Global Civil Society Coalition for the UNCAC

Anti-Corruption Priorities in Asia-Pacific

Global Civil Society Coalition for the UNCAC[1]
Regional Submission to CoSP11

7 November 2025

Member civil society organisations from the Asia Pacific region make this submission to the States Parties to inform discussions at the 11th Session of the Conference of the States Parties (CoSP11). This statement, developed through an open regional consultation, reflects the voices from across a region representing about 60% of the world's population.[2] It outlines key priorities, concerns and recommendations identified during the regional meetings, and other forums.[3] We urge States Parties to consider these recommendations during deliberations and negotiations to ensure strong resolutions and meaningful commitments at CoSP11 and beyond.

Regional Context

Transparency and accountability are cornerstones of anti-corruption and good governance. Yet, across the Asia-Pacific region, corruption continues to erode these principles, amid a shrinking enabling environment.[4] Civil society and independent media face growing repression, worsening conditions for those working to expose and prevent corruption.[5] Simultaneously, these actors are increasingly excluded from governance and decision-making, despite UNCAC and other international commitments mandating their participation in anti-corruption policy-making, review, and implementation. Meanwhile, waves of anti-corruption protests across the region underscore strong public demand for accountability, even as civic space narrows.[6] Despite governments' commitment to sub-regional and regional initiatives and involvement in cooperation networks,[7] progress in delivering

[1] Has been known as the UNCAC Coalition.
[2] UNFPA in Asia and the Pacific. https://asiapacific.unfpa.org/en/topics/population-trends-9
[3] Twenty-eight organisations from Afghanistan, Australia, Bangladesh, India, Indonesia, Kazakhstan, Kyrgyzstan, Malaysia, Nepal, New Zealand, Pakistan, Philippines, Sri Lanka, Thailand, and Timor-Leste, and another jurisdiction have contributed to this submission.
[4] Fernz B., and Sihombing N. (2023) The domino effect we need in Asia Pacific: our strategy to create a chain reaction for change. Open Contracting Partnership https://www.open-contracting.org/2023/06/21/the-domino-effect-we-need-in-asia-pacific-our-strategy-to-create-a-chain-reaction-for-change/
[5] The CIVICUS Monitor. Global Findings 2024. https://monitor.civicus.org/globalfindings_2024/
[6] Amnesty International (2024) Sri Lanka: Unlawful use of weapons in policing of protests https://www.amnesty.org/en/latest/news/2024/04/sri-lanka-unlawful-weapons-protests/; OHCHR (2025) Fact-Finding Report. Human Rights Violations and Abuses related to the Protests of July and August 2024 in Bangladesh https://www.ohchr.org/sites/default/files/documents/countries/bangladesh/ohchr-fftb-hr-violations-bd.pdf; Human Rights Watch (2025) https://www.hrw.org/news/2025/09/09/nepal-police-fire-on-gen-z-protest; Forster, R. and Williams, A. (2025) Unrest in the world's third largest democracy https://www.u4.no/blog/unrest-in-the-world-s-third-largest-democracy
[7] Sub-regional and regional initiatives such as the ASEAN Political Declaration Against Corruption (ASEAN PAC); ASEAN Political-Security Community Blueprint (2025), and Teieniwa Vision; and cooperation networks such as

the commitments remains limited, often with little or no civil society participation.[8] Both UNCAC and these mechanisms have yet to deliver stronger safeguards against state capture and attacks on civic space that are on the rise across the region.[9]

Challenges and recommendations

A 2025 survey among the Coalition's Asia-Pacific regional group identified **restricted access to information, restrictive or harmful laws affecting civic space** and **limited or no access to decision-making** as three persistent challenges.

In line with UNCAC Articles 5, 10, and 13, we therefore call on States Parties to:

1. **Advance civic space** by promoting public participation in decision-making and legislative processes, and by ensuring an enabling environment for civil society action and initiatives. Legislative, policy or administrative actions that restrict civic space and freedom of expression should not be initiated or tolerated.

2. **Establish structured participatory processes** in the design, implementation, monitoring, and evaluation of anti-corruption policies and measures. Mechanisms such as public consultations, hearings, and multi-stakeholder working groups should be established to integrate civil society, expert and community perspectives, contributing to closing the trust gap between authorities and the public. States Parties should further promote and institutionalise public oversight mechanisms that empower citizens and communities to monitor public projects, service delivery, and procurement processes at the local levels.

3. **Enhance access to information** through both proactive and reactive disclosure, in particular by:
    - Adopting or strengthening access to information laws that cover all national and sub-national governments and entities and guarantee maximum disclosure, effective oversight and enforcement, and easy and cost-effective access in accordance with regional and international best practice;
    - Fully implementing Access to Information laws and ensuring information is accessible and available to the public, including through digital tools and platforms;
    - Identifying categories of data to be proactively made public, such as budget allocations and expenditure, procurement planning and awards, audit reports, asset

---

the Asia/Pacific Group on Money Laundering (APG) and the Asset Recovery Interagency Network - Asia Pacific (ARIN-AP)

[8] Transparency International (2024) CPI 2023 for Asia Pacific: Regional stagnation marked by inadequate delivery of anti-corruption commitments https://www.transparency.org/en/news/cpi-2023-asia-pacific-stagnation-due-to-inadequate-anti-corruption-commitments

[9] Zúñiga, N. (2019) State Capture in Asia Pacific. Transparency International Anti-Corruption Helpdesk Answer https://knowledgehub.transparency.org/assets/uploads/kproducts/State-capture-in-Asia-Pacific-2019.pdf; Saunders, C. and Malone, K. (2025) STATE CAPTURE: HOW TO RECOGNIZE AND REACT TO IT https://www.idea.int/sites/default/files/2025-05/state-capture-how-to-recognize-and-react-to-it.pdf; Transparency International (2025) Indonesia crackdown on protest is dangerous erosion of civic space https://www.transparency.org/en/press/transparency-international-indonesia-crackdown-on-protest-is-dangerous-erosion-of-civic-space

and interest declarations, investigation outcomes and data on political financing, subject to reasonable redactions; and
- Applying strong public interest tests in responding to information requests and ensuring that the requesting information is not a ground for harassment or intimidation.

Anti-Corruption priorities

The regional network identified the following anti-corruption priorities for States Parties to focus on at CoSP11:

- Beneficial ownership transparency
- Public procurement transparency
- Political finance transparency
- Next phase of the UNCAC Implementation Review Mechanism (IRM)

Enhance beneficial ownership transparency

Beneficial ownership (BO) information is a powerful anti-corruption tool, revealing the individuals who ultimately own, control, or benefit from legal entities, often hidden behind shell companies and complex structures. By exposing these hidden relationships, BO data helps detect conflicts of interest, trace illicit financial flows, and prevent the misuse of corporate vehicles for corruption, money laundering, and other crimes. The global significance of BO transparency was underscored by the Pandora Papers, which exposed the offshore financial dealings of political and business figures and other influential individuals worldwide, including in the Asia-Pacific.[10]

UNCAC Resolutions 10/6 and 9/7 recognise BO transparency as vital in fighting corruption.[11] While some States Parties in the region have introduced BO frameworks,[12] gaps remain in public accessibility, accuracy, and interoperability of BO data.[13]

Therefore, we urge the States Parties to:

1. Enact and implement robust BO legislation with clear definitions, disclosure requirements and sanctions for non-compliance.

[10] International Consortium of Investigative Journalists (ICIJ) (2021), Pandora Papers reporting from across Asia. https://www.icij.org/investigations/pandora-papers/pandora-papers-reporting-from-across-asia/

[11] Resolutions 10/6 adopted at CoSP10 (2023) https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325375E_L.10_Rev.1.pdf; Resolution 9/7 adopted at CoSP9 (2021) https://www.unodc.org/corruption/en/cosp/conference/session9-resolutions.html#Res.9-7

[12] Open Ownership. Open Ownership Map. https://www.openownership.org/en/map/

[13] Manuel, E. and Espinosa, M.K. (2024) Beneficial Ownership Transparency in the Philippines. Open Ownership. https://www.openownership.org/en/publications/beneficial-ownership-transparency-in-the-philippines/2-open-ownership-principles-for-effective-beneficial-ownership-disclosure-in-the-philippines/; Handy, M. and Gunaratne, s. (2025) Proposed Beneficial Ownership Register: Two Gaps Undermine Effectiveness. Verité Research https://www.veriteresearch.org/wp-content/uploads/2025/03/20250310_Proposed_Beneficial_Ownership_Register_Two_Gaps_Undermine_Effectiveness.pdf

2. Publish BO data in a user-friendly digital format, freely accessible to the public, journalists, and oversight bodies.
3. Ensure interoperability between BO registers and other databases (e.g., asset and interest declarations, politically exposed persons databases) to strengthen investigations and due diligence.

Ensure the integrity of public procurement

Public procurement accounts for a large share of national budgets in the Asia–Pacific, with six countries in the region among the top 12 global spenders.[14] This represents significant taxpayer money, yet procurement remains one of the highest-risk areas for corruption,[15] due to the large sums involved, the complexity of procedures, and the concentrated decision-making.

UNCAC Article 9 requires establishing transparent, competitive procurement systems with objective decision-making, and CoSP resolution 10/9 provides guidance on promoting procurement transparency and integrity. Despite some improvements, many countries still lack open, accessible procurement data and full-cycle transparency. **We, therefore, urge the States Parties to:**

1. Ensure open, user-friendly access to procurement data.
    - Publish procurement information via a centralised portal in open, machine-readable formats.
    - Introduce e-procurement systems to automate processes, standardise documentation, and reduce human discretion.
2. Strengthen public reporting across all stages of the procurement cycle.
    - *Pre-tender stage*: Disclose needs assessments, project scopes, specifications, timelines, etc.
    - *Tender stage*: Publish notices, evaluation criteria, lists of bidders, deadlines, amendments to notices and clarifications, etc.
    - *Post-tender stage*: Release contract awards, contract documents, implementation updates, any amendments to contracts and completion reports.
3. Establish independent oversight and whistleblower protection mechanisms.
    - Empower independent monitoring bodies.
    - Provide safe reporting channels for procurement irregularities with protections against retaliation.

Take measures to enhance political finance transparency

UNCAC Article 7.3 calls for greater transparency in political financing. Knowing who funds parties, candidates, and campaigns is essential to spotting conflicts of interest and undue influence.

[14] Fernz B., and Sihombing N. (2023) The domino effect we need in Asia Pacific: our strategy to create a chain reaction for change. Open Contracting Partnership https://www.open-contracting.org/2023/06/21/the-domino-effect-we-need-in-asia-pacific-our-strategy-to-create-a-chain-reaction-for-change/

[15] UNODC. Module 4: Public Sector Corruption. https://www.unodc.org/e4j/zh/anti-corruption/module-4/key-issues/corruption-in-public-procurement.html

Regional discussions highlighted several challenges around political finance transparency, including a lack of data and reporting, illicit funds in campaign financing, and weak oversight and accountability mechanisms. Following multiple elections across the Asia-Pacific[16] transparency in political finance, not just laws on paper, is critical to build public trust in election management bodies, electoral outcomes and elected officials.

Therefore, we recommend that States Parties:

1. Introduce and enforce robust legislative provisions.
    - Mandate disclosure of income and spending (including sources and amounts of finances received, such as donations, in-kind support and third-party spending).
2. Strengthen oversight mechanisms.
    - Empower oversight bodies to monitor, investigate and sanction violations of political finance rules.
    - Enable domestic and international election observers and media to have full access to independently observe all aspects of the electoral process and publicly report their findings.
3. Utilise digital technologies.
    - Make political financing information accessible and available to the public.
4. Enhance due diligence on high-risk donors.
    - Prohibit donations from companies without verified BO records, and flag high-risk donors (E.g., Politically Exposed Persons, recent awardees of public contracts), to enhance due diligence.

Strengthen and enhance the transparency and inclusivity of the UNCAC IRM

As discussions on the next phase of IRM continue, there is an urgent need to make it more transparent, inclusive and effective.[17] Without openness, public participation and engagement, IRM risks becoming a mere technical, self-reporting exercise, missing valuable perspectives from civil society, the private sector, academia, and citizens, which threatens its credibility.

In the Asia–Pacific region, many countries have already completed the second review cycle or are currently undergoing it. However, limited access to review schedules, country reports, and opportunities for input remains a key challenge to meaningful engagement and accountability.[18]

We, therefore, call on States parties to:

1. **Enhance transparency:** Publish timelines for reviews and how stakeholders can engage, as well as outcome documents from UNCAC reviews, including full country reports and

[16] Transparency International (2023) 2024 is a big year for democracy, Don't let political corruption ruin it https://www.transparency.org/en/blog/2024-big-year-for-democracy-dont-let-political-corruption-ruin-it

[17] UNCAC Coalition (2025) Key Recommendations to make the IRM more effective in strengthening UNCAC implementation https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Recommendations-for-the-IRM-next-phase.pdf

[18] UNCAC Coalition. UNCAC Review Status Tracker. https://uncaccoalition.org/uncacreviewstatustracker/

stakeholder submissions, enabling relevant stakeholders, including civil society, to utilize the information.

2. **Strengthen stakeholder participation:** Meaningfully consult with non-governmental stakeholders at key stages of the reviews and follow-up, including on technical assistance, and reflect stakeholder participation and views in the review outcome documents. Allow non-governmental stakeholders to participate in the meetings of the UNCAC Subsidiary bodies.

4. **Establish a structured follow-up process:** Adopt a formal follow-up process to regularly monitor how countries have addressed recommendations from previous country reviews, including new developments, with countries submitting and publishing progress reports annually.

5. **Assess effectiveness of implementation:** Carry out reviews with a central focus on assessing UNCAC implementation in practice, examining aspects such as compliance, preventive, investigative, and enforcement actions, and the resourcing and independence of competent anti-corruption bodies.