

Mongolia: Civil Society Report

An input to the UNCAC Implementation Review Mechanism:
Fourth year of review of UNCAC Chapters II and V

7 November 2025

This is the executive summary of a civil society parallel report from August 2024 by Transparency International Mongolia¹ reviewing Mongolia's implementation and enforcement of selected articles of UN Convention against Corruption (UNCAC) Chapters II (Preventive Measures) and V (Asset Recovery). The report was supported by the Global Civil Society Coalition for the UNCAC² and is a contribution to the UNCAC peer review process of Mongolia. The full report is available on the Coalition's website.³

Mongolia has many legal provisions for the prevention of corruption and asset recovery, including the 2023 National Anti-Corruption Strategy. However, many laws have loopholes and lack effective implementation, and some have been used to restrict civic space.

Assessment of the Review Process

Did the government disclose information about the country focal point?	Yes	Mongolia's UNCAC Focal Point is the Ministry of Justice and Home Affairs. The contact person's name is available online on UNODC's website. ⁴
Was the review schedule published somewhere/ publicly known?	Yes	The country visit was scheduled and published on UNODC's website. ⁵
Was civil society consulted in the preparation of the self-assessment checklist?	No	
Was the self-assessment checklist published online or provided to civil society?	No	
Did the government agree to a country visit?	Yes	
Was a country visit undertaken?	Yes	26 - 28 th April 2022.

¹ <https://www.transparency.mn/>.

² Has been known as the UNCAC Coalition.

³ UNCAC Coalition, Civil Society Parallel Report on Mongolia, <https://uncaccoalition.org/uncacparallelreportmongolia/>, accessed 30th September 2025.

⁴ UNODC, Country Review Report of Mongolia, https://www.unodc.org/documents/treaties/UNCAC/CountryVisitFinalReports/2023_10_26_Mongolia_Cycle_I_I_Country_Report_EN.pdf, accessed on 17th June 2024.

⁵ UNODC, Country Profile for Mongolia, <https://www.unodc.org/unodc/en/corruption/country-profile/countryprofile.html#?CountryProfileDetails=%2Funodc%2Fcorruption%2Fcountry-profile%2Fprofiles%2Fmng.html>, accessed on 17th June 2024.

Was civil society invited to provide input to the official reviewers?	Yes	☒ Anti-corruption and access to information CSOs ☒ CSOs working on other issues ⁶ ☒ Academia ☒ Trade unions
Was the private sector invited to provide input to the official reviewers?	Yes	
Has the government committed to publishing the full country report?	Yes	The full country report was published in November 2023 on IAAC's website, ⁷ and on UNODC's website ⁸ with the self-assessment checklist, ⁹ in line with Mongolia's Transparency Pledge commitment.

Main Findings and Recommendations (R)

Preventive Anti-Corruption Policies and Practices

Mongolia adopted the necessary laws and regulations in compliance with the UNCAC¹⁰ but faces challenges in implementation, transparency, and accountability for non-compliance, as well as identification and assessment of national corruption risks.

R: All stakeholders should prioritize implementing the National Anti-Corruption Strategy.

Preventive Anti-Corruption Bodies

The Law on Anti-Corruption defines the Independent Agency against Corruption's (IAAC) autonomy.¹¹ The appointment of Chief and Deputy Chief Commissioners is made via open hearings in Parliament, however the selection processes are opaque, with cases of spontaneous removal and appointment of Chief Commissioners.¹² Whilst adequately funded, the IAAC cannot present evidence of illegal enrichment in court, and lacks technical capacity to review irregularities in public officials' assets and income declarations.

R: Revise the Law on Anti-Corruption to enable the IAAC to inspect tax payments for investigating assets and public officials' transactions.

⁶ CSOs that participated in the country visit: Open Society Forum, Globe International, Media Council, TI-Mongolia, Partnership for Transparency, "Onch Shiidel" NGO, Mongolian Criminologists' Association, All for Education Coalition.

⁷ IAAC, <https://iaac.mn/post/146795>, accessed on 13th January 2024.

⁸ UNODC, Mongolia's Self-assessment checklist, https://www.unodc.org/documents/treaties/UNCAC/SA-Report/2023_11_21_Mongolia_SACL_2nd_cycle_dated_2019_08_12.pdf, accessed on 10 July 2024.

⁹ Following Mongolia signing the UNCAC Coalition's Transparency Pledge in November 2023: UNCAC Coalition (2023), Mongolia signs the UNCAC Review Transparency Pledge, <https://uncaccoalition.org/mongolia-signs-the-uncac-review-transparency-pledge/>, accessed on 10 July 2024.

¹⁰ The National Anti-Corruption Strategy was adopted in 2023.

¹¹ Unified Legal Information System, Law on Anti-Corruption 2006, <https://legalinfo.mn/mn/detail?lawId=8928>, accessed on 6th March 2024.

¹² TI-M, Assessment of the IAAC 2020, <https://www.transparency.mn/post/монгол-улсын-авлигатай-тэмцэх-газарт-анх-удаа-хөндлөнгийн-үнэлгээ-хийлээ>, accessed on 27th February 2024.

Public Sector Employment

The Civil Service Law regulates public officials' hiring and rotation within the civil service,¹³ with entrance examinations and merit-based promotions. However, officials lack compliance and human rights training.

R: Enhance understanding on human rights and compliance, transparency and accountability through systematic training at public offices.

Political Financing

The Law on Political Parties¹⁴ includes rules for the disclosure of financial statements for political parties, auditing of funds, and declarations of funding and spending sources. The National Anti-Corruption Strategy has an action plan to reduce political party corruption and enhance transparency and accountability for candidates and members of parliament around elections. However, accountability for non-disclosure or violation of the law falls on the reporting responsible person, not the political party.

R: Ensure full accountability for non-disclosure of financial statements by political parties.

Codes of Conduct, Conflicts of Interest, and Asset Declarations

There are rules preventing candidates convicted of a criminal offense from running for election. Nevertheless, candidates punished for conflicts of interest whilst in public office may still run for office. There is no record of breaches of the Law on Ethics of Public Officials¹⁵ nor on implementation, assessment, or reviews by the Civil Service Council or government agencies.

R: Restrict the appointment of public officials with conflicts of interest records.

Whistleblower Protection

Despite the Law on Human Rights Defenders¹⁶ 2021, the protection of whistleblowers, informants, or complaint lodgers is not ensured. It also lacks implementation, with no record of its application and no responsible institution.

R: Adopt the Law on Protection of Whistleblowers and ensure adequate protection mechanisms that prevent retaliation.

Public Procurement

Mongolia has an e-procurement system,¹⁷ and the Law on Procurement¹⁸ covers government organizations and State-Owned Enterprises (SOEs). However, under the Law on State and Local

¹³ Unified Legal Information System, Civil Service Law 2017, <https://legalinfo.mn/mn/detail?lawId=13025>, accessed on 12th March 2024.

¹⁴ Unified Legal Information System, Law on Political Parties 2023, <https://legalinfo.mn/mn/detail?lawId=16760239349461>, accessed on 16th May 2024.

¹⁵ Unified Legal Information System, Law on Ethics of Public Officials 2023, <https://legalinfo.mn/mn/detail?lawId=16759635984401>, accessed on 16th May 2024.

¹⁶ Unified Legal Information System, Law on Human Rights Defenders 2021, <https://legalinfo.mn/mn/detail?lawId=16207226850601>, accessed on 16th May 2024.

¹⁷ Electronic system of state procurements, <https://www.tender.gov.mn/mn/index/>, accessed on 1st July 2024.

¹⁸ Unified Legal Information System, Law on Procurement of Goods, Works and Services by State and Local Government Assets 2023, <https://legalinfo.mn/mn/detail?lawId=16760359992351>, accessed on 16th May 2024.

Properties,¹⁹ only the shareholding of a SOE is defined as ‘state property’. This enables political interference in SOE procurement, unfair competition in the appointment of senior-level SOE officials handling procurement, involvement of line ministries in SOE’s operations, and negligence in accountability due to appointees’ connections to politically exposed persons (PEPs).

R: Develop a consolidated list of PEPs available to commercial banks and non-banking financial institutions for enhanced due diligence.

Management of public finances

Relevant laws exist, and Parliament has engaged the public in budget planning and implementation, establishing the Budget Stability Council composed of academics, CSOs, and professional unions. However, backsliding has occurred in the openness and comprehensiveness of budget documents. There is evidence of spending without oversight or reporting.²⁰

R: Ensure public participation in decision-making processes, and transparency of SOE’s budget management. Limit political involvement in SOEs.

Access to Information and Participation of Society

The legal framework ensures transparency of information that is not a ‘state secret’ or ‘officially sensitive’. Public hearings and discussions are mandatory prior to the adoption of legislation. However, implementation is weak. The government attempted to suppress concerns over the lack of public engagement in government decision-making and legislative drafting processes.

R: Restrict laws limiting legitimate activities of NGO and protect civic space, allowing consultations, multi-stakeholder dialogue, and public awareness campaigns. Ensure public discussions when passing laws. Revise laws²¹ that restrict public access to information and ensure protection of rights to information for reporters, researchers and the public.

Judiciary and Prosecution Services

Judges, prosecutors, law enforcement, and administrative officials must immediately report corruption-related information obtained while performing official duties to the IAAC. Judges must submit asset and income declarations to the General Judiciary Council and prosecutors to the IAAC. However, there is no code of conduct or ethics assessment for judges. Whilst prosecutors have a Code of Ethics and Ethics Committee, there is no record of implementation.

R: Adopt the Ethics Code for judges in compliance with the Bangalore Principles of Judicial Conduct.

Private Sector Transparency

¹⁹ Unified Legal Information System, Law on State and Local Properties 1996, <https://legalinfo.mn/mn/detail?lawId=492>, accessed on 16 March 2024.

²⁰ Natural Resource Governance Institute, Briefing June 2019, Erdenes Mongol and State-Owned Enterprise Laws, <https://resourcegovernance.org/sites/default/files/documents/erdenes-mongol-and-state-owned-enterprise-laws.pdf>, accessed on 16th May 2024.

²¹ Laws on Transparency of Public Information: Unified Legal Information System, Law on Public Information Transparency 2021, adopted 17 December 2021 (entered into force from 1 May 2022) <https://legalinfo.mn/mn/detail?lawId=16390263044601>, accessed on 22nd May 2024; State and Official Secrecy: Unified Legal Information System, Law on State and Official Secrecy 2016, <https://legalinfo.mn/mn/detail?lawId=12408>, accessed on 22nd May 2024., and Personal Information Protection: Unified Legal Information System, Law on Personal Information Protection 2021, <https://legalinfo.mn/mn/detail?lawId=16390288615991>, accessed on 22nd May 2024.

The Corporate Governance Codex applies to listed companies. Since 2020, companies must file changes in beneficial ownership information to the General State Registration Authority. Whilst the database on beneficial owners is not public, the state has publicly disclosed the legal owners' database. However, there have been cases where companies failed to post annual reports on their websites as required, with no penalties imposed by regulators.

R: *Revise the Criminal Code to define beneficial owners consistently across all sectors.*

Measures to Prevent Money Laundering

Mongolia has a comprehensive regulatory and supervisory regime for banks and entities susceptible to money laundering. The AML/CTF Law ensures collaboration of government bodies. However, the generalization of risk levels within sectors in the National Risk Assessment (NRA) led to a lack of tailored risk assessment that considers vulnerabilities in the national context.

R: *Improve technical assistance in identifying and developing a National Risk Assessment.*

Anti-Money Laundering

The FIU sits within the Central Bank of Mongolia. Risk assessment methodologies are regularly provided, with sufficient oversight. Mongolia is largely compliant with FATF Recommendations. However, additional measures are needed in identifying, inspecting, and investigating excessive numbers of bank accounts under one person, and money and asset mules. Although Suspicious Transaction Reports and Cash Transaction Reports involving these mules are delivered to the FIU, further actions are unclear and reportedly often neglected.

R: *Adopt measures to identify, conduct inspection, investigation, and exchange of information on money mules and asset mules, and increase sanctions.*

Asset Recovery

Mongolia has Mutual Legal Assistance Treaties (MLATs) with 23 countries.²² However, there is no law regulating relations between line ministries and law enforcement agencies in asset recovery regarding States without MLATs, communication with foreign agencies, and identifying asset managers. A person or legal entity that suffered a loss due to a crime may claim civil compensation;²³ however, determining the claimant in civil cases for the restitution of losses and damages to government entities lacks clarity. Courts can order the confiscation of property of foreign origin by adjudicating an offense of money laundering if the crime is punishable by minimum one year imprisonment. Assets can be seized upon a foreign country's request, but only confiscated via judicial order through a prosecutor's request based on a foreign MLA request. There is no restriction on authorities providing MLA to countries without MLATs.

R: *Adopt a law determining the state claimant in civil cases related to corruption crimes, a Law on Asset Management, and regulations on the coordination of public offices in extradition.*

²² Police Office, Mutual Legal Assistance Treaties, <https://police.gov.mn/as/law/12?page=1&size=20>, accessed on 16th June 2024.

²³ Under the Law on Judicial Decision Implementation: Unified Legal Information System, Law on Judicial Decision Implementation 2017, <https://legalinfo.mn/mn/detail?lawId=12701>, accessed on 2nd March 2024.