

Kuwait Integrity and Anti-Corruption Strategy

2019 - 2025

Fifth Annual Report
2024

5th



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ





His Highness the Amir
Sheikh Mishal Al-Ahmad Al-Jaber Al-Sabah
May Allah Protect Him





His Highness The Crown Prince of Kuwait
Sheikh Sabah Al-Khaled Al-Hamad Al-Sabah
May Allah Protect Him

Member Entities of the High Committee for Leadership and Coordination of Kuwait Integrity and Anti-Corruption Strategy

The High Committee for Leadership and Coordination of KIACS was formed pursuant to Council of Ministers' Resolution No. 961, dated 15 July 2019. The resolution identifies the Committee's members and mandate. The Committee was renewed as per the Committee's Chairman's Resolution No. 169, dated 11 October 2020. Headed by the President of Kuwait Anti-Corruption Authority (Nazaha), the Committee includes 19 entities, representing public and private sectors and civil society.

General Secretariat of the Supreme Council for Planning and Development (GSSCPD).



Central Agency for Information Technology



Central Agency for Public Tenders



Superior Council of the Judiciary



Public Prosecution



Kuwait Anti-Corruption Authority - Nazaha



Kuwait Transparency Society



Civil Service Commission (CSC)



Kuwait Chamber of Commerce and Industry



National Assembly



Council of Private Universities



Capital Markets Authority



Ministry of Information



Ministry of Commerce and Industry



Ministry of Education



Ministry of Higher Education



Ministry of Interior



Ministry of Justice



Ministry of Finance





Kuwait Integrity and Anti-Corruption Strategy 2019-2025 was launched as a comprehensive framework for national efforts in promoting integrity and combating corruption. It unites these efforts in an integrated plan with the necessary legislations, policies, and procedures.

The Fifth Annual Report showcases the strategy's achievements, progress, challenges and lessons learned from the launch of this strategy until December 2024.

Despite the challenges, the team at Nazaha has done the highest degree of due diligence to collect data and measure impact as reflected in this report.

This report was prepared by Nazaha's Planning and Follow-up Office, which carries out the tasks of the Strategy Implementation Support Office, in cooperation with all technical committees concerned with KIACS all four axes.

An electronic version of the report is available on: www.nazaha.gov.kw.



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“For Kuwait”

Integrity for Development

Key achievements of this ambitious national project:



1. 89% of KIACS initiatives have advanced to the final implementation stage and most of the work has been completed.
2. Continuing to implement awareness-raising activities on the laws issued in terms of promoting integrity and combating corruption, while evaluating the extent of government agencies' commitment to implementing the Right to Access Information Law
3. Launching “Aadaa” project to include a system of accreditations that is based on adopting rules of professional conduct for public employees to comply with the standards and ethics of the Code of Professional Conduct to create a work environment characterized by professionalism, efficiency and optimal productivity in the framework of institutional values and a healthy work environment.
4. Increasing number of entities and services provided to the public through “Sahl” application since its launch in September 2021 to date, so that the number of participating entities has reached (36) government agencies and the number of electronic services provided by the application since its launch to date has reached approximately (423) services.
5. Partnerships have been strengthened nationally, regionally and internationally, including with civil society organizations and oversight bodies.





Message from the President

Kuwait Integrity and Anti-Corruption Strategy (KIACS) plays a crucial role in laying out an anti-corruption roadmap at the legislative, preventive and awareness levels, ensuring that national efforts align with the requirements of implementing the United Nations Convention against Corruption.

The fifth year of implementing KIACS' pillars and initiatives marks some achievements that complement those attained in previous years, seeking to complete the components of the system set for preventing and combating corruption and consolidating the values of integrity and transparency.

As reflected in the data, figures, and statistics included in this report, it is worth noting that KIACS' implementation rates during 2024 (the fifth year) have witnessed remarkable progress, with a full progress rate of approximately {82%} of KIACS' total initiatives.

The work performed by Kuwait Anti-Corruption Authority (Nazaha), particularly in terms of KIACS, has undoubtedly witnessed achievements and progress that would not have been possible without the support and assistance from the State's political guidance under the leadership of His Highness the Amir, may Allah protect him, along with the fruitful and constructive cooperation Nazaha receives from the parties participating in all KIACS' pillars.

As always emphasized, the ultimate goal of optimally implementing KIACS' objectives is to confront corruption and combat its causes, fostering an atmosphere that is favorable to accomplishing the goals of the development plans while protecting the state's wealth and resources.

Therefore, in continuation of Nazaha's commitment to publishing sound and transparent reports on all its activities, including its leadership in implementing Kuwait Integrity and Anti-Corruption Strategy (KIACS), we present to you this Fifth Annual Report on KIACS' work, hoping that the recipient will receive a statistical overview and thorough explanation of KIACS' outcomes.

Abdulaziz Abdullatif Al-Ibrahim

President of Kuwait Anti-Corruption Authority (Nazaha)

Chairman of the High Committee for Leadership and
Coordination of KIACS

Executive Summary

Kuwait Integrity and Anti-Corruption Strategy (KIACS) was launched in January 2019 under the auspices of His Highness the late Emir, Sheikh Sabah Al-Ahmad Al- Jaber Al-Sabah, may Allah rest his soul, during the first Kuwait International Anti-Corruption Conference. According to the United Nations Development Program, KIACS is the first of its kind in the GCC in terms of its participatory methodology and the first anticorruption strategy to launch in a decade.

KIACS extends for five years, from 2019 to 2024. KIACS High Committee for Leadership and Coordination, formed by the Council of Minister's Resolution No. (961), decided in its fifth meeting, held on 03/10/2024, to extend KIACS until the end of 2025, as a result of the many challenges that KIACS has gone through over the past years, including the disruption of the work of many government agencies during Corona pandemic.

It aims to reform Kuwait, implement the United Nations Convention against Corruption, achieve sustainable development goals, and improve the state's ranking in international indicators in line with the Kuwait Vision 2035.

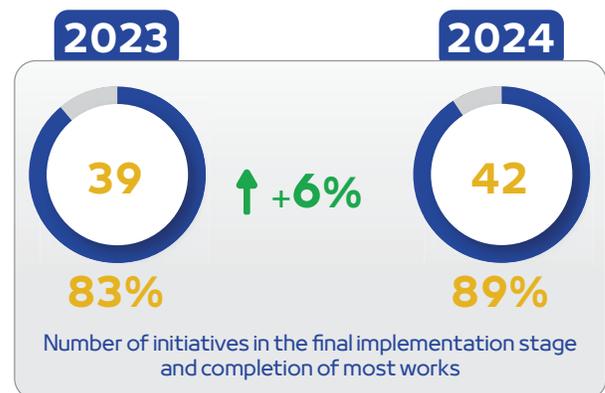
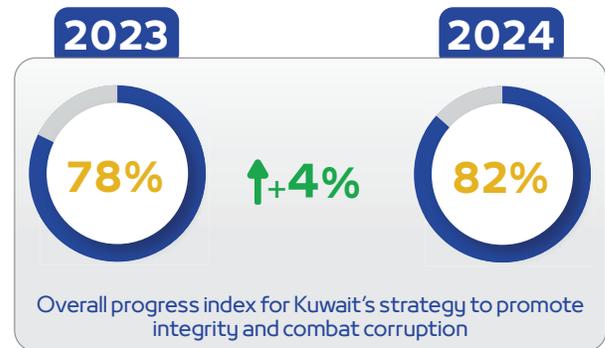
KIACS is based on 4 pillars and strategic objectives. The pillars include 13 priorities and 47 initiatives. Each initiative encompasses activities, standards and indicators.

They are implemented by government and private agencies, including Kuwait Anti-Corruption Authority (Nazaha). Nazaha is also the entity responsible for leading and coordinating the implementation of KIACS, pursuant to its establishment-law.

KIACS fifth annual report tackles the achievements and efforts of government and private agencies and their contribution towards achieving Kuwait's strategic goals to enhance integrity and combat corruption. The percentage achieved in completing the procedures of KIACS' initiatives since its launch amounted to 82% and the targeted percentage reached 92%, compared to achieving 78% and targeting 88% for the year 2023.

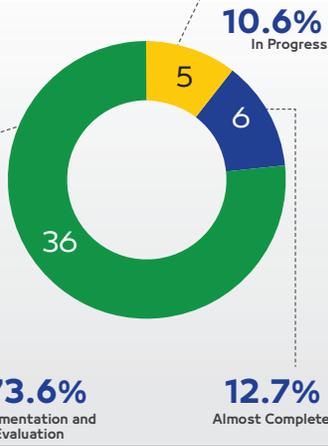
The report details the efforts of public and private entities in fulfilling their commitments and presents their impact on the progress rate of KIACS pillars and objectives. Assessing the degree of government institutions' commitment to implementing the Right to Access Information Law is one of the most notable initiatives carried out in the fifth year of KIACS' launch, with the goal of developing the law as needed. "Aadaa" project has also been launched to include a system of accreditations based on rules of professional conduct for public employees, so as to achieving compliance with the standards and ethics of the Code of Professional Conduct and create a work environment characterized by professionalism, efficiency and optimal productivity within the framework of institutional values and a healthy work environment. Furthermore, the number of entities participating in the "Sahel" application has increased from 35 to 36 government entities, the number of electronic services provided by the application increased from 346 to 423 and the number of completed transactions increased from approximately 30,000,000 to approximately 49,000,000 transactions, compared to the statistics of the Fourth Annual Report.

An Overview of the Indicators of Strategy Implementation Progress

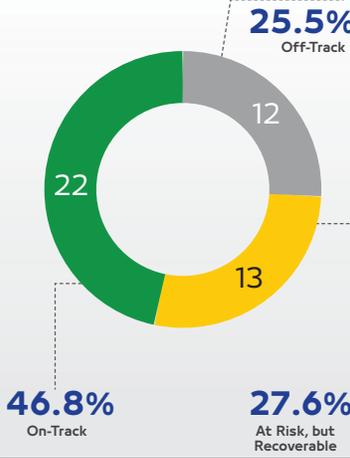


Decreasing ↓ Improving ↑

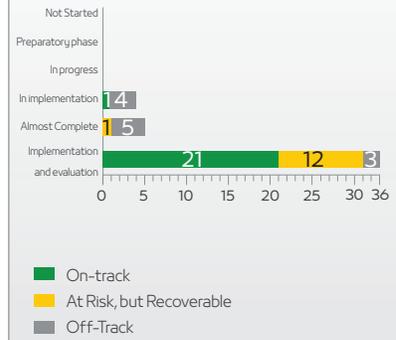
Distribution of initiatives according to the percentage of completion



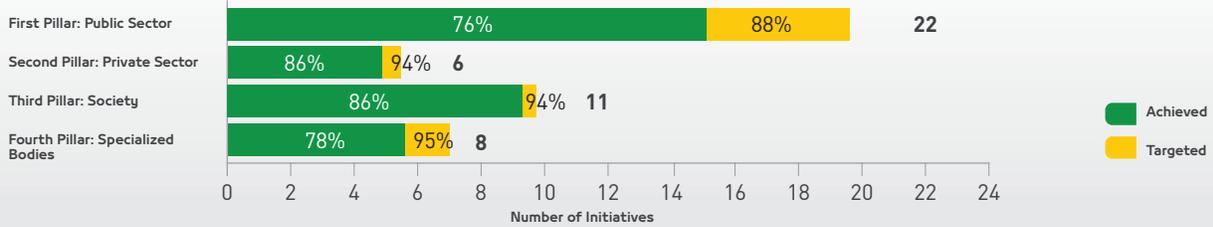
Distribution of initiatives according to their compatibility with the schedule



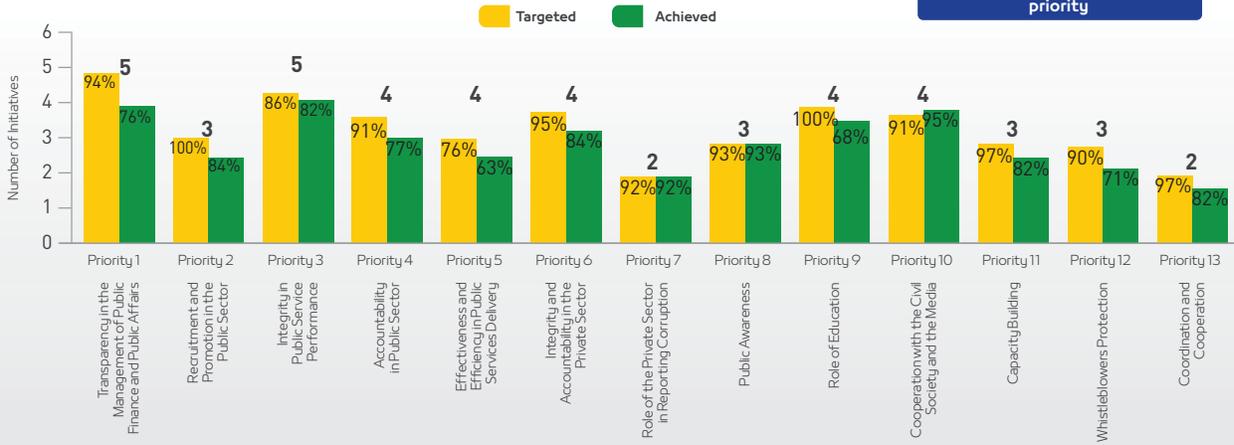
Alignment of initiatives with the established schedule and completion percentage



Completion percentage per pillar



Completion percentage per priority



Completion rate by implementing agencies



*Joint educational initiatives are explained in detail on pages No. (64-68) of the report



Summary of the laws and legislations promoted by KIACS and their progress:

The Committee for Laws and Legislation, constituted by Kuwait Anti-Corruption Authority (Nazaha) and other entities concerned with the laws included in KIACS, proceeded to develop and monitor the approval of the remaining legislation. The following table indicates the progress made in the laws included in KIACS as of 31 December 2024:

Law	Responsible Entity	Draft Prepared	Draft is Reviewed by Nazaha	Draft is Reviewed by Department for Legal Advice and Legislation	Draft is Reviewed by Concerned Parties	Law is Approved by the National Assembly	Remarks
1 Right to Access to Information	 Nazaha	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Law No. 12 of 2020 was issued and published in the Official Gazette on 6 September 2020. The Executive Regulations were issued on 27 January 2021.
2 Criminalization of Bribery in Private Sector	 Nazaha	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		Issuance of Decree No. (11/2019) referring the draft law to the National Assembly.
3 Liability of legal persons	 Nazaha	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Issuance of Law No. (2) of 2023, dated 22/01/2023, amending some provisions of the Penal Law No. (31) of 1970, including defining and assigning legal persons' criminal liability in corruption crimes.
4 Amended Conflicts of Interest Law	 Nazaha	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Enactment of Law No. 1 of 2023 and Executive Regulations on Conflicts of interest on 22 January 2023, and its publication in Kuwait Al-Yaum.
5 Amended establishment-law for Kuwait Anti-Corruption Authority and the provisions of financial disclosure	 Nazaha	<input checked="" type="checkbox"/>	Under review by the Department for Legal Advice and Legislation	Under review			Sending the draft review and amendment to Law No. (2) of 2016 Establishing Kuwait Anti-Corruption Authority and the provisions related to financial disclosure by the Ministry of Justice to (Legal Advice and Legislation) for review on 27 December 2023.
6 International legal and judicial cooperation	 Nazaha	<input checked="" type="checkbox"/>	Under Review (by the Ministry of Justice)				Under coordination to refer the project to the Department for Legal Advice and Legislation in preparation for its final legal form.

Law	Responsible Entity	Draft Prepared	Draft is Reviewed by Nazaha	Draft is Reviewed by Department for Legal Advice and Legislation	Draft is Reviewed by Concerned Parties	Law is Approved by the National Assembly	Remarks
7 Amended draft-law for Public Tenders	 Central Agency for Public Tenders	<input checked="" type="checkbox"/>		Under Review			Issuance of the Administrative Decision No. 129 of 2024 by the Central Agency for Public Tenders on 28/07/2024 to study and revise the proposed amendment. The proposal was then submitted to the Fatwa and Legislation Department by the competent minister for necessary action.
8 Financing election campaigns	 Ministry of Interior	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Issuance of Law No. (120) of 2023 on the Election of the National Assembly Members "Establishment of the Electoral Commission"

Summary of the main challenges in KIAC's fourth year of implementation:

- **Legislative Challenges:** The length of the procedural path for reviewing and amending existing laws, as well as the involvement of multiple stakeholders in the review process for draft laws, have contributed to delays in the approval of relevant legislation.
- **Financial Challenges:** The lack of necessary budgets for initiatives that require advisory studies for implementation is impeding progress.
- **Administrative Challenges:** The lack of effective communication between parties involved in the implementation of many initiatives has resulted in delays in their implementation.





3

Overview of Corruption Indicators in the State of Kuwait

It is widely recognized that corruption is a significant barrier to economic development, depleting resources, diverting them away from efforts to achieve developmental outcomes, and compromising the efficiency of public spending. Given the strong correlation between corruption and low growth rates, efforts to combat corruption are increasingly crucial for achieving sustainable structural reform. Corruption in the business environment also creates instability, hinders business efficiency, and results in additional costs, making the state less attractive to investors and compromising the private sector's investment and competitiveness. In the medium and long terms, corruption may be widespread and lead to deepening social disparities, greater inequality in society, declining trust in the state, and weakened effectiveness of government institutions and agencies.

(Source: OECD)

Political will is a key factor in long-term effectiveness of combating corruption. This includes the following:

1. Preserving **public sector** integrity and developing the efficiency and effectiveness of public services, to achieve transparency and accountability.
2. Encouraging the **private sector** to enhance integrity and combat corruption.
3. Enabling the community to participate in establishing a culture of integrity and combating corruption.
4. Enhancing the efficiency and effectiveness of **specialized bodies** that aim to promote integrity and combat corruption.

Legal and institutional framework for combating corruption

There is no standard or universally recognized definition of corruption as the United Nations Guide for Anti-Corruption (2003) indicates that "Current definitions of corruption vary from one state to another according to cultural, legal and other relevant factors, in addition to the nature of corruption challenges faced by each state. A number of institutions (such as Transparency International) define corruption as "the abuse of entrusted power for private gain".

The World Bank also defines the practice of corruption as "the offering, giving, or receiving, directly or indirectly, of anything of value to unlawfully influence the actions of another party."

Kuwait has implemented numerous mechanisms and regulations to establish a legal and institutional framework for combating corruption. This includes the creation of specialized entities dedicated to combatting corruption crimes and preventing the misuse of public funds. In 2016, Kuwait enacted Law No. (02) of 2016 on Establishing Kuwait Anti-Corruption Authority "Nazaha" and empowering it with the necessary authorities to enforce the legal and institutional framework for anti-corruption efforts. These efforts include the prevention of corruption risks, the detection and monitoring of corruption crimes and the investigation of such crimes.

In addition, a high national committee was formed on 24 August 2019. The Committee is chaired by His Highness the Prime Minister and its membership includes government oversight agencies and specialized bodies in combating corruption and protecting public funds. Its mandate is as follows:

- Supporting the implementation of Kuwait Integrity and Anti-Corruption Strategy.
- Promoting cooperation and coordination among oversight agencies and examining the comments and violations mentioned in reports by these agencies on the work of ministries and government departments and agencies.
- Enhancing the integration of oversight agencies, with a view to unify government efforts to follow-up on issues related to public funds inside and outside Kuwait.
- Following-up the recovery of public funds to state treasury.
- Developing preventive measures to combat all forms and causes of administrative and financial corruption, in an attempt to fulfill the anti-corruption elements in all its forms.

Main Legislations

In Kuwait, laws addressing bribery and corruption are numerous and interconnected. The country has taken a particularly noteworthy step in creating an independent anti-corruption law (Law No. (02) of 2016) that is aligned with the United Nations Convention Against Corruption. Under this law and in accordance with Law No. (16) of 1960 (Penal Law amended by Law No. 31 of 1970), bribery is considered a crime of corruption (Anti-Corruption Law - Article No. 22.2). Furthermore, the implementation of the Anti-Corruption Law takes precedence over other laws that may conflict with it (Anti-Corruption Law - Article 58).

Kuwait's legal framework criminalizes a broad range of crimes, in accordance with international conventions and treaties that the country has ratified or acceded to. In particular, Kuwait is committed to aligning its national legislative system with the requirements of the United Nations Convention Against Corruption and other relevant international agreements. To this end, Kuwait is currently pursuing legislative amendments that will criminalize bribery in the private sector, as well as bribery of foreign public officials and employees of public international institutions.

Kuwait's Anti-Corruption Law criminalizes several corrupt practices, including the manipulation of public tender and auction procedures, bribery, forgery, illicit enrichment, and other offenses related to financial disclosure and money laundering. Those found guilty of corruption offenses can face criminal penalties of up to seven (7) years' imprisonment. Additionally, Kuwait's Anti-Money Laundering and Terrorist Financing Law stipulates that organized crime groups and non-governmental organizations (NGOs) convicted of money laundering offenses may face up to 20 years in prison. In line with its commitment to combatting corruption, Kuwait has also ratified the United Nations Convention Against Corruption (UNCAC) and signed the United Nations Convention Against Transnational Organized Crime.

Kuwait's Score on Corruption Perceptions Index (CPI) 2024

On Tuesday, 11 February 2025, Transparency International released its annual Corruption Perceptions Index for 2024, stating that corruption remains deeply entrenched across the Middle East and North Africa, hindering critical climate action and development efforts. Over the past twelve years, the region has witnessed limited progress, with its average score rising by just one point to 39 out of 100, well below the global average of 43.

Against the backdrop of record global warming, extreme weather events, the erosion of democracy and a decline in global climate leadership, the world is on the verge of defeat in its fight against the climate crisis. Corruption will only render this fight more difficult, where the international community is required to address the link between corruption and the climate crisis.

Transparency International stated that over the past five years, seven states, including the State of Kuwait, have significantly improved their scores on the index. In MENSA region, notable improvements since 2017 include the Kingdom of Bahrain (53), which rose by 17 points, and the State of Kuwait (46), which rose by 7 points.

The State of Kuwait maintained the progress achieved thereby in its ranking on the Corruption Perceptions Index (CPI) last year, scoring 46 out of 100 for 2024, maintaining its score in 2023.

By re-ranking states each year, the State of Kuwait ranked 65th out of 180 countries, having ranked 63rd in 2023, dropping two places from the previous year.

The state's score is calculated on a percentage scale (0 = highest point of corruption, 100 = highest point of corruption-free). By calculating the average scores obtained from various sources, the state is ranked among 180 countries (1 = Best Ranking, 180 = Worst Ranking).

Among the GCC State, Kuwait ranked sixth, dropping two places from fourth, and ranked seventh in the Arab world, dropping two places from fifth. It is worth noting that Kuwait's score is 12 points higher than the overall average of Arab states (the overall average score for Arab states is 34). Kuwait's average score is 7 points higher than the overall average score for the MENA region (the overall average score for region is 39). Comparing Kuwait's performance in 2024 with the same in the base year 2012, it is two points higher and advanced by one place.

Table 1 displays the relationship between the change in Kuwait's score and position over the past three years. It is worth noting that a change in score by a certain amount is not necessarily accompanied by a change in rank by the same amount.

Year	Score	Score Change	Ranking	Ranking Change
2019	40	-	85	-
2020	42	+2 ↑	78	+7 ↑
2021	43	+1 ↑	73	+5 ↑
2022	42	-1 ↓	77	-4 ↓
2023	46	+4 ↑	63	+14 ↑
2024	46	-	65	-2 ↓

Table (1) The relationship of score change with the change in Kuwait position

Figure (1) also monitors Kuwait's score development and its CPI global ranking from 2019 (KIACS launch year) until 2024.

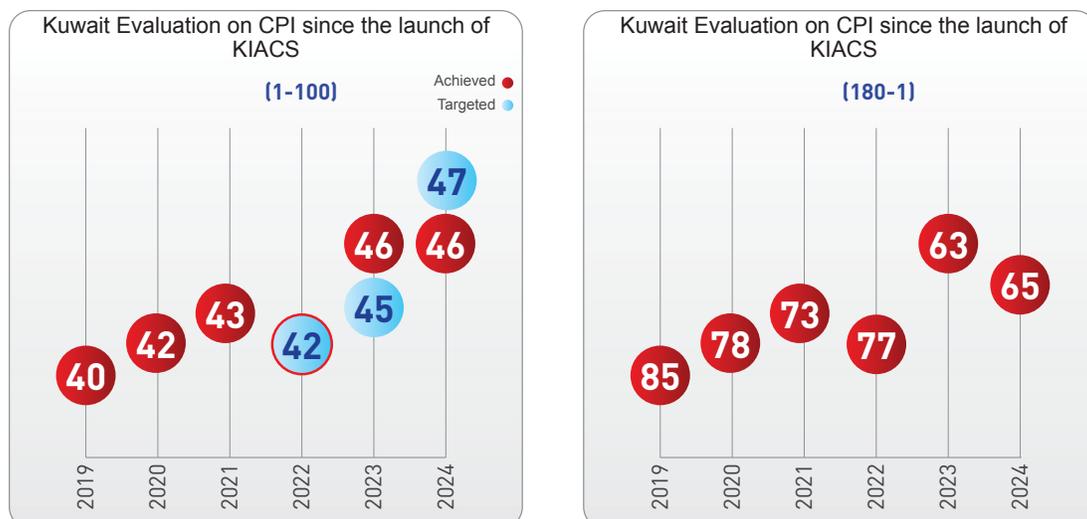


Figure (1) Kuwait's score development and its CPI global ranking from 2019 to 2024

Kuwait on CPI 2024

Moved from (63) to (65) Globally



Kuwait dropped ↓ 2 places in the global ranking.

Kuwait's Stability in the Global Corruption Perceptions Index for 2024

Changes in evaluation and ranks on CPI for GCC Member States between 2023 and 2024:

Noticeable Decrease >-5 ↓ Score □ Rank ■

Stable ranking -5; +5 ← Improved Ranking >5+ ↑

2023		2024		Difference
26	↑	23		0%

2023		2024		Difference
40	↑	38		+1%

2023		2024		Difference
53	↑	38		+7%

2023		2024		Difference
63	↓	65		0%

2023		2024		Difference
70	↑	50		+12%

2023		2024		Difference
76	↑	53		+11%

It is worth noting that a score change by a certain amount does not necessitate a change in rank by the same amount.

Source: Transparency International

Table (2) Scores and rankings of the GCC States in the Corruption Perceptions Index in 2023 and 2024

Regional and International Cooperation

United Nations Convention Against Corruption (UNCAC)

The United Nations Convention Against Corruption (UNCAC) is the preeminent international convention adopted by the United Nations General Assembly in October 2003 and is considered the primary tool for combating corruption worldwide. The international negotiations surrounding the UNCAC and its ratification by 168 states represent significant achievements in the fight against corruption at the global level, providing an international solution to an international problem.

Kuwait signed the United Nations Convention Against Corruption on 9 December 2003 and ratified it through Law No. 47 of 2006, pursuant to Article 70 of the Kuwait Constitution, which provides that ratified treaties shall have the force of law from the date of their ratification and issuance. Kuwait became an official state party to the Convention on 16 February 2007.

Kuwait Integrity and Anti-Corruption Strategy, with the national legislation, systems, policies, procedures and relevant practices, is in line with the best international standards set forth by the UNCAC, rendering Kuwait an exemplar for other states to follow among counterpart states and globally.

Arab Anti-Corruption Convention

League of Arab States' Arab Anti-Corruption Convention serves as the first official instrument at the Arab level to combat corruption. The Convention was signed by 21 Arab states on 21 December 2010, represented by the Arab Ministers of Interior and Ministers of Justice.

The Convention aims to activate both Arab and international efforts to combat all aspects of corruption, with a particular focus on extradition and the recovery of property. The Convention emphasizes that combating corruption is not limited to official authorities, but also includes individuals and civil society organizations, which should play an effective role in this field. Additionally, the Convention stresses the importance of respecting the sovereignty of its states parties and ensuring full equality among all states.

The Convention defines 13 crimes as acts of corruption, including bribery in public offices and public and private sector companies, bribery of public officials of international institutions in connection with international business, money laundering, illicit enrichment, abuse of public office, trading in influence, embezzlement of public and private institutions' property, and obstruction of justice.

In addition, the Convention highlights the importance of preventing corruption and raising awareness, outlining measures to ensure nationals' effective participation in combating corruption. This includes developing standards of transparency and competition in public procurement and setting rules of professional conduct in public services.

Makkah Al-Mukarramah Convention of the Member States of the Organization of Islamic Cooperation of Anti-Corruption Law Enforcement Cooperation.

This Convention is significant in enhancing procedures for exchanging information and investigations among anti-corruption law enforcement authorities, so as to prevent, detect, investigate, prosecute and recover stolen assets. This is in addition to enhancing the exchange of technical assistance, training and expertise among member states to improve the efficacy of information exchange and investigations in corruption crimes. In November 2024, Nazaha signed Makkah Al-Mukarramah Convention of the Member States of the Organization of Islamic Cooperation of Anti-Corruption Law Enforcement Cooperation, affirming Kuwait's commitment to continuing its efforts to enhance international cooperation in advancing global collaboration in the fight against corruption crimes and facilitating the sharing of knowledge in the creation of anti-corruption plans and initiatives.

Other signed Treaties and Conventions:

Agreement for the Establishment of the International Anti-Corruption Academy (IACA) as an international organization:

IACA is the first international organization dedicated to overcoming current deficiencies in knowledge and practice in the field of anti-corruption. It empowers professionals to meet future challenges in anticorruption. Kuwait has signed its establishment agreement on 5 March 2015 and ratified it on 4 May 2015. This Agreement aims to enhance the effectiveness and efficiency of combating corruption and preventing its risks through the following:

1. Providing the necessary academic education and vocational training with regard to combating corruption.
2. Conducting and supporting research related to all aspects of corruption.
3. Providing all aspects of anti-corruption technical assistance.
4. Enhancing international cooperation and communication among the participating parties to combat corruption.

Arab Convention on Combating Money Laundering and the Financing of Terrorism: The Convention was signed on 21 December 2010 by all Arab League member states for the purpose of enhancing combating money laundering and financing of terrorism supporting measures and strengthening cooperation among states in this regard.

United Nations Convention Against Transnational Organized Crime: Kuwait signed this Convention on 12 May 2006. The Conventions aims to enhance cooperation to combat transnational organized crime effectively and efficiently.

Arab Convention on Combating Transnational Organized Crime: This Conventions aims to enhance cooperation among Arab states to combat transnational organized crime. Kuwait signed it on 21 December 2012 and ratified it on 5 September 2013.

Memoranda of Understanding:

Nazaha has signed some Memoranda of Understanding with counterpart anti-corruption entities to enhance bilateral cooperation in the areas of preventing and combating corruption, as follows:

- Memorandum of Understanding between Kuwait Anti-Corruption Authority “Nazaha” and the Palestinian Anti-Corruption Commission regarding joint cooperation in the areas of combating corruption and preventing its risks.
- Memorandum of Understanding between Kuwait Anti-Corruption Authority “Nazaha” and the Administrative Control Authority of the Arab Republic of Egypt regarding bilateral cooperation in the areas of combating and preventing corruption.

- Memorandum of Understanding between Kuwait Anti-Corruption Authority “Nazaha” and the French Anti-Corruption Agency regarding bilateral cooperation in the areas of combating corruption.
- Memorandum of Understanding between Kuwait Anti-Corruption Authority “Nazaha” and the Anti-Corruption and Civil Rights Commission of the Republic of Korea regarding bilateral cooperation in the areas of combating corruption.
- Memorandum of Understanding between Kuwait Anti-Corruption Authority “Nazaha” and the Oversight and Anti-Corruption Authority “Nazaha” of Kingdom Saudi Arabis regarding enhancing and coordinating bilateral cooperation in the field of combating corruption.





4

General Framework of Kuwait Integrity and Anti-Corruption Strategy

1. Alignment with National Priorities

Combating corruption is one of the key enablers to achieve Kuwait Vision 2035

Kuwait launched its national vision "New Kuwait 2035" in January 2017 with a view to transform Kuwait into a regional financial, commercial and cultural hub that attracts investments and promote diversification of income and gradual reduction of total dependence on oil revenues.

Kuwait Vision 2035 is based on (7) pillars to achieve five (5) strategic directions, as indicated in below figure. Combating corruption is one of the crucial factors in achieving these pillars and goals, directly and indirectly, as it contributes to improving effective government administration and enhances accountability and transparency in public funds' management. This is in addition to enhancing government effectiveness by improving the formulation of public policies and government work procedures.

Kuwait Vision 2035

Objectives

	Nationals' Involvement and Respect for Law	Effective and Transparent Government	Thriving and Sustainable Economy	Interconnected Community	Prominent International Standing
Pillars	1 	Effective Public Administration			
	Just laws enhance the government's accountability	Clarity of responsibilities and effective government enhance public policies Public expenditure management is the basis for public finances' sustainability	Better laws to encourage greater private sector participation		
	2 	Sustainable Diversified Economy			
			Diversifying sources of income helps the state's prosperity	Economy that provides jobs and necessary income for the nationals	Robust economy that enhances Kuwait's standing internationally
	3 	Developed Infrastructure			
	Improving the application of technology to enhance transparency in the provision of services	Efficient infrastructure enhances the growth of the economy	Providing the best facilities and services to the nationals	Growth of air transport to enhance international connectivity	
4 	Sustainable Living Environment				
	Rationalizing subsidies to support the sustainability of public finances	Effective housing programs to boost the economy	Housing and environmentally sound plans for a better standard of living		
5 	High Quality Health Care				
			Improving the public health care system quality to provide a longer and healthier life		

- Crucial** Combating corruption is crucial to achieving outcomes expected from Vision 2035
- Important** Combating corruption is important to achieve outcomes expected from Vision 2035
- Relevant** Combating corruption is linked and relevant to achieving better outcomes from Vision 2035

Objectives

6



Creative Human Capital

Nationals' Involvement and Respect for Law	Effective and Transparent Government	Thriving and Sustainable Economy	Interconnected Community	Prominent International Standing
		Better education system to provide qualified human capital	Better education system to provide greater skills and knowledge in society	

Pillars

7



Global Positioning

Strengthening the rule of law to ensure security and peace		Foreign investment for economy stimulation		International impact is essential for developing economic and political ties
--	--	--	--	--

Crucial

Combating corruption is crucial to achieving outcomes expected from Vision 2035

Important

Combating corruption is important to achieve outcomes expected from Vision 2035

Relevant

Combating corruption is linked and relevant to achieving better outcomes from Vision 2035

Alignment with the Sustainable Development Goals (UN Global Goals)

KIACS is aligned with Kuwait's obligations at the international level with regard to corruption and development. It focuses on the two most prominent frameworks in this field; namely, the United Nations Sustainable Development Goals 2030 (SDGs) and United Nations Convention Against Corruption (2003).

Kuwait ratified the 17 Sustainable Development Goals (SDGs) in September 2015. These goals are interrelated and integrated, reflecting the importance of a holistic approach to achieving the purpose of this new plan by the United Nations. Kuwait's success in realizing the aspirations of this plan would significantly improve the lives of all citizens and residents, contributing to transforming the state and the world for the better.

KIACS has been designed to enable Kuwait to make genuine progress towards achieving the UN SDGs plan, with a specific focus on the Sixteenth Goal related to "peace, justice, and strong institutions". This goal calls on all nations to promote peaceful and inclusive societies, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels in order to achieve sustainable development. In this context, KIACS has been aligned with this goal and aims at achieving its targets related to enhancing integrity and combating corruption, which are:

- 16.3** Promote the rule of law at the national and international levels and ensure equal access to justice for all.
- 16.4** By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organized crime.
- 16.5** Substantially reduce corruption and bribery in all their forms.
- 16.6** Develop effective, accountable and transparent institutions at all levels.
- 16.7** Ensure responsive, inclusive, participatory and representative decision-making at all levels.
- 16.8** Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements.

2. Vision, Mission and Goals

Over the years, Kuwait has made significant efforts to combat corruption. To further promote these efforts, the Kuwait Integrity and Anti-Corruption Strategy was launched. KIACS was developed by Nazaha in collaboration with the United Nations Office on Drugs and Crime, the United Nations Development Program, and the General Secretariat of the Supreme Council for Planning and Development. According to the United Nations Development Program, KIACS “is the first of its kind at the level of the GCC Member States in terms of the participatory preparation methodology. It is also the first in a decade at the level of the GCC Member States.”

The launch and approval of KIACS was sponsored by His Highness the late Emir Sheikh Sabah Al-Ahmad Al-Jaber Al-Sabah (may Allah rest his soul) on 15 January 2019. The event took place as part of the first Kuwait International Anti-Corruption Conference, which was held under the title “Integrity for Development” on 15-16 January 2019.

KIACS extends for five years, from 2019 to 2024. It seeks to contribute substantially to achieving reforms in Kuwait. The strategy aims at achieving this by promoting the implementation of the UNCAC and SDGs in line with the “New Kuwait 2035,” and ultimately improving Kuwait’s status on international indicators related to integrity and combating corruption.

To achieve its goals, KIACS must have a clear and ambitious vision, reflect a specific and actionable message, and adopt principles and values that reflect the essence of its aspirations. KIACS was designed with all of these elements in mind, and reflects the aspirations, convictions, and commitments of all those responsible for its preparation and implementation.

Kuwait Integrity and Anti-Corruption Strategy (2019 – 2024)



Vision 2024

To build a New Kuwait, on a foundation of trust that would embody the principles of transparency, accountability and the rule of law, with all parties striving in unison to eliminate corruption.



Mission

To promote the values of integrity and anti-corruption in the public and private sectors and in the society at large, thereby contributing to sustainable development.

Principles



Pillars



Strategic Goal:
Protecting the Integrity of the Public Sector and Developing the Efficiency and Effectiveness of the Public Services so that They are Delivered in a Transparent and Accountable Manner.



Strategic Goal:
Encouraging the Private Sector to Promote Integrity and Fight Corruption.



Strategic Goal:
Enabling the Society to Contribute to Building a Culture that Promotes Integrity and Anti-Corruption.



Strategic Goal:
Enhancing the Efficiency and Effectiveness of Specialized Bodies that Focus on Promoting Integrity and Combating Corruption.

3. KIACS' Priorities:

For its work term (2019-2024), KIACS has 4 pillars: Public Sector, Private Sector, Society, and Specialized Bodies. These pillars are inspired by its vision, mission and principles. Each pillar is based on a strategic goal that can be monitored and evaluated.

Across the four pillars, KIACS includes 13 priorities and

47 initiatives. The First Pillar on Public Sector includes 5 priorities and 22 initiatives. As for the Second Pillar on Private Sector, it has 2 priorities and 6 initiatives. The Third Pillar on Society contains 3 priorities and 11 initiatives. Lastly, there are 3 priorities and 8 initiatives in the Fourth Pillar on Specialized Bodies.



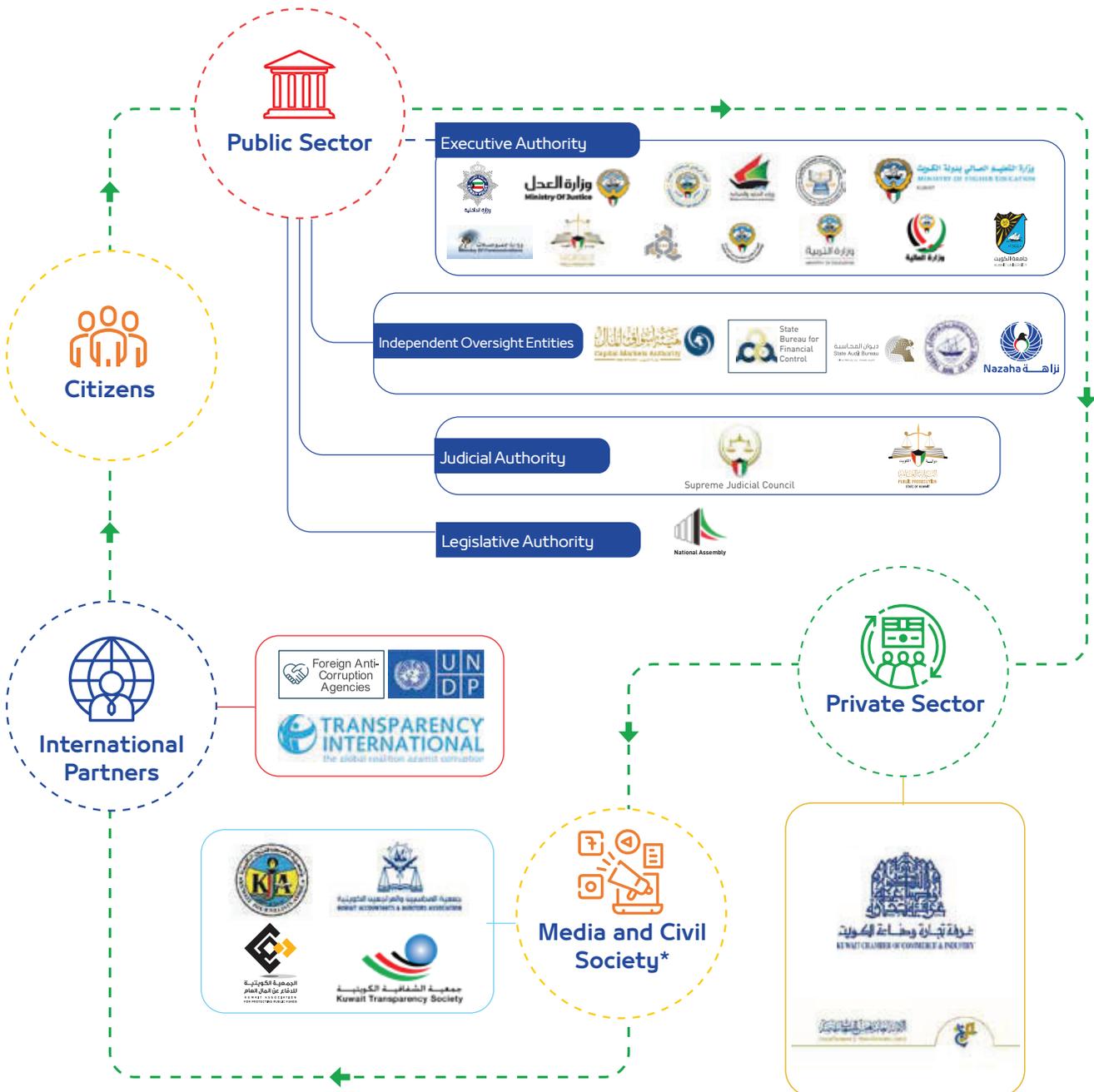
4. The Integrated System to Enhance Integrity:

Combating corruption is carried out in collaboration with all partners, both locally and internationally:

Corruption has administrative, societal, cultural, and legal dimensions, and combating it effectively requires a system that addresses all these aspects. KIACS recognizes the need for a strong and coordinated anti-corruption system that includes law enforcement agencies, legislative entities, oversight agencies, civil society, media, and other stakeholders. The success of KIACS depends on the active participation and cooperation of all parties involved, as combating corruption is a shared national responsibility.



The Integrated System to Enhance Integrity



* The entities are mentioned by example. The technical committee responsible for the Third Pillar of KIACS is in contact with a wide range of civil society and media representatives.

Kuwait Anti-Corruption Authority "Nazaha"

Kuwait Anti-Corruption Authority "Nazaha" is an independent entity that was established under Law No. (02) of 2016, issued on 24/01/2016 in response to the requirements of the United Nations Convention Against Corruption. The UNCAC stipulates in Article Six that "Each State Party shall, in accordance with the fundamental principles of its legal system, ensure the existence of a body or bodies, as appropriate, that prevent corruption". One of the primary motivations behind the establishment of Nazaha was the recognition of the critical need for an integrated system to enhance integrity and combat corruption. The presence of Nazaha within this system is seen as an essential national requirement that serves the best interests of the state.

Furthermore, Nazaha has developed its first institutional strategy to organize and streamline its efforts in leading and supporting the implementation of KIACS. This strategy is designed to enhance Nazaha's institutional capabilities and align its scope of work with the provisions of the law.

Nazaha's First Five-Year Strategy 2024-2019

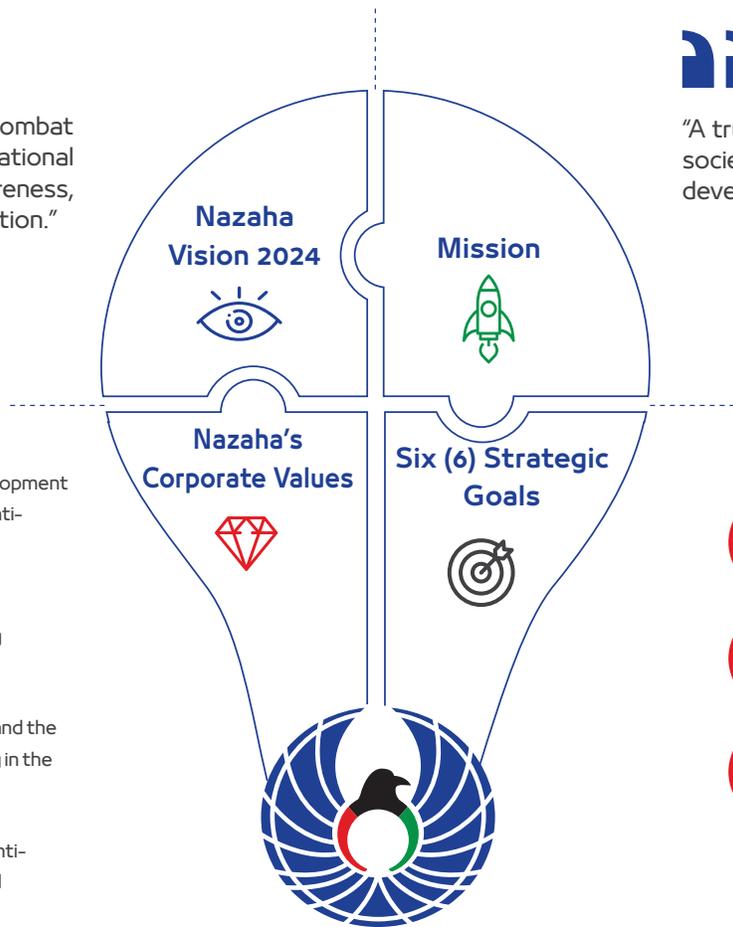


"We work together to combat corruption with all national elements through awareness, prevention and investigation."



"A trusted entity for an honest society and sustainable development"

- 1 Contributing to the development and implementation of anti-corruption legislations.
- 2 Developing institutional framework for combating corruption.
- 3 Enhancing transparency and the principle of accountability in the public sector.
- 4 Efficiently coordinating anti-corruption efforts with all stakeholders.
- 5 Raising awareness and spreading anti-corruption culture.
- 6 Promoting cooperation with regional and international organizations.



Credibility



Transparency



Accountability

نزاها Nazaha



5

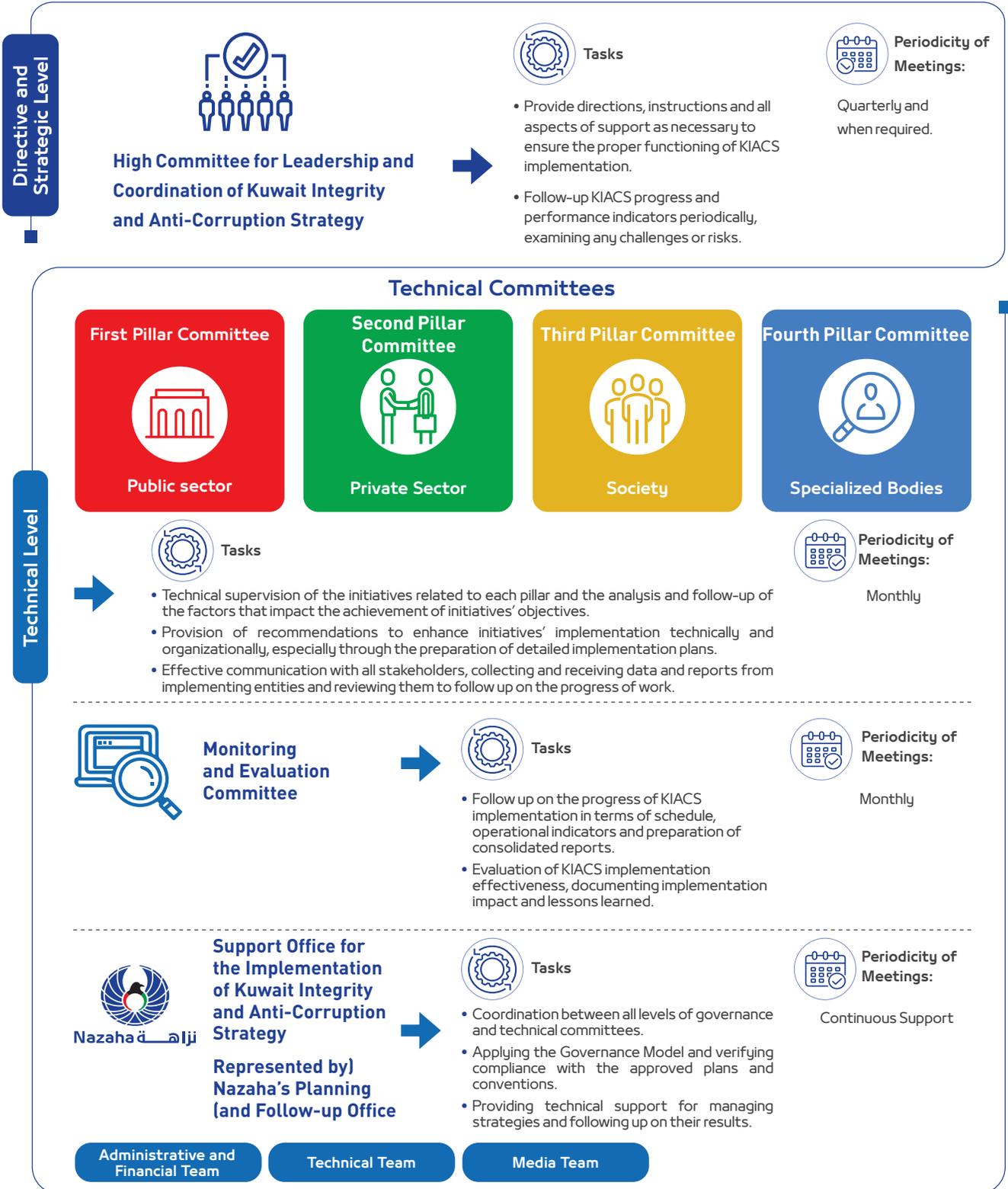
Governance Model for Kuwait Integrity and Anti-Corruption Strategy **Leadership and Implementation**

1. Governance Model Components

KIACS success relies heavily on its governance mechanism, which ensures effective communication and clarity of responsibilities between KIACS' leadership, implementation, follow-up, and evaluation components. It also facilitates the decision-making process and provides technical and administrative support at all levels.

A clear, coordinated and effective governance model has been adopted that draws on the globally best practices and is commensurate with the work environment and the institutional and legal system in Kuwait. KIACS' governance mechanism is based on four (4) basic components, as indicated in the following figure:

Implementation Mechanism Structure





6

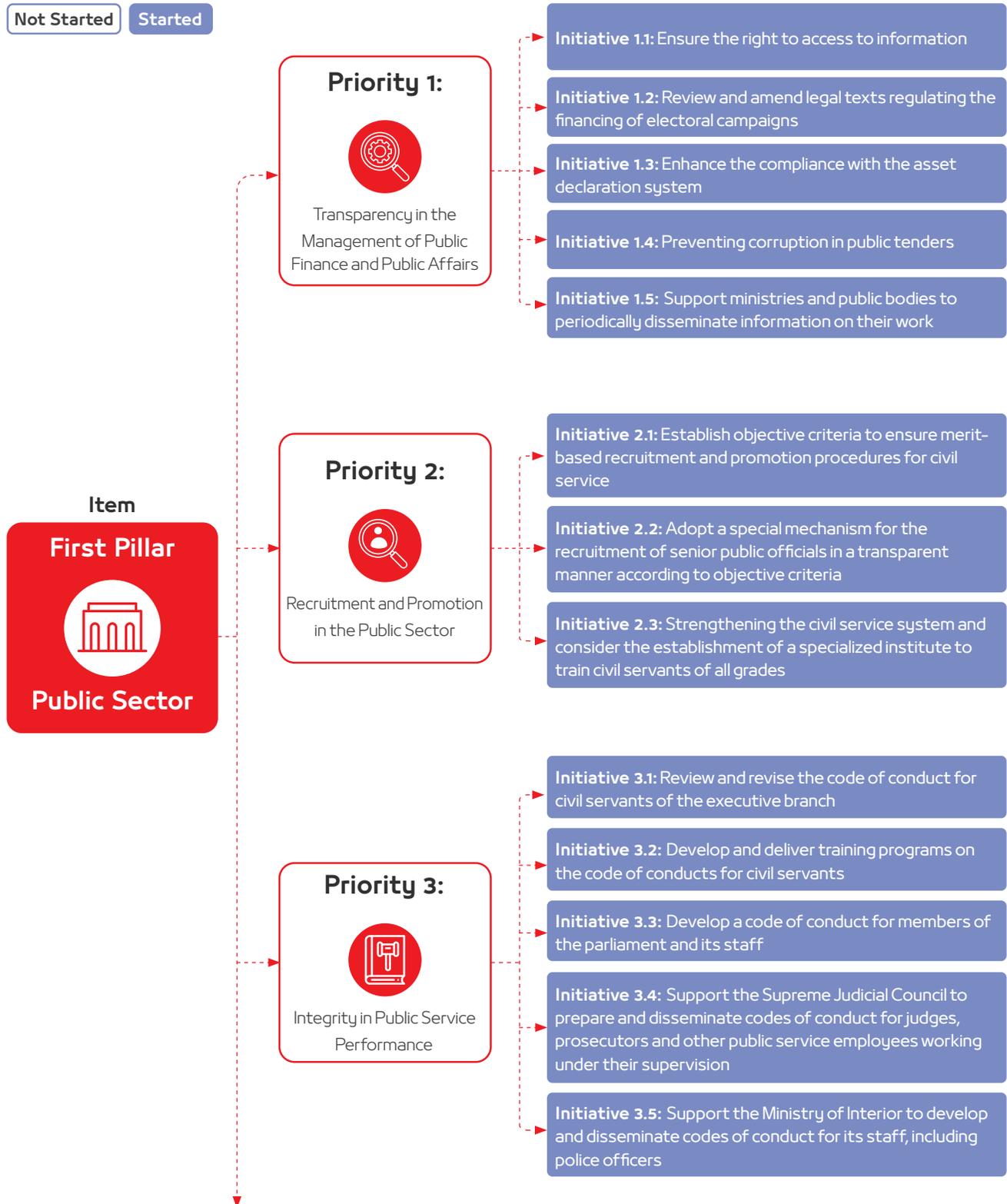
Outcomes and Progress of Kuwait Integrity and Anti-Corruption Strategy

1. First Pillar: Public Sector

Strategic Goal: Protecting the integrity of public sector and developing the efficiency and effectiveness of public services so that they are delivered in a transparent and accountable manner.

A) Progress Overview:

Initiatives in the First Pillar:



Not Started

Started

Priority 4:



Accountability in Public Sector

Initiative 4.1: Review and strengthen performance management systems of public service employees and conduct regular performance evaluations

Initiative 4.2: Review and strengthen the standards and mechanisms of accountability in the public sector, including accounting, auditing and oversight mechanisms

Initiative 4.3: Review and strengthen measures to ensure integrity and accountability in state-owned enterprises

Initiative 4.4: Establishing and enforcing a conflict-of-interest management system

Initiative 4.5: Amend legislation to effectively criminalize illicit enrichment

Priority 5:



Effectiveness and Efficiency in Public Services Delivery

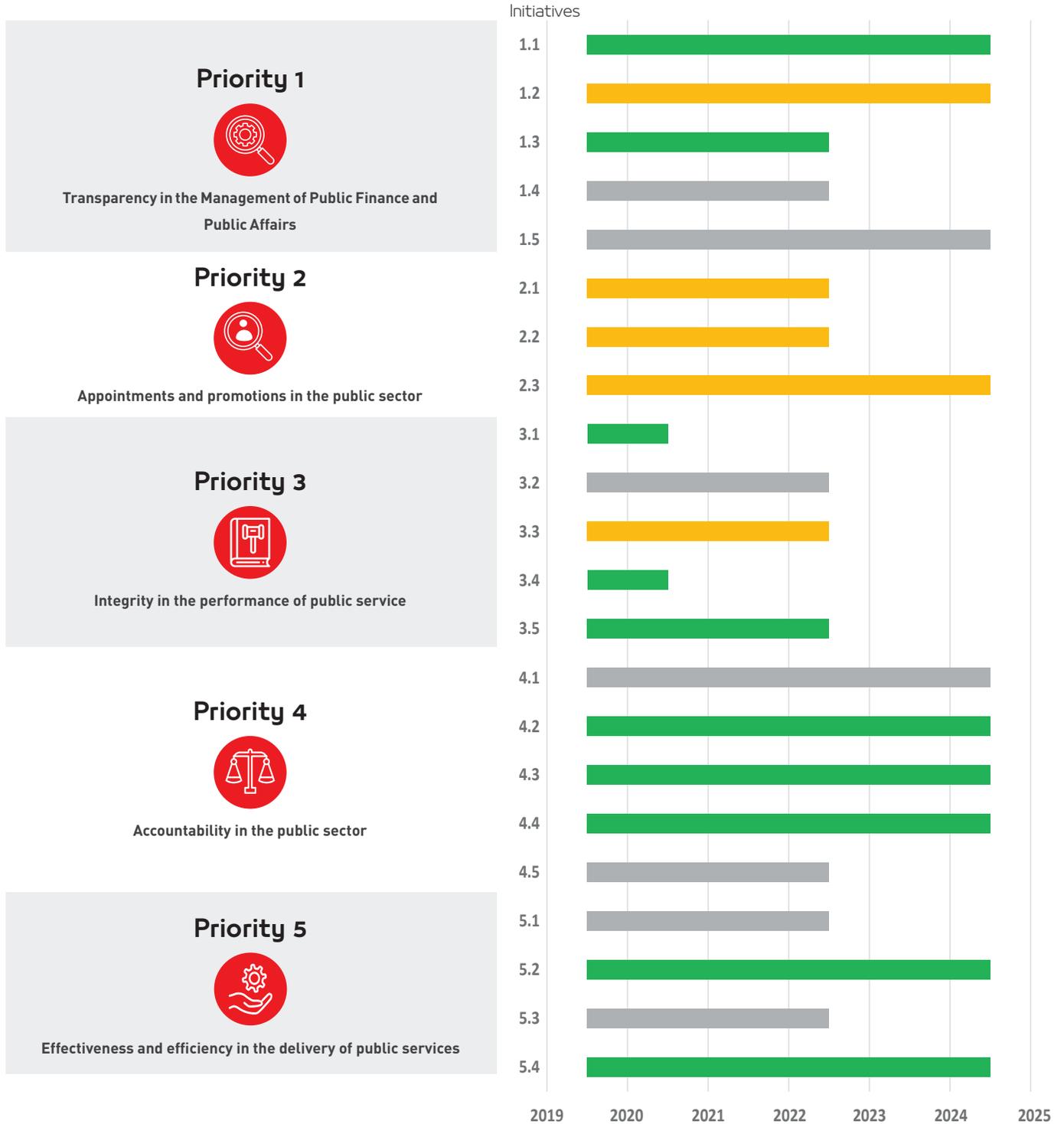
Initiative 5.1: Review and streamline bureaucratic procedures of public service delivery

Initiative 5.2: Develop and implement e-government internet-based platforms to further automate processes for the delivery of public services

Initiative 5.3: Develop and publish user-friendly guides for the public regarding how to access and apply for public services both in paper and electronically

Initiative 5.4: Integrate corruption risk management into sectors that provide public services to identify and address weaknesses periodically and sustainably

Progress made in the initiatives of the First Pillar



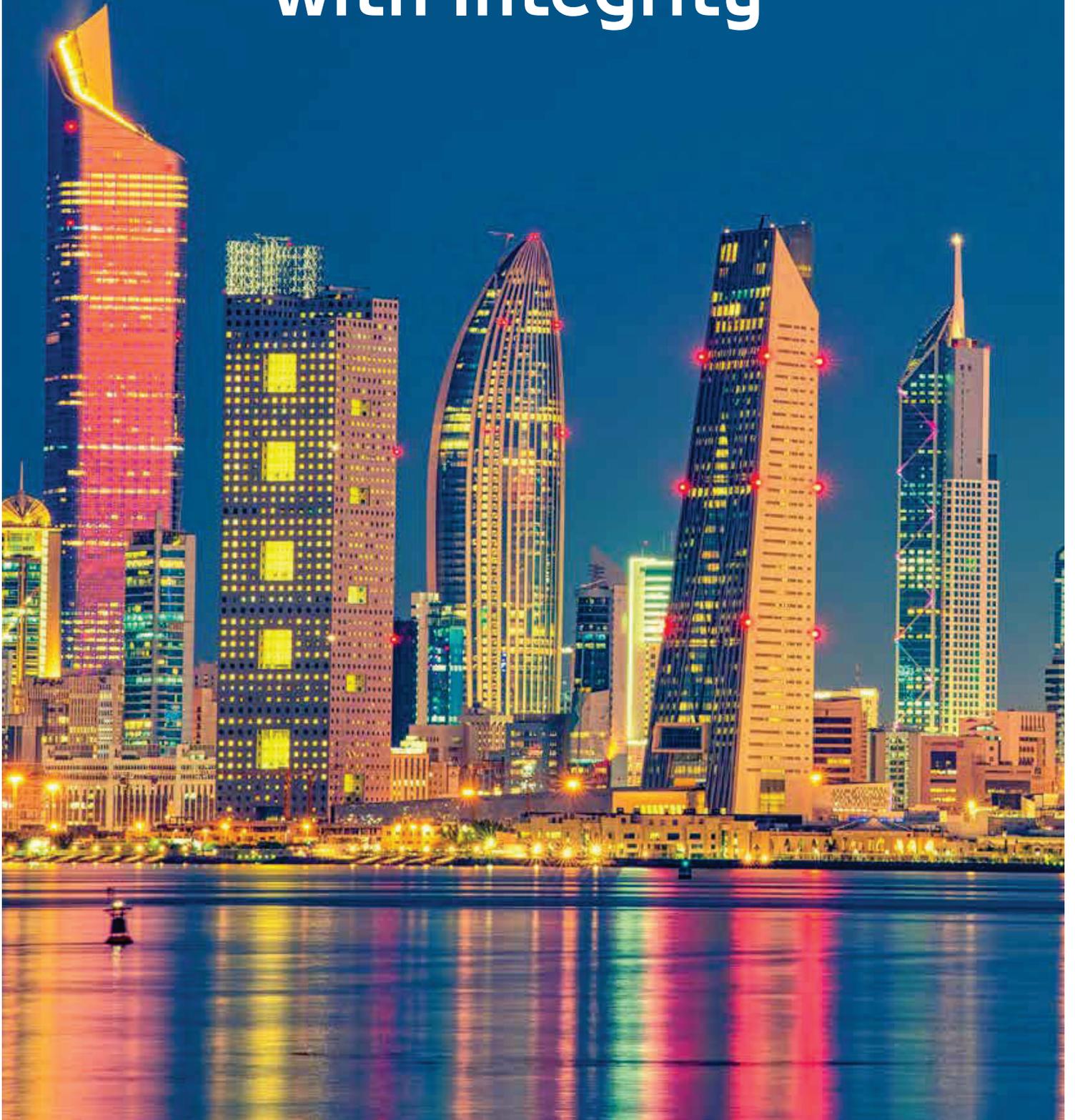
- Aligned on the right track
- Minor deviation from the plan, but it is manageable
- Not aligned - off track with the potential for not adhering to the timeline / or significant risks to achievement

For details of the achievements of each initiative, please refer to page 41 of the report

Target results of the First Pillar and its initiatives at the conclusion of KIACS

Item	Result
<p style="text-align: center;">First Pillar</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Public Sector</p>	<p>Increase in the level of integrity in public sector and the development, effectiveness and efficiency of public services in a transparent and accountable manner.</p>
<p> Priority 1 Transparency in the Management of Public Finance and Public Affairs</p>	<p>Achieving stronger confidence in state institutions and the rule of law, achieving more efficient government performance.</p>
<p> Priority 2 Recruitment and Promotion in the Public Sector</p>	<p>Building trust between citizens and the government and enhancing the efficiency and effectiveness of public sector at work on the basis of transparency and the rule of law.</p>
<p> Priority 3 Integrity in Public Service Performance</p>	<p>Increase in the integrity of public services.</p>
<p> Priority 4 Accountability in Public Sector</p>	<p>Full implementation of the United Nations Convention Against Corruption and promotion of accountability in public sector.</p>
<p> Priority 5 Effectiveness and Efficiency in Public Services Delivery</p>	<p>Increase in the transparency and accessibility of public services, reduce corruption risks and enhance the effectiveness of public service delivery systems.</p>

**We Build the Nation
with Integrity**

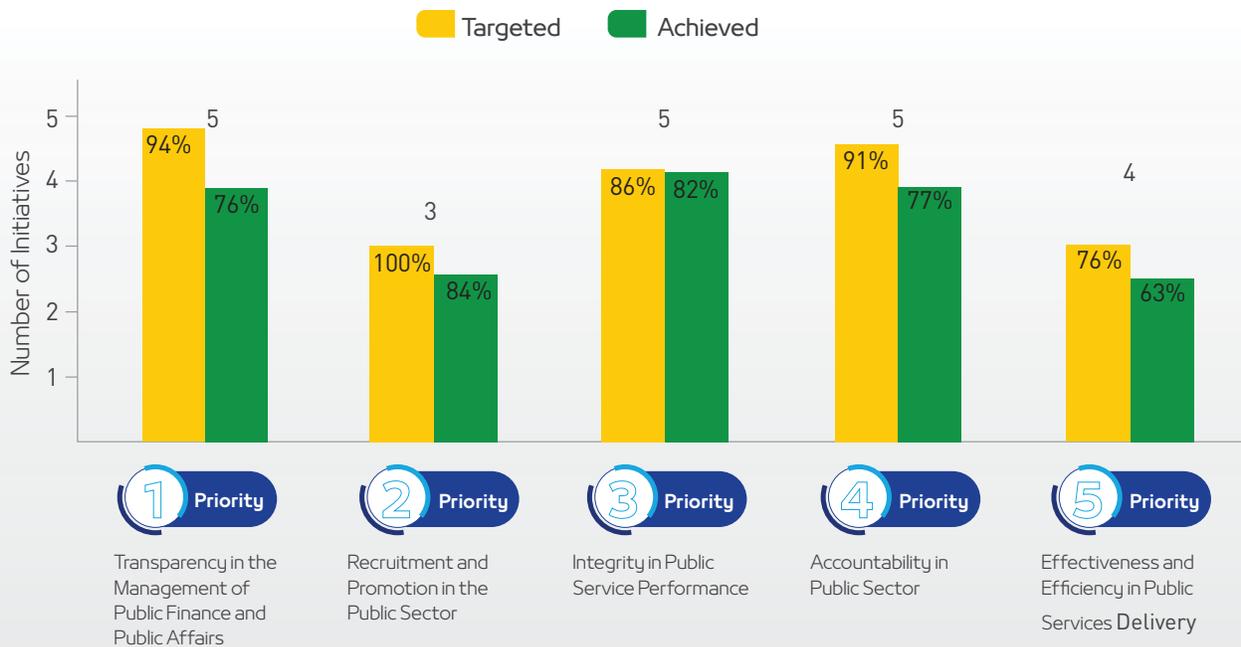


First Pillar Follow-Up Board

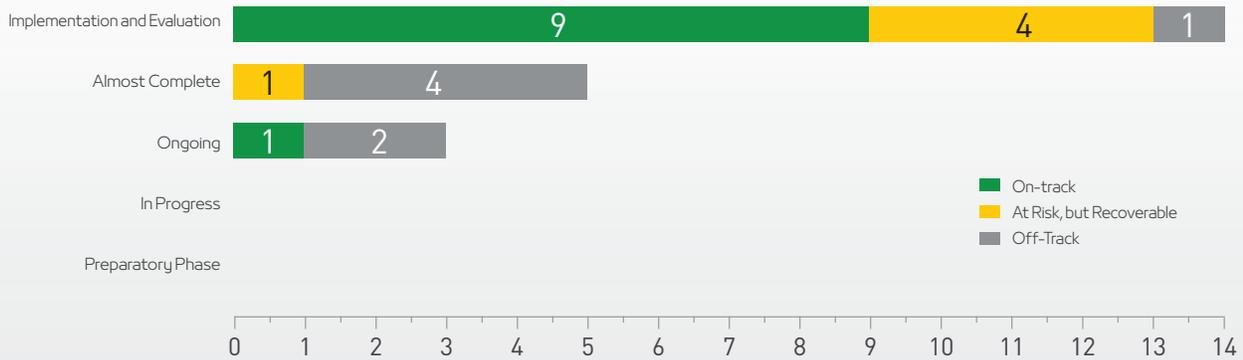
Pillar's Implementation Progress



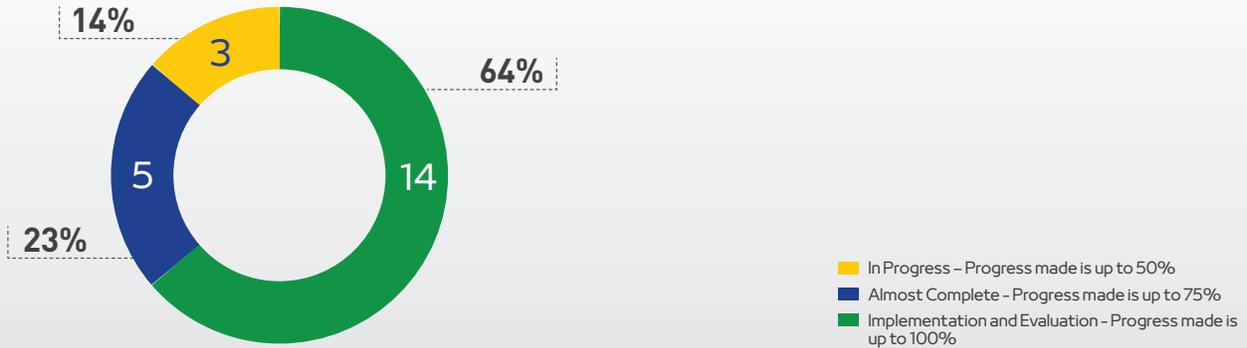
Priorities' progress status



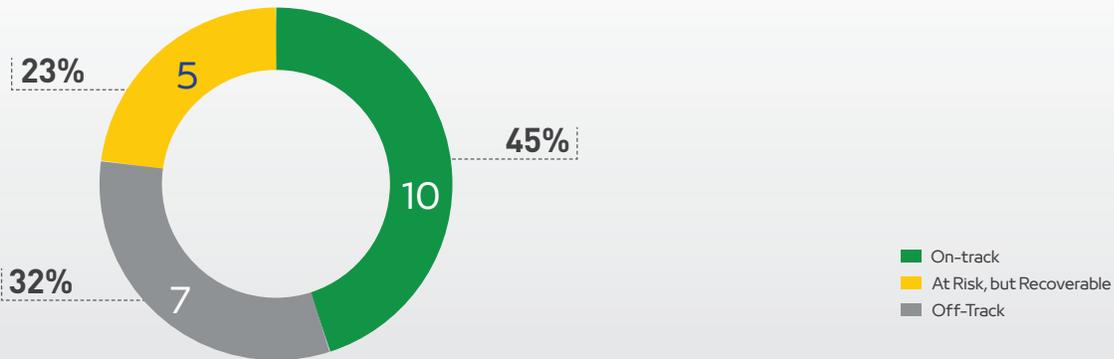
Alignment of initiatives with the established schedule and percentage of completion



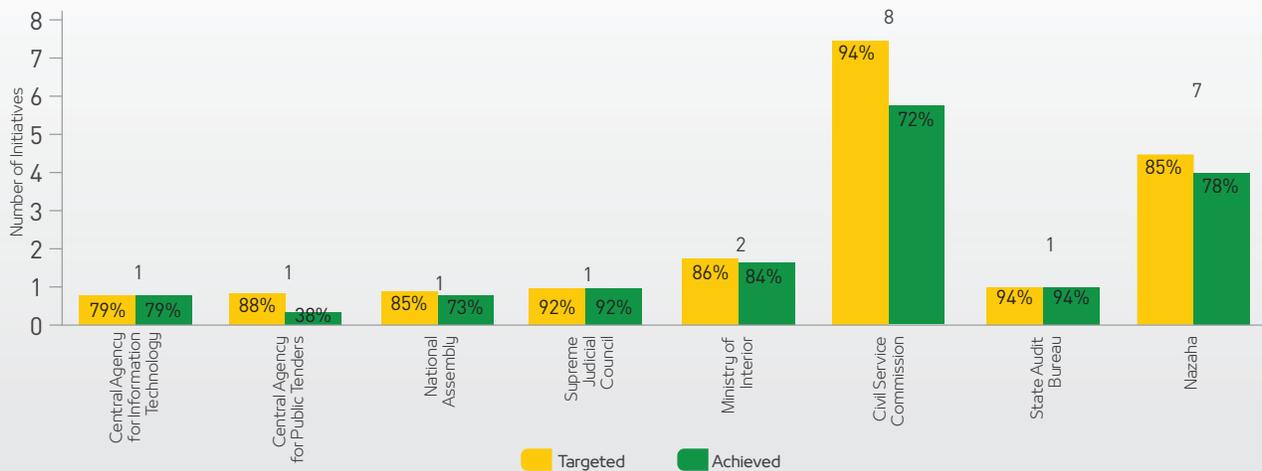
Distribution of initiatives according to the percentage of completion



Percentage of compliance with the approved plan



Implementing agencies



Initiatives' rate of completion is evaluated according to the following criteria



Priority 1: Transparency in the Management of Public Finance and Public Affairs

Progress: 76%

#	Initiative	Procedure	Implementing Agency
1.1	<p>Ensure the Right to Access to Information</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> Law No. 12 of 2020 regarding the Right to Access to Information was issued and published in the Official Gazette in September 2020. Its Executive Regulations were issued in January 2021. "Nazaha" continues to implement several awareness programs on the law, its objectives and its implementation mechanism, presenting awareness programs during the year 2024 for the following entities: <ol style="list-style-type: none"> Ministry of Social Affairs and Labor Kuwait Petroleum Corporation National Office for Human Rights International Law School Kuwait Foreign Petroleum Exploration Company Nazaha prepared a study to evaluate the extent of government agencies' commitment to implementing the Right to Access Information Law in three stages. The study included fourteen (14) items to evaluate the agencies in the first stage, where the agencies concerned with the law were contacted to participate in filling out a questionnaire to evaluate the extent of commitment to implementing the Law. Agencies' response rate to the questionnaire amounted to 70%, 81% of whom responded to requests for information, with a total of 3597 requests, of which about 73% were approved, 8% were rejected and 1% of them included fragmented responses (part is rejected and part is approved), and 9% of them are still under study. In the second stage, data received was audited according to its availability on the website of the relevant agencies. In the third stage, the voluntary disclosure of all agencies covered by the law was evaluated according to the ten items included in the fifth clause of the Law, noting that the majority of agencies are subject to eight items. Agencies' average commitment amounted to 72% in the third phase. 	 <p>نزهة Nazaha</p>
1.2	<p>Review and amend legal texts regulating the financing of electoral campaigns</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> Enactment of Law No. 120 of 2023 on Election of the National Assembly Members, "Establishment of the Electoral Commission", which is concerned with all matters related to the electoral process, including setting the rules regulating advertising, campaigns, electoral expenses, sources of funding and the maximum limit for financing and spending thereon. An Amiri Decree was issued on 10 May 2024 to dissolve the Kuwaiti National Assembly, suspending certain articles of the Constitution for a period not exceeding four years. 	 <p>وزارة الداخلية</p>
1.3	<p>Enhance the compliance with the asset declaration system</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> The initiative is in the final implementation and evaluation phase, in accordance with the provisions of the law establishing Nazaha. Nazaha continues to hold and implement training and awareness programs in coordination with stakeholders to ensure compliance with financial disclosures and the availability of all data. The percentage of commitment to submitting a financial disclosure statement amounted to 99%, where the percentage of declarants whose declarations were examined reached 99% during the year 2024. 	 <p>نزهة Nazaha</p>

#	Initiative	Procedure	Implementing Agency
1.4	<p>Target 100%</p> <p>Preventing corruption in public tenders</p>  <p>50%</p> <p>Ongoing</p>	<ul style="list-style-type: none"> Enactment of Law No. 1 of 2024, which modifies Article 24 of Decree-Law No. 68 of 1980 that established the Commercial Law, as well as Article 31 of Law No. 49 of 2016 on Public Tenders. The Law was published in Kuwait Al-Yaum on 21 January 2024. With the abolishment of the local agent requirement via amendments, foreign companies are permitted to invest, set up branches in the State of Kuwait, and operate directly without needing a local agent. The working group established by Administrative Decision No. 180 of 2023 to monitor the execution of the government's work program for the draft amendment to Law No. 49 of 2016 concerning Public Tenders and its amending laws, involving a specialized advisor from the Department for Legal Advice and Legislation, has concluded its work. Following consultations with all government agencies, it was decided to amend 52 articles of the Public Tenders Law and its amending laws to align them with the nature of business and practical reality, in order to achieve greater transparency, integrity, competitiveness, justice, and equality. Consequently, the relevant minister submitted the draft proposal to the Department for Legal Advice and Legislation for necessary action. Administrative Decision No. 129 of 2024 was issued on 28 July 2024, to study and revise the proposed first amendment. The Resolution confirmed the compatibility of the amendments issued in the first draft of the law with the addition and modification of some articles. Accordingly, the proposal was submitted, as an addendum to the previous proposal, to the Department for Legal Advice and Legislation by the relevant minister for necessary action. 	
1.5	<p>Target 100%</p> <p>Support ministries and public bodies to periodically disseminate information on their work</p>  <p>75%</p> <p>Almost Complete</p>	<ul style="list-style-type: none"> Nazaha reviewed the best international and local practices in preparing annual reports, in addition to Law No. (12) of 2020 on the Right to Access to Information and the articles included therein that require entities to publish guides containing lists of information available for disclosure thereon, with the aim of preparing a draft guide on the content and mechanism of preparing annual reports. Nazaha also defined all government agencies' reports pursuant to the following mechanism: <ol style="list-style-type: none"> The extent to which the law establishing the concerned government agency obliges it to issue (annual - semi-annual - monthly) reports. The extent to which government agencies implement Law No. (12) of 2020 on the Right to Access to Information. Administrative classification of government agencies as applied in Kuwait, into (ministries - government departments - independent agencies - attached bodies - state-owned companies - public benefit organizations, etc.) Report publishing tools: (issuing a book annually, semi-annually or quarterly), publishing on the agency's official website, publishing periodic statistics or monthly magazines. Nazaha prepared a draft guide for preparing annual reports in accordance with international best practices and in a manner that achieves the highest levels of transparency. Government agencies will be trained to implement that guide. 	 <p>Nazaha نـزاهة</p>



Priority 2: Recruitment and Promotion in the Public Sector

Progress: 84%

#	Initiative	Procedure	Implementing Agency
2.1	<p>Target 100%</p> <p>Establish objective criteria to ensure merit-based recruitment and promotion procedures for civil service</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> CSC prepared a draft law amending some provisions of Decree Law No. 15 of 1979 and submitted it to the Council of Ministers in March 2021. This included updating the CSC law to allow the establishment of a recruitment central system in all government agencies, public and independent entities and institutions, which the Commission undertakes to implement in a manner that achieves equality and equal opportunities among all citizens. 	 <p>دولة الكويت CIVIL SERVICE COMMISSION</p>
2.2	<p>Target 100%</p> <p>Adopt a special mechanism for the recruitment of senior public officials in a transparent manner according to objective criteria</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> Based on the decision by the former Council of Ministers in September 2021, CSC prepared a study on a new mechanism for recruitment and promotion of leaders and supervisors. It was discussed with the Civil Service Council in accordance with the Council's systems and powers, as the recommendation was that the project needs further study. The Civil Service Commission issued Resolution No. (18) of 2023 regarding the mechanism for selecting candidates to fill leadership positions. The Resolution has been published in Al-Kuwait Al-Yaum on 06/082023. 	 <p>دولة الكويت CIVIL SERVICE COMMISSION</p>
2.3	<p>Target 100%</p> <p>Strengthening the civil service system and consider the establishment of a specialized institute to train civil servants of all grades</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> The Council of Ministers tasked the Civil Service Commission with activating the Training Department's role therein, expanding its responsibilities in terms of providing training and conducting tests. This is with a view to developing the capabilities of those occupying leadership, supervisory, executive and other positions within the government apparatus, thus enhancing and supporting government plans, development and progress directives. The Civil Service Commission issued Circular No. (14) of 2024, dated 02 December 2024, obligating each government agency to provide training in its field of expertise and work tasks. All government agencies are required to adhere to the following: <ol style="list-style-type: none"> Government agencies shall provide the necessary training for their employees, according to their field of expertise and specialized needs, in line with their defined objectives and roles. Administrative development and training departments in government agencies shall develop a draft annual training plan, specifying all training programs and needs, which shall be categorized and approved by the CSC before being incorporated into the integrated systems. This process is based on the training needs of the agency and designed to meet the needs of its employees. The government agency shall train its employees and those of other government agencies, provided that these programs are specialized in their field of expertise. As for the administrative and refresher programs and courses they shall be limited to the agency's employees only. 	 <p>دولة الكويت CIVIL SERVICE COMMISSION</p>

Highlight on Recruitment and Promotions in the Public Sector

The laws and circulars of the Civil Service Commission (CSC) govern recruitment in government agencies that fall under the supervision of the Commission.

Recruitment is organized through a central automated system that enables citizens to view and apply for vacancies online.

CSC issued **Circulars No. 25 of 2006 and No. 30 of 2015** regarding supervisory positions (director, controller, head of department, head of division). These circulars indicate the requirements for holding these positions (such as academic requirements and experience), with a view to reorganizing the process (such as relying on a recommendation from the Human Resources Committee). These two circulars specify the minimum requirements, where it is possible for relevant government agencies to add other criteria without prejudice to the minimum requirements.

For appointment and promotion decisions to be valid, prior approval of the CSC Control is required. This is a procedure adopted by the Commission in order to ensure that such decisions are issued in accordance with the relevant rules and laws.

A transparent grievance mechanism has been adopted to allow any citizen who has any doubts about his/her recruitment process to complain in accordance with the approved procedures. The Right to Access to Information Law enhances citizens' right to request access to any data related thereto pursuant to the Law.

Circular No. 18 of 2011 governs and regulates promotions in entities subject to the Civil Service Commission's control.

For leadership positions, **Circular No. 8 of 2018** sets clear recruitment criteria (including minimum experience, academic requirements, previous job performance, etc.), provided that at least three candidates shall be selected for the job, who shall undergo tests and interviews. This process prioritizes internal promotions over external candidates.

The Civil Service Commission issued Resolution **No. (18) of 2023** regarding the mechanism for selecting candidates to fill leadership positions. The Resolution was published in Al-Kuwait Al-Youm 06/08/2023.

Priority 3: Integrity in Public Service Performance

Progress: 82%

#	Initiative	Procedure	Implementing Agency
3.1	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">Target 100%</div> <p>Review and revise the code of conduct for civil servants of the executive branch</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> CSC issued Circular No. (2) of 2021 regarding an updated Code of Conduct for all government agencies. Nazaha resumes its awareness campaigns about the codes of conduct, their purpose and the principles they should include in the public sector. 	 ديوان الخدمة المدنية CIVIL SERVICE COMMISSION
3.2	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">Target 75%</div> <p>Develop and deliver training programs on the code of conducts for civil servants</p>  <p>50% Ongoing</p>	<ul style="list-style-type: none"> CSC conducts training on the Code of Conduct for government agencies, in addition to preparing a training program on the new Code of Conduct and its inclusion within the annual training plan. The number of trainees on codes of conduct since 2013 to 2023: 1334 trainees. CSC continues to address all government agencies periodically regarding the implementation of training programs related to the codes of professional conduct. "Nazaha" launched "Aadaa" project to include a system of accreditations based on adopting the rules of professional conduct for public employees with a view to achieving compliance with the standards and ethics of the Code of Professional Conduct to create a work environment characterized by professionalism, efficiency and optimal productivity in light of institutional values and a healthy work environment. The number of participating entities reached (14) government agencies and the number of beneficiaries amounted to 223,500 male and female employees. 	 ديوان الخدمة المدنية CIVIL SERVICE COMMISSION

#	Initiative	Procedure	Implementing Agency
3.3	<p>Target 100%</p> <p>Develop a code of conduct for members of the parliament and its staff</p> <p>75% Almost Complete</p>	<p>A) Staff of the General Secretariat of the National Assembly: 100% (Implementation and Evaluation)</p> <ul style="list-style-type: none"> A code of professional conduct for the staff of the General Secretariat of the National Assembly was issued according to Resolution No. (13), issued at the meeting of the National Assembly Office No. (4) held in February 2021. Training programs were conducted for the Secretariat's employees to explain the Code of Conduct, in addition to designing and disseminating an awareness campaign to (650) employees in the Secretariat to raise awareness of the Code of Conduct. <p>B. Members of the National Assembly:</p> <ul style="list-style-type: none"> An Amiri Decree was issued to dissolve the Kuwaiti National Assembly 10/05/2024, suspending some articles of the Constitution for a period not exceeding four years.. 	
3.4	<p>Target 100%</p> <p>Support the Supreme Judicial Council to prepare and disseminate codes of conduct for judges, prosecutors and other public service employees working under their supervision</p> <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> In 2021, the Supreme Judicial Council issued a code of conduct for the judiciary and public prosecution members, and it was updated in 2023. Kuwait Institute for Judicial and Legal Studies circulated the Code of Judicial Conduct to all representatives and judges of the Court of First Instances and members of the Public Prosecution, where a number of (18) members of the Public Prosecution were trained thereon during the year 2024. The Institute also trained (103) legal researchers nominated to work as representatives of the Public Prosecutor and (53) judges transferred from the Public Prosecution to work in the Court of First Instances on "Judicial Values and Traditions". 	
3.5	<p>Target 100%</p> <p>Support the Ministry of Interior to develop and disseminate codes of conduct for its staff, including police officers</p> <p>100% Implementation and Evaluation</p>	<p>A code of conduct for police officers and another one for the Ministry's employees were circulated in October 2021.</p> <ul style="list-style-type: none"> The Mol circulated the "Code of Professional Conduct" and the rate of orientation thereof for all employees, including civilians and police personnel, is 100%. Total of 122 police force (military) members received training on the Code of Professional Conduct, out of a total of 3,000. Total of 837 civilian trainees received training on the Code of Professional Conduct, out of 5,000. Total of 959 military and civilian trainees received training on the Code of Professional Conduct. In November 2024, the Ministry of Interior held a meeting with representatives of Nazaha regarding the Nazaha's experience in preparing a visual and awareness presentation on the Code of Professional Conduct. That presentation was circulated to all its members and provided to the Ministry for implementation by the Ministry of Interior. 	

Priority 4: Accountability in the public sector

Progress: 77%

#	Initiative	Procedure	Implementing Agency
4.1	<p>Target 100%</p> <p>Review and strengthen performance management systems of public service employees and conduct regular evaluations performance</p> <p>75% Almost Complete</p>	<ul style="list-style-type: none"> The CSC seeks to submit a proposal regarding raising the ceiling of the public employee's salary, reward and promotion linked to his performance evaluation, based on the efficiency and quality of his achievement, as a means of encouraging public employee to acquire more skills and competencies to raise their performance level. The proposal also aims to achieve the following: <ol style="list-style-type: none"> Improving and developing employee's tasks performance as related to the result of his evaluation, so as to raise his salary ceiling, reward and promotion. Governance of institutional performance to achieve standards of integrity and transparency. Developing performance systems to increase efficiency and oversight and keep pace with Kuwait's priorities in government development (digital transformation). Achieving the principle of justice in the decision-making process to raise employees' efficiency. Educating and raising awareness among employees and officials about the importance of the "Daily Performance Record" and its impact on promotions and incentives. The CSC has also started holding meetings and workshops with (16) agencies on the performance evaluation proposal, recording their observations and recommendations. The government has included in its Action Programme for 2023-2027, under the "Productive Government" Pillar, a project titled "Establishing a Potential E-Government through Technology". This project aims to "issue a comprehensive guide to all services provided by government agencies." 	

#	Initiative	Procedure	Implementing Agency
4.2	<p>Target 100%</p> <p>Review and strengthen the standards and mechanisms of accountability in the public sector, including accounting, auditing and oversight mechanisms</p> 	<ul style="list-style-type: none"> The Council of Ministers assigned CSC, in coordination with the General Secretariat of the Supreme Council for Planning and Development, to circulate the National Guidelines for Corporate Governance in the state's administrative apparatus in January 2022. The Council of Ministers issued Resolution No. (383) of 2011 requiring government agencies to establish inspection and audit offices. A standard internal audit guide has been issued for all entities subject to the State Audit Bureau's oversight in 2019. On 19/06/2023, the State Audit Bureau organized and held, with the participation of Nazaha, the "Internal Auditing Added Value" forum for some government agencies under the Bureau's oversight, with the aim of achieving governance pillars in terms of independence and responsibility. Nazaha cooperated with the Government Performance Monitoring Agency, Kuwait Auditors Association and the State Audit Bureau to hold a workshop entitled "Strengthening Accountability and Audit Mechanisms in Public Sector" for government agencies. The workshop was held on 22/11/2023, with the participation of (58) audit and inspection offices. The aim of the workshop was to boost government agencies' implementation of internal audit methodology, thus rendering the inspection and audit offices established pursuant to the Council of Ministers' Resolution No. (283) of 2011 more efficient in reducing regulatory observations. Standard scientific material was published through the workshop for government agencies to activate their internal audit processes accordingly. Through the support project in the field of strengthening integrity, combating corruption and activating inspection and auditing offices, "Nazaha" implemented practical training to activate these offices in government agencies with the aim of benefiting from the expertise of Nazaha's Inspection and Auditing Office in this field, where (15) meetings were held to transfer knowledge and experience at the request of (10) government agencies, as follows: <ul style="list-style-type: none"> 1. Public Authority for Food and Nutrition 2. Environment Public Authority 3. Ministry of Finance 4. Ministry of Oil 5. Minister of State for National Assembly Affairs 6. Public Authority for Applied Education and Training 7. Kuwait Institute for Scientific Research 8. Central Statistical Administration 9. Public Authority for Youth 10. Public Authority for Sports 	 <p>ديوان المحاسبة State Audit Bureau</p>
4.3	<p>Target 100%</p> <p>Review and strengthen measures to ensure integrity and accountability in state-owned enterprises</p> 	<ul style="list-style-type: none"> SAB issued audit guidelines in 2019 on the application of governance rules in state-owned companies. SAB prepared tools for evaluating integrity and accountability measures in state-owned institutions, based on a set of rules, including: <ul style="list-style-type: none"> 1. Proper identification of tasks and responsibilities 2. Ensuring the integrity of financial reports 3. Putting in place sound systems for risk management and internal control 4. Promoting professional behavior and ethical values 5. Encouraging performance improvement On 07 December 2023, Nazaha organized its third forum under the title "Integrity through Governance", in the presence and participation of selected group of governmental and private institutions, civil society organizations and ten (10) state-owned companies out of (24) companies. Nazaha cooperated with SAB, the General Secretariat of the Supreme Council for Planning and Development, and Price Waterhouse (PwC) to hold a discussion panel on "Practicing Governance for Institutions Enhancement", during which the optimal mechanisms for governance of state-owned companies were highlighted, resulting in several recommendations, including calling for companies' commitment to implementing the Guidelines on Corporate Governance of State-Owned Enterprises, prepared by SAB and cooperating with SAB to follow up on the reports issued thereby, identifying deficiencies in preparation for addressing them. According to SAB's annual report for the year 2023-2024, SAB reviewed and analyzed the governance models related to the compliance of the companies subject to its supervision to governance rules. The number of companies amounted to (24) companies divided into (3) companies subject to the Capital Markets Authority, with compliance rate ranging between 95% and 97%, (13) companies subject to Companies Law No. (1) of 2016, with compliance rate ranging between 29.5% and 81.5% and (8) companies affiliated with the oil sector, with compliance rate ranging between 80% and 93.5%. 	 <p>نزهة Nazaha</p>

#	Initiative	Procedure	Implementing Agency
4.4	<p>Target 100%</p> <p>Establishing and enforcing a conflict-of-interest management system</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> Law No. (01) of 2023 on Conflicts of Interest was issued on 22/01/2023 and the Executive Regulations thereof were published in Al-Kuwait Al-Yaum on 10/09/2023. Nazaha continues to implement awareness programs on the Law, its objectives and implementation mechanism and has presented several awareness programs during 2024 for the following entities: <ol style="list-style-type: none"> Kuwait Oil Tanker Company Ministry of Defense Kuwait Airways Kuwait Direct Investment Promotion Authority Kuwait Petroleum Corporation Kuwait Aviation Fueling Company. 	 <p>Nazaha نزاها</p>
4.5	<p>Target 100%</p> <p>Amend legislation to effectively criminalize illicit enrichment</p>  <p>75% Almost Compete</p>	<ul style="list-style-type: none"> In January 2023, the draft review and amendment to Law No. (02) of 2016 on Establishing Kuwait Anti-Corruption Authority and the provisions related to financial disclosure, including the expansion of "Illicit Gain" definition, was sent to the Minister of Justice, the Minister of Endowments and Islamic Affairs and the Minister of State for Integrity Enhancement Affairs. The draft is under review between Nazaha, Ministry of Justice and the Department for Legal Advice and Legislation. 	 <p>Nazaha نزاها</p>

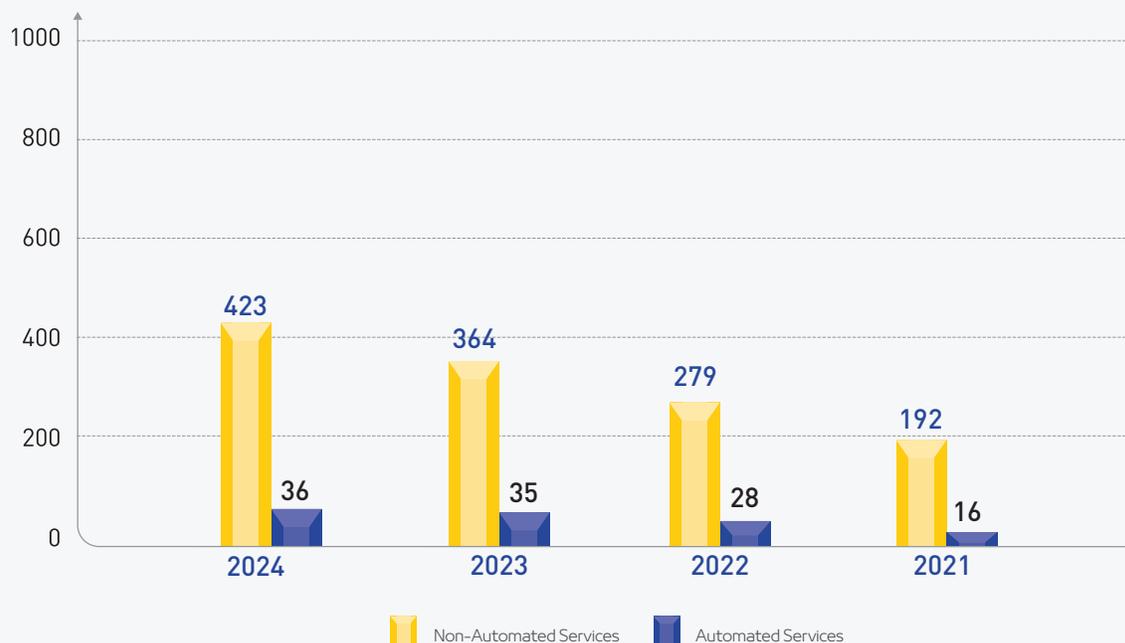
Priority 5: Effectiveness and Efficiency in Public Services Delivery

Progress: 63%

#	Initiative	Procedure	Implementing Agency
5.1	<p>Target 100%</p> <p>Review and streamline bureaucratic procedures of public service delivery</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> In December 2020, CSC issued a manual aimed at enhancing government services and streamlining their procedures. This manual was disseminated to all government agencies as per Circular No. 24/2020. Inventorizing the mechanized and non-mechanized services during the year 2024 for all government agencies approved in the Government Services Directory system, along with preparing a report on the approved services statistics for all government agencies according to the (individuals / private sector / government agencies) classification. CSC provided 19 training workshops to several government agencies on how to document and simplify service procedures. The success of this initiative depends on the cooperation of all government agencies affiliated with the CSC by entering the required data through the integrated service system and applying the Guidelines for Government Services Development. 	 <p>دائرة الخدمة المدنية CIVIL SERVICE COMMISSION</p>
5.2	<p>Target 100%</p> <p>Develop and implement e-government internet-based platforms to further automate processes for the delivery of public services</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> The Council of Ministers has issued several decisions since the beginning of 2021 to form technical and coordinating committees and teams tasked with completing the development and launch of the unified government application "Sahl". "Sahl" app was launched on 15/09/2021. The number of entities participating in "Sahl" application increased from 35 to 36 government entities, and the number of electronic services provided by the application increased from 346 to 423 since its launch. Also, the number of completed transactions increased from approximately 30,000,000 to approximately 49,000,000 million transactions, compared to the statistics included in the Fourth Annual Report. Beneficiary satisfaction rating for the application in general during the year 2024 is (3.93/5). The average rating of services after completion is (4.5/5). "Sahl Business" application has been launched on 20/11/2022 with a view to enabling companies' owners and institutions to complete their transactions through one window. The number of entities participating in the "Sahl Business" application since its launch in November 2022 to date is (18) government agencies, with (210) electronic services provided thereby since its launch to date, while its users amount to (65,036) and (296,998) completed transactions. Users' satisfaction level of the targeted public services regarding their ease of access and lack of bribery and favoritism increased from 65% in 2022 to 79%, according to the second national survey launched by Nazaha in 2024. Statistics on the number of government services and entities participating in the Sahl application since its launch to date are on page 48. 	  <p>الهيئة العامة للمعلومات المدنية THE PUBLIC AUTHORITY FOR CIVIL INFORMATION</p>

#	Initiative	Procedure	Implementing Agency
5.3	<p>Target 100%</p> <p>Develop and publish user-friendly guides for the public regarding how to access and apply for public services both in paper and electronically</p>  <p>75% Almost Complete</p>	<ul style="list-style-type: none"> CSC issued a manual aimed at enhancing government services and streamlining their procedures as per Circular No. (24) of 2020. This manual is deemed an integrated digital system to define relevant services, how to document and simplify their procedures. CSC circulated the manual to all government agencies and uploaded it to its official website. In the Government Services Directory System, CSC added new fields for "Procedures" and "Services Classification." The fields are to be completed by government agencies and monitored and reviewed by the CSC. Government agencies were addressed to add procedures so that it would be a comprehensive guide for all government services. CSC continues to follow up with all government agencies to enter data related to their procedures. CSC also provides training for the agencies in developing their own procedures manuals. Publishing the Government Services Directory System on CSC's official website, adding and updating data on an ongoing basis based on follow-up with government agencies. Preparing training workshops on the Government Services Directory System and following up on received comments and inquiries with government agency coordinators. The percentage of automated services approved in the Government Services Directory System for the year 2024 amounted to 59%, and the percentage of services which process steps were incorporated into the Government Services Directory System for the year 2024 reached 67%. The success of this initiative relies on the cooperation of all government agencies with the CSC. These agencies are required to enter the necessary data through the Government Services Directory System and to adhere to the guidelines set for the development of government services. 	 <p>دولة الكويت CIVIL SERVICE COMMISSION</p>
5.4	<p>Target 50%</p> <p>Integrate corruption risk management into sectors that provide public services to identify and address weaknesses periodically and sustainably</p>  <p>50% Ongoing</p>	<ul style="list-style-type: none"> Nazaha held a number of consultative meetings with local and international experts to identify best practices for developing a unified risk management manual in the public sector. Nazaha also specified and reviewed risk management-related literature and developed a general vision for developing the said manual. A register has been developed in some government agencies to monitor corruption risks associated with the elements of the Code of Conduct as a preliminary step toward activating the corruption risk register. On 09 December 2024, Nazaha organized the fourth Nazaha Forum to commemorate International Anti-Corruption Day under the theme "Measuring Corruption and Managing Risk", with the participation of several local and international entities. The forum highlighted the best practices in the field of corruption risk management, discussed international best practices, and reviewed public agencies' relevant experiences. 	 <p>نزهة Nazaha</p>

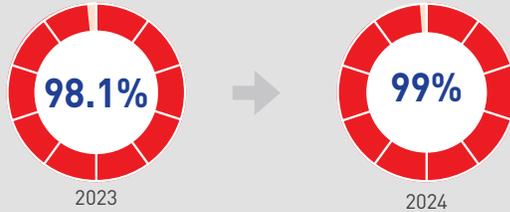
Statistics on the number of government agencies that provide (mechanized - non-mechanized services) to citizens and residents during the year 2023:



(Source: Civil Service Commission)

Highlight on Financial Disclosure

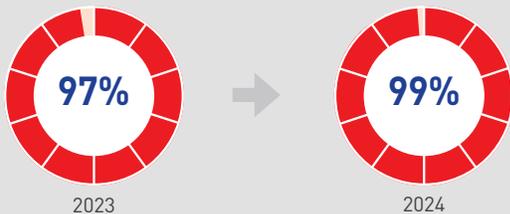
Percentage of commitment to submitting financial disclosures



Percentage of total non-compliance with submission of disclosures



Percentage of declarants whose disclosures are examined.

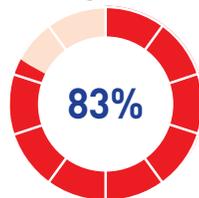


Number and percentage of delay in submitting financial disclosures

Total disclosures received on time and in accordance with legal deadlines:

4,718

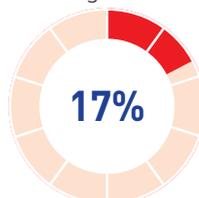
Percentage of Receipt



Total disclosures received after legal deadlines:

956

Percentage of Receipt



Number of disclosures by type

First Disclosure	Disclosure Update	Final Disclosure	Total
2,307	1,877	1,490	5,674

Number of disclosures according to top five (5) job titles

Director of Administration or equivalent	2,432
Members of the boards of directors of cooperative societies	433
Board member at a sports authority	245
Public prosecution member	420
Expert at the Ministry of Justice	496

Total Top Five (5) Job Titles **4,026**

Number of disclosures according to top five (5) government agencies

وزارة العدل Ministry of Justice	1112
وزارة الداخلية Ministry of Interior	1,119
بلدية الكويت Kuwait Municipality	451
Department for Legal Advice and Legislation	360
ديوان المحاسبة State Audit Bureau	446

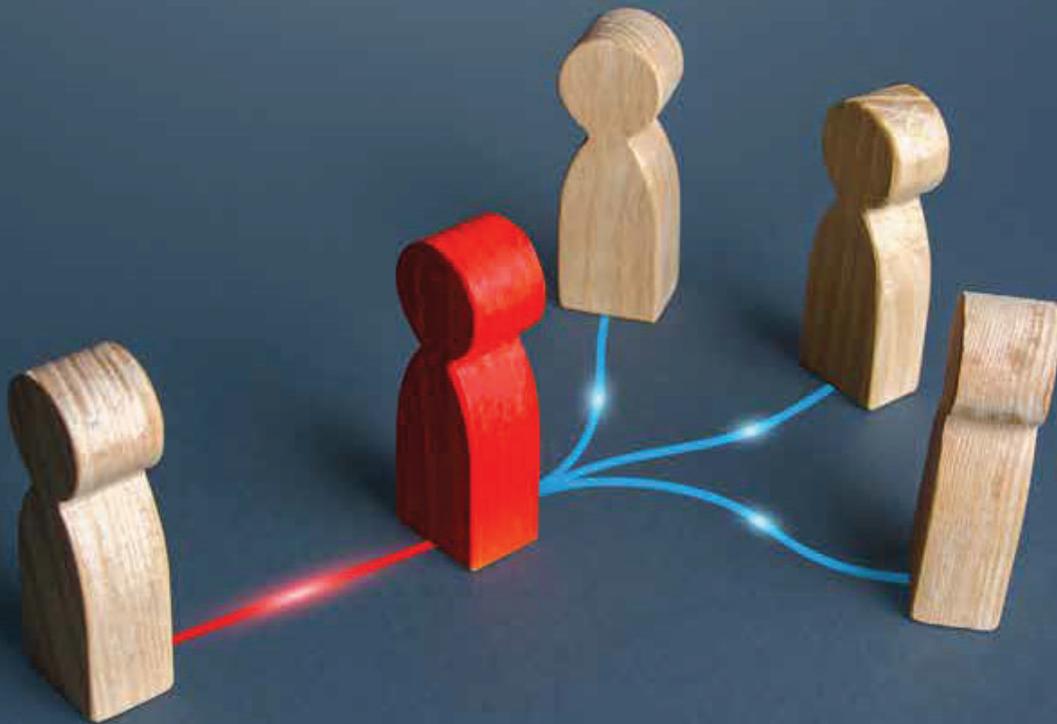
Total number of statements of the top five (5) government agencies **3,488**

Number of disclosures not submitted according to top five (5) job titles

Board member at a sports authority	9
Members of the boards of directors of cooperative societies	4
Director of Administration or equivalent	27
Public Prosecution member	6
Notaries in Real Estate Registration Department and Authentication Department	7

Total **53**

Conflict of Interests

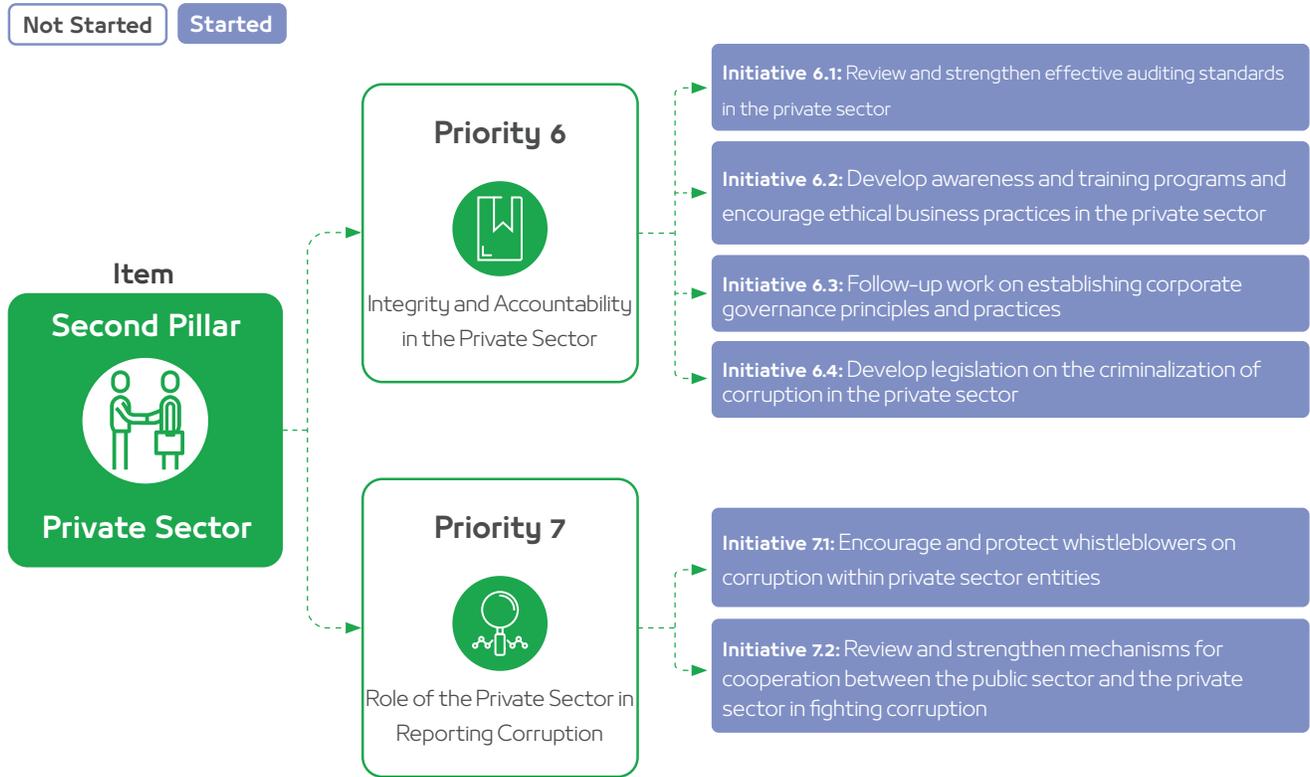


2. Second Pillar: Private Sector

Strategic Goal: Encouraging the Private Sector to Promote Integrity and Fight Corruption.

A) Progress Overview:

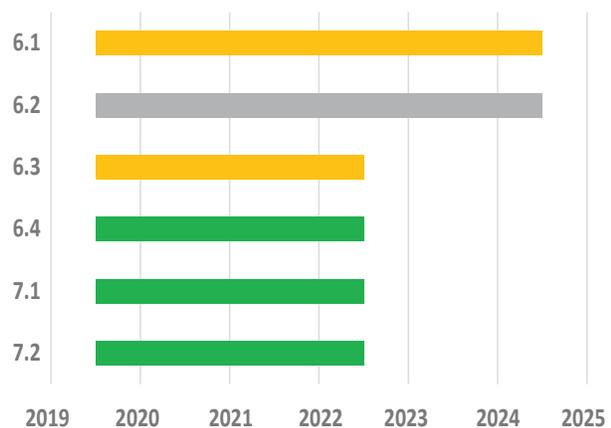
Initiatives in the Second Pillar:



Progress made in Second Pillar Initiatives



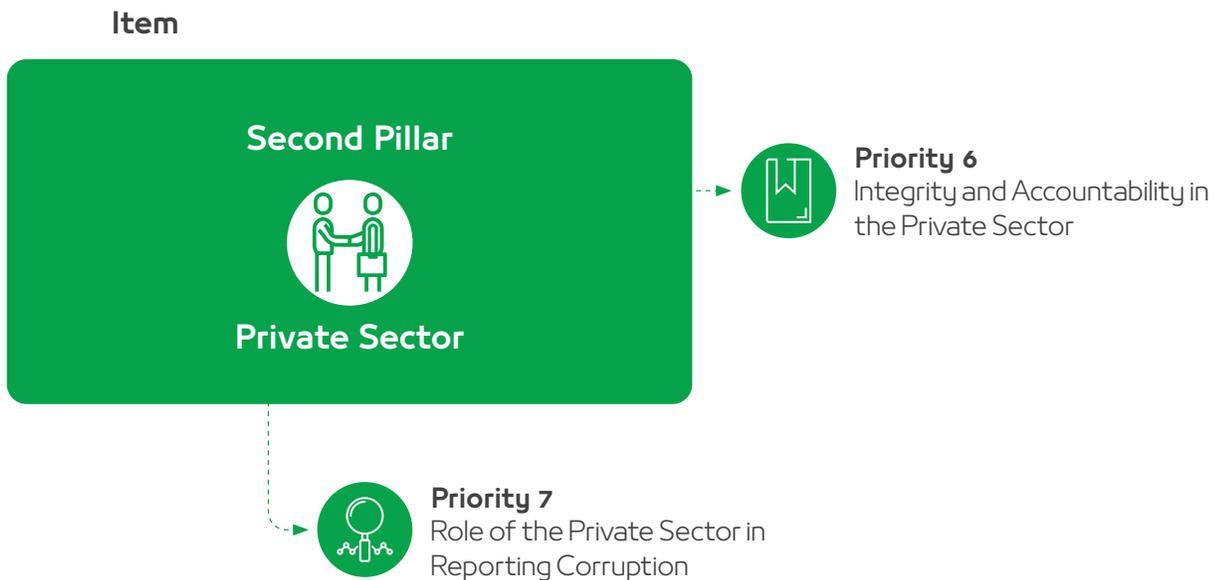
Priorities



- On Track
- At Risk, but Recoverable
- Off Track

For details of achievements in each initiative, please refer to page 55 of the report.

B) Pillar and initiatives' results targeted at KIACS conclusion:



Result

Enabling the private sector to undertake an effective role as a partner in promoting integrity and combating corruption

Business environment attractive for foreign investment that provides equal opportunities for investors, promotes sustainable development of society as a whole and enhances Kuwait's position in global business and financial markets.

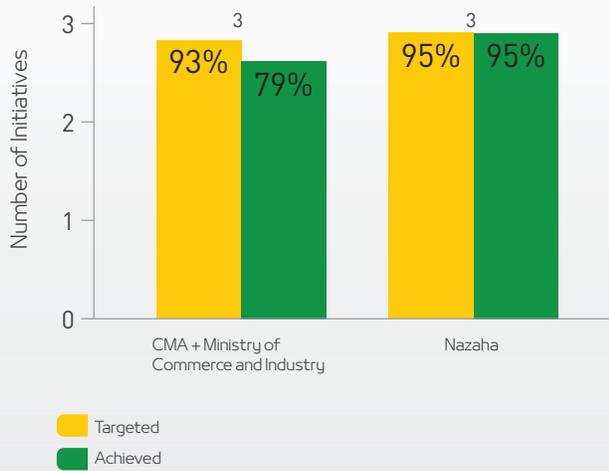
Increase in the level of cooperation and partnership between public and private sectors in prevention and reporting of corruption.

C) Second Pillar Follow-Up Board

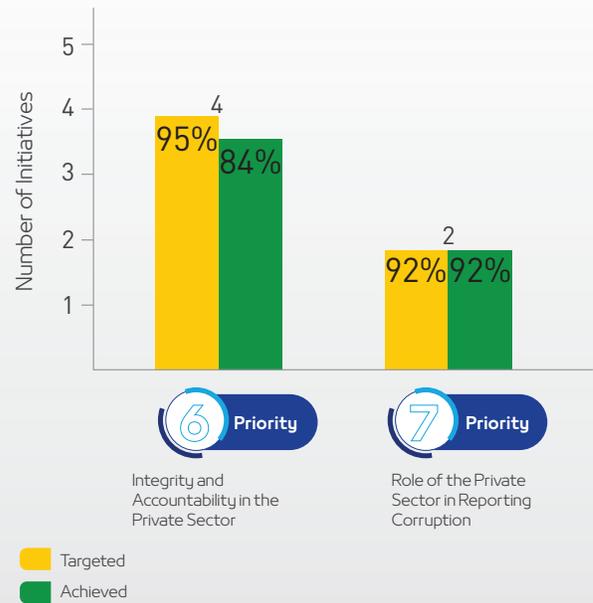
Pillar's Implementation Progress



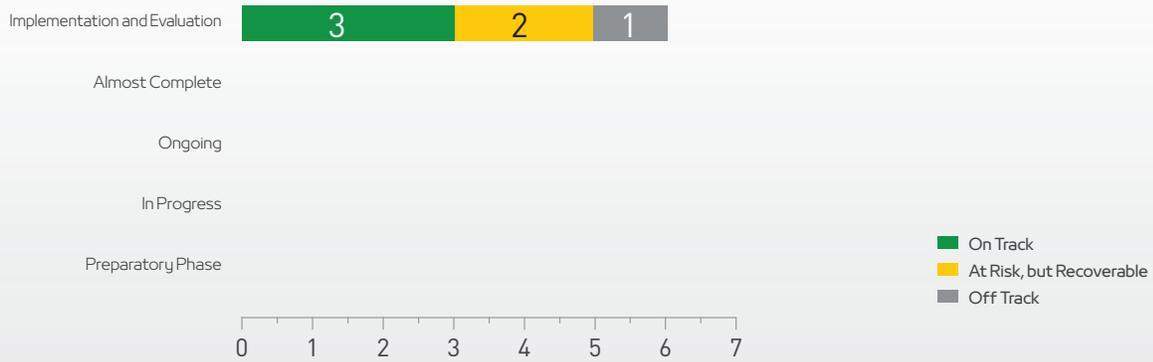
Implementing agencies



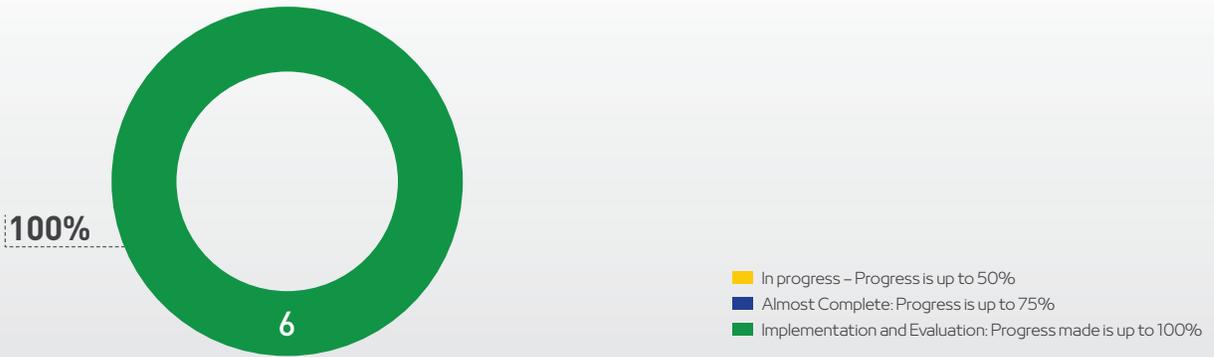
Priorities's progress status



Alignment of initiatives with the established schedule and the percentage of completion



Distribution of initiatives according to the percentage of completion



Percentage of compliance with the approved plan



Initiatives' percentage of completion is evaluated according to the following criteria:



Priority 6: Integrity and Accountability in the Private Sector

Progress: 84%

#	Initiative	Procedure	Implementing Agency
6.1	<p>Review and strengthen effective auditing standards in the various private sector bodies</p>	<ul style="list-style-type: none"> Issuance of Auditors Law No. (103) of 2019, and its Executive Regulations, on 09/02/2020 by Resolution No. (13) of 2019. According to current laws, all companies are required to comply with international accounting standards. They are required to prepare updated financial statements, in addition to adhering to the professional principles of the International Federation of Accountants. The Executive Regulations of Law No. (7) of 2010 establishing the Capital Markets Authority (CMA) and Regulating Securities Activity, as amended, included provisions and requirements for auditors who conduct audits for authorized persons, Kuwaiti companies listed on the stock exchange, collective investment systems, and special purpose companies licensed by the CMA. The CMA has developed a regulatory framework to ensure compliance with these regulations and requirements. The Capital Markets Authority has implemented extensive and intensive training programs on corporate governance. The training included all joint-stock companies subject to the corporate governance provisions issued by the Capital Markets Authority, including companies concerned with implementing Rule Six "Promoting Professional Conduct and Ethical Values", Module Fifteen (Corporate Governance), of the Executive Regulations of CMA's Law. Since the issuance of the Executive Regulations in 2013, the Capital Markets Authority has continued to provide extensive and intensive awareness programs, both locally and across the Gulf, for companies concerned with implementing corporate governance principles, with the aim of achieving optimal implementation. CMA closely follows up with companies concerned with governance implementation. Issuance of Ministerial Resolution No. (159) of 2023 regarding developing auditors' professional capabilities and the mechanism of qualification and continuous training to oblige the auditor to develop his professional capabilities and ensure continuous training in accordance with the International Education Data Directory. The Ministry of Commerce and Industry has prepared a draft proposal to amend the Auditors Law No. (103) of 2019 to add articles stipulating the establishment of "Kuwait Accountants and Auditors Association". In September 2023, the Ministry of Commerce and Industry concluded the Information Cooperation and Data Exchange Agreement with Kuwait Accountants and Auditors Association, where it was agreed upon that a training license for the Association shall be issued by the Civil Service Commission, so that coordination could be made to hold training courses for the Ministry's employees. A permanent technical committee has been formed to develop accounting rules and audit manuals by the Ministry of Commerce and Industry pursuant to Resolution No. (9) of 2021, dated 12/01/2021, for developing auditors' profession, keeping pace with global and local changes and approving what is appropriate to achieve the objectives of the new legislation. The committee also works on proposing a legislation to unify the data entry system at the concerned authorities and preparing a special system for reporting corruption by auditors and the public in this regard. This is in implementation of ISA 240 and ISA 250 regarding the consideration of laws and regulations in an audit of financial statements Granting judicial police powers to a number of employees in the MOCI's Joint Stock Companies Department, training them continuously in cooperation with Kuwait Accountants and Auditors Association and some MOCI-accredited accounting audit offices on inspection of auditors, as violations were detected and referred to MOCI's Auditors Special Investigation Committee In coordination with the Kuwait Association of Accountants and Auditors, the Ministry of Commerce and Industry has enhanced the financial auditors' capabilities through specialized workshops and training courses aimed at raising the level of financial auditing in the private sector. The Ministry has also sought to strengthen financial oversight in the private sector, adopting a dual budget certification and auditing mechanism: An initial budget certification mechanism has been implemented by the Association of Accountants in accordance with recognized international accounting standards, so as to ensure the quality of financial auditing and reduce the risks associated with irregular practices. The initial audit process by the Association of Accountants is to be finally ratified by the Ministry of Commerce and Industry, enhancing the efficiency of financial oversight processes and raising the level of compliance with transparency standards. 	
6.2	<p>Develop awareness and training programs and encourage ethical business practices in the private sector</p>	<ul style="list-style-type: none"> MOCI has held meetings with Nazaha, in addition to some internal meetings to work on identifying target segments and specific entities to provide training courses on business ethical practices. The MOCI is currently working on agreements with accredited institutes and public benefit associations, including Kuwait Accountants and Auditors Association to contribute to training active cadres in the Ministry. The Ministry of Commerce and Industry launched awareness programs on social media platforms to raise awareness and encourage ethical business practices, in addition to developing a manual for integrity practices in the private sector. The Ministry of Commerce and Industry held several workshops for ministry employees involved in auditing companies' financial statements, to enhance their knowledge of anti-corruption best practices. 	

#	Initiative	Procedure	Implementing Agency
6.3	<p>Target 100%</p> <p>Follow-up work on establishing corporate governance principles and practices</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> • Companies Law stipulates that each supervisory authority shall issue its requirements on corporate governance. Accordingly, CMA and Central Bank of Kuwait (CBK) issued comprehensive frameworks for corporate governance for companies subject to its supervision, including: <ol style="list-style-type: none"> 1. Building a balanced board of directors structure. 2. Proper identification of tasks and responsibilities 3. Ensuring integrity of financial reports 4. Promoting professional behavior and ethical values • The MOCI issued Resolution No. (75) of 2023, issued on 15 May 2023, regarding the formation of a committee dedicated to study proposals to facilitate the development of the Kuwaiti financial market and to develop the necessary proposals, mechanisms and solutions in this regard. The committee is also specialized in submitting a proposal on the possibility of unifying corporate governance rules to all regulatory authorities. • On 06/11/2023, the Insurance Regulatory Unit issued Resolution No. (58) of 2023 on governance rules for insurance and/or reinsurance companies. • The Capital Markets Authority applies risk management policies and procedures to companies, as it is a licensing requirement for all persons licensed by the Authority to practice securities activities. It is a mandatory requirement pursuant to the Corporate Governance Executive Regulations, issued in 2013. Therefore, the Authority closely and continuously monitors concerned companies. • 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 disclosures, in line with international best practices, for all listed companies, licensed persons, collective investment systems, investment funds under liquidation, auditors registered with the Authority and market participants. • The Ministry of Commerce and Industry launched the "Electronic Real Estate Brokerage System Project", which covers all real estate sectors after it was restricted to the "residential" sector. The System includes investment contracts, commercial contracts and heirship contracts, in addition to linking with the "Minors' Affairs" platform by activating notifications from "Sahl" application, which will reflect the real prices of traded properties. It will also enhance efforts to combat money laundering in the real estate market, increase transparency and credibility in terms of accurately recording real estate transactions and trading values, and ensure the documentation of the real owners of properties. Furthermore, the System will contribute to eliminating fraud and forgery and ensuring the credibility of contracts through electronic authentication of involved parties. The project will be officially implemented as of 01 January 2025. 	
6.4	<p>Target 100%</p> <p>Develop legislation on the criminalization of corruption in the private sector</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> • Issuance of Law No. (02) of 2023 on 22/01/2023, amending some provisions of the Penal Law No. (31) of 1970, including defining and assigning the legal person's criminal responsibility in corruption crimes. • Until the date of preparing this report, the National Assembly has not decided on other amendments to the Penal Law related to the criminalization of bribery in private sector and the criminalization of bribery of a foreign public employee in light of the draft prepared by Nazaha referred by the Council of Ministers per Decree No. (111) of 2019. • Nazaha started preparing a study of a draft law on class action lawsuits in the State of Kuwait. 	

Priority 7: Role of the Private Sector in Reporting Corruption

Progress: 92%

#	Initiative	Procedure	Implementing Agency
7.1	<p>Target 100%</p> <p>Encourage and protect whistleblowers on corruption within private sector entities</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> Nazaha prepared a comprehensive study on protection provisions and measures in the Agreement, the Law and the Regulations, identifying the problems that the Authority faced in measures application, especially those related to providing administrative and functional protection related to the public and private sectors. The study concluded by developing some recommendations to contribute to the development and application of legislation and measures relevant to whistleblowers' protection. Nazaha developed an action plan to implement the recommendations contained in the study to avoid risks related to reporting and protect whistleblowers. A draft amendment to Law No. (2) of 2016 regarding the establishment of Kuwait Anti-Corruption Authority (Nazaha) and the provisions related to the disclosure of financial assets by "Nazaha" was sent to the Minister of Justice, the Minister of Endowments and Islamic Affairs and the Minister of State for Integrity Enhancement Affairs in January 2023, which ensures achieving the goal of encouraging the protection of whistleblowers from the private sector. The draft amendment to Law No. (02) of 2016 on Establishing Kuwait Anti-Corruption Authority and the provisions set for financial disclosures were sent by the Minister of Justice to the Department for Legal Advice and Legislation in December 2023 for review, thus ensuring protection of corruption whistleblowers in private sector. The Capital Markets Authority organized a mechanism for reporting violations and crimes and protecting the whistleblower in accordance with the provisions of Chapter Three of Module Three of the Executive Regulations of Law No. (07) of 2010, as amended. The Capital Markets Authority issued a regulatory decision specifying the entity therein assigned to receive reports. The Authority has completed automating the report form, where the whistleblower may submit his report by accessing the Authority's official website and filling out the electronic form or through the government application (Sahel). 	 <p>Nazaha نزهة</p>
7.2	<p>Target 100%</p> <p>Review and strengthen mechanisms for cooperation between the public sector and the private sector in fighting corruption</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> The Memorandum of Understanding signed between Nazaha and the Kuwait Financial Intelligence Unit in 2020 aims to cooperate and exchange information on money laundering crimes, related predicate offences and terrorist financing, facilitate communication with local banks to disclose bank accounts of persons with suspicious financial movements related to money laundering, in accordance with the provisions of KFIU's establishment-law No. (106) of 2013 on combating money laundering and terrorist financing. Nazaha signed an MOU with Kuwait Clearing Company (KCC) to promote information exchange on the balances of the persons subject to the provisions of Nazaha establishment-law No. (2) of 2016 and the provisions related to financial disclosures. The Capital Markets Authority, represented by the Field Supervision Department, prepares and implements annual field inspection plans on persons subject to the Authority's supervision (licensed persons - persons registered in the Authority's records - persons listed on Bursa Kuwait), in addition to conducting unplanned field inspections on all matters that would maintain justice, transparency and integrity in the financial markets. 	 <p>Nazaha نزهة</p>

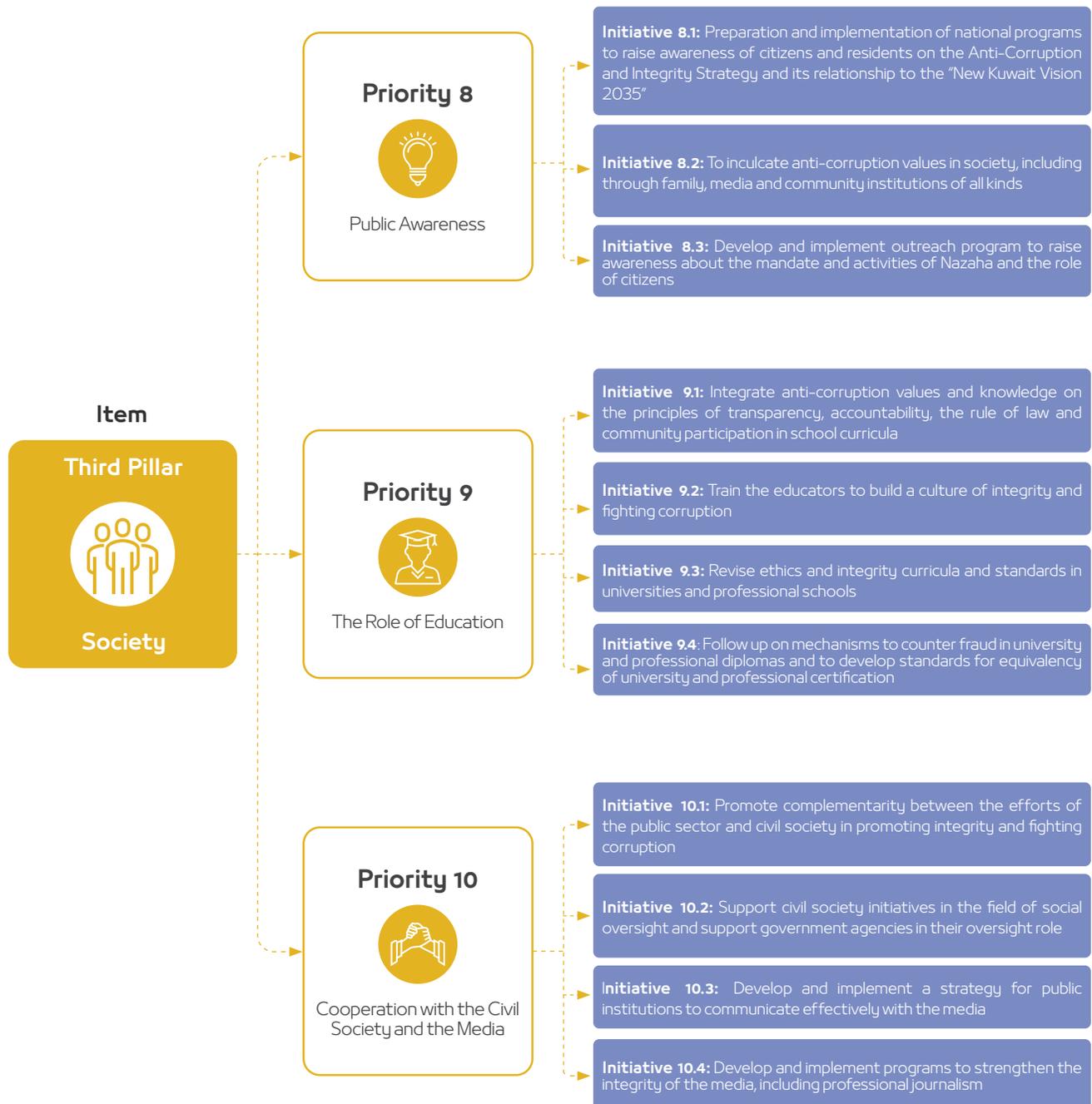
3. Third Pillar: Society

Strategic Goal: Enabling the Society to Contribute to Building a Culture that Promotes Integrity and Anti-Corruption.

A) Progress Overview:

Initiatives in the Third Pillar:

Not Started Started



Progress in the initiatives of the Third Pillar

Priority 8



Public Awareness

Priority 9

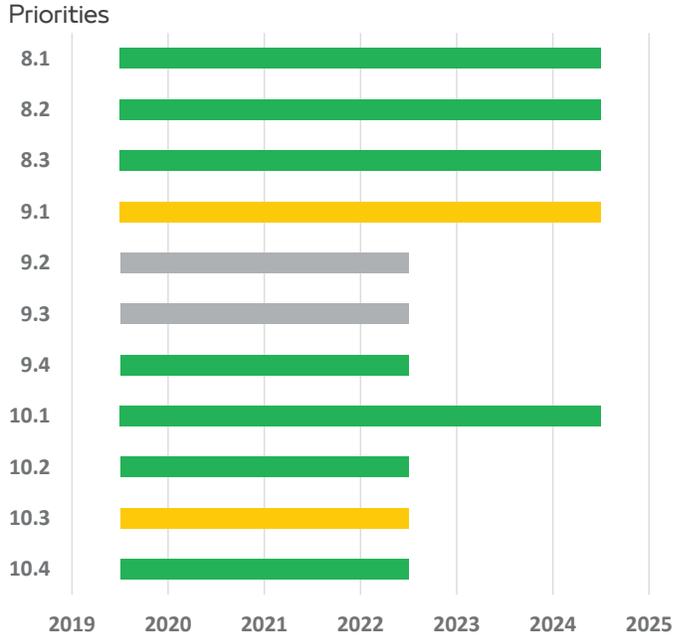


The Role of Education

Priority 10



Cooperation with the Civil Society and the Media



B) Target results of the Third Pillar and its initiatives at the conclusion of KIACS:

Item	Result
<div style="background-color: #e69d00; color: white; padding: 10px; text-align: center; border-radius: 10px; margin-bottom: 10px;"> <p style="font-weight: bold; font-size: 1.2em;">Third Pillar</p> <div style="font-size: 2em; margin: 0 auto;">  </div> <p style="font-weight: bold; font-size: 1.2em;">Society</p> </div> <div style="margin-top: 10px;"> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="font-size: 2em; margin-right: 10px;">  </div> <div> <p style="font-weight: bold; margin: 0;">Priority 8</p> <p style="margin: 0;">Public Awareness</p> </div> </div> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="font-size: 2em; margin-right: 10px;">  </div> <div> <p style="font-weight: bold; margin: 0;">Priority 9</p> <p style="margin: 0;">The Role of Education</p> </div> </div> <div style="display: flex; align-items: center;"> <div style="font-size: 2em; margin-right: 10px;">  </div> <div> <p style="font-weight: bold; margin: 0;">Priority 10</p> <p style="margin: 0;">Cooperation with the Civil Society and the Media</p> </div> </div> </div>	<div style="background-color: #fff9c4; padding: 10px; border-radius: 10px; margin-bottom: 10px;"> <p>Society further participates in building a culture that embraces integrity and combats corruption.</p> </div> <div style="background-color: #fff9c4; padding: 10px; border-radius: 10px; margin-bottom: 10px;"> <p>Creating a conscious culture based on consolidating the values, principles and ethics of integrity by working with all segments of society.</p> </div> <div style="background-color: #fff9c4; padding: 10px; border-radius: 10px; margin-bottom: 10px;"> <p>Launching a culture of integrity in future generations.</p> </div> <div style="background-color: #fff9c4; padding: 10px; border-radius: 10px;"> <p>Strengthening the process of oversight and detection of corruption by initiating strong cooperation and coordination with civil society organizations and media channels.</p> </div>

- On Track
- At Risk, but Recoverable
- Off Track

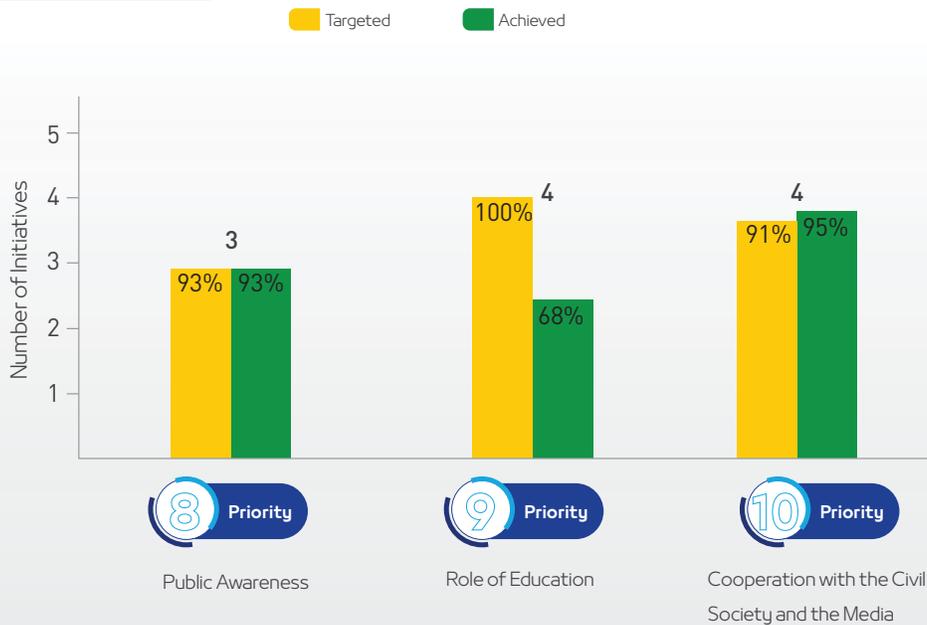
For details of achievements in each initiative, please refer to page 62 of the report

C) Third Pillar Follow-Up Board

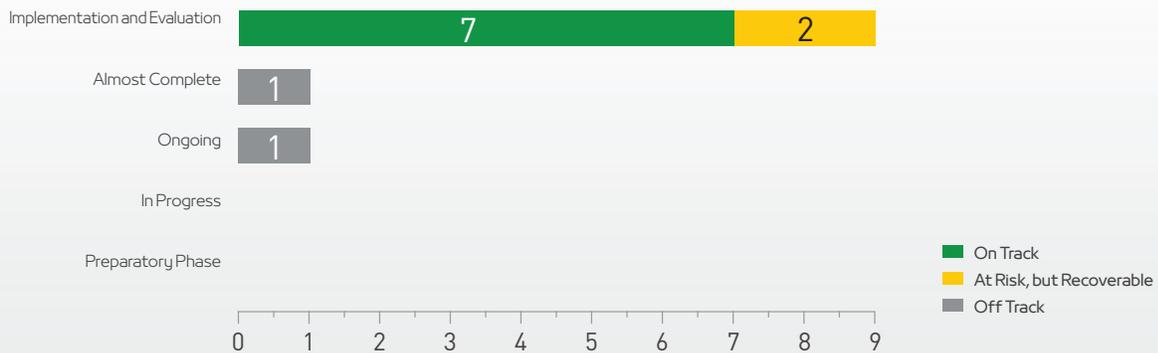
Pillar's Implementation Progress



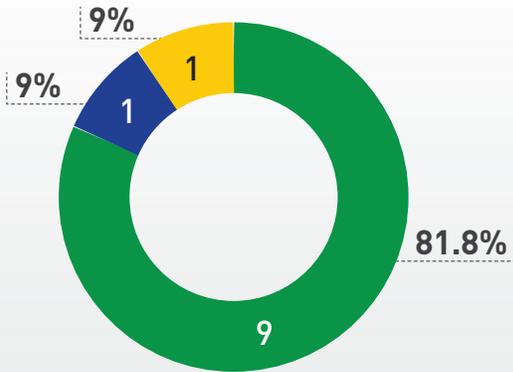
Priorities' progress status



Alignment of initiatives with the established schedule and the percentage of completion

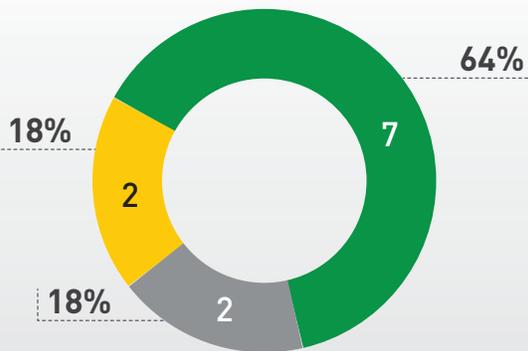


Distribution of initiatives according to the percentage of completion



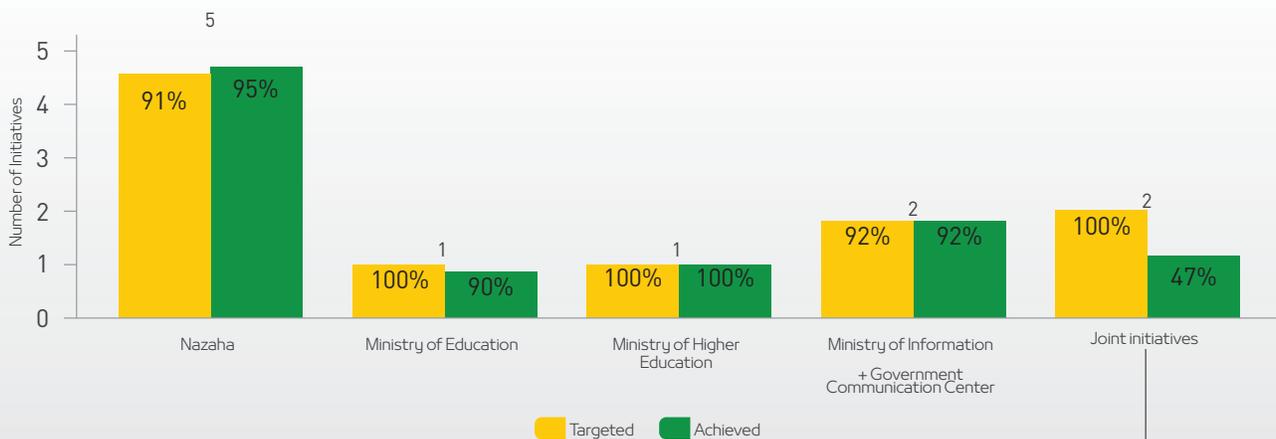
- In progress – Progress is up to 50%
- Almost Complete: Progress is up to 75%
- Implementation and Evaluation: Progress made is up to 100%

Percentage of compliance with the approved plan



- On-track
- At risk, but Recoverable
- Off-Track

Implementing Agency



Joint initiatives (Public Authority for Applied Education and Training, Kuwait University, Council of Private Universities and Ministry of Education)

:Initiatives' rate of completion is evaluated according to the following criteria:



Priority 8: Public Awareness

Progress: 93%

#	Initiative	Procedure	Implementing Agency
8.1	<p>Preparation and implementation of national programs to raise awareness of citizens and residents on the Anti-Corruption and Integrity Strategy and its relationship to the "New Kuwait Vision 2035"</p> 	<ul style="list-style-type: none"> Nazaha continued to implement awareness campaigns through visual, audio and print media, in addition to social media, so as to raise awareness of KIACS and its connection to vision New Kuwait 2035 and the UNCAC, where the following was implemented: <ol style="list-style-type: none"> An awareness seminar, in cooperation with the Ministry of Social Affairs and Labor, on "Institutional Governance," which touched on the concept of governance and its impact on institutional integrity. An awareness workshop on the code of professional conduct for employees of the Ministry of State for National Assembly Affairs. An awareness lecture entitled (Practicing Integrity in Construction Contracts), in cooperation with Kuwait Fund for Arab Economic Development (KFAED) within the training and qualification program for newly graduated Kuwaiti architects to raise awareness of the importance of codes of professional conduct. Nazaha held a training workshop, in cooperation with the Global Partnership Foundation, with the aim of raising awareness of the importance of codes of professional conduct and their optimal application to the following entities: <ul style="list-style-type: none"> General Insurance Corporation. Kuwait Direct Investment Promotion Authority. Public Authority for Food and Nutrition. Environment Public Authority. Nazaha launched a podcast that presents a group of topics on legal, economic, media, and preventive affairs related to governance and the promotion of integrity and transparency. The podcast hosts several specialists and academics in a series of episodes that address several educational and awareness-raising topics. Nazaha organized its third forum on the occasion of the International Anti-Corruption Day, entitled "Integrity through Governance", with the participation of (Kuwait University - Kuwait International Law School - Capital Markets Authority - Kuwait Association of Accountants and Auditors), in the presence of 200 persons from various government agencies, public benefit societies, private sector and media. Nazaha is working to launch a second national questionnaire to measure the level of awareness among citizens and residents about KIACS and its connection to the "New Kuwait 2035" vision during the fiscal year 2023-2024. "Nazaha" produced and broadcasted "Nazaha Podcast" program, which is an awareness series of episodes that addresses a number of topics related to legal, economic, and preventive media issues on governance, enhancing integrity and transparency and combating corruption, hosting a number of specialists and academics in a series of educational and awareness episodes. Twenty (20) episodes were recorded and ten (10) were recorded during 2024. "Nazaha" launched a second national survey to measure the level of awareness among citizens and residents about KIACS and its connection to the "New Kuwait 2035" vision during the fiscal year 2023-2024. The percentage of the public who reported understanding KIACS and its connection to the Kuwait Vision 2035 increased from 21% in 2022 to 24% in 2024. 	 <p>Nazaha نـزاهة</p>
8.2	<p>To inculcate anti-corruption values in society, including through family, media and community institutions of all kinds</p> 	<ul style="list-style-type: none"> Nazaha continued its efforts to raise awareness of anti-corruption values among all members of society through various means such as visual, audio, and print media as well as social media. Nazaha also collaborated with government institutions and civil society organizations to hold awareness workshops aimed at promoting these values. "Nazaha" launched a second national survey to measure the level of awareness of society in all its categories and segments, so as to acknowledge the percentage of the public who reported changing their behaviors after learning about anti-corruption values, as the percentage increased from 60% in 2022 to 78% in 2024. The second national survey also included measuring the level of society awareness, with the aim of determining the percentage of the public who reported understanding the concept of corruption, the measures to combat it, and anti-corruption values, where the level of awareness remains at 52%, which is the same percentage as stated in the first national survey. 	 <p>Nazaha نـزاهة</p>

#	Initiative	Procedure	Implementing Agency
8.3	<p>Target 100%</p> <p>Develop and implement outreach program to raise awareness about the mandate and activities of Nazaha and the role of citizens</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> Nazaha continued to implement awareness campaigns through visual, audio and print media, in addition to social media, to raise awareness of Nazaha's role, competencies and activity, as well as the role of citizens. The second national survey launched by "Nazaha" included measuring the awareness of all participants who are aware of Nazaha's role, competencies and activities and the role of citizens, as the percentage increased from 61% in 2022 to 70% in 2024. 	 <p>Nazaha نـزـاهة</p>

Priority 9: The Role of Education

Progress: 68%

#	Initiative	Procedure	Implementing Agency
9.1	<p>Target 100%</p> <p>Integrate anti-corruption values and knowledge on the principles of transparency, accountability, the rule of law and community participation in school curricula</p>  <p>Implementation and Evaluation</p>	<ul style="list-style-type: none"> Nazaha prepared the Values Integration Document as a guide to integrate basic principles and values related to transparency, integrity, and honesty into new curricula at the Ministry of Education (MOE). MOE has included anti-corruption concepts in the curricula of all educational levels and grades, and they were launched in Academic Year 2022-2023. The values and knowledge incorporated into the curricula are taught in all 896 schools affiliated with the MOE. Nazaha continues to implement "BANKEE" project with the National Bank of Kuwait, in cooperation with the Ministry of Education, for a period of three years. This project is the first of its kind in the State of Kuwait in terms of its support and assistance for basic education curricula. The project aims to disseminate cultural and economic knowledge among students, instill values and concepts that demonstrate integrity and transparency, raise awareness among students about best economic practices and sustainably improve levels of financial and behavioral literacy among society members in the future. This project has been implemented in 62 schools, out of 150, and the number of beneficiaries from the project amounted to 32,406 male and female students, with the participation of 7,282 male and female teachers to supervise the implementation of this project in the academic year 2024/2025. During the Academic Year 2023/2024, Nazaha conducted (14) introductory meetings for fifteen (15) schools in various educational districts, so as to introduce the project, its objectives and the pilot application thereof. Nazaha launched a joint awareness campaign with the Ministry of Education and the National Bank of Kuwait on social media platforms to introduce the educational program and principles and to spread financial literacy and ethical values among students. Nazaha held six (6) lectures during 2024, titled "Academic Integrity", as part of the "Bedaina 8" training program, organized by Boubyan Bank. The lectures discussed the role of social responsibility in reducing the manifestations of academic corruption and the risks of educational corruption, including academic cheating and academic plagiarism. 	 <p>وزارة التربية MINISTRY OF EDUCATION</p>

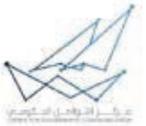
#	Initiative	Procedure	Implementing Agency
9.2	<p>Target 100%</p> <p>Train the educators to build a culture of integrity and fighting corruption</p>  <p>75% Almost Complete</p>	<p>A) Public Authority for Applied Education and Training (PAAET): 100% (Implementation and final evaluation)</p> <ul style="list-style-type: none"> PAAET has established a mechanism to motivate teaching staff to pass courses, linking them to the annual performance report. PAAET has also launched several training programs during 2024/2025 training season, in the field of anti-corruption and enhancing transparency, represented by Ibn Al-Haytham Center and the Measurement, Evaluation and Professional Development Center. Among the most prominent training programs: <ul style="list-style-type: none"> 1. Training on the Application of Corporate Governance. 2. Integrity in Education and Training. 3. Integrity in Educational Institutions: Values and Behavior. 4. Corporate Governance in the Government Sector. 5. Financial Fraud, Cheating, and Forgery. 6. Capacity Building for Corporate Governance Professionals. 7. Anti-Money Laundering and Combating the Financing of Terrorism. 8. Work and Professional Ethics. 9. Promoting Integrity and Combating Administrative Corruption. The number of teachers, professors, academics and administrators who completed training programs related to anti-corruption and a culture of integrity among the targeted entities amounted to (228) trainees. <p>B) General Secretariat of Private Universities Council: 75% (Almost Complete)</p> <ul style="list-style-type: none"> The General Secretariat of the Private Universities Council has collaborated with the Ibn Al-Haytham Training Center, affiliated with the Public Authority for Applied Education and Training and Kuwait International Law School, to hold training courses on combating corruption and promoting a culture of integrity and transparency for teachers, academics and all employees of private universities. <p>C) Kuwait University: 100% (Implementation and Evaluation).</p> <ul style="list-style-type: none"> Kuwait University has launched a training program for education professionals in the field of education, anti-corruption and building a culture of integrity, through the office of the Vice President for Scientific Affairs. The training program is meant to be the "official reference" for training on integrity at Kuwait University. The university has launched three (3) training programs targeting academics and professors, where the percentage of teachers, professors and academics who completed training programs related to anti-corruption and the culture of integrity within the targeted entities amounted to 42%, i.e. (705) out of a total of (1695) academics. The percentage of teachers and academics who reported the effectiveness of the training in building a culture of integrity was about 97%. Kuwait University continues to implement a training program for education professionals on building a culture of integrity and combating corruption through the Office of the Vice President for Scientific Affairs. The training program is meant to be the "official reference" for training on integrity at Kuwait University. The University has launched several training programs targeting academics and professors, where the number of teachers, professors and academics who have completed training programs related to anti-corruption and a culture of integrity among the targeted groups for academic year 2023/2024 amounted to 40 academics, out of a total of 1,691. The percentage of teachers and academics who reported the effectiveness of the training in building a culture of integrity was approximately 95%. <p>D) Ministry of Education: 100% (Implementation and Evaluation)</p> <ul style="list-style-type: none"> The Ministry of Education has prepared and implemented training programs for teaching, administrative and supervisory staff for academic year 2024/2025. These programs are intended to empower teachers and administrators to understand the concept of integrity, reduce corruption-related activities and implement anti-corruption laws. 	   
9.3	<p>Target 100%</p> <p>Revise ethics and integrity curricula and standards in universities and professional schools</p>  <p>50% Ongoing</p>	<ul style="list-style-type: none"> With a view to supporting educational institutions in introducing a good governance major in universities and institutes, Nazaha has prepared a report on international best practices for establishing a specialized certificate in good governance and anti-corruption in the State of Kuwait. A) Public Authority for Applied Education and Training: 75% (Almost Complete) The percentage of institutes and colleges teaching professional ethics and integrity curricula reached 100%. The number of students reached through professional ethics and integrity curricula during academic semester 2023/2024 reached 19,751 male and female students. B) General Secretariat of the Council of Private Universities: 50% (Ongoing) Some private universities intend to launch a master's program or curriculum or a professional certificate in good governance to build the capacity of executive directors from the private and public sectors and civil society in the field of good governance. C) Kuwait University: 75% (Almost Complete) Represented by the College of Graduate Studies, KU, has listed (7) programs that include good governance. KU has reviewed and updated the curricula related to teaching professional ethics in all colleges. Fifteen (15) colleges are committed to implementing the initiative, with a 100% compliance rate and (2283) male and female students have successfully passed the curricula on professional ethics and integrity. Among the key courses listed at Kuwait University is the Public Service and Professional Ethics course, which aims to the following: <ol style="list-style-type: none"> Enhancing citizenship and responsibility by adhering to professional values in public service. Emphasizing the concept of public service and public office that aims to achieve public interest. Developing awareness of the values of transparency, integrity, accountability and whistleblowing. Defining the role of ethical considerations in avoiding suspicions of conflict of interest. Emphasizing the importance of developing ethical codes of conduct and educating employees of their importance 	  

#	Initiative	Procedure	Implementing Agency
9.4	<p>Target 100%</p> <p>Follow up on mechanisms to counter fraud in university and professional diplomas and to develop standards for equivalency of university and professional certification</p> 	<ul style="list-style-type: none"> In February 2019, the Ministry of Higher Education (MOHE) issued regulations for the equivalence of academic degrees, the first of its kind since the establishment of the MOHE. The regulations serve as a reference for the equivalence of academic degrees under Ministerial Resolution No. (17) of 2019, and have been published on the MOHE's official website. MOHE issued the mechanism "Combat forgery in university and professional certificates" in July 2021. MOHE evaluates the implementation of this mechanism annually. Number of cases of forgery of academic certificates during KIACS phase of implementation: <ul style="list-style-type: none"> ➤ 2019: 28 cases ➤ 2020: 10 cases ➤ 2021: 5 cases ➤ 2022: 2 cases ➤ 2023: 4 cases ➤ 2024: 6 cases 	

Priority 10: Cooperation with the Civil Society and the Media

Progress: 95%

#	Initiative	Procedure	Implementing Agency
10.1	<p>Target 100%</p> <p>Promote complementarity between the efforts of the public sector and civil society in promoting integrity and fighting corruption</p> 	<ul style="list-style-type: none"> In November 2020, Nazaha completed the preparation of a unified coordination and cooperation mechanism between Nazaha and civil society organizations. Nazaha's Cooperation with Civil Society Organizations Division supervises the implementation of the mechanism in coordination with relevant civil society organizations on an ongoing basis. 	 <p>Nazaha نزاها</p>
10.2	<p>Target 100%</p> <p>Support civil society initiatives in the field of social oversight and support government agencies in their oversight role</p> 	<ul style="list-style-type: none"> According to the mechanism set up in Initiative 10.1, Nazaha continues to coordinate with public sector institutions and civil society organizations to support the organizations' initiatives in community oversight and supporting government agencies in performing their oversight role. Nazaha has provided support to a number of private civil society organizations' initiatives in the field of community oversight since the launch of the mechanism to date. The number of initiatives has amounted to (37) initiatives, as the initiatives during the year 2024 focused on the following: <ol style="list-style-type: none"> An initiative by the Women's Leadership Forum Against Corruption, in cooperation with the Women's Cultural and Social Society. An initiative to promote integrity in student activities, in cooperation with Kuwait National Integrity Society. 	 <p>Nazaha نزاها</p>

#	Initiative	Procedure	Implementing Agency
10.3	<p>Target 100%</p> <p>Develop and implement a strategy for public institutions to communicate effectively with the media</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> Nazaha and the Ministry of Information (MOI) continue to cooperate in raising awareness campaigns through visual, audio and print media, in addition to social media, so as to raise awareness of Nazaha's role, competencies and activities, as well as awareness of KIACS 2019-2024 and its relationship to the vision of the State of Kuwait 2035 and raise awareness of anti-corruption values for all members of society. This is in implementation of the terms of the MOU concluded between both parties on 29/03/2018. Among its objectives are the following: <ol style="list-style-type: none"> Coordinating the preparation of radio and television programs that include awareness concepts of the dangers of corruption and methods of preventing them. Cooperating in conducting television and radio interviews to introduce the activities, competencies and objectives of Nazaha. Working to publish the reports issued by Nazaha. Working on publishing Nazaha's awareness, outreach and documentary videos. Media coverage of the activities, events and workshops organized by Nazaha. Cooperation in the field of training through the organization of training courses by the MOI for Nazaha's employees in media and technical aspects and communication skills with the public. Resolution No. (1281) was issued in 2019 to establish the Center for Government Communication (CGC) at the General Secretariat of the Council of Ministers with a view to activate media performance of government agencies, by developing an effective system to raise the efficiency and speed of media response, adopting the general framework for government discourses and unifying media message for all parties. 	 
10.4	<p>Target 100%</p> <p>Develop and implement programs to strengthen the integrity of the media, including professional journalism</p>  <p>100% Implementation and Evaluation</p>	<ul style="list-style-type: none"> In cooperation with the Nazaha, the Ministry of Information held several training workshops on "Journalism Professionalism", with a view to raising awareness among media professionals and journalists about building investigative journalism and media anti-corruption role. 	



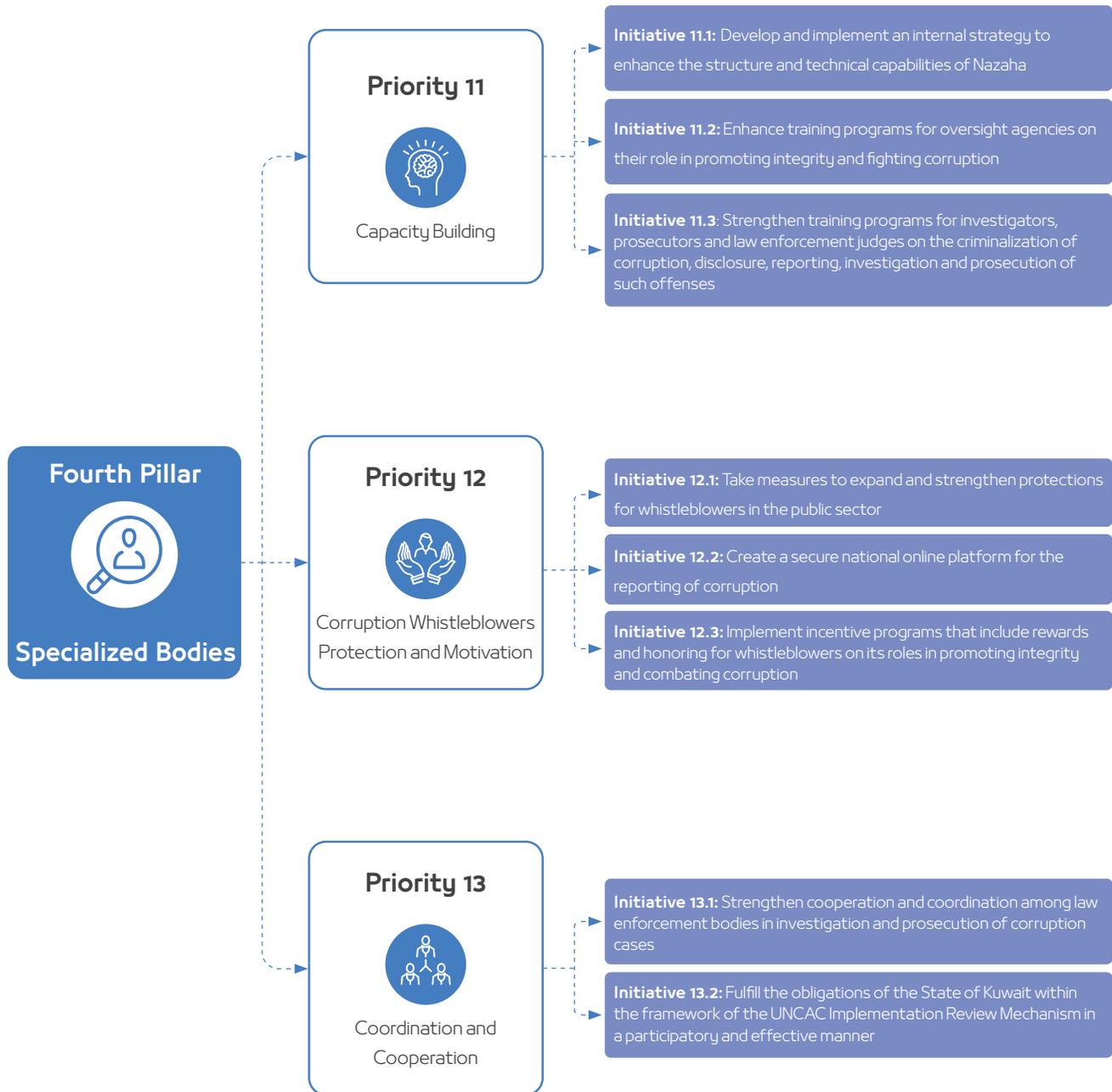
4. Fourth Pillar: Specialized Bodies

Strategic Goal: Enhancing the Efficiency and Effectiveness of Specialized Bodies that Focus on Promoting Integrity and Combating Corruption.

A) Progress Overview:

Initiatives in the Fourth Pillar:

Not Started Started



Progress in the initiatives of the Fourth Pillar

Priority 11



Capacity Building

Priority 12



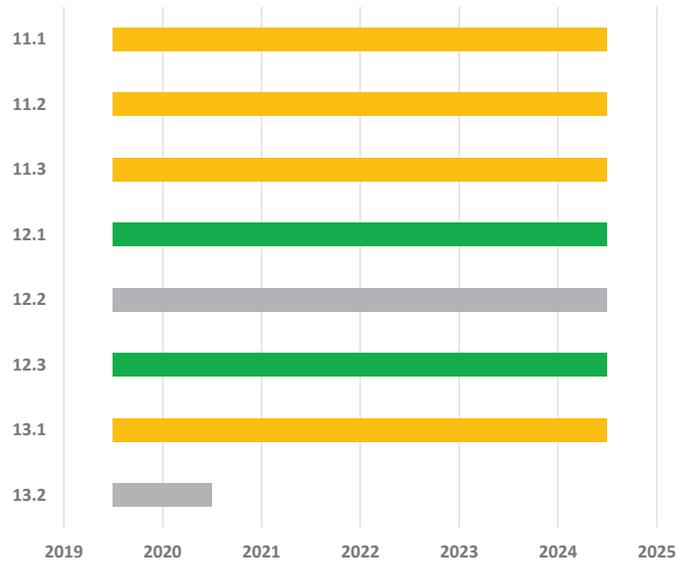
Corruption Whistleblowers Protection and Motivation

Priority 13



Coordination and Cooperation

Priorities



B) Target results of the Third Pillar and its initiatives at the conclusion of KIACS Pillar

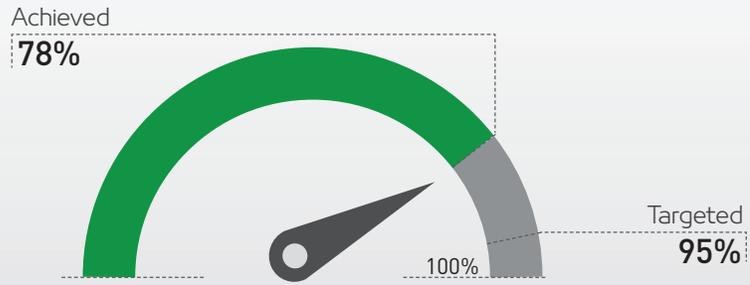
Item	Result
<p style="text-align: center; font-weight: bold; font-size: 1.2em;">Fourth Pillar</p> <div style="text-align: center;">  </div> <p style="text-align: center; font-weight: bold; font-size: 1.2em;">Follow-Up Board</p>	<p>Building specialized capacities of the bodies undertaking a key role in KIACS implementation.</p>
<div style="display: flex; align-items: center;"> <div style="margin-right: 10px;">  </div> <div style="text-align: center;">  <p>Priority 11 Capacity Building</p> </div> </div>	<p>Strengthening the capacity of oversight agencies to ensure successful enforcement of anti-corruption laws, effective legal prosecution and seizure and confiscation of funds and property related to corruption cases.</p>
<div style="display: flex; align-items: center;"> <div style="margin-right: 10px;">  </div> <div style="text-align: center;">  <p>Priority 12 Corruption Whistleblowers Protection and Motivation</p> </div> </div>	<p>Activating whistleblower protection, reporting and verifying corruption crimes and enhancing suspects' identification, investigation and accountability.</p>
<div style="display: flex; align-items: center;"> <div style="margin-right: 10px;">  </div> <div style="text-align: center;">  <p>Priority 13 Coordination and Cooperation</p> </div> </div>	<p>Enhancing coordination and cooperation among specialized bodies in Kuwait for the purpose of implementing KIACS and related laws and rules.</p>

- On Track
- At Risk, but Recoverable
- Off Track

For details of achievements in each initiative, please refer to page 72 of the report

C) Fourth Pillar Follow-Up Board

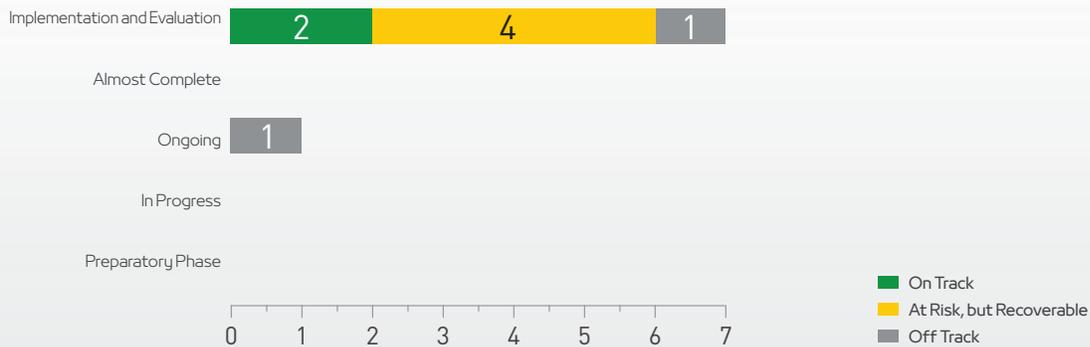
Pillar's Implementation Progress



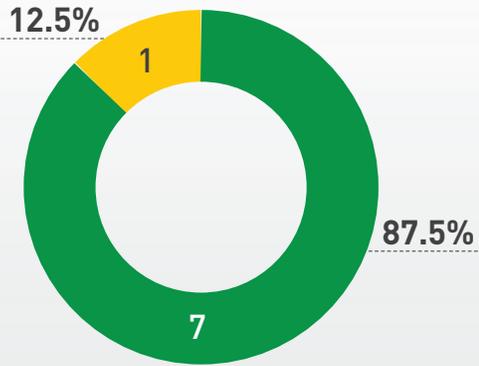
Priorities' progress status



Alignment of initiatives with the established schedule and percentage of completion

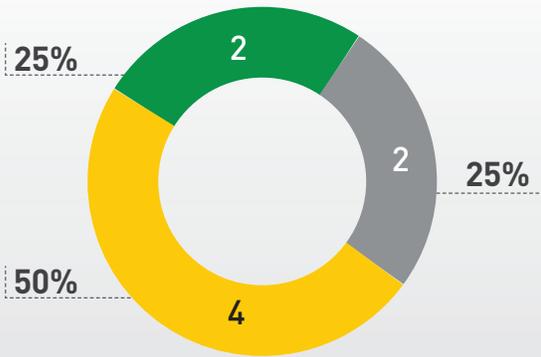


Distribution of initiatives according to the percentage of completion



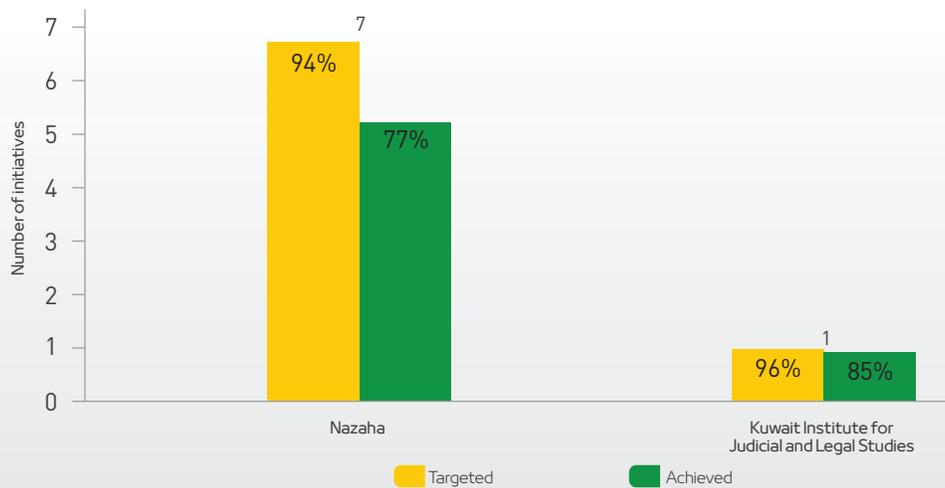
- In progress – Progress is up to 50%
- Almost Complete: Progress made is up to 75%
- Implementation and Evaluation: Progress is up to 100%

Percentage of compliance with the approved plan



- On-track
- At Risk, but Recoverable
- Off-Track

Implementing agencies



Initiatives' rate of completion is evaluated according to the following criteria:



Priority 11: Capacity Building

Progress: 82%

#	Initiative	Procedure	Implementing Agency
11.1	<p>Target 100%</p> <p>Develop and implement an internal strategy to enhance the structure and technical capabilities of Nazaha</p>	<ul style="list-style-type: none"> Nazaha has prepared its internal strategy to include its vision, mission and strategic objectives. The internal strategy includes 45 initiatives, divided into 6 strategic programs. The strategy was launched in April 2019, including initiatives to develop the internal structure and technical capabilities of Nazaha. Nazaha continued to implement the initiatives within its internal strategy. Implementation of all three phases has commenced. The following is a review of the most prominent achievements at internal level: <ol style="list-style-type: none"> Adapting Nazaha's governance model and operating system in accordance with its terms of reference, approving and implementing operational rules and procedures by 89%. Adopting an educational communication plan for Nazaha's employees to introduce its internal strategy, work plan, vision, mission and values, so as to enhance awareness of Nazaha's objectives. Preparing and approving a project to develop the performance management system for Nazaha employees. Starting to prepare a reference framework for training programs in the field of governance, especially for oversight bodies. Developing and implementing a training program to raise awareness of Code of Ethics for Nazaha's employees Preparing a draft internal reporting mechanism in government agencies on 30/03/2023, submitting the same to the CSC for comments and approval in preparation for circulating it to government agencies. 	
11.2	<p>Target 100%</p> <p>Enhance training programs for oversight agencies on their role in promoting integrity and fighting corruption</p>	<ul style="list-style-type: none"> "Nazaha" has finalized developing the plan and reference framework for stakeholders' capacity building in the National Integrity System, with a focus on public entities to enhance the capabilities of government employees and develop their roles in the field of promoting integrity and combating corruption. The program will be implemented at the beginning of 2025. "Nazaha" has implemented training and educational programs for many government agencies in the state on promoting integrity and combating corruption during the year 2024. Nazaha is developing and implementing a capacity-building plan for specialized bodies in promoting integrity and combating corruption. The plan will focus on specific priorities, starting with oversight entities by enhancing their training programs and developing their roles in promoting integrity and combating corruption. Nazaha also presented the "Good Governance" program to its members. 	

#	Initiative	Procedure	Implementing Agency
11.3	<p>Target 100%</p> <p>Strengthen training programs for investigators, prosecutors and law enforcement judges on the criminalization of corruption, disclosure, reporting, investigation and prosecution of such offenses</p> 	<ul style="list-style-type: none"> • Kuwait Institute for Judicial and Legal Studies conducts training programs for members of the Public Prosecution Office, Department for Legal Advice and Legislation and the General Department of Investigations, in addition to supporting judges' experience to raise their level of performance and practical practice. • The Institute attaches great importance to continuous and specialized training programs in accordance with its objectives, as it holds advanced courses in cooperation with local, regional and international entities to enhance the trainees' expertise in various legal and judicial branches. • The Institute obtained the ISO International Administrative Quality Certificate (ISO 9001:2015) in training and qualifying judiciary members and assistants, training of trainers and developing scientific research in judicial and legal fields. • Kuwait Institute for Judicial and Legal Studies circulated the Code of Judicial Conduct to all representatives and judges of the Court of First Instances and members of the Public Prosecution, where a number of (18) members of the Public Prosecution were trained thereon during the year 2024 • The Institute also trained (103) legal researchers, (27) representatives and judges of the Court of First Instances and (32) members of the Public Prosecution on training programs concerned with criminalizing corruption and detecting, reporting, investigating and prosecuting these crimes during the fiscal year 2024/2025, where several training programs were implemented, as follows: <ol style="list-style-type: none"> 1. The effective role of national agencies in protecting and promoting human rights. 2. Crimes of human trafficking and migrant smuggling. 3. Combating human trafficking. 4. National referral system in accordance with United Nations conventions and national legislation. 5. Human rights. • The Institute has also implemented training programs related to criminalizing corruption and detecting, reporting, investigating and prosecuting these crimes for public and private government agencies for the fiscal year 2024/2025, where several training programs were implemented, as follows: <ol style="list-style-type: none"> 1. Public Money Protection Law. 2. Judicial police. 3. Forgery of official documents and bribery crimes. 	

Priority 12: Corruption Whistleblowers Protection and Motivation

Progress: 71%

#	Initiative	Procedure	Implementing Agency
12.1	<p>Target 100%</p> <p>Take measures to expand and strengthen protections for whistleblowers in the public sector</p> 	<ul style="list-style-type: none"> • Nazaha evaluated the risks related to the reporting process in the public and private sectors and recommended appropriate measures to increase and enhance protection for corruption whistleblowers working in the public sector through clear protocols and procedures. Nazaha listed and identified reports of all types in the public and private sectors and the procedures in place at Nazaha were evaluated, identifying relevant risks. • Nazaha developed an action plan to implement the recommendations included in the study to avoid risks related to reporting and protection of whistleblowers. • Nazaha has prepared a draft amendment to Law No. (02) of 2016 on Establishing Kuwait Anti-Corruption Authority, so as to enhance the expansion and protection of whistleblowers and improve cooperation with law enforcement agencies to include the following: <ul style="list-style-type: none"> • Redefining "Whistleblower" to include informants who provide testimony related to criminal facts or acts of corruption. • Redefining "Illicit Gain Crime" to include any public employee, or any person in similar position, who is subject to financial liability. 	 <p>Nazaha نـزـاهة</p>
12.2	<p>Target 100%</p> <p>Create a secure national online platform for the reporting of corruption</p> 	<ul style="list-style-type: none"> • Nazaha has completed the preparation of the "Roadmap for Nazaha's Digital Transformation" plan, which includes a project to create a safe online platform for reporting corruption. It is planned that the platform will be launched in the fiscal year 2025/2026. 	 <p>Nazaha نـزـاهة</p>

#	Initiative	Procedure	Implementing Agency
12.3	<p>Target 100%</p> <p>Implement incentive programs that include rewards and honoring for whistleblowers on its roles in promoting integrity and combating corruption</p> 	<ul style="list-style-type: none"> • “Nazaha” implemented the provisions of Article No. (43) of the law by honoring one of the whistleblowers of corruption crimes in 2021. In 2023, “Nazaha” also prepared and approved a new mechanism to reward whistleblowers financially and morally in the same year in a manner that ensures the confidentiality and protection of the whistleblower at the moment of his honoring. In order to activate this new mechanism, “Nazaha” granted one of the whistleblowers a financial reward and a moral incentive in 2023, so that the number of whistleblowers benefiting from the reward stipulated in the Authority’s Law is (2) since 2020 until now. • Nazaha continues to raise awareness of the mechanism to motivate and honor those who report corruption through its awareness campaigns. 	 <p>Nazaha نزهة</p>

Priority 13: Coordination and Cooperation

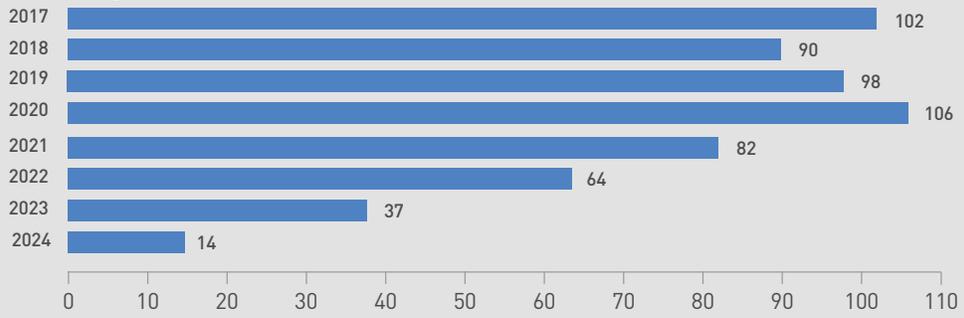
Progress: 71%

#	Initiative	Procedure	Implementing Agency
13.1	<p>Target 100%</p> <p>Strengthen cooperation and coordination among law enforcement bodies in investigation and prosecution of corruption cases</p> 	<ul style="list-style-type: none"> • Continuing coordination and cooperation between Nazaha and the primary investigating authority, “the Public Prosecution,” regarding the reports referred to the Public Prosecution. • Sending the draft amendment to Law No. (02) of 2016 on Establishing Kuwait Anti-Corruption Authority and the provisions related to financial disclosure to the Department for Legal Advice and Legislation for review. The draft amendment to the Authority’s law included some amendments, as follows: <ol style="list-style-type: none"> 1. Expanding Nazaha’s powers to interrogate the accused in corruption cases, request travel bans for those suspected of corruption crimes and follow up on the procedures and measures undertaken by the competent judicial authorities regarding the recovery of corruption proceeds. 2. Forming joint investigation teams with the membership of several national entities, including the Ministry of Interior - the Public Prosecution - and the Department for Legal Advice and Legislation and transnational entities, to cooperate in collecting data, information, documents and evidence related to incidents, actions or crimes of corruption, investigating them and arresting and prosecuting its perpetrators. 	 <p>Nazaha نزهة</p>
13.2	<p>Target 100%</p> <p>Fulfill the obligations of the State of Kuwait within the framework of the UNCAC Implementation Review Mechanism in a participatory and effective manner</p> 	<ul style="list-style-type: none"> • In November 2023, Nazaha received the draft Executive Summary of the Country Review Report of the State of Kuwait on the implementation of Chapters Two and Five of the United Nations Convention against Corruption from the United Nations Office on Drugs and Crime (UNODC). Nazaha specialists reviewed the executive summary after coordinating with the relevant authorities in the state regarding receiving their comments. It was sent to the United Nations Office on Drugs and Crime (UNODC) in October 2024. • In December 2024, (UNODC) sent additional queries on the draft executive summary to Nazaha and they are being studied and worked on to respond to UNODC in coordination with the relevant national authorities. • Nazaha has also listed the recommendations resulting from the First Cycle of the mechanism to review the implementation of the Convention regarding the implementation of Chapters Three and Four thereof, with the aim of continuing to follow up on the implementation of these recommendations with the relevant authorities in the State of Kuwait. 	 <p>Nazaha نزهة</p>

Highlight on Reporting Corruption

Total number of reports received by Nazaha and the cases it monitored in the past six years:

593

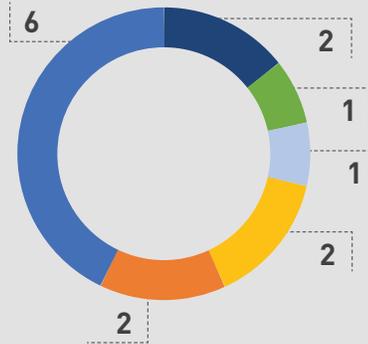


Source: Nazaha

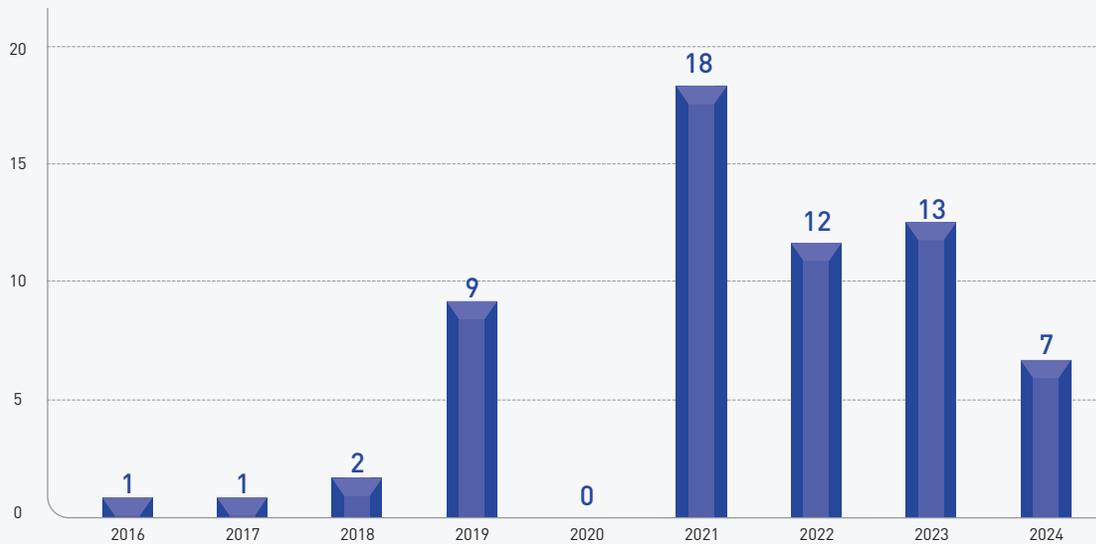
The nature and number of crimes included in the reports received by Nazaha during 2024:

- Damaging public funds
- Facilitation + Forgery
- Suspicion of forgery
- Administrative violations
- Illicit gain + Conflict of interest
- Conflict of interest

Source: Nazaha



Total number of protection requests from 2016 to 2024



■ Number of requests

Total: 63

Highlight on the United Nations Convention Against Corruption (UNCAC)

The United Nations Convention Against Corruption (UNCAC) is a legally binding international instrument that aims to combat corruption in all its forms. It covers a wide range of corruption-related offences and is structured around five main chapters: Preventive Measures, Criminalization and Law Enforcement, International Cooperation, Asset Recovery, and Technical Assistance and Information Exchange.

UNCAC calls on its parties to provide mutual legal assistance in investigations, trials and judicial proceedings related to corruption offences. It also includes provisions on mutual legal assistance, extradition, cross-border law enforcement cooperation, and joint investigations. In the area of asset recovery, UNCAC provides a framework for detecting, tracing, confiscating, freezing, and even returning and disposing of stolen assets.

To monitor the implementation of the UNCAC, an accredited and transparent mechanism was launched in 2009 to assist the Conference of the States Parties in monitoring its implementation.

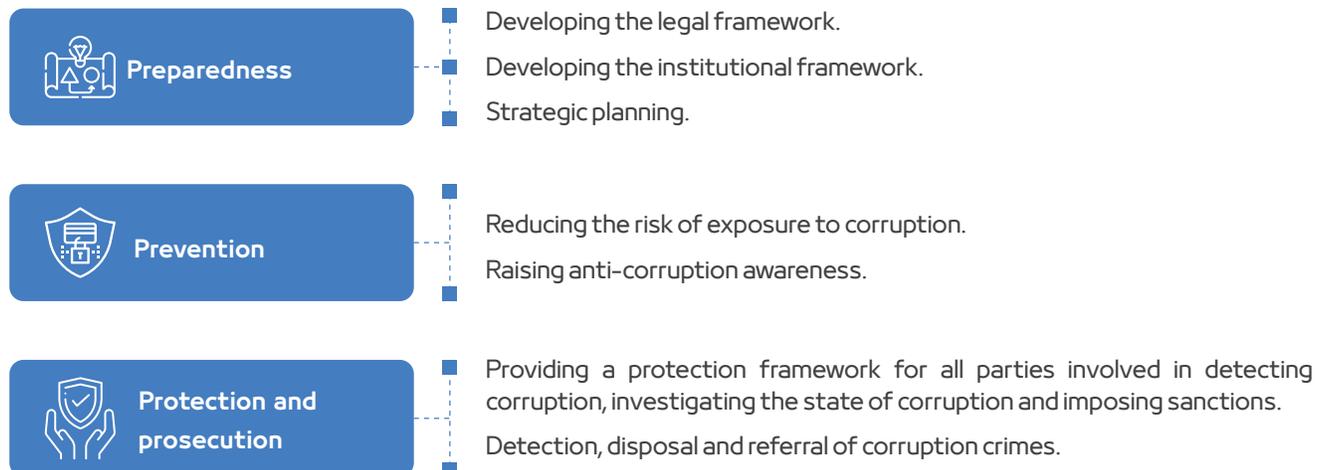
UNCAC's Implementation Review Mechanism consists of the following three steps:



The States Parties of the UNCAC are reviewed by two counterpart governments, with the support of the United Nations Office on Drugs and Crime in Vienna, which serves as the secretariat for the UNCAC. The review process is overseen by the Implementation Review Group (IRG), an open intergovernmental group of States Parties. The review process is divided into two five-year cycles. During the first cycle, Chapters Three and Four of the UNCAC, which cover criminalization and law enforcement and international cooperation, respectively, are reviewed. The second cycle covers Chapters Two and Five, which address preventive measures and asset recovery.

5. Progress of KIACS as per anti-corruption methodology tracks

The anti-corruption methodology consists of 3 main tracks or 'elements'



Analyzing the progress of Kuwait Integrity and Anti-Corruption Strategy according to the different elements of anti-corruption methodology:

This analysis shall help assess the level of achievement according to each element of the anti-corruption methodology.

Initiatives' status, i.e., compatible, deviant and incompatible, shall be reviewed based on the observations previously-mentioned in pillars' details.



- On Track
- At Risk, but Recoverable
- Off Track

- Progress is consistent across the levels of the anti-corruption methodology components: preparation, prevention, protection and prosecution.
- Considerable efforts have been made to make progress in the “Preparedness and Capacity Building” area, with five (5) out of the eleven initiatives aligned with the established plan, representing 45% of the initiatives related to this track. These initiatives involve the establishment of legal frameworks, as well as planning and assessing the current situation.
- Regarding KIACS initiatives, the majority of the initiatives (64%) are focused on the “Prevention” track. However, there has been a delay in implementing 30% of the initiatives within this track, which will require increased effort in the next phase to ensure alignment with the action plans.
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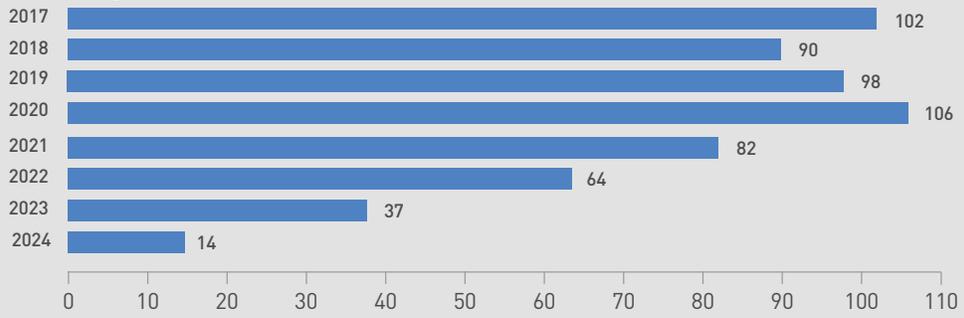
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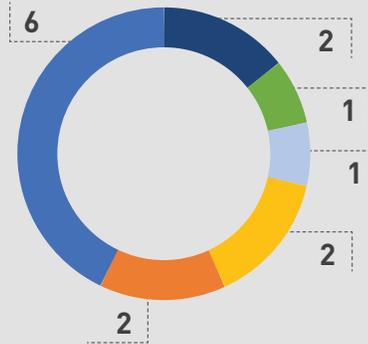


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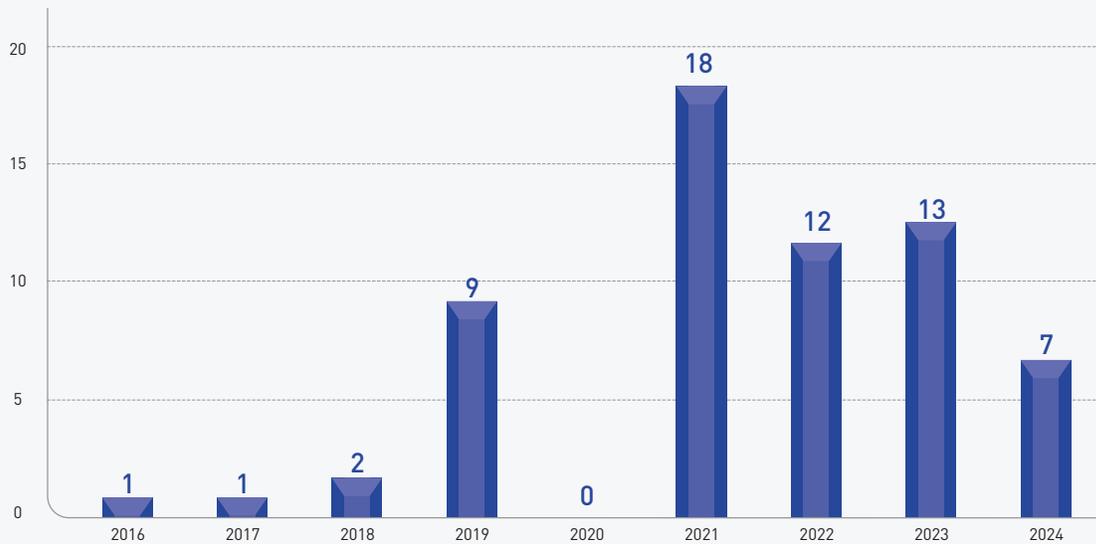
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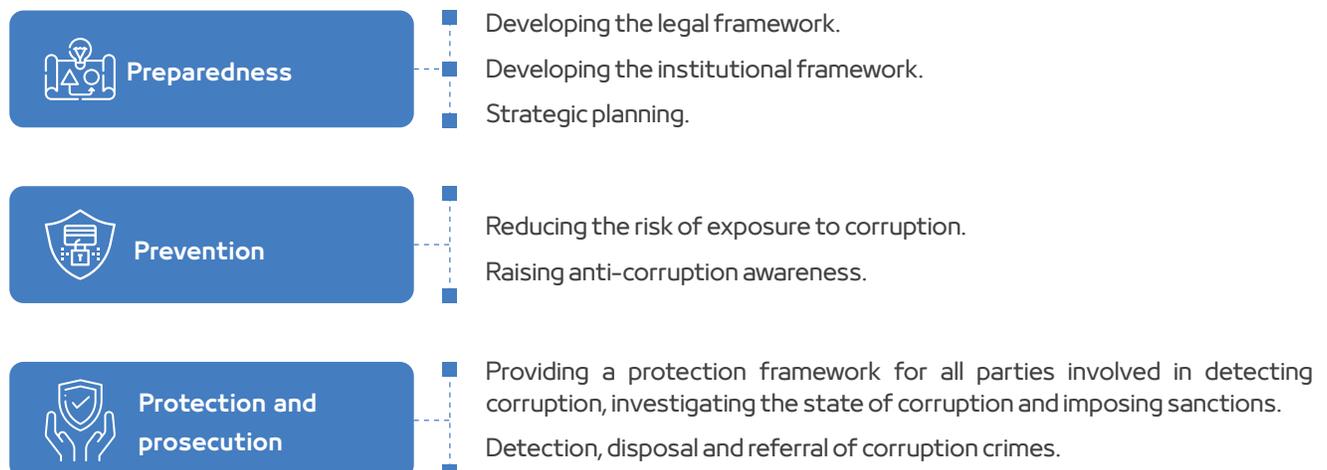
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Next steps to implement KIACS in 2025

In the Fifth year (2024) of implementation, KIACS has witnessed a remarkable qualitative leap, with completion rate of (42) initiatives, out of (47) of KIACS' initiatives, reaching the final "Implementation and Evaluation" and "Almost Complete" phases. This remarkable achievement is the result of concerted efforts exerted by stakeholders and the continuous support from state institutions and political leadership, especially since Government Action Program 2023-2027 includes several projects and laws closely linked to KIACS' objectives, priorities and initiatives, which emanate from the goals of Kuwait Vision 2035.

In 2025, we look forward to more fruitful achievements that will reflect positively on citizens and the State of Kuwait in general, through cooperation and partnership with all stakeholders, as well as continued support from the executive and legislative authority, in addition to the wise political leadership, to improve the anti-corruption system, achieve KIACS' objectives and raise Kuwait's rating in the relevant international indices.

Summary of 2025 Priorities



Public Sector

Transparency in public affairs and funds management:

Completing awareness programs to raise public awareness of the Right to Information Law, focusing on the draft amendment to the Public Tenders Law, publishing the manual for preparing government agency reports in accordance with best practices and providing training thereon.

Recruitment and promotion in public sector:

Developing appointment and promotion mechanisms in the public sector and following up on the draft law regulating appointments to leadership positions.

Integrity in the performance of public office:

Completing, implementing and evaluating training programs related to the codes of professional conduct for government and private entities. We will continue to monitor the implementation of "Aadaa" project with a view to ensuring compliance with the standards and ethics of the code of professional conduct in the public sector, thus creating a work environment that is professional, efficient, and productive, supported by institutional values and a healthy workplace.

Accountability in the public sector:

We will continue to provide support to stakeholders to improve public employees' performance. This is in addition to finalizing the draft amendment to the law establishing Kuwait Anti-Corruption Authority, including the development of the necessary legislation to criminalize illicit enrichment and follow up on its issuance.

Effectiveness and efficiency of public services' provision:

Continuing to develop public services' effectiveness and digitization, working on preparing a manual for assessing and managing corruption risks in Kuwait and providing training thereon.



Private Sector

Integrity and Accountability in Private Sector:

Following up on the approval and issuance of draft laws and legislation as necessary to criminalize corruption and bribery in the private sector and bribery of foreign public officials.

Private Sector Role in Exposing Corruption:

- Continuing to follow up the Capital Markets Authority's efforts in terms of the mechanism for reporting violations and crimes and protecting whistleblowers in private sector. In addition to following up on the recommendations included in the study prepared by Nazaha regarding the provisions and protection measures in the United Nations Convention against Corruption and the law establishing Nazaha. The study included developing and implementing legislation and measures related to the protection of whistleblowers.
- Nazaha has developed an action plan to implement the recommendations included in the study to mitigate risks related to reporting and protect whistleblowers.



Society

Public Awareness:

Based on the results of the national survey conducted by Nazaha, we will continue to implement, evaluate and develop awareness campaigns and activities on the risks of corruption and ways to prevent it, in addition to raising awareness of Nazaha's duties, responsibilities and activities, as well as the role of citizens and residents in combating corruption.

Role of Education:

Joining efforts with concerned parties to follow up on revising the curricula after evaluating them, following up on the evaluation of the quality and impact of training personnel in the field of education on building a culture of integrity and anti-corruption. This is in addition to following up with the joint educational entities on reviewing and updating the curricula related to professional ethics training in universities and institutes in Kuwait and creating the "Good Governance" specialization in universities and institutes.

Cooperation with civil society and media:

Continuing to empower and encourage the role of civil society institutions in the field of community oversight and enhance efforts to support public and private media, so as to build a culture of objective investigative journalism in anti-corruption field.



Specialized Bodies

Capacity Building:

Optimizing the institutional framework for combating corruption, particularly by supporting Nazaha in implementing its internal strategy, in addition to developing and building government agencies' capacities in the field of promoting integrity and combating corruption. "Building a Knowledge Base Towards a New Strategic Framework for Promoting Integrity and Combating Corruption" project will be launched to evaluate Nazaha's current internal strategy and KIACS, in cooperation with international experts from the United Nations Development Programme (UNDP), in preparation for launching the next strategic integrity and anti-corruption framework.

Protection of Whistleblowers:

We will continue our preparations to establish a secure national online platform for submitting corruption-related reports and to continue to strengthen the protection of whistleblowers from both public and private sectors.

Coordination and Cooperation:

We will intensify efforts exerted with stakeholders to ensure the State of Kuwait's commitment to the implementation mechanism framework of the United Nations Convention against Corruption and to follow up on the legal, judicial and international cooperation draft law.



نـزاهة Nazaha



الهيئة العامة لمكافحة الفساد
Kuwait Anti Corruption Authority



@nazaha_gov_kw



www.nazaha.gov.kw

