring public funds and building rules and mechanisms to facilitate joint work among all these entities.

The estimated percentage of completing the procedures set for implementing the Fourth Pillar is (80%) to 31 March 2025, compared to (76%) for last year.

Most notable accomplishments in this Pillar are:

- Kuwait Institute for Judicial and Legal Studies has circulated the Code of Judicial Conduct to all public prosecutors and judges of the Court of First Instance and members of the Public Prosecution. Eighteen (18) public prosecutors were trained during the year 2024. The Institute also trained (103) legal researchers, (27) public prosecutors and judges of the Court of First Instance and (32) members of the Public Prosecution in training programs concerned with criminalizing corruption, and with detecting, reporting, investigating and prosecuting such crimes, during the fiscal year 2024/2025. Several training programs were implemented, as follows: (Effective role of national agencies in protecting and promoting human rights, crimes of human trafficking and migrant smuggling, combating human trafficking, the national referral system in accordance with United Nations charters and national legislation, human rights, the law on the protection of public funds, judicial police, forgery of official documents and bribery crimes).

### **The implementing agencies' success in achieving KIACS' initiatives and fulfilling the relevant commitments:**

Figure No. (2) displays KIACS' initiatives completion rate for each entity, where it is noticeable that the highest KIACS' initiatives implementation entities are Nazaha, followed by the Civil Service Commission, the Ministry of Commerce and Industry and then the other entities and agencies. It is also worth noting that the University of Kuwait and the Supreme Council of Private Universities and the Public Authority for Applied Education and Training participate in implementing two of KIACS' initiatives, while the Ministry of Education participates therewith in one initiative.

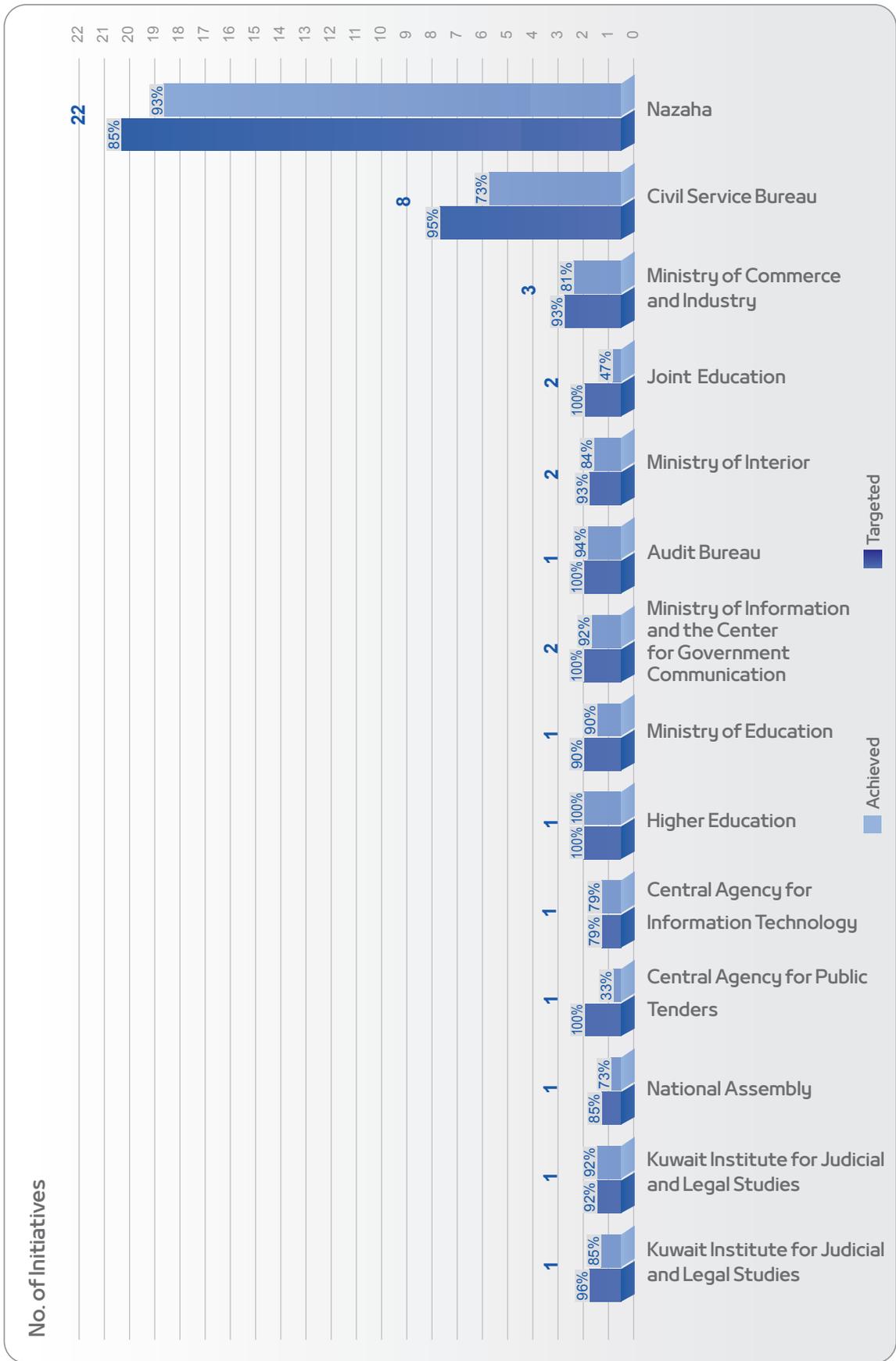


Figure (2) Percentage of KIACS initiatives completion by each entity

## Second: The Internal strategy of the Anti-Corruption Authority

Nazaha launched its first strategy (2019-2025) to coincide with Kuwait Integrity and Anti-Corruption Strategy. Nazaha's strategy has been designed based on an analysis of external factors to understand the exterior scene, relying on New Kuwait Vision 2035 and Kuwait Integrity and Anti-Corruption Strategy (2019-2025), in addition to some pioneering practices. An analysis has also been conducted to identify the influential internal factors to understand the scope of Nazaha's work through its establishment Law and Executive Regulations and to evaluate its current status.

It is worth noting that Nazaha's strategy includes (47) initiatives and implements (22) of KIACS initiatives through its sectors and work units. As for the remaining Nazaha strategy initiatives and projects, they are concerned with building Nazaha's capabilities and capacities to grant it national confidence and render it a role model for the public sector.

The most notable achievements in Nazaha strategy are as follows:

- "Nazaha National Anti-Corruption Program" has been implemented with the participation of (18) trainees from (7) government agencies. The program aims to enhance integrity and transparency in the public sector by introducing employees to the concept of corruption, its causes and effects, in addition to applying anti-corruption international and local legal framework. The training program also addressed the international legal anti-corruption framework, by explaining the United Nations Convention against Corruption, international cooperation in combating corruption, anti-corruption local legal framework and laws, the role of supervisory and competent authorities. This is in addition to governance principles and tools and the enhancement of transparency and efficiency in government work. Financial crimes, such as money laundering, bribery and illicit gains, and mechanisms for combating them were also addressed. Conflicts of interest and corruption whistleblowers protection were defined. Tackling the advancement of a safe reporting environment.
- Nazaha continues to implement the recommendations included in the study on the risks of the reporting process and the study on assessing the risks of whistleblowers' protection. It also periodically reviews the sector's procedural manual, identifies and defines the databases necessary for research and investigation and coordinates with relevant authorities to form a legal committee specializing in reports examination.
- Finalizing a mechanism for receiving conflict of interest disclosure forms from job categories required to submit them to Nazaha, thus ensuring efficiency and confidentiality.

- Nazaha's Legal Department continues to follow up on the approval of laws related to promoting integrity and combating corruption (bribery in the private sector, bribery of foreign public employees and the draft amendment to Nazaha's law), in collaboration with relevant government authorities.
- Completing the preparation of the training program guide for the 2024-2025 season.
- Completing the development of an integrated automated system for preparing KIACS and Nazaha's internal strategy, training Nazaha's employees on the system.
- Obtaining ISO 27001 certification for developing information security policies and procedures required in accordance with ISO-IEC 27001 standard requirements. The external audit standard has been passed successfully and the certification was obtained, paving the way for completing all project phases pursuant to Nazaha's approved roadmap.
- Implementing training programs for government agencies to acknowledge the scope of Nazaha's work during the fiscal year 2024-2025.
- Nazaha prepared a study entitled "Public Procurement Best Practices Manual", which aims to compare Public Tenders Law No. (49) of 2016 with international best practices in the field, providing recommendations for developing the Law or enhancing the practical application of these practices.
- An initiative to prepare a guidance model for annual reports and the mechanism for preparing them to achieve transparency has been completed. The model is being approved for submission to government agencies and training thereon is recommended. The draft has been submitted to government agencies for them to provide Nazaha with their input to develop the model in accordance with best practices.
- A study has been prepared on the Financial Action Task Force (FATF) and the Nazaha's relationship therewith, in order to raise awareness among Nazaha's employees of its role in relation to FATF's recommendations and the impact of implementing them on the efforts exerted to promote integrity and combat corruption in the State of Kuwait.

**Part III:**  
Activities and Achievements of  
Kuwait Anti-Corruption Authority  
According to its Terms of  
Reference



# Chapter I

## Corruption Detection and Investigation



Upon the issuance of Law No. (2) of 2016, Establishing Kuwait Anti-Corruption Authority (Nazaha) and provisions related to financial disclosures, as well as Decree No. (300) of 2016 issuing the Executive Regulations thereof, a new era emerged in dealing with what is known as corruption offences. Nazaha has been granted powers as necessary to deal with those offences with the required professionalism, in cooperation with all competent authorities. The following is a statement of the key special actions performed in this regard:

### First: Complaints and Reports Received by Nazaha (Reporting of Corruption Office)

The Reporting of Corruption Office is responsible for dealing with whistleblowers regarding reports and complaints submitted thereby in the early stages of reporting, verifying that the report fulfills all formal and substantive conditions before recording it in the Reports Register under a special record number. It is worth noting that, after study and examination, the Reporting of Corruption Office registers the complaints received thereby, and do not meet the conditions necessary for the report to be legally accepted, temporarily in the Administrative Complaints Book. The Head of the Office then verifies their registration and signs for archiving them in a file prepared specifically for that purpose.

Reports and complaints have been classified during this Report's period, as indicated in Figure (3).

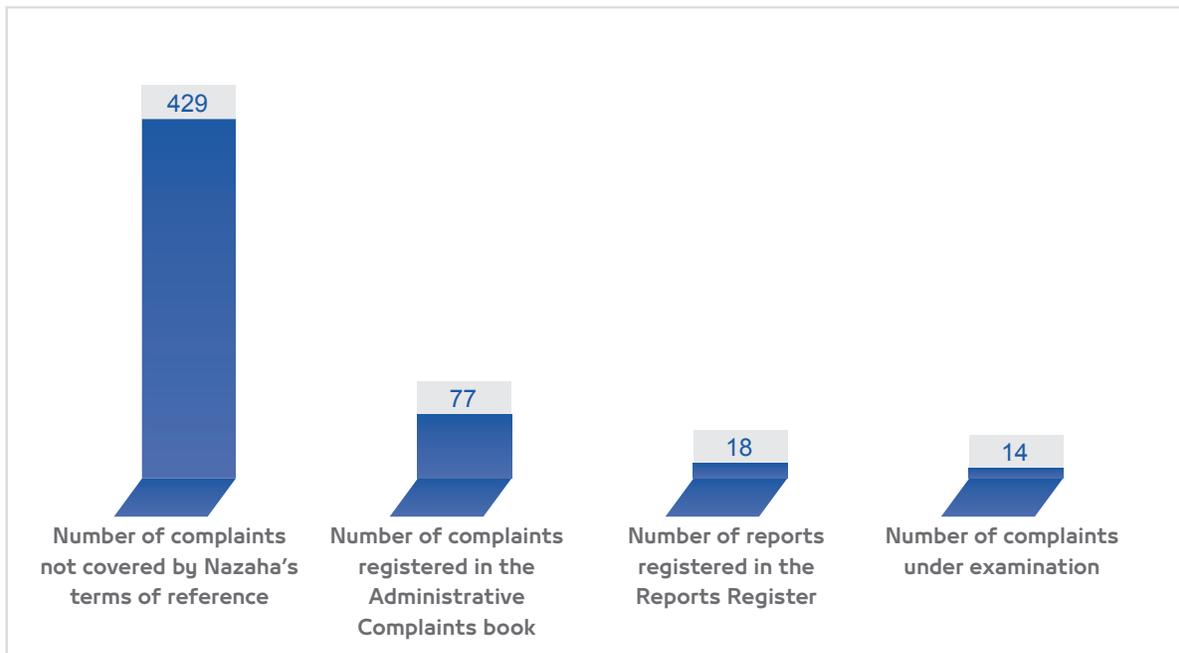


Figure (3) Distribution of complaints and reports during the period of this Report

## 1. Reports

Chapter V of Law No. (2) of 2016 regulates the procedures for reporting and protection of whistleblowers, dealing with facilitating and simplifying the process of reporting corruption offences and providing all means and guarantees for whistleblowers' safety and protection. Accordingly, Nazaha received whistleblowers of corruption offences and collected information and inferences about the incidents of corruption.

Reporting is defined as the process in which a natural or legal person reveals information he has about a crime, an attempt to commit a crime, covering up a crime, getting rid of evidence of a crime or a serious financial violation, submitting the same to Nazaha or to an authority competent to receive those reports.

Nazaha classifies reports according to their source or by the entity to which the reported person is affiliated or according to the type of suspicions included in the reports, which helps in further analysis and adaptation.

Nazaha's classification of reports is as follows:

### A) Reports according to their sources

Nazaha examined, reviewed and collected evidence on the reports submitted thereto and ascertained the existence of a suspicion of a corruption offences, including serious financial violations or illicit gains crimes. During the period of this Report, (18) reports were registered, where (11) thereof (at the percentage of (61%)) were from natural persons, as indicated in Figure (4).



Figure 4: number of reports received by nazaha by source, during the period of this Report

Pursuant to the last five fiscal years, Figure (5) indicates that the reports received by Nazaha are mostly from natural persons, as the average number of reports from natural persons was (28) and the average number of reports from legal persons was (11).

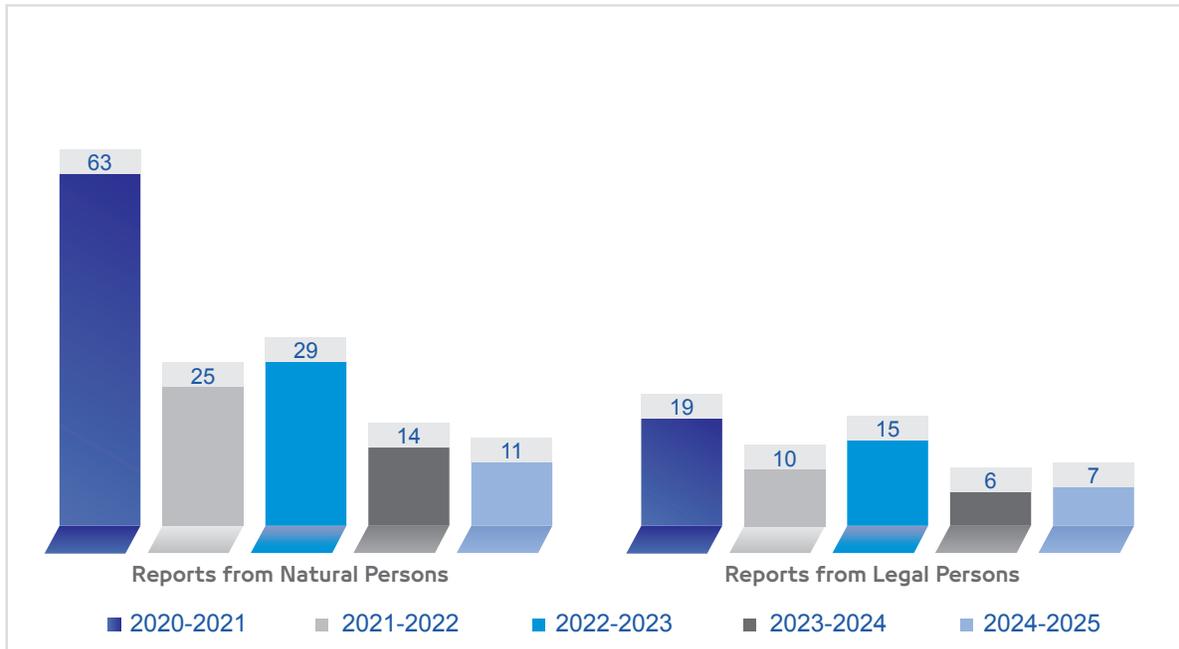


Figure 5: Percentages of reports received by Nazaha by source, pursuant to the last five fiscal years

## B) Reports according to the entity to which the reported person is affiliated

Some of the (18) registered reports filed with Nazaha include several incidents, in which two or more entities participated, so that the total number of entities amounted to (15). Figure (6) indicates the distribution of reports according to the entity to which the reported person is affiliated.

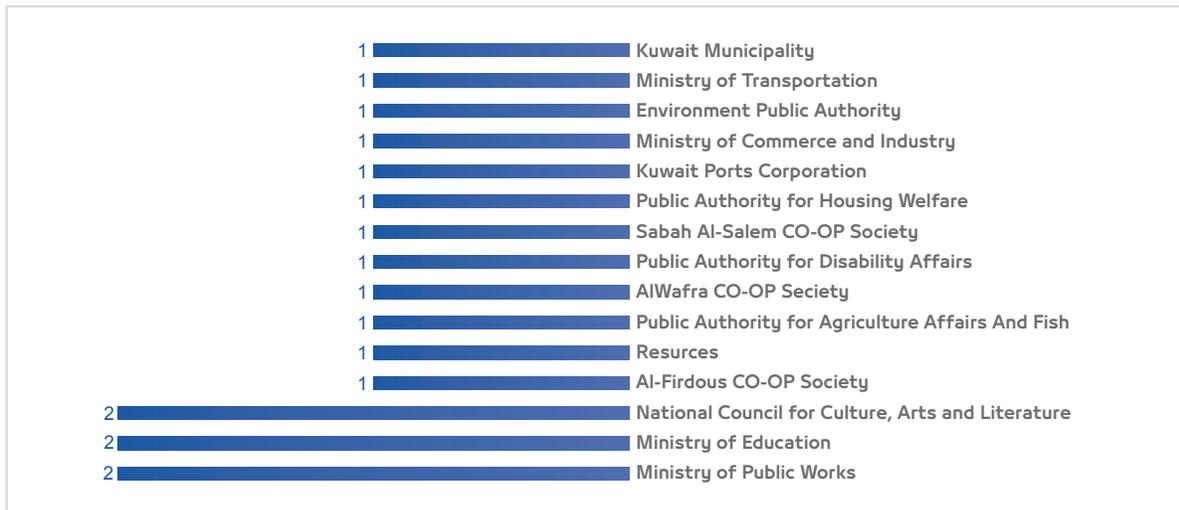


Figure 6: distribution of reports according to the whistleblower's entity during the period of this Report

## C) Reports according to the type of suspicions contained therein

Nazaha's role is to verify and collect evidence regarding committing corruption offences, including serious financial violations and benefiting from illicit gains, pursuant to Law No. (2) of 2016 Establishing Kuwait Anti-Corruption Authority and the provisions related to financial disclosures.

Nazaha registered (18) reports, where in (17) of them the existence of corruption is suspected, according to the corruption offences stipulated in the Law establishing Nazaha, in addition to one (a) administrative or financial violation.

Figure (7) details the above, noting that more than one type of corruption offences may be included in any single report.

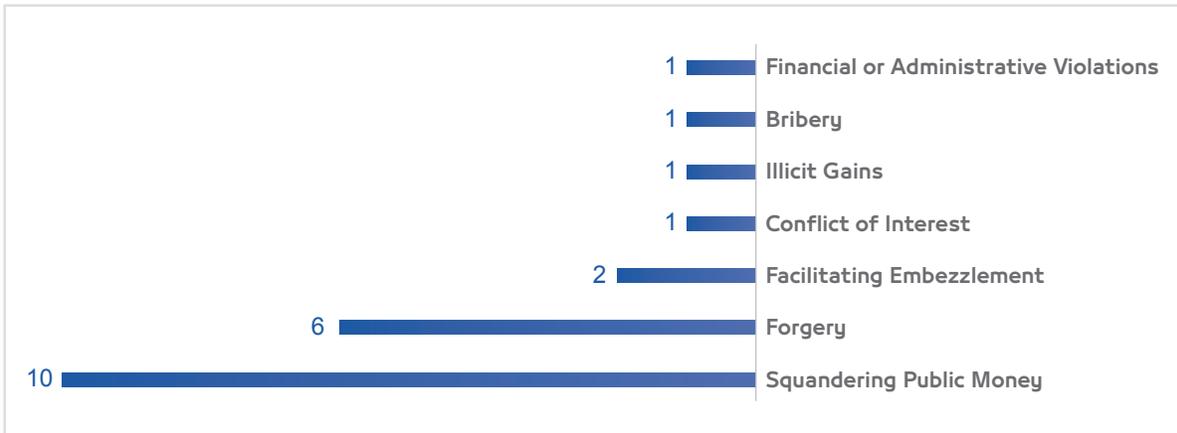


Figure 7: Distribution of reports including suspicions of corruption or violations during the period of this Report

According to the last five fiscal years, it is noticeable from Figure (8) that the number of reports containing suspicions of corruption is higher than the number of reports that constitute financial or administrative violations, as the average number of the former is (37), while the average number of the latter is only (3).

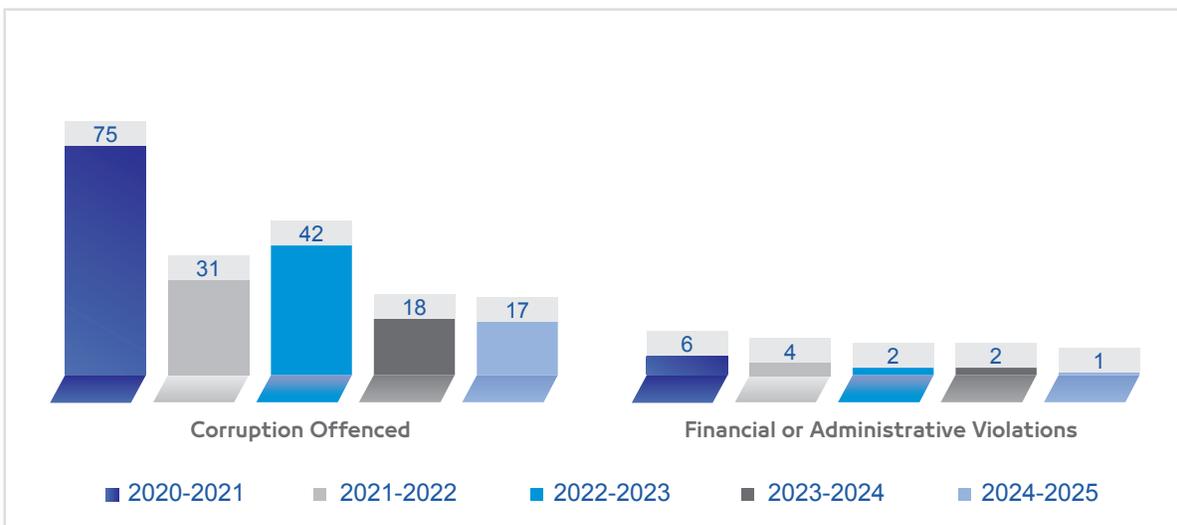


Figure 8: Reports that included suspicions of corruption or violations during the period of this Report

## D) Addressed Reports

Nazaha studied and examined the reports submitted thereto through investigations, preliminary inquiry and gathering of evidence. In case of reasonable belief that a suspicion of corruption offence exists, including serious financial violations, or in case of benefiting from illicit gains, the report will be referred

to the Public Prosecution or to the competent authority. However, if the report is not accepted in merits, then Nazaha’s competent department recommends preserving that submitted report. Eleven (11) reports were referred to the Public Prosecution during the period of this Report, representing 32% of the total reports that were addressed, noting that some of the reports were received by Nazaha in a period prior to that of this Report, which were addressed during its period. Figure (9) indicated Nazaha’s disposition of the reports.

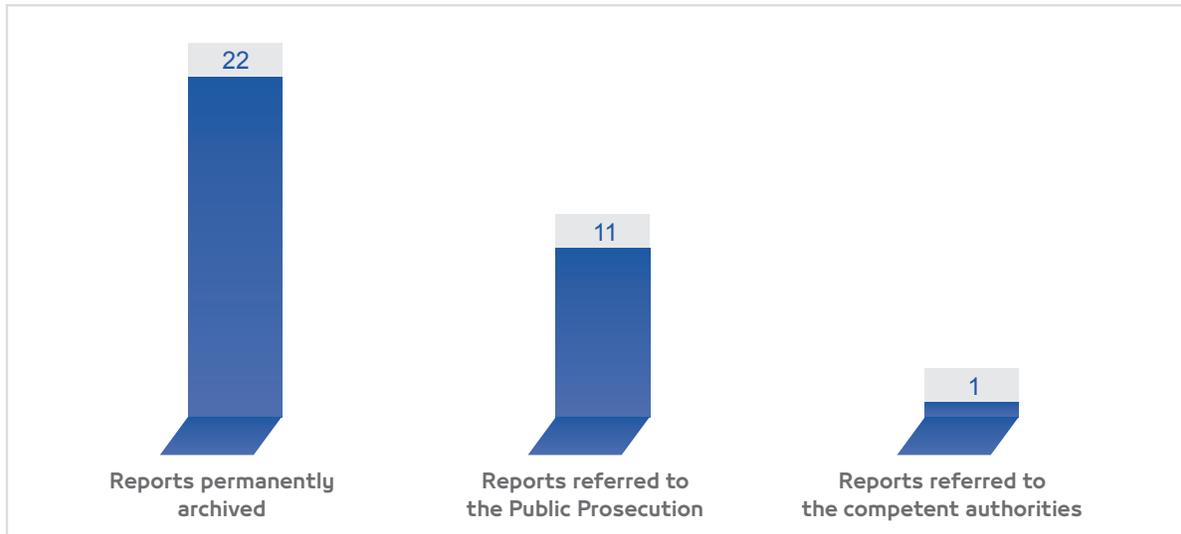


Figure 9: Reports addressed in the last five fiscal years

Figure No. (10) indicates the reports addressed in the last five fiscal years, noting that the average number of reports referred to the Public Prosecution is (10).

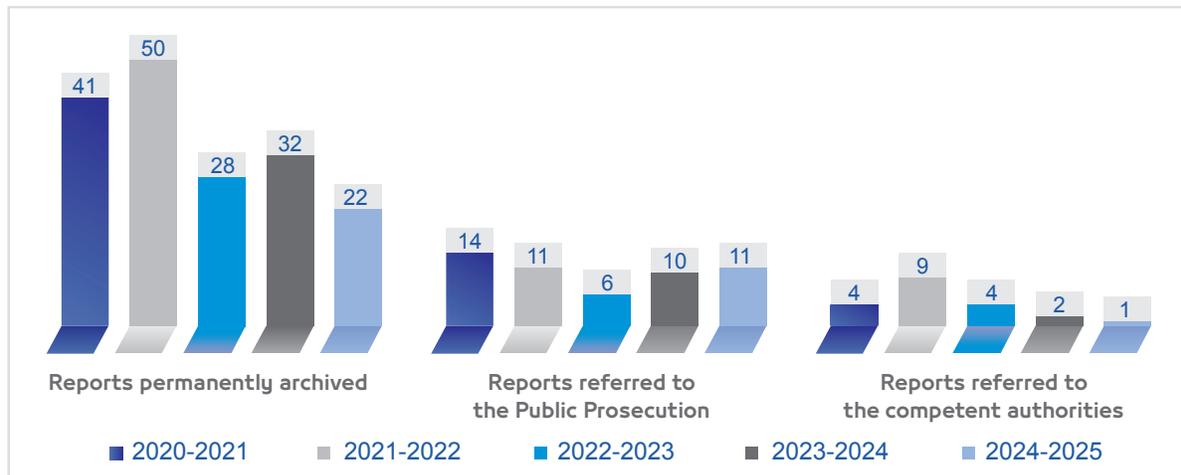


Figure 10: Reports addressed in the last five fiscal years

## Reports Referred to Public Prosecution

Article (27) of Law (2) of 2016 Establishing Kuwait Anti-Corruption Authority stipulates that "Subject to the provisions of law No. (88) of 1995 Concerning the Trial of Ministers, the public prosecution shall have exclusive competence on the investigation, disposition and prosecution of all offences set forth herein and any other offences related thereto." Accordingly, the (11) complaints that were referred to Public Prosecution are indicated in Table (1).

Table 1: Reports referred to the Public Prosecution during the period of this Report

Entity	Reasons that the report is referred to PP	No.
Public Authority for Agriculture Affairs and Fish Resources	- Suspicion of Money Laundering and Illicit Gains	1
National Council for Culture, Arts and Letters	- Suspicion of squandering public funds	1
Al-Naeem Cooperative Society	- Suspicion of squandering public funds	1
General Secretariat of the Supreme Council for Planning and Development	- Suspicion of forgery and squandering public funds	1
Environment Public Authority	- Suspicion of facilitating the embezzlement of public funds	1
Ministry of Commerce and Industry	- Suspicion of squandering public funds and forgery	1
Al-Firdous Cooperation Society	- Suspicion of Conflict of Interest	1
Public Authority for Disability Affairs	- Suspicion of forgery	1
National Council for Culture, Arts, and Letters	- Suspicion of squandering public funds	1
Ministry of Social Affairs - Cooperative Society	- Suspicion of forgery	1
Ministry of Education	- Suspicion of squandering public funds and forgery	1
<b>Total</b>		<b>11</b>

It is also worth noting that the total number of reports that were referred to the Public Prosecution from the date of issuing the Executive Regulations by Decree No. (300) of 2016 to 31 March 2025 amounted to (85) reports. They were dealt with by the Public Prosecution and the competent courts, as indicated in Figure (11)

were dealt with by the Public Prosecution and the competent courts, as indicated in Figure (11)

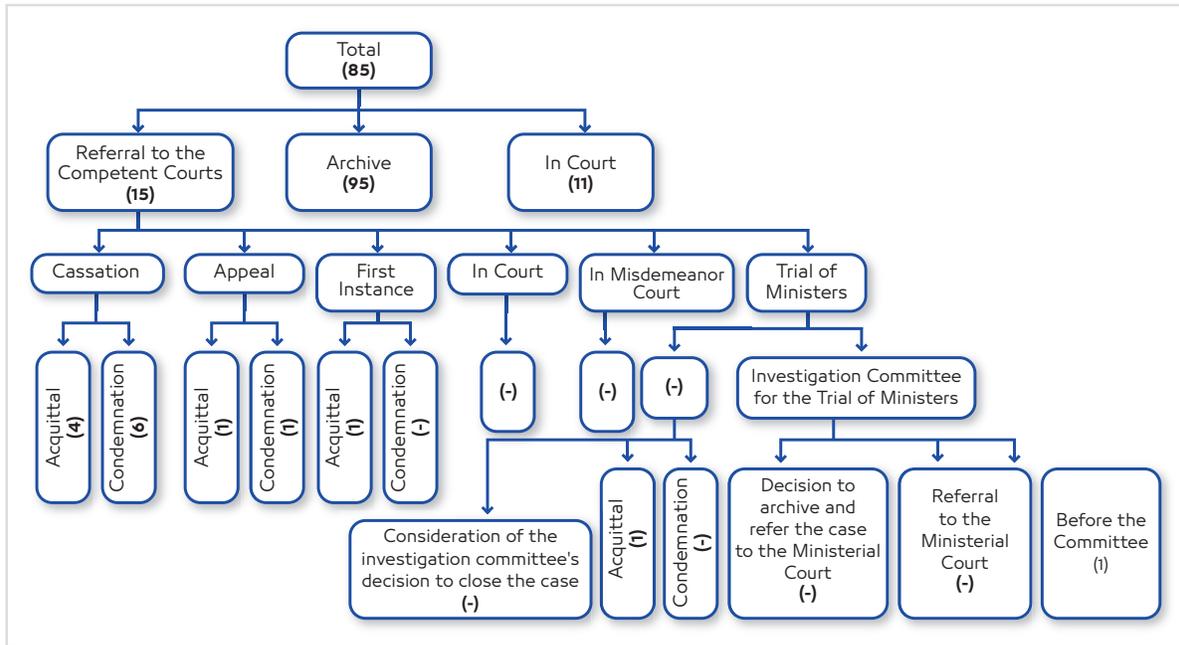


Figure 11: public prosecution's actions and competent courts's verdicts regarding the reports referred thereto by nazaha

## Second: Monitoring

Article (44), Chapter IV, of Decree No. (300) of 2016 on Issuing the Executive Regulations of Law No. (2) of 2016, provides that "Nazaha shall follow up and examine incidents of corruption that come to its attention in any way and through information and news published by various media outlets in this regard. Nazaha may request investigation of those incidents, collect documents and facts thereon and dispose thereof". In this respect, Nazaha monitored (13) cases during the period of this Report, permanently closed (12) monitored cases, and referred (8) monitored cases to Public Prosecution. One monitored case is still being studied. Table (2) sets forth the (8) cases that were referred to the Public Prosecution. Until 31 March 2025, a total of 17 monitoring cases was referred to the Public Prosecution since the issue of the Executive Regulations under Decree No. 300 of 2016. A conviction was issued in respect of one of those cases at all levels of litigation, (1) conviction was issued by the Court of First Instance, while (7) cases are under investigation by the Public Prosecution. (1) monitoring case was permanently closed by the Ministers Trial Court and (7) monitoring cases were permanently closed by the Public Prosecution.

Table 2: Cases monitored and referred to the Public Prosecution, with the type of crime, during the period of this Report

Entity	Reasons that the report is referred to PP	No.
Public Authority for Sports- Kuwait Athletics Federation	- Suspicion of squandering public funds	1
Higher Institute of Dramatic Arts - National Council for Culture, Arts and Letters	- Suspicion of forgery squandering of public funds.	1
Ministry of Social Affairs	- Suspicion of squandering public funds crime, facilitating embezzlement of public funds and Abuse of Authority	1
Public Authority for Sports - Kuwait Athletics Federation - Sports Club	- Suspicion of squandering public funds crime, forgery and facilitating embezzlement of public funds	1
Unspecified	(2) crimes of providing false information  (2) Suspected Crime of Forgery and embezzlement of Public Funds 4	4
<b>TOTAL</b>		<b>8</b>

Figure No. (12) presents a comparison of the numbers of monitored cases in the last five fiscal years, where the average number of monitored cases was (25) cases.

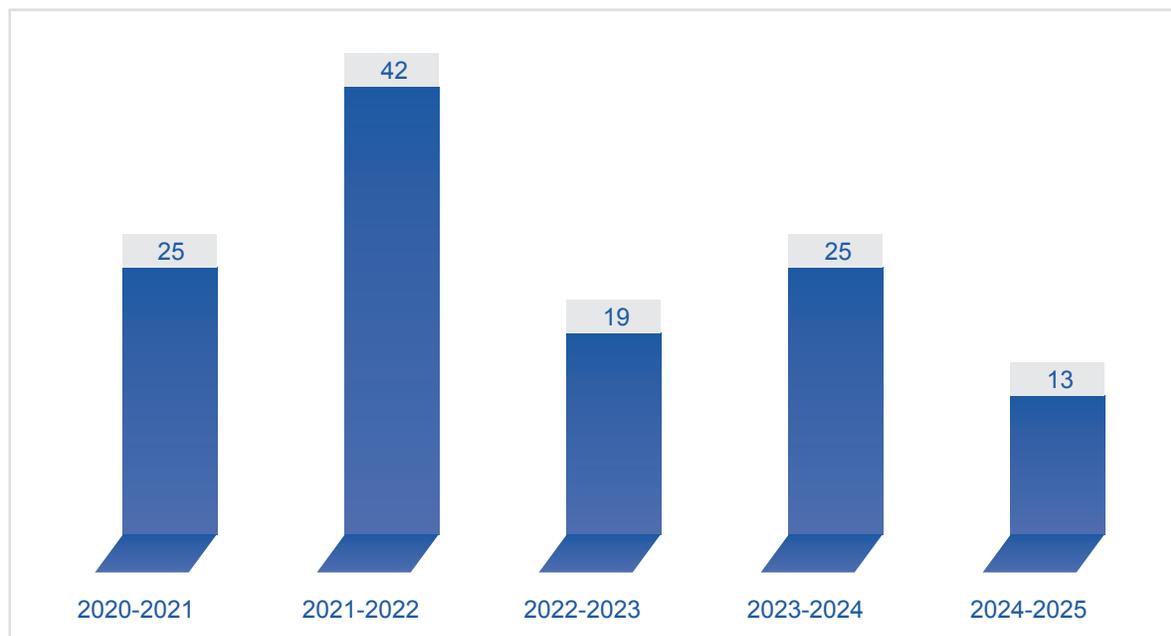


Figure 12: Number of cases monitored in the last five fiscal years

### Third: Exercising judicial seizure by entity

Pursuant to Article (14) of Law No. (2) of 2016 Establishing Kuwait Anti-Corruption Authority and provisions related to financial disclosure and based on Resolution No. (260) of 2016, issued on 29 November 2016 in Kuwait Al-Yaum regarding authorizing some Nazaha employees to detect violations and issue reports regarding crimes stipulated in the Law and its Executive Regulations, issued by Decree No. (300) of 2016, Nazaha conducted (12) judicial seizures during the period of this Report, distributed to (4) entities, as indicated in Figure (13), noting that judicial seizure is a tool granted by the legislator to Nazaha to help it complete and properly investigate corruption incidents. Such tool shall be used by persons to whom a resolution is issued to grant them that capacity by Nazaha's president whenever the work of the investigator so requires.

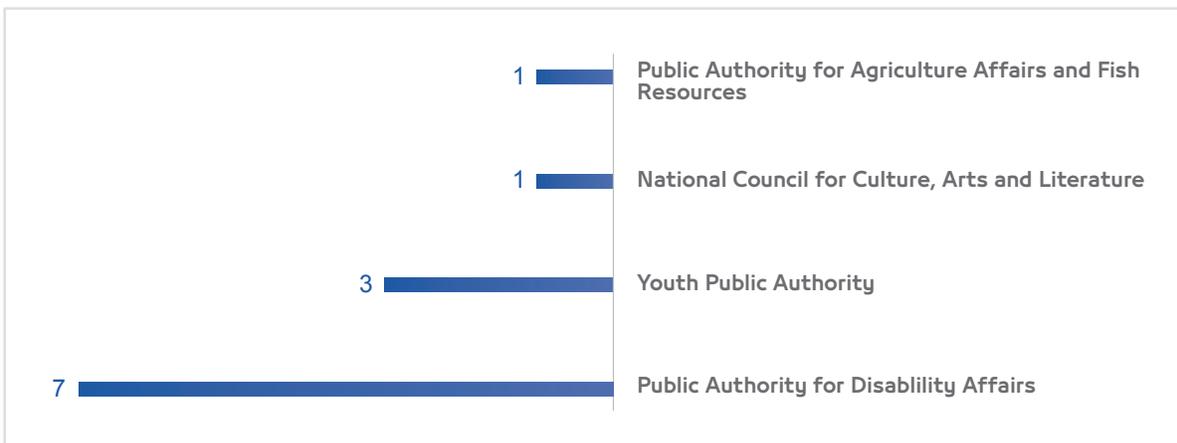


Figure 13: Number of judicial police operations by entity during the period of this Report

Figure (14) indicates the number of judicial seizures in the last five fiscal years, noting that the average number of judicial seizures is (12).

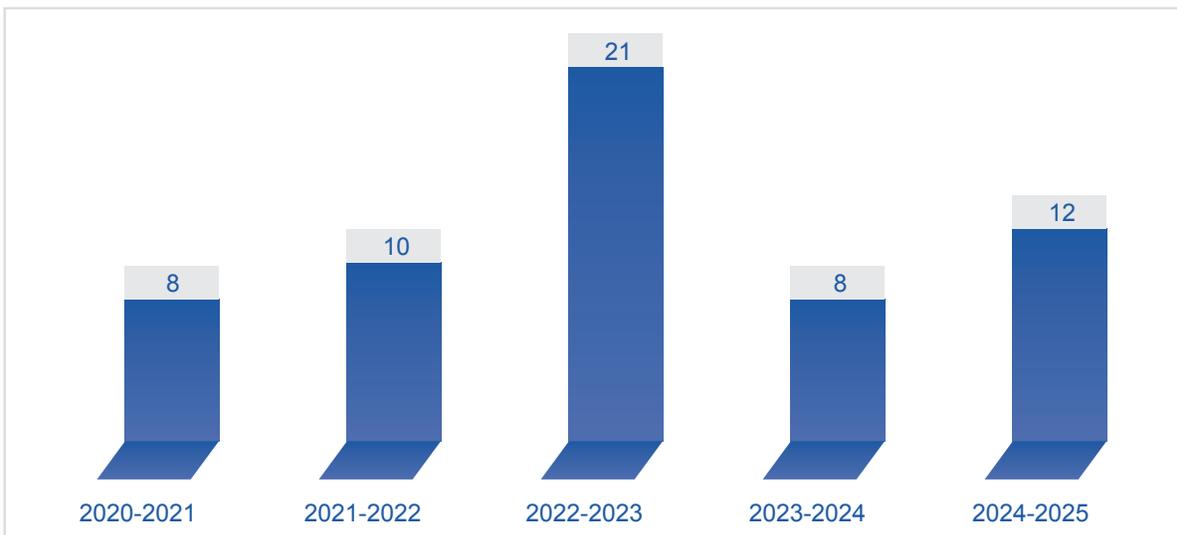


Figure (14) Comparison of the number of judicial seizures in the last five fiscal years

## Fourth: Protection of Whistleblowers

Nazaha carried out its powers and tasks related to the protection of whistleblowers from its establishment date until 31 March 2025, by receiving (64) protection requests, of which (19) requests were accepted by Nazaha.

These requests were divided into three forms, as follows:

1. Multiple requests including more than one type of request: (3).
2. Administrative and functional protection: (52).
3. Legal Protection: (9).

During the period of this Report, Nazaha practiced its terms of reference regarding protection requests, as indicated in Figure (15):

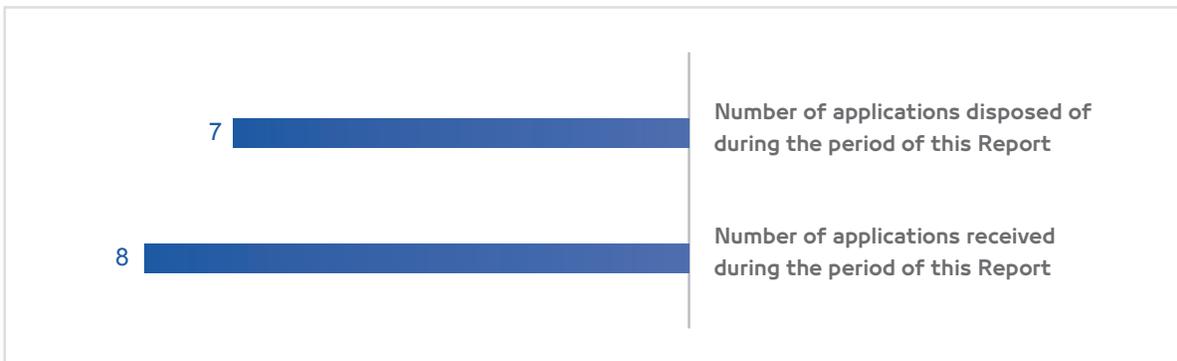


Figure 15: Number of protection requests during the period of this Report

Figure (16) indicates the classification of received protection requests:

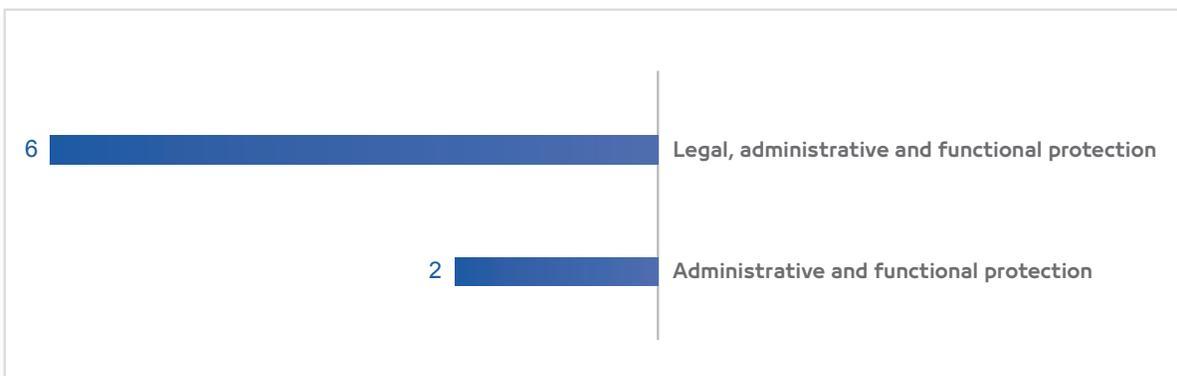


Figure 16: Types of protection requests received  
Legal, administrative and functional protection  
Legal protection

Figure (17) indicates the protection requests disposition classification during the period of this Report:



Figure 17: Status of protection requests disposed of during the period of this Report

Nazaha decided to approve (3) protection requests after ensuring that their reasons and justifications were connected to reports that met the conditions stipulated in the Law and the Executive Regulations, according to the following details:

- A. Request for administrative and functional protection: To provide administrative and functional protection for the whistleblower in Report No. (8/TU/2024), filed against the Public Authority for Disability Affairs, as it has been proven that an administrative resolution has been issued that affected the whistleblower's functional position due to his filing the report with Nazaha.
- B. Request for legal protection: To provide legal protection for a witness in Case No. (1) of 2020 – Ministers exclusive, filed with the Permanent Investigation Committee for the Trial of Ministers, partially filed with Nazaha under Report No. (14/T W/2021) (Kuwait Army Fund Case), for having legal recourse against him due to the testimony submitted to the judicial authority.
- C. Request for Legal Protection: This request aims to provide legal protection for a technical employee at Nazaha in connection with Report No. (59/TU/2019) filed against the Public Authority for Agriculture Affairs and Fish Resources. This is because one of the complainants' filing a complaint with the Public Prosecution against the employee for carrying out his job duties by gathering investigations and evidence regarding the incident in question.

Nazaha also decided to reject (4) requests for administrative and functional protection due to the lack of relevant reasons and justifications for providing protection to the report filed with Nazaha.



# Chapter II

## Financial Disclosures



According to the provisions Chapter IV of Decree Law No. (2) of 2016, financial disclosures are one of the main pillars along with the other Nazaha works, where the receipt of total disclosures index is one of the indices that highlight Nazaha's role in enhancing integrity and transparency. Therefore, since the publication of the Executive Regulations of Law No. (2) of 2016, Nazaha continues to receive those committed to submit financial disclosures.

The following is a statement of the key tasks related to financial disclosures:

### **First: Receipt of Financial Disclosures**

#### **1) Total disclosures since launching the Financial Disclosure System (Cumulative Total)**

The total of (47,019) disclosures were received by Nazaha from the issuance of the Executive Regulations on 13 November 2016 to 31 March 2025 (Cumulative Total). Hence, the percentage of disclosures received by Nazaha is 99.6%.

A. (20,912) first disclosure.

B. (18,052) disclosure update.

C. (8,055) final disclosure.

Figure (18) indicates the percentage of each.

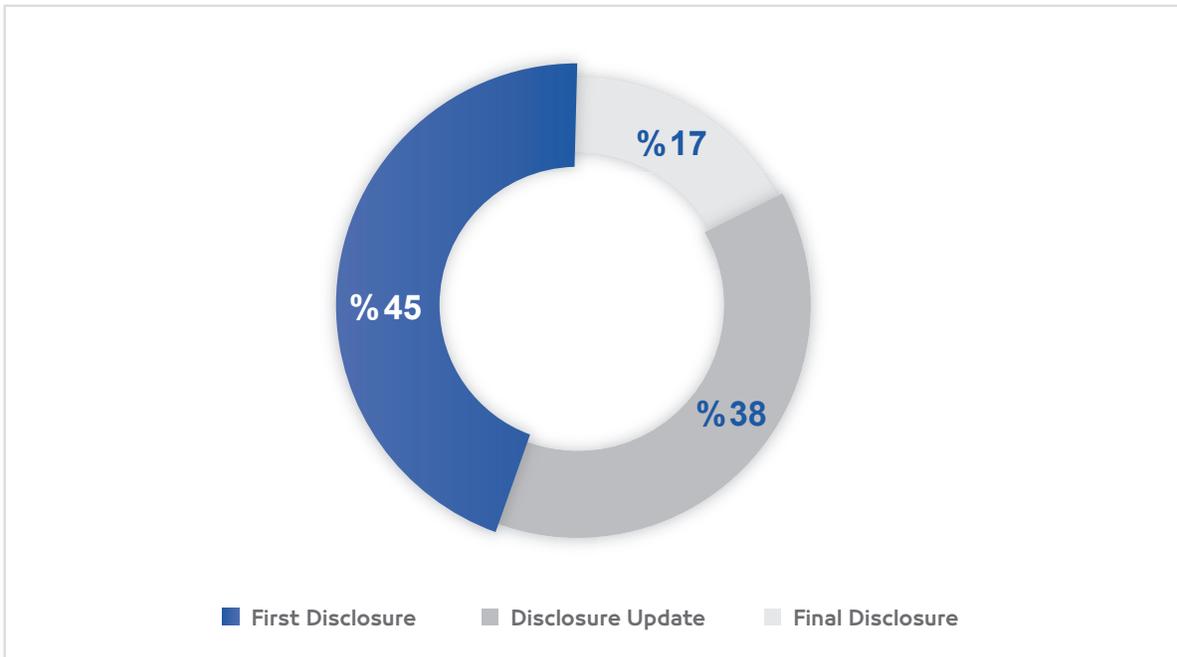


Figure (18) Percentage of disclosures received by Nazaha by type (cumulative total)

## 2) Disclosures during the period of this Report

Total number of disclosures received by Nazaha during the period of this Report amounted to (5,390), where total disclosures received are distributed as follows:

- A. (2,369) first disclosure.
- B. (1,347) disclosure update.
- C. (1,674) final disclosure.

Figure No. (19) indicates the percentage of each.

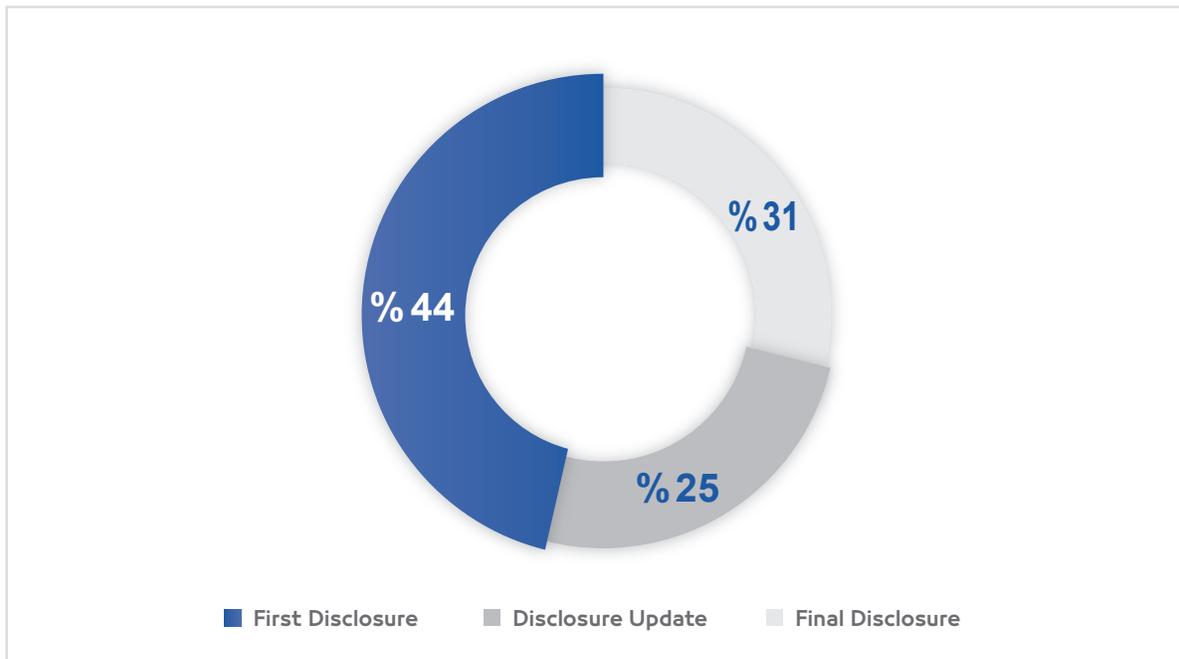


Figure (19) Percentage of disclosures received by Nazaha by type during the period of this Report

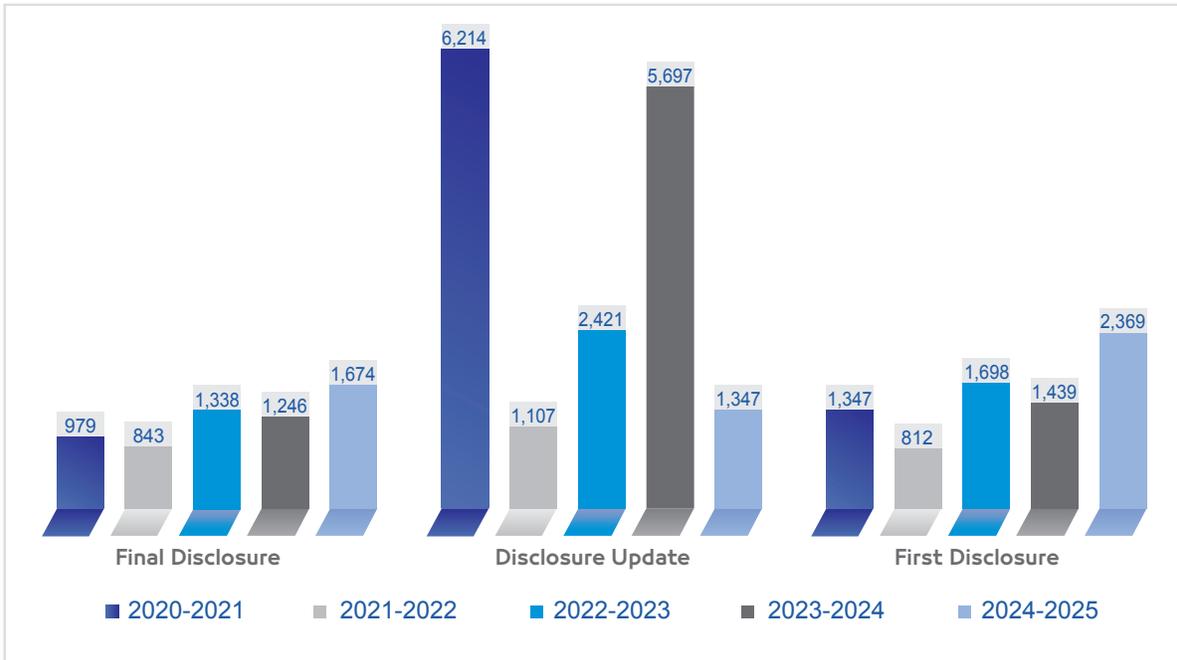


Figure (20) Number of disclosures received by Nazaha by type in the last five fiscal years

Figure (20) also displays the number of disclosures by type as received in the last four fiscal years. Disclosures updates continued and the average total of all types of disclosures received amounted to 2035 disclosures.

Figure (21) indicates the classification of the disclosures received by Nazaha according to the deadlines set during the period of this Report.

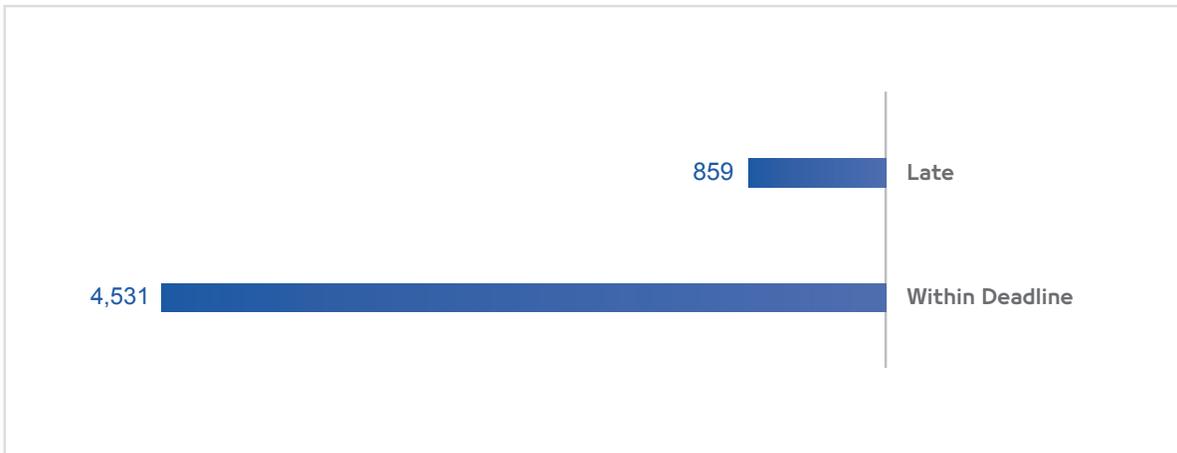


Figure 21: Number of disclosures received by Nazaha according to deadlines

Figure No. (22) also indicates the classification of disclosures received according to the deadlines set in the last four fiscal years, noting that the percentage of disclosures received by the deadlines in the three terms exceeds 67%, as the average number of late disclosures amounted to 1176 and the average number of disclosures received within deadlines amounted to 4,758.

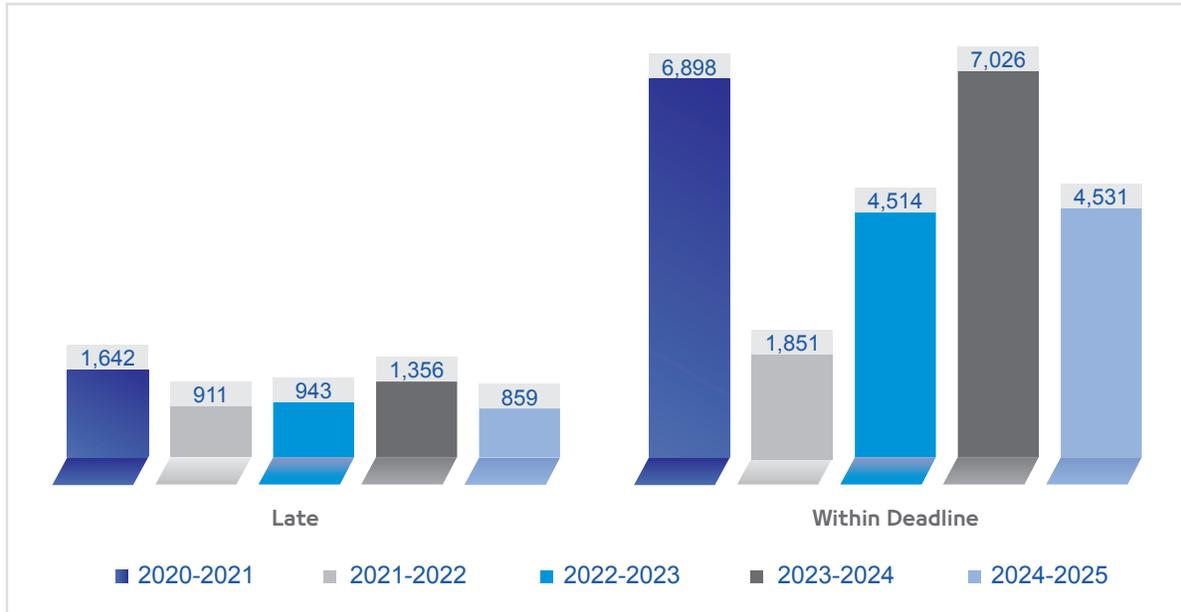


Figure (22) Number of disclosures received according to deadlines in the last five fiscal years

Figure No. (23) displays the classification of the disclosures received during the period of this Report according to the five highest job titles, indicating that the highest job title is (Head Department and equivalent).

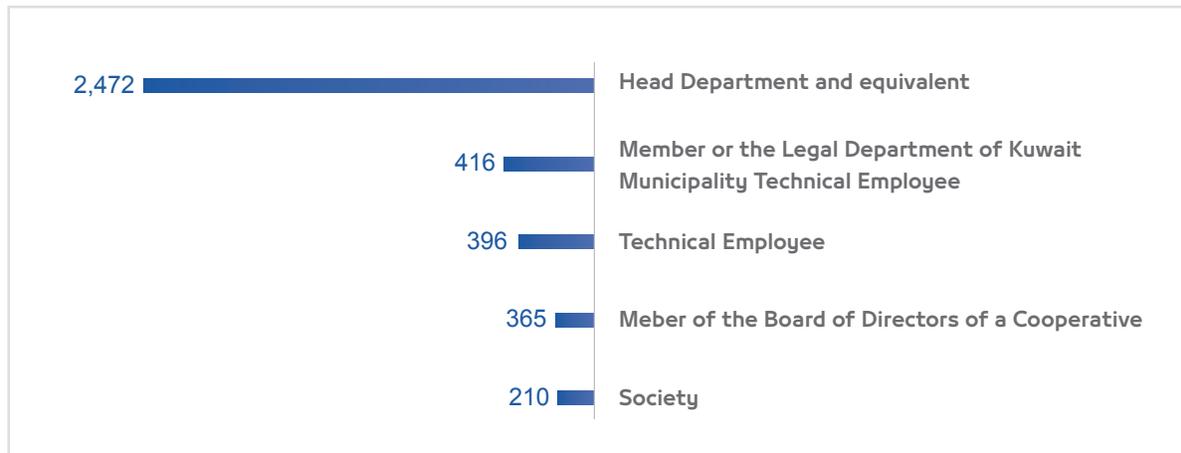


Figure 23: Number of disclosures received according to the five top job descriptions

Figure (24) indicates the classification of the disclosures received according to the top five entities to which the persons included are affiliated during the period of this Report, where it is evident that the highest authority from whose employees the disclosures is the Ministry of Interior.

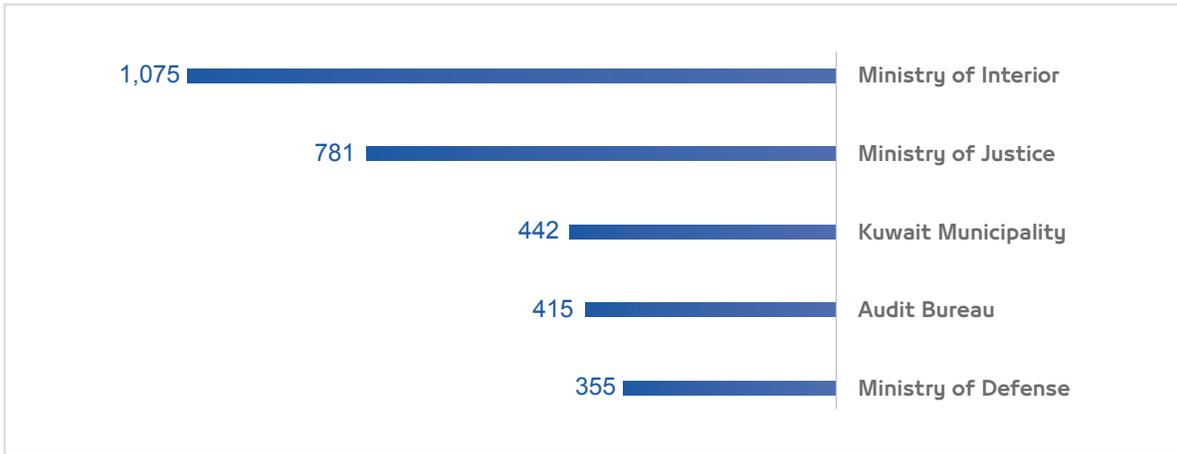


Figure (24) Number of disclosures received according to the entities to which the persons included are affiliated

### 3) The subjects who failed to submit their disclosures by the set deadlines

It should be noted that the number of persons who did not submit their disclosures despite missing the legal deadlines until 31 March 2025 amounted to (68). Nazaha communicated with the entities to which they belong and provided them with lists of their names to notify them of the necessity of submitting their disclosures, due to deadlines expiration, and to communicate therewith directly by sending them text messages to alert them of those deadlines automatically. Those cases are periodically monitored and referred to the competent authorities to take the necessary legal measures.

Figure (25) features a comparison of the numbers of disclosures not submitted by their owners despite missing the legal deadlines in the last four fiscal years. The average number of disclosures that have not been submitted despite the expiration of the legal deadlines amounted to (216) disclosures.

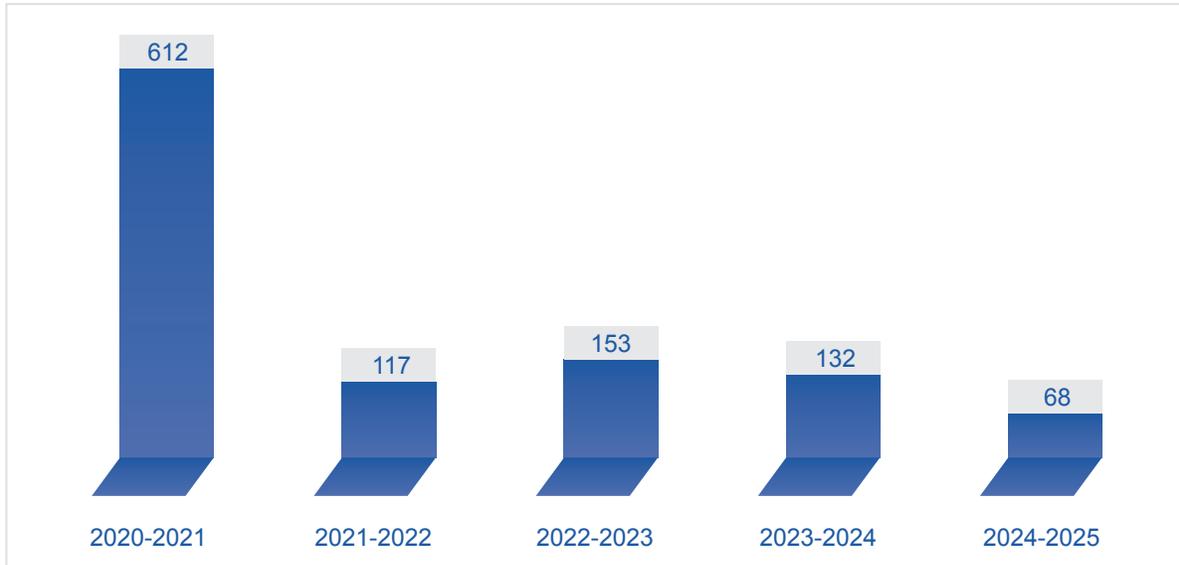


Figure (25) Number of disclosures that were not submitted within the deadline in the last five fiscal years

#### 4) Follow-up on the update of the data of the persons covered by the Financial Disclosure System

Article (2) of Law No. (2) of 2016 stipulates that: "The Authority shall in coordination with the concerned agencies on a regular basis, define and update the holders of these offices under the provisions of this law." To this end, "Nazaha" has undertaken the following:

- A) Sending periodic letters to update report-filers' data to all the entities to which the persons included are affiliated, as well as letters requesting missing data and letters informing those entities of how to inquire about disclosures date of update via Nazaha's website.
- B) Receiving letters issued by government agencies regarding periodic update of the data of the persons included in the Financial Disclosure System. Those letters include copies of administrative resolutions related to the persons included. Nazaha reviewed the data received from the entities and matched them with the data recorded in the FDS. Data was updated when necessary and those resolutions were automatically archived to ensure preserving them automatically, thus contributing to quick access thereto when required.
- C) Sending text alert messages to those included upon receipt of data that requires the submission of a financial disclosure, in several stages, as follows:

Upon updating the data of those included in the automated system (FDS) and at the outset of the legal period for submitting the disclosure.

At least two weeks before the deadline expiry.

Upon the elapse of the deadline.

The decrees and resolutions issued in (70) Official Gazette (Al-Kuwait Al-Yaum) issues were also reviewed to spot the decrees and resolutions issued regarding entities announcement and to list the data of those obligated to submit financial disclosures, by following up on the resolutions to form or dissolve governmental committees, councils or agencies, as well as the administrative appointment resolutions for any of the included positions, resolutions to refer to retirement or job dismissal.

Table (3) indicates the numbers of resolutions and decrees issued during the period.

Table 3: Number of decrees, laws and resolutions published in (Al-Kuwait Al-Yaum)

Item	Number
Decrees and laws on the declaration of entities	-
Decrees and decisions on the FDS included persons	146
Number of decrees on the cancelation of entities announcements	-
<b>Total</b>	<b>146</b>

## Second: Financial Disclosures Examination

Committees were formed to examine financial disclosures in accordance with the positions and job titles of the persons covered by the provisions of Law No. (2) of 2016 and a mechanism for organizing the examination process was established in accordance with Nazaha's Executive Regulations.

Nazaha includes three examination committees, one for each of the job categories (A, B, and C), all of which are chaired by a member of Nazaha's executive body and include, as members, financial specialists, accountants, and legal experts from among Nazaha's supervisory staff and employees.

### 1. Total disclosures examined since the commencement of examination committees' work (cumulative total)

The total number of disclosures examined from the commencement of examination committees' work until 31 March 2025 amounted to (38,754) disclosures. Hence, disclosures' examination rate amounted to (99%).

### 2. Disclosures examined during the period of this Report

The total number of disclosures examined during the period of this Report amounted to (9930) disclosures.

Figure (26) displays the number of disclosures examined by the current period and the cumulative period.

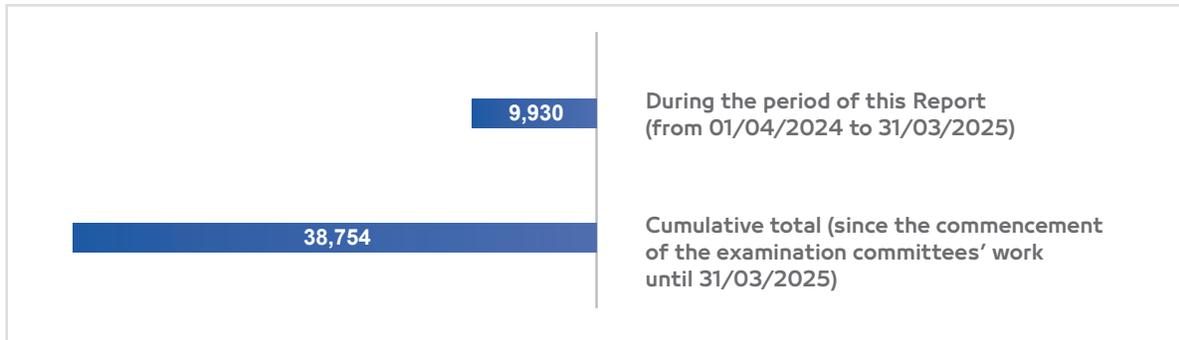


Figure (26) Number of disclosures examined in the current and cumulative periods

Figure (27) indicates a comparison of the number of disclosures examined according to the last five fiscal years, where the average number of disclosures examined was (9,827).

### 3. Reasons for Disclosures Examination

Reasons for examining financial disclosures vary according to what is stated in Law No. (2) of 2016, its Executive Regulations and the internal mechanisms established by Nazaha's Examination Committees Department, to include the following:

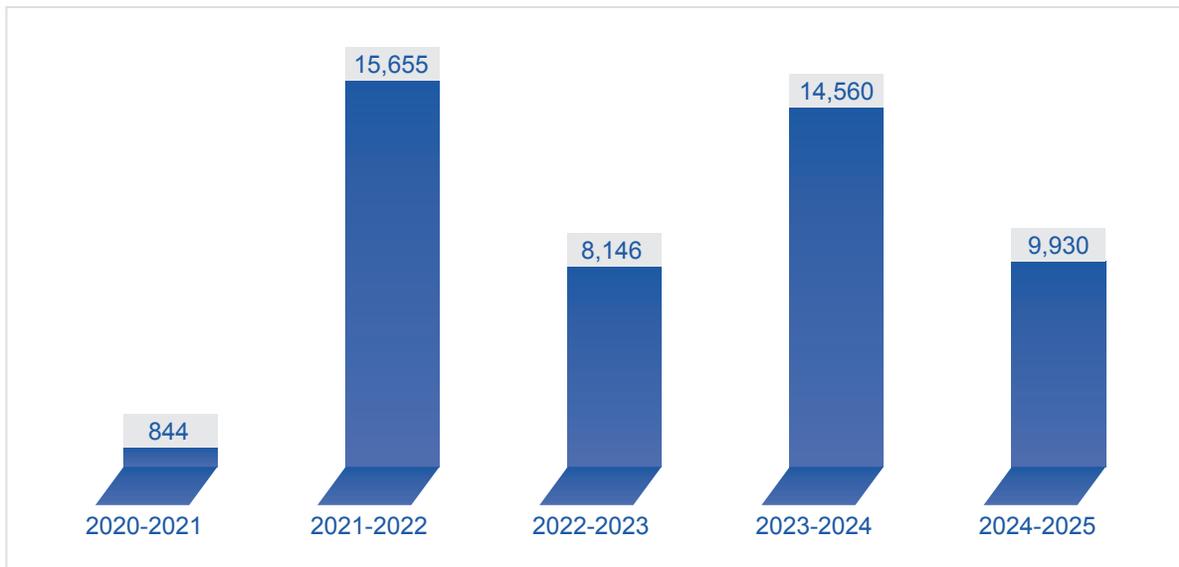


Figure (27) Number of disclosures examined in the last five fiscal years

- A) Periodic statements, which include all persons included, who submitted financial disclosures.
- B) Reports: Cases for which a report or news monitoring is received based on a request from the Corruption Detection and Investigation Sector, the Financial Disclosure Sector or the Committee's monitoring within the framework of Nazaha's sectors' work integration.

# Chapter III

## International Cooperation



Within the framework of anti-corruption agencies and international organizations concerned with promoting integrity and transparency, international cooperation is one of the most prominent requirements for implementing the United Nations Convention against Corruption. Stemming from its mandate, Nazaha seeks to enhance aspects of cooperation at international and regional levels through the United Nations Office on Drugs and Crime (UNODC), the Organization of Islamic Cooperation, the League of Arab States and the Gulf Cooperation Council, as well as by concluding bilateral memoranda of understanding with some sister and friendly states. This is in addition to joining specialized international organizations and networks, e.g., the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network) and the Arab Anti-Corruption and Integrity Network (ACINET) and holding training programs in cooperation with United Nations agencies concerned with capacity building. Nazaha also participates in international meetings, conferences and events related to promoting integrity and combating corruption.

From that standpoint, Nazaha has undertaken the following from international cooperation perspective:

### **First: Cooperation memoranda and protocols signed within the framework of bilateral transnational cooperation**

Nazaha is keen to cooperate with international counterparts to exchange expertise in the field of bilateral cooperation to combat and prevent corruption. In light of that, Nazaha signed a number of memoranda of understanding that included the following parties:

- A) Anti-Corruption and Civil Rights Commission, Republic of South Korea.
- B) Anti-Corruption Agency, Republic of France.
- C) Administrative Control Authority, Arab Republic of Egypt.
- D) Palestinian Anti-Corruption Commission, State of Palestine.
- E) Oversight and Anti-Corruption Authority, Kingdom of Saudi Arabia.

### **Second: Membership of the Authority in the international organizations and agencies”**

On 12 October 2021, Nazaha joined the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network) of the United Nations, which is an information exchange network. GlobE Network provides a platform for exchanging information among law enforcement practitioners on the anti-corruption front lines around the world, in addition to providing knowledge materials and tools as necessary to track, investigate and prosecute cases of cross-border corruption, through secure communication channels.

Nazaha regularly participates in GlobE Network's meetings since its establishment and also participates in its Thematic Working Groups (TwGs) which provide consultations and proposals to the Network's steering committee to facilitate resolution-making processes.

Nazaha has nominated its representatives to participate in three (3) working groups for Operations, Online One-Stop Hub and (Knowledge and Capacity Development).

## 1. Election of the Steering Committee for the period 2025–2027:

During the 5th General Assembly meeting held in Beijing, People's Republic of China, 24-27 September 2024, Nazaha participated in the voting process to select the members of the Network's Steering Committee. The Kingdom of Saudi Arabia was elected as the Network's Chair and the Federative Republic of Brazil as Vice-Chair. The following states were also elected as members of the Committee: Azerbaijan, the People's Republic of China, the Republic of Ethiopia, Grenada, the Republic of India, the Republic of Italy, the Republic of Nigeria, the Republic of Korea, Romania, the Russian Federation, the Republic of South Africa, the Kingdom of Spain and the United Arab Emirates. Nazaha also held bilateral meetings with delegations from several other countries to enhance cooperation and exchange of expertise.

The 5<sup>th</sup> meeting addressed key topics and concluded with notable outcomes, including:

### • **Institutional Development:**

- A high-level forum was held to discuss four main themes: global vision, legal framework, operational objectives and building partnerships.
- Adoption of "Beijing Consensus on Law Enforcement Cooperation and the Denial of Safe Havens for Corruption."
- Review and adoption of the Network's 2023 Annual Activity Report.
- Adoption of the 2024 Work Plan and the 2025–2027 Strategic Plan.
- Admission of five observer entities to the Network: Arab Interior Ministers Council, (GCCPOL), the Legal Ministerial Committee of the Organization of Ibero-American States (COMJIB), the Commonwealth Secretariat (ComSec), the International Anti-Corruption Academy (IACA) and the Integrity Unit of the World Bank.
- Review of current and future areas of cooperation with observer entities.

- **Enhancing cooperation and communication:**

- Holding more than (182) bilateral meetings between representatives of the Network's member law enforcement authorities.
- Providing an update on the draft voluntary model agreement and guidelines for information exchange between interested members.
- Supporting asset recovery efforts in Algeria, South Africa, the Republic of Zambia, and Zambia, in cooperation with the Stolen Asset Recovery Initiative (StAR) and the Network.

- **Empowerment and Capacity Building:**

Launching two new reports on:

- Good practices in denying entry to corrupt individuals.
- Legal and practical issues related to Article (49) of the United Nations Convention against Corruption, relating to joint investigation teams.
- Organizing two panel discussions and four side events, during which case studies on investigation and prosecution in corruption cases were presented.

## **2. General Recommendations issued during the 5th General Assembly Meeting:**

- Continue building on direct cooperation initiatives and expanding their use in asset recovery.
- Supporting the development of bilateral and multilateral agreements on investigations and secure denial.
- Promoting the use of the secure GlobE Network platform for information exchange.
- Encouraging Member States to exchange expertise, particularly in cross-border investigations.

## **Third: Work related to the United Nations Office on Drugs and Crime (UNODC)**

### **Reviewing the implementation of Kuwait's compliance with the provisions of the United Nations Convention against Corruption:**

The United Nations Convention against Corruption is the general framework governing the anti-corruption system at international level, where Kuwait Anti-Corruption Authority (Nazaha) has been established in response to the requirements of Article (6) thereof. In Article (4.2) of the law establishing Nazaha, the legislator was keen to grant it jurisdiction to implement the Convention, in addition to implementing all approved international anti-corruption agreements and treaties and initiating procedures for reviewing Kuwait's implementation of

the Convention. Stemming from that, Nazaha has formed a specialized working group to follow up on all procedures and requirements of the review process. Nazaha is also concerned with preparing Kuwait's responses to the self-assessment lists regarding the review of its implementation of the Convention, in coordination with the relevant national authorities, based on the Council of Ministers' Resolution No. (95/2018), through which the necessary directives are issued to all relevant national authorities to enhance their cooperation with Nazaha in preparing those responses. These efforts are within the context of the second cycle of reviewing the implementation of the provisions of Chapters II (Preventive Measures) and V (Asset Recovery).

States' steps and procedures to review their implementation of the Convention are as follows:

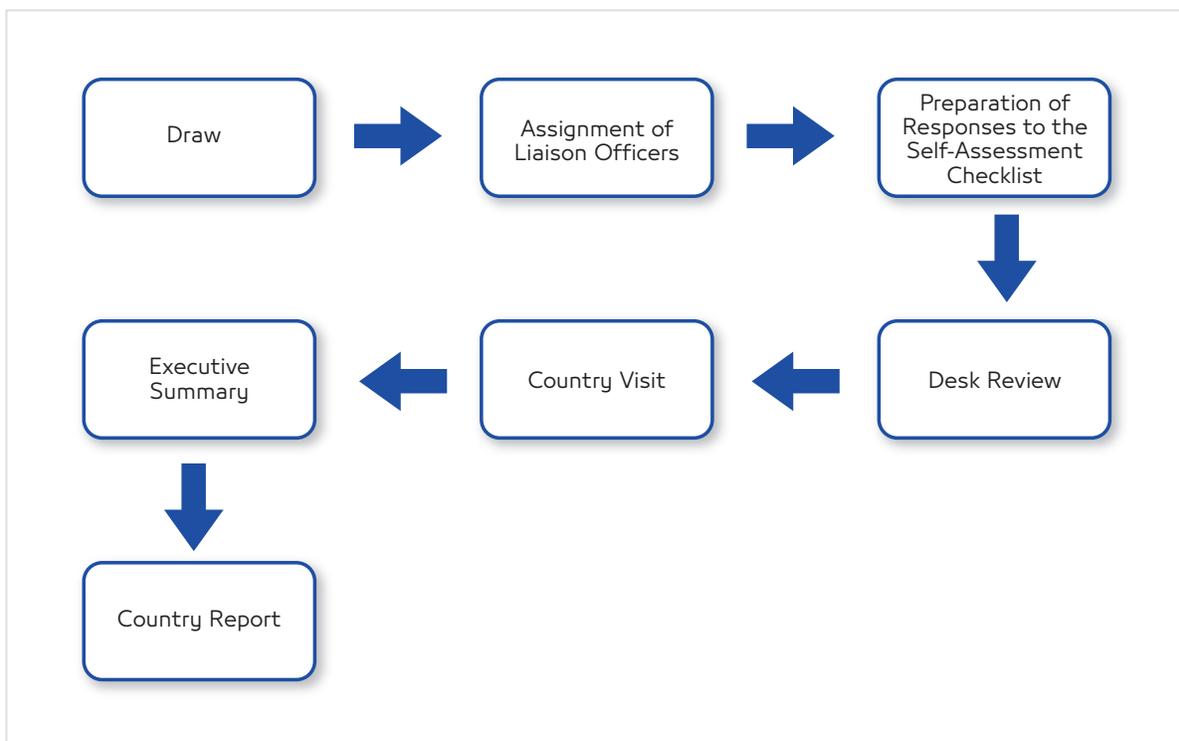


Figure 28: states' steps and procedures to review their implementation of the un convention

According to the previous chart, Nazaha prepared its responses to the self-assessment checklist sent to the Secretariat of the Conference of the States Parties in March 2018. The experts from the Kyrgyz Republic and Antigua and Barbuda, reviewing the State of Kuwait, then studied Kuwait's responses and submitted their comments in November 2020. Nazaha prepared its responses to these comments and inquiries and sent them to the Conference Secretariat in 2021.

In line with the above and in accordance with the established procedures for the State Review Mechanism, a country visit was held to Kuwait by experts from the United Nations Office on Drugs and Crime (UNODC) and the reviewing states to complete and clarify a number of issues related to Kuwait's responses.

The visit was held at Nazaha’s headquarters in November 2022 and resulted in some supplementary inquiries. Nazaha collected all responses and provided them to the UNODC in March 2023, in preparation for the adoption of the executive summary and final report (country report) for the State of Kuwait.

At the end of October 2023, Nazaha received a draft of the executive summary from the UNODC, including the observations and recommendations submitted to the State of Kuwait on Chapters II and IV of the Convention. Based on the above, Nazaha took the necessary measures, in cooperation and coordination with the relevant national authorities. Nazaha also coordinates continuously with the UNODC and the reviewing states regarding the draft executive summary, so as to reach a consensus among the reviewing states for the State of Kuwait.

### Review-Resulting Recommendations:

The State of Kuwait was reviewed in the first review cycle (2010-2015) concerned with aspects included in Chapter III (Criminalization and Law Enforcement) and Chapter IV (International Cooperation) of the UN Convention.<sup>1</sup>

The review resulted in a number of recommendations/observations, as shown in Table No. (4)

Table 4: Recommendations issued in the First Review Cycle (2016-2020)<sup>2</sup>:

S.	Recommendation/Notes	Outcome
1	Criminalizing bribery in the private sector and bribery of foreign public officials.	Not Completed
2	Establishing a national legal framework regarding the organization of international mutual legal assistance.	Not Completed
3	Determining legal persons’ liability	Completed <sup>2</sup>
4	Establishing an independent anti-corruption authority	Completed
5	Criminalizing illicit gains	Completed
6	Developing a comprehensive anti-corruption strategy	Completed
7	Amending the Anti-Money Laundering Law in accordance with the Financial Action Recommendations <sup>3</sup>	Completed

1 The process of reviewing the State of Kuwait in the first cycle was undertaken by Kuwait Ministry of Justice in 2012 as Nazaha has not been established yet. Kuwait was then reviewed by Sri Lanka and Ethiopia

2 Issuance of Law No. (2) of 2023 amending Law No. (31) of 1970, amending the Penal Law promulgated by Law No. (16) of 1960.

3 Issuing the new Anti-Money Laundering and Terrorist Financing Law No. 106 of 201

## **Recommendations tackled in the Second Review Cycle (2016-2020)<sup>4</sup>:**

The State of Kuwait is currently undergoing the (Second Review Cycle<sup>4</sup>) to review its implementation of its obligations currently stipulated in Chapters II (Preventive Measures) and Chapter V (Asset Recovery) of the UN Convention<sup>5</sup>

Nazaha is working with the reviewing states of Kuwait and UN experts to prepare the Comprehensive Report and the Country Report for Kuwait, which will include the proposed recommendations for Kuwait in the context of implementing both aforementioned chapters.

Although the recommendations have not been formally issued within the framework of the second cycle of the review, the preliminary recommendations included: Enhancing the independence of the Kuwait Anti-Corruption Authority (Nazaha) and establishing immunity rules for its employees; ensuring merit-based recruitment and promotion practices in all government agencies; and adopting and implementing rigorous selection and training procedures for public positions vulnerable to corruption is crucial for maintaining public trust and preventing corruption.

The preliminary recommendations also included continuing the State's efforts to develop and adopt specific legislation to regulate international cooperation in combating corruption offences in detail, including mutual legal assistance for asset recovery; considering expanding the financial disclosure system; considering granting competent authorities emergency powers or temporarily freezing suspicious transactions and establishing an explicit legislative basis to enable competent authorities to return confiscated assets to the requesting State Party or to their former legitimate owners and to compensate victims of the crime.

### **Fourth: Nazaha's Participation in International Meetings and Conferences**

Nazaha is keen to represent the State of Kuwait in international forums, fulfilling the requirements of its signature to relevant agreements and treaties. Hence, Nazaha has participated in numerous international meetings and conferences related to its mandate and objectives, including the following:

1. The 15th Session of the Implementation Review Group, the 18th Session of the Task Force on Asset Recovery and the 13th Open-Ended Intergovernmental Expert Meeting on Enhancing International Cooperation under the United Nations Convention against Corruption, held during 10-14 June 2024, in Vienna, Austria.

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4 Due to the Corona pandemic and the failure of many states to complete their review procedures, the UNODC decided to extend the life of the Second Review Cycle (which is supposed to be 5 years for each cycle) to 2024.

5 Since 2017, when, through random selection, Kuwait was reviewed by the states of Kyrgyzstan and Antigua & Barbuda to follow up on Kuwait's implementation of its obligations related to Chapter II (Preventive Measures) and Chapter V (Recovery of Assets) of the UN Convention.

2. The 15th Resumed Session of the Implementation Review Group and the 15<sup>th</sup> Session of the Working Group on the Prevention of Corruption, under the United Nations Convention against Corruption, held from 28 August to 6 September 2024, in Vienna, Austria.
3. The Fifth General Assembly of GlobE Network, held during 24-27 September 2024, in the People's Republic of China.
4. The second 15th Resumed Session of the Implementation Review Group of the United Nations Convention against Corruption, held during 04 - 09 November 2024, in Vienna, Austria. Nazaha participated as a keynote speaker in a sideline panel discussion to discuss the next phase of the Convention's implementation review mechanism.

## **Fifth: Nazaha's Participation in Regional Meetings**

### **Anti-Corruption Activities in the Gulf Cooperation Council (GCC) States**

Nazaha participated in the events and activities of the GCC Member States' anti-corruption committees, organized as follows:

1. Meeting (31) of the GCC Anti-Corruption Experts Committee, held via videoconference during 23 - 24 April 2024.
2. Meeting (32) of the GCC Anti-Corruption Experts Committee, held in the State of Qatar during 02 - 03 July 2024.
3. Meeting (33) of the GCC Anti-Corruption Experts Committee, held via videoconference during 06 - 07 August 2024.
4. The annual event of the Gulf Cooperation Council, held in the State of Qatar on 14 August 2024.
5. The (34) meeting of the GCC Anti-Corruption Experts Committee, held via videoconference during 20 - 21 August 2024.
6. The 9th meeting of the GCC Anti-Corruption Undersecretaries Committee, held via videoconference on 19 September 2024.
7. The 10th meeting of the GCC Ministerial Anti-Corruption Committee, held in the State of Qatar on 12 October 2024.
8. The 35th meeting of the GCC Anti-Corruption Experts Committee, held via videoconference on 29 January 2025.

Nazaha also made numerous contributions, observations and views by providing the GCC General Secretariat with its views on the implementation of the resolutions passed in the 8th meeting of the Ministerial Committee. Further, Nazaha expressed its views on a number of draft laws and guidelines related to promoting integrity and combating corruption in the GCC Member States.

Perhaps the most prominent of the meetings referred to above was the 10th meeting of the GCC Ministerial Committee on Combating Corruption, which issued a number of resolutions, including:

1. Holding a workshop entitled "Disclosure of Assets and Conflicts of Interest", in coordination between the GCC General Secretariat and the United Nations Office on Drugs and Crime.
2. Approving the draft guide entitled "Guide to Providing Media and Awareness Content to Bodies and Agencies Responsible for Promoting Integrity and Combating Corruption in the GCC Member States."
3. Adopting the draft guide (Enhancing Integrity through Governance of State-Owned Enterprises in the GCC Member States).

On the occasion of the State of Kuwait's presidency of the 45th Gulf Summit, held in December 2024, for Their Highnesses the Leaders of the Gulf Cooperation Council (GCC) Member States, and the resulting Kuwaiti presidency of all ministerial and technical committee meetings in various areas of cooperation, Nazaha will chair all meetings of the anti-corruption committees in the GCC Member States. This presidency was launched at the 35th meeting of the Committee of Experts on Combating Corruption in the GCC Member States, held in January 2025.

### **Activities related to Arab cooperation and the Arab Anti-Corruption Convention**

Nazaha has been keen to provide the General Secretariat of the League of Arab States, on a regular basis, with the legal visions, recommendations and proposals adopted by Nazaha within the framework of strengthening and activating Arab cooperation in these areas. Nazaha also participated in the activities of the 5th session of the Conference of the States Parties to the Arab Anti-Corruption Convention, with a high-level delegation headed by His Excellency the Advisor and Vice Chairman of Nazaha, Mr. Nawaf Abdullah Al-Muhammal, and a group of Nazaha specialists. The State of Kuwait has approved some resolutions proposed by the Arab states at the conference, including:

1. Approval of the resolution on the election of members of the Bureau of the 5th session of the conference.
2. Approval of the resolution on the agenda of the Secretariat's report on the measures taken to implement the resolutions passed in the 4th session of the States Parties to the Arab Anti-Corruption Convention.
3. Approval of the resolution on the recommendations issued by the 1st session of the Review Group for the Optimal Implementation of the Arab Anti-Corruption Convention.

4. Approval of the resolution on the recommendations issued by the 2nd session of the Review Group for the Optimal Implementation of the Arab Anti-Corruption Convention.
5. Approval of the resolution on the recommendations issued by the 5th meeting of the open-ended committee of governmental experts and representatives of independent bodies in the States Parties to the Arab Anti-Corruption Convention.
6. Approval of the resolution on establishing a mechanism to monitor integrity indicators in public sector procedures by analyzing information provided by the States Parties to the Convention.
7. Approval of the resolution on amending the terms of reference for the mechanism for reviewing the implementation of the Arab Anti-Corruption Convention.
8. Approval of the resolution on establishing a mechanism for submitting draft resolutions.
9. Approval of the resolution on determining the venue and date of the 6th session of the Conference of the States Parties to the Arab Anti-Corruption Convention.

Nazaha also participated as a speaker in a side event of this session, in a session titled "Using Technology to Prevent and Combat Corruption". Nazaha presented a visual presentation titled "The Role of Digital Transformation in Promoting Integrity and Combating Corruption in the State of Kuwait." The presentation highlighted Kuwait's efforts in digital transformation to combat corruption, provide highly efficient e-government services and establish infrastructure to simplify procedures for citizens and achieve greater transparency. These efforts include the "Sahel" application, through which Kuwait seeks to achieve the principle of fairness, prevent favoritism in scheduling government appointments and reduce opportunities for corruption by separating service providers from service applicants.

Nazaha also regularly and periodically provides the General Secretariat of the League of Arab States with the legal visions, recommendations and proposals adopted thereby within the framework of strengthening and activating Arab cooperation in these areas. Nazaha contacted the General Secretariat of the League of Arab States and provided the names of Kuwaiti government experts and relevant liaison officers within the framework of the mechanism for reviewing the implementation of the Arab Anti-Corruption Convention. In the context of the Arab Anti-Corruption Convention Review Mechanism, a draw was conducted at the 1st meeting of the Arab Anti-Corruption Convention

Review Team in September 2022 in the Arab Republic of Egypt, resulting in the following:

Table 5: Draw Outcome at the 1st Meeting of the Arab Anti-Corruption Convention Review Team

2023	
Reviewing States	Reviewed Sates
State of Kuwait United Arab Emirates	Kingdom of Bahrain
2024	
Reviewing States	Reviewed Sates
State of Kuwait Kingdom of Saudi Arabia	Kingdom of Morocco

For its part, Nazaha is following up on all procedures related to the Arab Anti-Corruption Convention Review Mechanism, in coordination with the Ministry of Foreign Affairs and the General Secretariat of the League of Arab States.

In this regard, Nazaha has participated in numerous Arab events and meetings, as follows:

1. The 6th Meeting of the Open-Ended Committee of Governmental Experts and Representatives of Independent Bodies in the States Parties to the Arab Anti-Corruption Convention, and the 5th Session of the Conference of the States Parties to the Arab Anti-Corruption Convention, held from 05-07 May 2024, at the headquarters of the General Secretariat of the League of Arab States in Cairo, Arab Republic of Egypt.
2. The 2nd Arab Forum of Anti-Corruption Bodies and Financial Intelligence Units, held during 15 - 16 May 2024, in Riyadh, Kingdom of Saudi Arabia.
3. The Workshop on Raising Awareness on Criminal Justice Responses to Terrorism and Emerging Threats in Accordance with the Rule of Law, held during 28 - 29 May 2024, at the headquarters of the General Secretariat of the Gulf Cooperation Council in Riyadh, Kingdom of Saudi Arabia.
4. The Regional High-Level Meeting to Enhance Cooperation for Effective National Anti-Corruption Strategies, held during 03 - 05 June 2024, in Baghdad, Iraq, organized by the United Nations Development Programme (UNDP), the Federal Integrity Commission of the Republic of Iraq, and the Korea International Cooperation Agency (KOICA).

5. The Regional High-Level Conference entitled “Health Sector Integrity in the Arab Region: Risks, Solutions and Stakeholder Roles”, organized by the United Nations Development Programme and the Arab Anti-Corruption and Integrity Network, held during 10 - 11 June 2024, in the Arab Republic of Egypt.
6. Workshop entitled “Sharing the UAE’s Experience in the Financial Action Task Force (FATF) Mutual Evaluation Process”, held during 05 - 07 November 2024, organized by the UAE National Anti-Money Laundering and Combatting Financing of Terrorism and Financing of Illegal Organizations Committee.
7. The Second Ministerial Meeting of Anti-Corruption Law Enforcement Agencies of the Member States of the Organization of Islamic Cooperation (OIC), held during 26 - 27 November 2024, in Qatar.
8. The Regional Meeting for the Middle East and North Africa, entitled “Moving Forward: Promoting Business Integrity in the MENA Region”, held during 14 - 16 January 2025, and organized by the General Secretariat of the League of Arab States in Cairo, Arab Republic of Egypt.
9. The World Government Summit, organized by the UAE Accountability Authority, held during 11 - 13 February 2025, in Dubai, United Arab Emirates.

The Anti-Corruption Authority “Nazaha” participated with a delegation led by His Excellency the President of the Authority, Mr. Abdulaziz Al-Ibrahim, in the activities of the “World Governments Summit 2025”, held in the Emirate of Dubai, United Arab Emirates, from February 11 to 13, 2025.

This summit brings together over six thousand participants from around the world, representing more than eighty international, regional and governmental organizations, with the participation of nearly two hundred speakers, so that this summit will be a platform for global experts and decision-makers from all over the world to raise and discuss global issues, aiming to enhance international cooperation, highlight effective solutions to today’s most pressing challenges, and develop the tools and policies essential for the governments of the future.

The agenda covered several key themes, including effective governance and accountability, highlighting global trends aimed at strengthening accountability, improving governance efficiency, and unifying international efforts to achieve optimal outcomes in this field. Another core theme is the emerging frontiers and the future, which focuses on emerging trends that forecast transformative changes in all sectors in the world, such as artificial intelligence, quantum computing, biotechnology, and sustainability-driven technology. This theme presented the impact of these emerging trends on societies, governments, the global economy, and how strategies and policies can be designed to maximize their vast potential while mitigating the challenges posed by these future transformations.

The summit also addressed several critical global issues, including transformations in global health, resilience of cities, crisis mitigation, climate, the global economy, financing the future, human-centric futures, and capacity building.

- **Activities related to Islamic cooperation within OIC framework:**

Nazaha is committed to promoting cooperation and partnership with regional and international states and organizations in the fight against corruption, including the Organization of Islamic Cooperation (OIC), which was founded in 1969 and represents “the collective voice of the Islamic world and seeks to protect and express its interests”.

Nazaha participated with a high-level delegation, headed by His Excellency Mr. Abdulaziz Al-Ibrahim, Chairman of Nazaha, in the Second Ministerial Meeting of the Anti-Corruption Law Enforcement Agencies of OIC Member States, held during 26 - 27 November 2024, in Doha, Qatar.

The meeting witnessed the signing ceremony of Makkah Agreement of the OIC Member States for Law Enforcement Cooperation, which the member states have been keen to conclude, recognizing that protecting integrity and combating corruption in all its forms are principles firmly rooted in Islamic Sharia and international law. They also believe that international cooperation in combating corruption offences has become imperative, imposed by the current reality and necessitated by the increase in criminal activities across the world.

It is worth noting that Makkah Agreement also aims to enhance procedures for exchanging information and investigations between anti-corruption law enforcement authorities, with a view to preventing, detecting, investigating, and prosecuting corruption offences and recovering stolen assets. This is in addition to enhancing the exchange of technical assistance, training and expertise among the member states, so as to improve the effectiveness of their exchange of information and investigations into corruption offences.

It is worth noting that Nazaha has actively and extensively participated in the drafting stages of Makkah Agreement, presenting its views and proposals on the text and provisions thereof. Nazaha has also actively participated in preparatory meetings of anti-corruption expert groups and senior officials in OIC Member States, which were held from 2022 to 2024.

Given the importance of joining Makkah Agreement for Member States of the Organization of Islamic Cooperation on Law Enforcement Cooperation, the esteemed Council of Ministers issued Resolution No. (522) at its meeting No. (217/2023), held on 29 May 2023, approving in principle the procedures for signing Makkah Agreement draft by OIC Member States in the Field of Enforcement of Anti-Corruption Laws.

Thus, Nazaha signed Makkah Agreement for Member States of the Organization of Islamic Cooperation on Law Enforcement Cooperation on the sidelines of the aforementioned ministerial meeting, affirming Kuwait’s commitment to continuing its efforts to enhance international cooperation to combat corruption offences and support the exchange of expertise in developing anti-corruption programs and plans.

In addition, the heads of anti-corruption law enforcement agencies present at that meeting adopted a set of resolutions, as follows:

Table 6: Resolutions Adopted by the Heads of Anti-Corruption Law Enforcement Agencies

S.	Draft Resolution	Resolution Presenter
1	Draft Resolution No. 2/1-AQF Concerning Makkah Agreement for OIC Member States on Cooperation in the Field of Enforcement of Anti-Corruption Laws.	State of Qatar
2	Draft Resolution No. 2/2-AQF Concerning the Establishment of a Joint Saudi-Maldivian Forum to Promote Integrity in the Tourism Sector in the Republic of Maldives in 2025.	Kingdom of Saudi Arabia and Republic of Maldives
3	Draft Resolution No. 2/3-AQF Concerning Promoting the Role of the Organization of Islamic Cooperation in International Anti-Corruption Efforts and Enhancing Cooperation in Developing Methodologies for Measuring Corruption.	Kingdom of Saudi Arabia



# Chapter IV

## Laws and Legislations



## **First: Projects still in government session**

- Draft law amending some provisions of Law No. (2) of 2016 regarding the establishment of Kuwait Anti-Corruption Authority and the provisions pertaining to financial disclosure.
- Draft law regulating the procedures for receiving, implementing and exchanging requests for international legal and judicial assistance in criminal matters.
- Draft law amending some provisions of Law No. (106) of 2013 regarding Combating Money Laundering and the Financing of Terrorism, and its executive regulations.
- Draft law amending some provisions of the Penal Law and Law No. (31) of 1970 amending some provisions of the Penal Law, promulgated by Law No. (16) of 1960.

## **Second: Proposals and draft laws on which Nazaha's opinion has been sought**

Based on requests from relevant authorities in the state, Nazaha received a number of draft legislation for its opinion, including:

- Draft law regarding international legal and judicial cooperation in criminal matters.
- Draft law amending certain provisions of Law No. (2) of 2016 regarding the establishment of Kuwait Anti-Corruption Authority and the provisions pertaining to financial disclosure.
- Draft decree amending certain provisions of Law No. (1) of 1993 regarding the Protection of Public Funds.
- Draft decree-law regarding Public Auctions.

## **Third: Projects under preparation and follow-up by Nazaha**

- Amendment to Law No. (106) of 2013 regarding Combating Money Laundering and Terrorist Financing and its Executive Regulations.



# Chapter V

## Prevention of Corruption



## First: Prevention of Corruption

Nazaha is very keen on corruption prevention as evident in expanding society's role in anti-corruption activities, preparing orientation programs about Nazaha's activities and terms of reference, raising awareness of the dangers of corruption and methods of its prevention. This is in addition to conducting field studies and research in cooperation with research institutions to identify the causes and facets of corruption and areas of its spread in state agencies, pursuant to international best practices. Thus, developing recommendations and appropriate solutions to prevent corruption and its causes, pursuant to the Law establishing Nazaha and in implementation of the priorities included in KIACS (2019-2025).

### 1) Nazaha and Education

Educational institutions are also considered an organizing tool that aims to achieve society's goals and objectives and turn them into a tangible reality. They are also responsible, alongside the other pedagogical institutions, for preserving society's identity through preparing generations that contribute to achieving community development based on a number of values and principles that protect society against any challenges faced thereby. Thus, educational institutions are either the nation's citadel and fortress or a means to eliminate it.

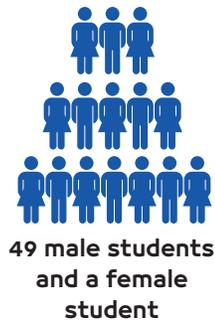
Nazaha has been keen to reflect the objectives of the United Nations Convention against Corruption related to integrity in education at several levels, including by continuing to strengthen its partnerships and cooperation with relevant entities, such as the Ministry of Education and Kuwait University, as well as religious institutions and the private sector, in the areas of promoting ethics, good values, social responsibility and anti-corruption concepts.

In this context, as part of Initiative No. (91) and in cooperation with the Ministry of Education, Nazaha completed its cooperation projects with the Ministry of Education in the field of promoting values within school curricula, which is a priority for Nazaha in promoting educational integrity.

In cooperation with the Educational Activities Department, the Ministry of Education, Nazaha implemented an interactive reading project for its story publications in (17) schools across the six educational governorates. The project was launched in March and continued until the end of 2024, targeting children and adolescents between the ages of 4 and 9 years, with the aim of including it in school reading classes. The total number of beneficiaries from the project reached (411) male and female students.

Nazaha also sought to reach this segment of population by offering interactive reading sessions that reinforce educational principles among young people; being a favorite extracurricular activity. This was part of the summer club activities organized by KIDS IN ACTION organization for children, where (63) children benefited from the program. This stems from Nazaha's belief in the role of education in instilling concepts of integrity among young people and school students and promoting ethical and educational values.

In continuation of the successful field training experience for fourth-year law students, in cooperation with Kuwait University, and as part of their preparation for the job market after graduation, the reporting period included two lectures entitled “Ethics of Lawyers’ Work”, which benefited (49) male and female students. Both lectures aimed to educate students on the most important topics related to integrity, professional ethics and honor, in addition to the key laws relevant to efforts to promote integrity and combat corruption, including Nazaha’s Law and related legal legislation, such as the Conflict of Interest Law and the Right to Access Information Law.



Nazaha also delivered two lectures: the first, titled “Code of Professional Conduct and Kuwait Integrity and Anti-Corruption Strategy”, was delivered as part of the Professional Ethics course at the College of Administrative Sciences. The second, titled “Educational and Professional Integrity”, was delivered to students at the College of Life Sciences on 02 December 2024. Both lectures benefited (73) students and teachers.

“Bankee” program has witnessed widespread popularity and remarkable success in schools locally, becoming an educational model that many states seek to benefit therefrom. This success is due to the fruitful cooperation between Nazaha, the National Bank of Kuwait and the Ministry of Education. The program combines the consolidation of values, such as honesty, integrity and responsibility, while promoting financial literacy in the concepts of earning, spending, and saving. The period of this report witnessed the conclusion of the second phase of the program for AY 2023/2024, with the participation of (30) schools and (3445) male and female teachers, benefiting (15,940) male and female students.



In addition to the role of “Nazaha” in supporting and implementing the project, and in continuation of the successes of previous seasons, the third phase of “Bankee” program was launched through introductory meetings and workshops to discuss its goals and future outcomes. The third phase witnessed (10) visits to new schools joining the program in the AY 2024/2025, targeting (61) schools, led by (7,219) male and female teachers, and benefiting (32,240) male and female students.

## 2) In the field of supporting private sector awareness initiatives:

To enhance Nazaha’s efforts to cooperate with all government sectors, civil society and the private sector, and to encourage awareness-raising initiatives related to summer training programs, Nazaha participated in delivering (12) awareness lectures for youth (aged 14 to 25 years), as part of the summer training programs organized by the National Bank of Kuwait under the title (ASPIRE), Boubyan Bank (“Bedina 8” program), Warba Bank (summer program for recent graduates), in addition to the summer program organized by Kuwait

Institute for Scientific Research. This cooperation comes in response to the keenness of private and public sector institutions to raise awareness of the risks of corruption and methods of preventing it in financial and administrative transactions, promoting the concepts of educational integrity and social responsibility. The number of beneficiaries of these activities amounted to (302) individuals.

### 3) In the field of community awareness and supporting preventive oversight of government institutions:

As part of Nazaha's continued efforts to strengthen communication channels with the public, and as part of its external communication plan, Nazaha continued publishing a series of awareness episodes via (Podcast "Nazaha", Season 3), aiming to raise awareness of integrity values and principles. The period of this report included publishing four awareness episodes that hosted specialists in various fields, such as international indicators, integrity in sports, education and instilling values, combating corruption and strategic planning. These episodes were published across Nazaha's social media platforms and its YouTube channel.



### 4) In the field of public awareness

In implementation of the initiatives of KIACS (2019-2025) in the field of community awareness, legal culture for government institutions and preventive oversight support, Nazaha collaborated with several government agencies and

delivered two awareness lectures entitled “Practicing Integrity in Construction Contracts” on 25 July 2024 and 26 January 2025, favor of Kuwait Fund for Arab Economic Development. This activity is part of a training program for newly graduated Kuwaiti engineers and architects, where the number of beneficiaries amounted to (65) trainees. Both lectures addressed the risks of corruption in construction sector, ways to prevent it and the best local and international practices, in addition to raising awareness of codes of professional conduct and ethics of the engineering profession.

In the context of raising employees’ awareness of the responsibilities of Nazaha and the legislation that enhances integrity and transparency, and as part of efforts to prevent the risks of corruption, Nazaha presented a series of awareness lectures entitled “Enhancing Integrity and Combating Administrative and Financial Corruption” for employees of the Ministry of Finance. Three lectures were presented on 16 May, 22 October 2024 and 6 January 2025, benefiting (113) employees; two lectures for the employees of the Ministry of Defense and of Kuwait Institute for Scientific Research, on 07 November and 23 December 2024, respectively, benefiting (105) employees and one lecture for employees of the Ministry of Public Works on 09 February 2025, benefiting (36) employees.

In continuation of the series of lectures and training workshops directed at employees of government agencies within the annual training program of the Civil Service Commission, aiming to enhance the principles of integrity and transparency, and to demonstrate Nazaha’s efforts in combating and preventing corruption and introducing its competencies, Nazaha presented four lectures for executive and supervisory categories entitled “The Role of Prevention in Promoting the Concepts of Integrity, Transparency and Combating Corruption”. The lectures were held on 06 and 20 May 2024 and benefited (40) employees, as well as on 16 and 30 October 2024, benefitting (173) employees, and on 06 January 2025, benefitting (16) employees.

#### **5) In the field of cooperation with civil society organizations:**

Based on Nazaha’s belief that partnerships with civil society organizations are an essential and influential component of society, undertaking an effective role in combating corruption and raising awareness among citizens of all categories, especially women, about the need to take preventive measures, Nazaha held the “Women Against Corruption” Forum on 28 April 2024, in cooperation with the Women’s Cultural and Social Society, the Kuwaiti Society for National Brotherhood, the United Nations Office in the State of Kuwait and the Palestinian Aman Organization. The forum exchanged regional best practices to enhance the role of women in combating corruption based on social discrimination. The forum highlighted several themes, including: the role of women in promoting integrity and transparency, the importance of encouraging reporting, the most prominent challenges that may hinder their ability to perform this significant role, and mechanisms for dealing therewith. Seventy-seven (77) figures benefited from the forum.

## 6) In the field of corporate governance

Corporate governance is not limited to the presence of oversight entities and includes policies that support the activities of these entities, e.g., the preparation of certified trainees in the field of corporate governance in implementation of KIACS' initiatives, which aim to consolidate the principles of governance, integrity, transparency and accountability. Based on the strategies of the Civil Service Commission, a training workshop entitled "Corporate Governance" was held during 17-18 September 2024, addressing several key topics, including the concept of governance, the reasons for its emergence and the importance of adopting it in the public sector, in addition to raising institutional awareness of governance concepts and applications. Thirteen (13) Nazaha employees benefited from that workshop. In January 2025, the CSC organized a training program entitled "Corporate Governance and Its Role in Promoting Sound Practices", in which Nazaha presented a review of the "Corporate Governance National Guide" and its principles, where (16) employees from the supervisory category participated in the program.



In continuation of "Aadaa" project to activate codes of conduct for public sector employees, as a step to promote the principles of integrity, transparency, and commitment to professional values and behaviors, which was launched in 2023 in partnership with (14) state institutions (such as the Public Institution for Social Security, the Direct Investment Promotion Authority, and the Public Authority for Food and Nutrition). An internal and national media campaign was also launched, extending over an eight-week period. Within the framework



of implementing the project in its bronze and silver phases, the first annual "Aadaa" conference was held on 17 April 2024, followed by the second conference on 18 February 2025. The conference included discussion panels between the participating entities and presentations of their most prominent achievements and efforts in promoting the values of teamwork and the principles of corporate governance, with the aim of advancing the work of their institutions, achieving functional excellence, and contributing to raising the efficiency and effectiveness of services, in addition to discussing challenges and obstacles.

As part of raising awareness of codes of professional conduct and achieving professional excellence within "Aadaa" project and its associated programs and activities, lectures entitled "Codes of Conduct and Corruption Prevention" were delivered. The lectures targeted employees affiliated with the Public Authority for Sports in December 2024, employees of the Direct Investment Promotion

Authority in January 2025 and employees of the Public Authority for Industry in the same month. Total attendance amounted to (329) employees.

“Aadaa” project also included a training workshop that was held to qualify trainers from the entities participating in the Silver Phase: (the Environment Public Authority, the Direct Investment Promotion Authority, the Public Authority for Food and Nutrition, the Public Institution for Social Insurance and Kuwait Anti-Corruption Authority “Nazaha”). The workshop was held on 25 September 2024, with a total number of beneficiaries amounted to (27) certified trainers from the five entities.

The training program covered several topics:

- An overview of the Code of Professional Conduct.
- Corporate communications related to corporate values.
- Mechanisms for changing and monitoring behavior.

In implementation of the memoranda of cooperation signed with media and religious institutions, being one the primary arms of raising community awareness of the dangers of corruption, Nazaha cooperated with the Ministry of Endowments and Islamic Affairs through Sharia guidance utilized within the framework of guidance messages in Friday sermons. In this context, a Friday sermon was held on 06 December 2024, titled “Do not cause corruption on the earth after its reformation”, coinciding with the International Anti-Corruption Day, to emphasize social responsibility in preventing and safeguarding against corruption.

### **7) In the field of exchanging expertise:**

From 21 to 24 October 2024, Nazaha participated in the “Health Sector Integrity in the Arab Region - Risks and Solutions” conference, organized by the United Nations Development Programme in the Arab Republic of Egypt. A working paper was presented on health sector integrity and the importance of enhancing civil service integrity and government sector governance. Nazaha also participated in the regional meeting titled “Advancing Business Integrity in the Middle East and North Africa”, held in the Arab Republic of Egypt, where it presented a working paper on the role of private sector in combating corruption and activating the teaching of integrity in education sector.

### **Second: Nazaha House**

From the standpoint of enhancing knowledge communication and stemming from interest in developing knowledge and cognitive expertise in anti-corruption field, building an integrated information center in that respect, as well as in continuation of the activities of Nazaha Library (Dar Nazaha), the library has been provided with new information sources (books and periodicals), increasing the books and periodicals included therein to (1540) publications.

Dar Nazaha’s knowledge platform is fed with scientific materials in the field of anti-corruption and related fields, in addition to archiving Nazaha’s professional and intellectual production.

### Third: The State of Kuwait in Global Indices

- In the field of international anti-corruption indices:

Nazaha pays great attention to indices, measures and studies their results to achieve their objectives. In this regard, Nazaha activates its competencies, under which it studies and evaluates reports issued by local, regional and international organizations related to anti-corruption, reviewing Kuwait’s situation therein and taking appropriate measures to establish the principle of transparency and integrity, achieving rational management of the state’s funds, resources and property, making optimal use thereof and strengthening the rule of law.

#### A. Corruption Perceptions Index (CPI):

Corruption Perceptions Index (CPI) is annually issued by Transparency International since 1995. Transparency International is a non-profit organization based in Berlin, Germany. CPI deals with political and administrative aspects of corruption in the public sector by measuring corruption perceptions in that sector. CPI is defined as the mental image of experts and supervisory executives in companies, because it is impossible to measure corruption directly based on solid data.

The Corruption Perceptions Index is calculated based on a maximum of (13) sources (sub-indexes) from specialized international institutions, including: the World Bank, the World Economic Forum, private risk and consulting companies, and research centers. Each source monitors the score of each state in the world in specific aspects of corruption, then ranks them from best to worst. Inclusion of any state in the Corruption Perceptions Index requires having results thereon from at least three sources. As for the State of Kuwait, its classification is based on eight sources as indicated in Figure (29).

 World Competitiveness Yearbook – Executive Opinion Survey, published by the International Development *(Institute (IMD)	 Expert Survey Index, published by the World Justice *(Project (WJP)	 International Country Risk Index, published by Political Risk Services ((PRS)	 Executive Opinion Survey, published by the World Economic Forum ((WEF)	 Varieties of Democracy Project ((V-DEM)	 Bertelsmann Transformation (Index BE (TI)	 Economist Intelligence Unit Country Risk Ranking (EIU)	 Global Insight Country Risk (Ranking (GI)
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Figure 29: Sources of the eight Corruption Perceptions Indexes on which the State of Kuwait’s ranking is based

\*The IMD and WJP sources were added for the State of Kuwait for the first time in 2023

In CPI's most recent edition (February 2025), issued in 2024, Transparency International stated that corruption remains deeply entrenched throughout the Middle East and North Africa, hindering critical efforts for climate action and development. The region has seen only minimal progress over the past twelve years, with its average score rising by only one point to (39), out of (100), which is significantly lower than the global average of (43).

- The State of Kuwait's score on the 2024 Corruption Perceptions Index

The State of Kuwait maintained its ranking progress on the Corruption Perceptions Index (CPI) of last year, scoring (46) out of (100) points for 2024, maintaining its score from 2023. Transparency International stated that over the past five years, seven states have significantly improved their scores on the index, including the State of Kuwait, achieving its highest score since 2019.

At the GCC States level, Kuwait ranked sixth, having previously been ranked fourth, and seventh in the Arab world, having previously been ranked fifth. It is worth noting that Kuwait's score is (12) points higher, compared to the overall average score for Arab states (the overall average score for Arab states is 34).

Kuwait's average score is higher than the general average score for MENA region by (7) points (the general average score for MENA region is 39). As for comparing Kuwait's performance in 2024 with its performance in the base year 2012, it is found to be higher by two points and advanced by one rank.

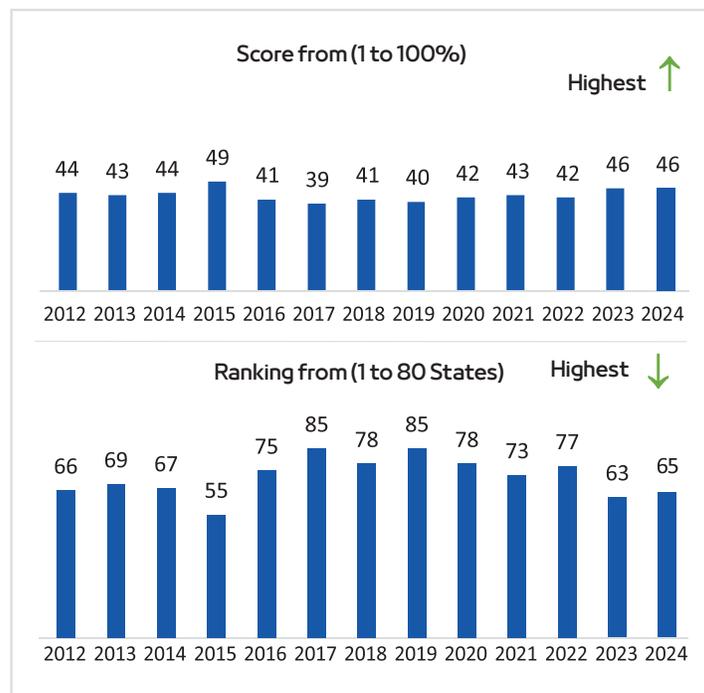


Figure (30) indicates the development of Kuwait's scores and global ranking on CPI from 2012 (the base year) to 2024.

It should be noted that Kuwait's score in the CPI is an arithmetic average of its scores from eight sources (out of 100 degrees). The following Table (7) displays Kuwait's scores in the CPI sources for the years 2023 and 2024.

Table 7: Kuwait's score in the eight sources on which the index score is based for the years 2023 and 2024

	Source (Sub-indices)	2023 (From 100)	2024 (From 100)	Change
1	WEF	53	54	1+ ↑
2	BF(TI)	45	47	2+ ↑
3	GI	35	32	3- ↓
4	PRS	47	42	5- ↓
5	EIU	37	51	14+ ↑
6	VDEM	56	54	2- ↓
7	IMD*	49	42	7- ↓
8	WJP*	46	47	1+ ↑
	<b>CPI</b>	<b>46</b>	<b>46**</b>	

\* The IMD and WJP sources for the State of Kuwait were added for the first time in 2023

\*\*Score =  $(54+47+32+42+51+54+42+47) \div 8 = 369 \div 8 \approx 46$

## B. International Institute for Management Development Indices (IMD):

Kuwait Anti-Corruption Authority "Nazaha" sought to cooperate and communicate with the International Institute for Management Development (IMD) to include the State of Kuwait in the indices' reports issued thereby, published the first report on Kuwait in 2023, by publishing three separate reports: the World Competitiveness Yearbook, the World Digital Competitiveness Report and the World Talent Report.

On June 18, 2024, the World Competitiveness Center (WCC) of the International Institute for Management Development (IMD) published the 36th edition of the World Competitiveness Yearbook (WCY). This report measures the state's economic performance based on several key factors and sub-factors, comparing the same with other states to enable decision-makers to identify strengths, weaknesses and best practices. It also analyzes the state's ability to create an environment where projects can generate sustainable value. It is worth noting that one of the components of the index issued in this report, which measures the presence or absence of bribery and corruption, is used to calculate the Corruption Perceptions Index (CPI).

The index is based on the following key factors:

1. Economic Performance
2. Government Efficiency
3. Business Efficiency
4. Infrastructure

The report stated in its results that the State of Kuwait has obtained in 2024 a score of (65.03 out of 100) and, therefore, ranked (37 out of 67) internationally at the level of the four main factors. Kuwait ranked fifth in the Gulf.

Comparing Kuwait's performance according to the Global Competitiveness Index for 2023 with its current performance for 2024, Kuwait advanced one position from 2023, when it ranked 38th out of 64, with a score of 65.59 out of 100.

IMD also released the World Talent Ranking Index (WTR) and the World Digital Competitiveness Ranking Index (WDCR) for 2024 in September and November 2024. The results of both indices are as follows:

- World Talent Ranking:

This report assesses the extent to which the states develop, attract and retain talents in their operating institutions, as well as the availability of talent and competencies based on several main and sub-factors.

The main factors relied upon are:

1. Investment & Development
2. Appeal
3. Readiness

The report stated in its findings that the State of Kuwait in 2024 achieved a score of (60.49 out of 100), with (100) indicating the best score. Accordingly, it ranked (31 out of 67) internationally across the three main factors. Comparing Kuwait's performance according to WTR Index for 2023 with its current performance for 2024, Kuwait fell three places from 2023; having ranked (28 out of 64) with a score of (63.19 out of 100), with a decline of (2.7) points in 2024 compared to 2023.

- World Digital Competitiveness:

This report assesses the economy's ability to adopt and explore digital technologies that lead to transformation in government practices, business models, and society in general, based on several main and sub-factors. The following are the main factors upon which it relies:

1. Knowledge.
2. Technology.
3. Future Readiness.

The report stated in its outcome that the State of Kuwait has achieved in 2024 a score of (56.90 out of 100), with (100) indicating the best score. Accordingly, it ranked (45 out of 67) internationally across the three main factors. Comparing Kuwait's performance according to WDCR Index for 2023 with its current performance for 2024, Kuwait fell four places from 2024, having ranked (41 out of 64) with a score of (65.14 out of 100), a decline of (8.24) points in 2024 compared to 2023.

### C. The Rule of Law Index issued by the World Justice Project (WJP):

Nazaha sought to include the State of Kuwait in the Rule of Law Index issued by the World Justice Project, which was issued for the first time by Kuwait in 2023, within the framework of tripartite cooperation between Kuwait Anti-Corruption Authority “Nazaha”, the General Secretariat of the Supreme Council for Planning and Development and the United Nations Development Programme. (UNDP).

The Rule of Law Index measures adherence to the rule of law by reviewing policy outcomes, such as whether people have access to courts or whether crime is effectively controlled. This stands in contrast to efforts that focus on written law or institutional means through which society may seek to achieve the results of these policies.

The Rule of Law index consists of eight (8) main factors (sectors/indices), divided into 44 sub-factors (sub-index). Table (8) indicates the main factors that comprise the index, and Kuwait’s scores for those factors for the years 2023 and 2024:

Table 8: Main factors of the Rule of Law Index for 2023 and 2024

The main factors		2023 (of 1)	2024 (of 1)	Change
1	Restrictions Imposed on Government Authorities	0.55	0.54	0.1-↓
2	Absence of Corruption	0.66	0.67	0.1+↑
3	Open Government	0.43	0.42	0.1-↓
4	Basic Rights	0.45	0.45	0
5	Order and Security	0.87	z.0	0.1+↑
6	Regulatory Enforcement	0.66	0.65	0.1-↓
7	Civil Justice	0.58	0.57	0.1-↓
8	Criminal Justice	0.47	0.47	0

Hence, Kuwait maintained its score of (0.58 out of 1.00), as the scores range from (0 to 1), where (1) indicates the strongest commitment to the rule of law. Kuwait has also maintained its global ranking of 52 out of 142 countries, its regional ranking of 2 out of 9 countries, and its high-income status of 43 out of 46 states.

## Other global anti-corruption indices

Figure (31) depicts the scores of the State of Kuwait for the year 2024 in the TRACE-Matrix Bribery Risk Index and the E-Government Development Index (EGDI):

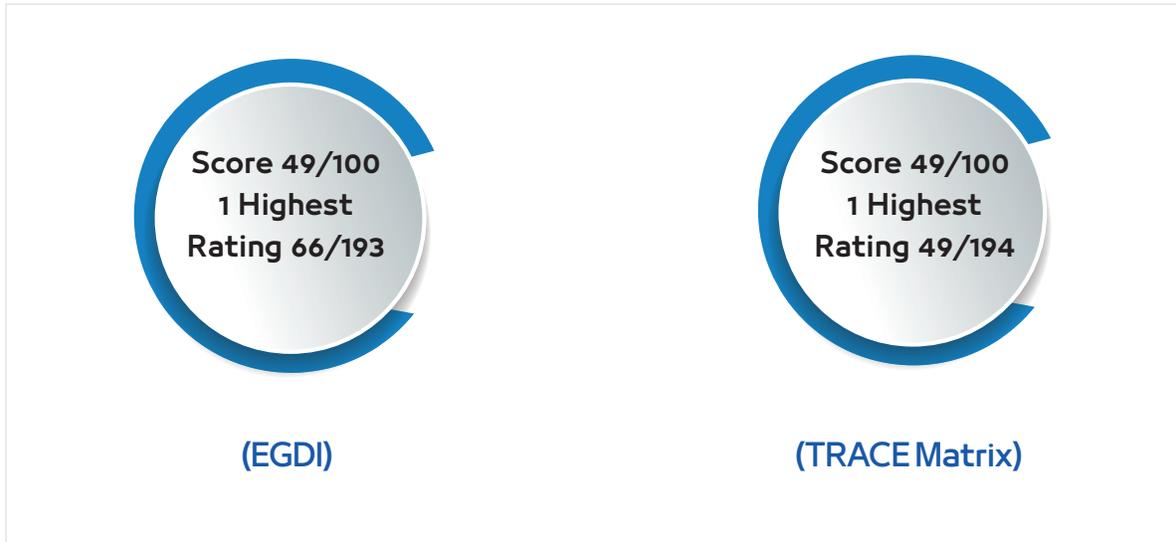


Figure 31: Kuwait's scores in some global indices in 2024

### • Nazaha's internal indicators:

As part of Nazaha's commitment to improving the quality of its services and facilitating the procedures for submitting financial disclosure statements, an evaluation study was conducted to measure the level of filers' satisfaction with the service and to identify the most prominent means of support and reminders that contributed to enhancing compliance with the specified legal deadline. This was accomplished by placing a quick response code (QR-code) in the disclosures' submission rooms, allowing filers to easily conduct the evaluation by scanning the code. It is worth noting that this evaluation is ongoing periodically, contributing to the continuous improvement of the service in line with filers' needs. The study yielded the following results:

#### 1. Key methods that helped remind the filers of the legal deadline for submitting their disclosures:

Table 9: Illustrative percentage of the methods used to remind the filers of the legal deadline for disclosure submission

	Method	Percentage
1	Text messages from Nazaha	47%
2	Reminders from employers	26%
3	Phone calls from Nazaha	12%
4	Others	15%

The results indicate that text messages were the most effective method for reminding filers of legal deadlines.

## 2. Key services provided by Nazaha that helped filers file their disclosures:

Table 10: Illustrative percentage of services provided by Nazaha that helped filers file their disclosures

Method	Percentage
Personal assistance at the receiving center	44%
Telephone service	21%
No assistance method was used	21%
Information leaflets	14%

It is evident that direct personal support at the receiving center is the most widely used, reflecting the importance of face-to-face service.

## 3. Evaluation of the disclosures' filing experience:

Table 11: Illustrative Percentage of Participants' Evaluation of the Disclosures Filing Process

	Evaluation	Percentage
1	Excellent	88%
2	Good	12%
3	Poor	0%

The results indicated a high level of satisfaction, with 88% of participants describing their experience as Excellent.

### In the field of local indices and studies:

Nazaha initiated national surveys to assess the level of awareness among citizens and residents concerning the promotion of integrity and combating corruption. Survey results are indicated in Tables (12) and (13).

Table 12: Main Levels in Citizen and Resident Surveys

	Main Levels	Score (of 100%)
1	Level of citizens and residents' confidence in Nazaha	76%
2	Public confidence in the whistleblower protection system - Initiative No. (12.1)	76%
3	Satisfaction level of users of targeted public services regarding their ease of access and the absence of bribery or favoritism	79%
4	Private sector confidence in business environment integrity	77%

Table 13: Sub-indices in citizen and resident surveys

	Other percentages specific to public sample	Score (of 100%)
1	Percentage of the public who reported understanding the concepts of corruption, anti-corruption measures and values (together)	52%
2	Percentage of those who reported changing their behavior after learning about anti-corruption values	78%
3	Percentage of the public who demonstrated a clear understanding of the citizen's role in combating corruption, especially by reporting corruption	70%
4	Percentage of citizens and residents reached through awareness programs	23%
5	Percentage of the public who reported understanding Kuwait's strategy and its relationship to Kuwait Vision 2035	24%
6	Percentage of those aware of Nazaha's duties and responsibilities	70%

• **Study of the Right to Access Information:**

Based on the implementation of KIACS and in accordance with Initiative No. (1.1) regarding ensuring the right to access information, and since this initiative requires monitoring and evaluating the extent to which entities comply with the Law, Nazaha conducted a study to assess the extent of government agencies' compliance with the Right to Access Information Law in three phases.

The study included (14) items to assess the agencies, as follows:

During the initial phase, the agencies relevant to the Law were approached to take part in filling out a questionnaire aimed at evaluating how well they complied with it. 70% of those surveyed completed the questionnaire, and of these, 81% had a cumulative (3597) requests for access to information. About 73% of these requests received approval, 8% were turned down, and 1% was met with a partial rejection and partial approval. Meanwhile, 9% of the requests remain under review. During the second phase of the study, the received data was audited according to its availability on the relevant agencies' websites. During the third phase, the voluntary disclosure of all entities governed by the Law was assessed based on the ten items outlined in Article Five of the Law. It should be emphasized that most entities are subject to eight items. During the third phase, the average compliance of entities with Article Five of the aforementioned Law was 72%.

# Chapter VI

## Institutional Support



## First: Training

A total of (123) training programs were participated in and implemented in the 2024-2025 training season, as indicated in Table (14).

Table 14: Training programs participated in and implemented in 2022/2024 training season

S.	Programs	No. of Training Programs	No. of Participants
1	Contractual programs	11	121
2	Individual programs	102	193
3	External programs	10	10
<b>Total</b>		<b>123</b>	<b>324</b>

## Second: Appointment

The Appointments Plan for the new vacant grades at Nazaha was prepared in light of the needs of all sectors of expertise and specializations and the extent of the functional need thereof, as well as to ensure the highest levels of transparency, integrity, justice and equal opportunities in the processes of announcement, testing and appointment at Nazaha. This is subject to the Right to Access Law in terms of the importance of announcing vacancies, appointment conditions and controls and the names and test results of the personal interviews for those accepted.

Nazaha also confirms its keenness, in the procedures for appointing and filling positions therein, to conduct specialized tests, personal ability tests and personal interviews, in addition to determining the appropriate specialization for each applicant prior to starting testing process, in order to ensure that each applicant passes the appropriate tests for his specialization.



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