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**Review of implementation of the United Nations
Convention against Corruption**

Executive summary

Note by the Secretariat

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II. Executive summary

Cuba

1. Introduction: Overview of the legal and institutional framework of Cuba in the context of implementation of the United Nations Convention against Corruption

Although it has special characteristics of its own, the legal order of Cuba is based on the European continental legal tradition. A mixture of procedures is used for criminal trials, with the preliminary investigation stage being differentiated from the trial stage. The international agreements ratified by Cuba may be applied directly, but they cannot establish criminal liability.

The supreme organ of State authority is the National Assembly of People's Power. Other State bodies include the system of courts headed by the People's Supreme Court, the Office of the Attorney General of the Republic and the Office of the Comptroller General of the Republic. The State Control Commission, known until March 2013 as the Government Control Commission, is made up of representatives and officials of agencies that have a leading policy role.

Since the 1990s, there has been a move towards the economic diversification of the societal model, with the creation of agricultural cooperatives, joint enterprises and the introduction of self-employment. The Foreign Investment Act No. 77 of 5 September 1995 regulates enterprises entirely financed by foreign capital — in which there is no involvement by a national investor — and joint enterprises, that is, Cuban trading companies that take the form of a limited company, the shareholders of which are one or more national investors and one or more foreign investors. Self-employed persons are governed by Decree Law No. 141/1993 and their contractual relations are covered by Decree Law No. 304 of 27 December 2012. They work independently of the State. At the end of 2012, there were about 400,000 self-employed persons in the country.

2. Chapter III: Criminalization and law enforcement

2.1. Observations on the implementation of the articles under review

Bribery and trading in influence (arts. 15, 16, 18 and 21)

Active bribery of national public officials (art. 15 of the Convention) is covered by article 152, paragraph 4, of the Criminal Code and passive bribery by paragraphs 1-3 of the same article.

It is noted that the concepts “directly or indirectly” and “an undue advantage for the official himself or herself or another person or entity” are covered by paragraph 1 of the article, as regards passive bribery, and these concepts are taken to apply also to all the following paragraphs, including active bribery. At the same time, the active bribery of a public employee, whether a public official or not, is not covered by paragraph 4 alone but is understood to be covered by paragraph 4 in conjunction with paragraphs 1 and 6.

A “public official” is taken to be any person who exercises senior functions or occupies a post involving responsibility for custody, conservation or supervision in a public agency, a military institution, a Government office or a production or service enterprise or unit. Persons employed by a State entity not exercising such responsibility are considered public employees.

Bribery of foreign public officials and officials of public international organizations (art. 16 of the Convention) is not regulated.

Passive trading in influence is provided for under article 151 of the Criminal Code (art. 18 of the Convention). This article regulates the promotion or management of proceedings based on the real or supposed influence of a public official but does not mention the solicitation or acceptance of an undue advantage. Active trading in influence is not regulated, although such conduct may be penalized under a number of headings. However, there is a difference, as regards both passive and active trading in influence, from the conduct described in the Convention in relation to the time when an offence is committed.

Active bribery in the private sector is considered to be covered by article 152, paragraph 4, of the Criminal Code. Passive bribery in the private sector is not regulated (art. 21 of the Convention).

Money-laundering, concealment (arts. 23 and 24)

Article 346 of the Criminal Code provides for the laundering of the proceeds of crime (art. 23 of the Convention) and this provision is complemented by the Acts of Terrorism Act No. 93 of 24 December 2001. There have been few cases of money-laundering to date. Article 338 of the Criminal Code criminalizes the acquisition but not the mere possession or use of the proceeds of crime. It also excludes acts committed for the benefit of third parties.

Predicate offences of money-laundering are regulated without limitation and do not include corruption offences. Although the laundering of the proceeds of crime committed outside Cuban jurisdiction is not specifically regulated, the law is interpreted in such a way that money-laundering offences are covered. So-called “self-laundering” is possible in the context of article 346 but not in that of article 338.

Concealment (art. 24 of the Convention) is governed by articles 160 and 338 of the Criminal Code and the Acts of Terrorism Act.

Embezzlement, abuse of functions and illicit enrichment (arts. 17, 19, 20 and 22)

The Criminal Code regulates various forms of embezzlement (art. 17 of the Convention), in articles 336, 335, 225, paragraph 1, 224 and 153 of the Code. The basic rule (art. 336, para. 1) does not cover the element of advantage to third parties. The concept of “treating”, set out in article 225, paragraph 1 (c), can cover some cases and the People’s Supreme Court seems to interpret the law in this way.

Abuse of position (art. 19 of the Convention) is regulated under articles 225, 153, 136-139 and 133 of the Criminal Code.

Article 150 of the Code criminalizes illicit enrichment (art. 20 of the Convention). Cuba also regards undue enrichment as an administrative offence under Decree Law No. 149.

Embezzlement in the private sector (art. 22 of the Convention) is provided for under article 336 of the Criminal Code.

Obstruction of justice (art. 25)

Article 142, paragraph 2, of the Criminal Code provides for violence or intimidation against a witness (art. 25 (a) of the Convention). Bribery to induce false testimony is not covered in the article referred to above, but it may be partially covered as incitement or attempted incitement to perjury (art. 155 of the Criminal Code). The obstruction of any other production of evidence is also not regulated.

Articles 142-144 of the Criminal Code are in line with the provisions of article 25 (b) of the Convention.

Liability of legal persons (art. 26)

The Cuban justice system provides for the criminal, civil and administrative liability of legal persons. Criminal sanctions have not yet been imposed, in view of the wide range of administrative measures.

Participation and attempt (art. 27)

Participation is governed by article 18 of the Criminal Code. Paragraph 4 of the article provides that all the perpetrators of any of the offences set out in international treaties are criminally liable, whatever form their participation takes. The possibility of applying this provision to acts of corruption is under consideration. Attempt is governed by articles 12, 13 and 15 of the Criminal Code. Although the Code provides for the possibility of penalizing criminal preparations (art. 12), penalties are not imposed for corruption offences.

Prosecution, adjudication and sanctions; cooperation with law enforcement authorities (arts. 30 and 37)

The Criminal Code contains sanctions that take into account the gravity of the offence in question. There is no immunity from legal process and, although wide-ranging jurisdictional privileges exist, there are also cases in which they are lifted. There are no discretionary legal powers. The power to suspend a person from his or her post during an investigation lies solely with the administration. Article 37 of the Criminal Code imposes as a criminal sanction deprivation of the right to hold any senior position in a State municipal or administrative body or in any State-owned company. Disciplinary powers are governed by Decree Laws Nos. 196 and 197, both of 1999 (art. 30 of the Convention).

Article 52 (c) and (h) of the Criminal Code provides that confession and assistance given to the authorities in resolving a criminal act constitute extenuating circumstances. A person who cooperates with the justice system is not granted immunity from prosecution, but certain considerations are taken into account. Cuba has considered entering into agreements or arrangements with other States with regard to the possibility of granting such immunity from prosecution to persons who provide substantial cooperation with the competent authorities of the other State, but the provisions of mitigation and extraordinary mitigation of punishment may be applied only by the courts and not in consequence of an agreement or arrangement. Cuba has therefore decided against entering into such agreements (art. 37 of the Convention).

Protection of witnesses and reporting persons (arts. 32 and 33)

The Cuban authorities have stated that it has not, to date, been necessary to provide protection measures for witnesses or experts or for reporting persons (arts. 32 and 33 of the Convention). A victim may speak freely at a trial in his or her role of witness. Reporting persons in Cuba may be protected by anonymity. There are also general employment and disciplinary safeguards.

Freezing, seizing and confiscation; bank secrecy (arts. 31 and 40)

The Cuban policy of confiscation is based on a criminal conviction, as an accessory penalty, in accordance with article 43 of the Criminal Code, and includes the concepts of seizing and freezing (art. 31 of the Convention). The value of the property confiscated is not taken into account, even where the proceeds of crime have been intermingled with lawful property.

Confiscation may, however, constitute a further accessory penalty, whereby the person concerned is dispossessed, totally or partially, of his or her property, which is transferred to the State (art. 44 of the Criminal Code). This penalty may be imposed for various corruption offences.

Lastly, confiscation may be imposed in accordance with Decree Law No. 149 as an administrative decision by the Ministry of Finance and Prices, on the basis of an investigation by the Office of the Attorney General of the Republic, which may adopt any necessary precautionary measure.

The administration of frozen property is the responsibility of the competent courts or the Central Bank of Cuba. Cuba observes the principle of innocence and there are no regulations requiring an offender to demonstrate the lawful origin of goods confiscated.

There are a number of procedures whereby bona fide third parties may protect their rights, such as amparo proceedings or the review procedure.

Cuban law allows for bank secrecy to be lifted in administrative or criminal proceedings by the courts, assessors or investigative authorities.

Statute of limitations; criminal record (arts. 29 and 41)

The statute of limitations for various offences is sufficient and there are ample opportunities for suspension (art. 29 of the Convention).

Cuba considers that sanctions imposed by a foreign court constitute a criminal record only in relation to Cuban nationals (art. 41 of the Convention).

Jurisdiction (art. 42)

Cuba has not established special rules on jurisdiction in cases where an offence is committed against one of its nationals (art. 42, para. 2 (a) of the Convention). According to the Cuban authorities, such a case may proceed on the basis of article 5, paragraphs 1, 2 and 3, of the Criminal Code. There have been no specific cases under this heading.

Consequences of acts of corruption; compensation for damage (arts. 34 and 35)

Contracts arising out of an act of corruption may be declared void by the commercial division of the people's courts, in accordance with the Civil Code.

Article 70 of the Criminal Code establishes that a person who is criminally liable is also civilly liable for damage caused by crime (art. 35 of the Convention).

Specialized authorities and inter-agency coordination (arts. 36, 38 and 39)

There are sufficient legal tools in place to safeguard the activities of the competent authorities as regards action against corruption. Training is also provided for staff (art. 36 of the Convention).

It is noted that there is cooperation between the authorities responsible for investigating offences and the public authorities. The State Control Commission is in place (art. 38 of the Convention).

Economic authorities are required to cooperate in investigations. Cuba has provided information on the existence of special measures to motivate people to report acts of corruption. “Green lines” are provided to enable people to make anonymous reports (art. 39 of the Convention).

2.2. Successes and good practices

Cuba observes a constant policy of updating its anti-corruption legislation and international treaties on extradition and mutual legal assistance.

As regards the offence of money-laundering, it is noted that money-laundering is punished on the basis of the obligation to know, reasonable assumption or inexcusable ignorance (art. 23, para. 1, of the Convention).

Illicit enrichment may take the form of direct enrichment through an intermediary or an increase in the assets of an official or a third party (art. 20 of the Convention).

The inter-institutional coordination evidenced by the existence of the Inter-institutional State Control Commission, which facilitates the exchange of information on pending cases (art. 38 of the Convention) is to be commended.

2.3. Challenges in implementation

General observations

In view of the fact that organized statistics are available at both provincial and national level, it is considered that the system could benefit from a stronger structure. This could be achieved by collecting statistical data broken down by type of conduct, not only criminal conduct but also such elements as participation and prescription. It could also be useful to publish such statistics, perhaps in the publications of public data-gathering institutions (Introduction).

The publication of the bulletins of the People’s Supreme Court is noted, as a tool to keep the public updated on the judgements of the Court. It has been pointed out that judgements published in the bulletins do not constitute case law, but the publication of the bulletins is a way of contributing to the enrichment of the legal culture of the judicial system. In that regard, consideration might be given to providing the bulletins with a fuller index of judgements passed by Cuban courts, possibly in the form of a database, so that a systematic study of the work of the Cuban judicial system could be carried out (Introduction).

Penalization

It is recommended that Cuba should ensure that article 152, paragraph 4, is applicable to cases of active bribery that benefit a public employee and to cases of indirect active bribery or active bribery that benefit third parties, in combination with paragraphs 1-3 and 6 of the same article. In cases of passive bribery, meanwhile, it is clear that article 152, paragraphs 1, 2 and 3, is applicable to benefits for third parties and that the term “for another person” includes any natural or legal person. Should the judiciary not interpret the law accordingly in future cases, legislative clarification may be considered (art. 15).

It is recommended that Cuba should amend its legislation in order that it should explicitly apply to bribery of foreign public officials and officials of public international organizations and that it should consider extending this amendment to the passive bribery of such persons (art. 16).

It is recommended that Cuba should ensure that benefits for third parties are covered by the application of all the criminal categories relating to embezzlement by a public official. Should the judiciary not interpret the law accordingly in future cases, legislative clarification may be considered (art. 17).

It is recommended that Cuba should continue its efforts to ensure that all forms of conduct constituting trading in influence, whether active or passive, should be penalized. Should the judiciary not interpret the law accordingly in future cases, legislative clarification may be considered (art. 18).

It is recommended that Cuba should monitor the implementation of the concept “with a view to obtaining unlawful benefit” (Criminal Code, art. 133) in order to ensure that it covers benefits for third parties. Should the judiciary not interpret the law accordingly in future cases, legislative clarification may be considered (art. 19).

It is recommended that, depending on the development of the private sector in the country, Cuba should consider whether it will be necessary in the future to extend the application of the provision on active bribery to the private sector. Cuba should consider criminalizing passive bribery in the private sector (art. 21 (b)).

It is recommended that Cuba should amend its legislation to provide, in article 338 of the Criminal Code, for the mere possession and use of the proceeds of crime and acts committed for the benefit of third parties (art. 23, para. 1 (b) (i)). It is recommended that Cuba should amend its legislation to ensure that the offence of money-laundering is applied to the widest possible range of predicate offences and, at a minimum, to corruption offences (art. 23, para. 2 (a) and (b)). It is recommended that predicate offences committed outside Cuban jurisdiction should be explicitly included (art. 23, para. 2 (c)).

It is recommended that Cuba should amend its legislation to ensure that the provision of evidence relating to corruption offences is not hindered. In the context of this reform, consideration may be given to the creation of a specific rule concerning bribery to induce false testimony (art. 25 (a)).

Implementation of the law

In view of the applicability of article 60 of the Constitution (Guarantee of due process), the reviewers wish to express their concern about the concept of confiscation as provided for in article 44, which might present a challenge in the context of the basic principles of due process and in civil or administrative

proceedings relating to the property rights mentioned in the preamble to the Convention. For the same reason, they wish to express their concern about the confiscation provided for in Decree Laws Nos. 149 and 232, particularly since it does not require a judicial decision. At the same time, they understand that the confiscation decision may be challenged by the person concerned. The reviewers therefore recommend that Cuba should continue to monitor the situation to ensure that this safeguard is always observed with regard to confiscation of property. The same applies to the confiscation governed by Decree Laws Nos. 149 and 232. It is also suggested that the country should give consideration in any future amendments to its legislation to clarifying the Decree Laws so that they expressly provide for a guarantee of due process with regard to confiscation of property (art. 31, para. 1).

The law on seizure and freezing should be assessed in order to ensure that it can cover all the eventualities mentioned in the Convention, including complex cases of financial crime (art. 31, para. 2).

It is recommended that Cuba should continue to provide for the mechanisms required for the administration of frozen or confiscated property and to make it clear that the administration of confiscated property is the responsibility of the courts (art. 31, para. 3).

It is recommended that the law should be amended for cases in which the proceeds of crime have been intermingled with property acquired from legitimate sources in order to ensure that such property is liable to confiscation up to the assessed value of the intermingled proceeds (art. 31, para. 5).

Although it is noted that, in practice, Cuba has not so far needed to take measures to protect witnesses or experts, it would be desirable to provide for additional measures to protect witnesses and experts who give testimony concerning corruption offences and to their relatives and other persons close to them (art. 32, paras. 1 and 2). It would be advisable to prepare in advance for cases requiring relocation and to provide measures to protect victims, insofar as they are witnesses (art. 32, paras. 3 and 4). It is recommended that Cuba should consider clarifying the law to permit victims to present their views even in cases in which they are not witnesses (art. 32, para. 5).

The national authorities are urged to continue to cooperate with the agencies engaged in investigating corruption and money-laundering in the light of current changes that have been made in the country's production structure. Cuba is encouraged to increase its cooperation with financial institutions and trading and joint companies (art. 39).

It is suggested that persons who participate or have participated in the commission of corruption offences but cooperate with the justice system should also receive the protection provided for witnesses (art. 37, para. 4).

It is suggested that the country should consider amendments to the law in future to take account of a second offence committed abroad by an alleged offender who is not Cuban (art. 41).

In view of the lack of actual cases, it is recommended that Cuba should consider clarifying, in a future review of legislation, the issue of its jurisdiction over an offence committed against one of its nationals (art. 42, para. 2 (a)).

2.4. Technical assistance needs identified to improve the implementation of the Convention

Cuba has indicated the following technical assistance needs:

General observations and articles 15-25 and 30: sharing of experiences at the regional level.

3. Chapter IV: International cooperation

3.1. Observations on the implementation of the articles under review

Extradition; transfer of sentenced persons; transfer of criminal proceedings (arts. 44, 45 and 47)

Cuba made a declaration concerning article 44, paragraph 6, stating that it would not consider the Convention to be a legal basis for cooperation on extradition.

Articles 434-441 of the Criminal Procedure Act govern the domestic procedure for extradition in cases of active extradition; in practice, the same rules apply to passive extradition. A Cuban national may not be extradited to another State.

Cuba has signed 11 extradition treaties and 11 agreements on mutual legal assistance that include the issue of extradition. In the absence of a bilateral treaty, Cuba may allow extradition in accordance with the principles of reciprocity and dual criminality.

There is no requirement of a minimum punishment of deprivation of liberty under domestic law, although this criterion is established in a number of bilateral agreements.

Although there have not yet been any cases of passive extradition, the authorities have stated that they would take a person present in Cuban territory into custody, so long as this was justified by circumstances, the issue was urgent and there was well-founded evidence. Although the national authorities have emphasized that the conviction by a foreign court of a Cuban based and located in Cuba could be enforced on the basis of article 7, paragraph 2, of the Criminal Code, no specific cases have been submitted.

Cuban law does not regard fiscal issues as an impediment to extradition.

Cuba has signed 17 agreements on mutual legal assistance that deal with the issue of the enforcement of judgements in penal proceedings. It is noted that the Convention can be taken as a legal basis to permit the transfer of a person sentenced to imprisonment (art. 45).

Cuba grants requests for transfer of criminal proceedings on the basis of existing conventions or treaties or the principle of reciprocity. Some agreements on mutual legal cooperation provide for the transfer of criminal proceedings (art. 47).

Mutual legal assistance (art. 46)

Cuba has concluded 23 relevant bilateral agreements in this sphere, too. Where there is no treaty, Cuba acts on the basis of the principle of reciprocity. It may also base its actions on the Convention. There is no requirement for the principle of dual criminality to be observed.

The Ministry of Foreign Affairs is the central authority for the purposes of the Convention. Requests may be submitted only on the basis of letters rogatory. The Ministry of Foreign Affairs transmits requests from abroad to the Independent Department of International Affairs (previously the Department of Judicial Cooperation of the Directorate of Scientific Information, Dissemination and Judicial Cooperation) of the People's Supreme Court. Requests addressed to foreign countries are transmitted through the same channels.

Cuba has a detailed system for following up requests for assistance, with established organizational and individual responsibilities and clearly identified deadlines. This enables problems to be periodically assessed and resolved by the persons engaged in the chain of mutual legal assistance.

Cuba sent two letters rogatory in 2010 relating to corruption cases (involving bribery) and four letters rogatory relating to the same issue between January and July 2012. One request was dealt with within six months, whereas the others were resolved within a period of between 6 and 12 months or are still pending.

Cuba received letters rogatory from abroad on one occasion in each of 2010, 2011 and 2012, relating to bribery and money-laundering.

There are no obstacles to the provision of financial data and no request for legal assistance has been refused on the grounds of bank secrecy or fiscal issues.

There are no specific rules permitting the use of videoconferencing for witness or expert statements at domestic legal trials. However, Cuba authorizes the use of such technology, at the request of another State, if its legislation so permits.

There is no one domestic law that sets out specific grounds for refusing a request for judicial assistance. Such a request must comply with the requirements laid down in the Constitution of the Republic (art. 12) and the provisions of the treaties concluded with the country concerned relating to the case in question. It must also comply with the formalities established for various procedures.

Reciprocal judicial assistance may be deferred if it interferes with an ongoing investigation, trial or judicial proceeding. Should judicial assistance obstruct or contravene domestic law, it may be refused, in view of the fact that cooperation is based on reciprocal assistance and friendly relations, so long as they do not harm or damage the domestic order or the interests of the requested State.

Law enforcement cooperation; joint investigations; special investigative techniques (arts. 48, 49 and 50)

Measures have been adopted to improve channels of communication between Cuban institutions and those of other States. This has been achieved through agreements on police matters, investigations, customs, the Central Bank and the Financial Intelligence Unit, among others.

Cuba is a member of the International Criminal Police Organization (INTERPOL), the Ibero-American Network for International Legal Cooperation (IberRed), the International Organization of Supreme Audit Institutions (INTOSAI) and the World Customs Organization.

Cuba was accepted as a full member of the Financial Action Task Force of South America against Money-Laundering (GAFISUD) at the plenary meeting held in December 2012.

Cuba considers the Convention to constitute the basis for mutual cooperation on law enforcement, where no bilateral agreement exists. Cuba also accepts such cooperation on the basis of the principle of reciprocity.

On this basis, Cuba is in favour of the implementation of joint investigations and the detention in Cuba of fugitives from justice of other countries and their return to the authorities of those countries.

There are no specific provisions in current Cuban legislation regarding the use of special investigative techniques. Such techniques may, however, be used in cooperation with other countries, provided that the results are not used as evidence in Cuba.

3.2. Successes and good practices

The willingness of the Government of Cuba constantly to update its bilateral treaties on extradition and mutual legal assistance is to be commended.

Although Cuba does not recognize the Convention as a basis for extradition, it is regarded as a positive element that extradition may be requested on the basis of the principles of reciprocity and dual criminality, where no treaty exists.

The possibility of using the Convention as a basis for mutual legal assistance is considered a good practice.

The existence of an organized and structured system to process requests for bilateral legal assistance in order to expedite international cooperation is to be commended.

The country's response times, in the examples relating to corruption provided by the authorities, are to be commended.

The good practice of engaging in ad hoc police cooperation between Cuba and other countries is noted.

The existence of bilateral agreements to facilitate police and customs cooperation is to be commended.

The participation of Cuba in INTERPOL and IberRed is welcomed.

The country's recent entry into GAFISUD is welcomed.

Cuba not only participates in multilateral networks but also enters into bilateral agreements between its institutions — particularly its Central Bank — and their foreign counterparts.

3.3. Challenges in implementation

Cuba is encouraged to make efforts to conclude more extradition treaties, given that it does not use the Convention as a legal basis (art. 44, para. 6). When it does so, it should adopt a list approach and ensure that corruption offences are included as grounds for extradition. It is also suggested that existing bilateral agreements that use the list approach should be reviewed in order to ensure that they include all corruption offences (art. 44, para. 4). Cuba is also urged, when it acts on the basis of

reciprocity, to recognize all the offences set out in the Convention as extraditable offences (art. 44, para. 7).

It is recommended that procedures and rules should be established for passive extradition. Such rules should cover the requirements, the procedure and the deadlines for extradition, extradition for related offences, the evidentiary requirements for simplifying and expediting extradition and the grounds for refusal (art. 44, paras. 1, 3 and 9).

Although the national authorities have stated that a sentence imposed by a foreign court on a Cuban established and present in Cuba may be covered by article 7, paragraph 2, of the Criminal Code, no specific cases have been submitted. It is recommended that law should be clarified in this regard (art. 44, para. 13).

In view of the fact that, according to the national authorities, a request for extradition submitted with a view to prosecuting a person on discriminatory grounds may be refused in accordance with the general principles of the law (arts. 41-44 of the Constitution) and that, in practice, no such requests have been made to Cuba, the country is encouraged to apply such general principles, where a relevant case occurs (art. 44, para. 15).

It is recommended that informal cooperation should be increased, without prior request, between public ministries or other central authorities, while recognizing that such cooperation cannot replace procedures established for international judicial assistance (art. 46, para. 4).

It is important that Cuba should consider the introduction of specific regulations permitting the use of videoconferencing (art. 46, para. 18).

Cuba is encouraged to continue its practice of updating bilateral mutual judicial assistance treaties (art. 46, para. 30).

It is considered important that Cuba should allow the use of special investigative techniques in its legal system. If any amendment is made, it is recommended that Cuba should assess the possibility of entering into bilateral or multilateral agreements or arrangements to use such techniques in the context of international cooperation (art. 50).

3.4. Technical assistance needs identified to improve implementation of the Convention

Cuba has indicated the following technical assistance needs:

Articles 44-46: regional exchange of experiences and support for participation in events conducted by the Regional Anti-Corruption Academy for Central America and the Caribbean;

Article 50: comparative legislation, legal advisory services and regional exchange of experiences.