

Sri Lanka: Civil Society Report by the Transparency International Sri Lanka

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

7 November 2025

This is the executive summary of a civil society parallel report from June 2025 reviewing Sri Lanka's implementation and enforcement of selected articles in 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 UNCAC¹ and is intended as a contribution to the UNCAC peer review process of Sri Lanka covering those two chapters. The full report is available on the Coalition's website.²

Sri Lanka has made progress in developing anti-corruption laws and policies in recent years. However, persistent institutional weaknesses, limited enforcement, and transparency gaps continue to pose obstacles to the effective implementation of key provisions under UNCAC Chapters II and V.

Assessment of the Review Process

Did the government disclose information about the country focal point?	No	Not explicitly.
Was the review schedule published somewhere/ publicly known?	Not publicly available	
Was civil society consulted in the preparation of the self-assessment checklist?	Yes, however, only one consultation	In October 2018, TISL was invited on short notice to a hastily-conducted consultation by the Commission to Investigate Allegations of Bribery or Corruption (CIABOC) and was required to provide overnight feedback on the self-assessment checklist.
Was the self-assessment checklist published online or provided to civil society?	No	Published only on the CIABOC website. ³ It was neither published on the UNODC website, ⁴ nor was it made available or aware to CSOs until the day of the consultation.

¹ Has been known as the UNCAC Coalition.

² UNCAC Coalition, Civil Society Parallel Report on Sri Lanka, <https://uncaccoalition.org/uncacparallelreportsrilanka/>, accessed on 08 September 2025.

³ CIABOC, 16 December 2016, UNCAC Self-assessment checklist, https://ciaboc.gov.lk/images/pdf/International_relations/United%20Nations%20CAC%20-corrected%20version1.pdf, accessed on 01 November 2024.

⁴ UNODC website, Country Profile Page: Sri Lanka, <https://www.unodc.org/corruption/en/country-profiles/data/LKA.html>, accessed on 01 November 2024.

Did the government agree to a country visit?	Yes	
Was a country visit undertaken?	Yes	From 29 th to 31 st March 2017 in Colombo, Sri Lanka. ⁵
Was civil society invited to provide input to the official reviewers?	Yes	TISL was invited.
Was the private sector invited to provide input to the official reviewers?	Not publicly available	N/A
Has the government committed to publishing the full country report?	Yes	The final draft of the Country Review Report was shared with TI Sri Lanka, but none of TISL's feedback was incorporated. The report was published on the UNODC website, ⁶ yet only in English, disregarding the country's language policy and limiting access to the Sinhala and Tamil speaking majority. This also violates the Right to Information law.

Main Findings and Recommendations (R)

Codes of Conduct, Conflicts of Interest in the Public Sector

Sri Lanka's approach to codes of conduct and conflicts of interest in the public sector reveals serious gaps. While frameworks like the Establishments Code and Public Administration Rules exist, they fall short of providing a clear, binding standard for all public officials. The result is systematic ambiguity, weak enforcement, and inconsistent application, creating space for conflicts of interest to go unchecked. Public officials often lack the training and awareness needed to recognize or properly manage these situations, which can lead to decisions driven by personal interest or patronage rather than the public good.

R: *Develop a comprehensive legal framework addressing conflicts of interest, including clear, enforceable guidelines for disclosure and recusal.*

Asset and Liabilities Declarations

The current asset declaration mechanism suffers from flaws that weaken its role in preventing corruption. Although public officials, including judges, must declare their assets, the absence of a centralized electronic system makes submissions inefficient and oversight limited. Arbitrary redactions of vital information⁷ by the Commission to Investigate Allegations of Bribery or Corruption (CIABOC) render monitoring efforts ineffective. Without regular audits or centralized electronic verification, false declarations can go unchecked.

⁵ Ibid.

⁶ UNODC, Sri Lanka Country Profile, Country Review Report, 2018, https://www.unodc.org/documents/treaties/UNCAC/CountryVisitFinalReports/2018_09_03_Sri_Lanka_Final_Country_Report.pdf%20,%20accessed%20on%2015%20July,%202024, accessed on 8 September 2025.

⁷ Such as bank account balances and opening dates.

R: *Establish a central electronic asset declaration system, mandate audits, ensure public access, and guaranteeing CIABOC's independence.*

Political Financing

Sri Lanka's 2023 Election Expenditure Act aims to improve transparency in political financing, but weak enforcement and limited scope undermine its impact. Despite the introduction of the 2023 Election Expenditure Act, Sri Lanka's approach to campaign financing remains inadequate. While the law sets spending limits and recent elections showed some improvements, enforcement is weak. Campaign financing, by nature, requires strict, time-bound oversight, yet real-time monitoring and self-reporting are minimal, and the Election Commission lacks the mandate and resources to prevent abuse. This gap was evident during the 2024 presidential election, when serious misuse of state power, including bribery and undue influence, was flagged by the Centre for Monitoring Election Violence.⁸ The absence of a broader political financing framework perpetuates clientelism and anti-competitive practices in Sri Lankan politics that fuel corruption.

R: *Enact and implement a robust political financing law to ensure continuous monitoring and regulation of funding, donations and contributions to political parties and politicians.*

Access to information

Sri Lanka's Right to Information (RTI) Act stands as a cornerstone of transparency and accountability, but implementation gaps persist. While the legal framework aligns with global standards and guarantees access to information as a constitutional right, public awareness is low, the RTI Commission is under-resourced, and many public authorities resist compliance. Institutions such as the Ministry of Justice and Legal Draftsman's Department often withhold draft laws,⁹ offering vague justifications. The RTI Commission handles RTI appeals but penalties for non-compliance are rarely enforced, stripping the law of its deterrent power and allowing impunity.

R: *Strengthen enforcement of the RTI Act by ensuring penalties for non-compliance.*

Participation of civil society

Sri Lanka has a solid framework for public participation in governance, particularly in anti-corruption efforts, fiscal transparency, and policymaking on paper, which contrasts sharply with its practical implementation. While laws such as the Anti-Corruption Act mandate civil society engagement, the state has taken few steps to institutionalize it. Language barriers persist as English dominates official processes. Lawmaking remains opaque, with no formal avenues for public or civil society input on draft legislation and repeated refusals to release key draft bills through RTI. The absence of a post-enactment judicial review mechanism further limits accountability, undermining Constitutional commitments to public participation.¹⁰

R: *Develop a centralised mechanism to publish draft laws and upcoming policy changes, invite public input with adequate time, and collect feedback through a standardized, accessible process.*

⁸ Centre for Monitoring Election Violence (CMEV), Quantitative Overview of Election Violations: Presidential Abuse of State Power Remains High, <https://cmev.org/2024/09/23/quantitative-overview-of-election-violations-presidential-abuse-of-state-power-remains-high-cmev/>, accessed on 8 September 2025.

⁹ Including the expected Public Procurement Law.

¹⁰ Amnesty International. Sri Lanka: Online Safety Act major blow to freedom of expression, <https://www.amnesty.org/en/latest/news/2024/01/sri-lanka-online-safety-act-major-blow-to-freedom-of-expression/>, accessed on 8 September 2025.

Judiciary and Prosecution Services

Despite constitutional protections, judicial independence in Sri Lanka remains under threat. Political interference, including the former Executive's disregard for Supreme Court rulings and the country's long history of politicized appointments to key legal positions are areas of great concern. The Attorney General's dual role as both the chief legal adviser to the government and the primary prosecutor creates an inherent conflict of interest that undermines the integrity of public prosecutorial service and fuels perceptions of political bias in the administration of justice. The controversial appointments of the Inspector General of Police¹¹ and the Director General of CIABOC¹² have led to legal challenges. Both cases sparked calls for more transparency in the appointment process and clearer guidelines for future appointments.

***R:** Create an independent prosecutor's office separate from the Attorney General's Department, to ensure impartiality, especially in prosecuting grand corruption and political misconduct in cases involving state officials and institutions.*

Measures to Prevent Money Laundering

Sri Lanka has a solid anti-money laundering framework, with laws like the Prevention of Money Laundering Act and the Financial Transactions Reporting Act aligned with FATF standards. However, key gaps remain. The lack of a centralized beneficial ownership registry and a dedicated law seriously weakens the country's ability to trace illicit funds and effectively enforce its AML measures. Sri Lanka's capacity to investigate money laundering is severely hampered by weak inter-agency coordination and outdated systems. The Financial Intelligence Unit only recently gained access to police criminal records, but the data remains non-digitized, limiting its ability to cross-reference suspicious transaction reports (STRs). Frontline officers often lack the training needed to handle complex financial crimes and the Inland Revenue Department lacks a mandate for effective information sharing.

***R:** Amend the Inland Revenue Act No. 24 of 2017 to mandate the Inland Revenue Department (IRD) to share information to assist money-laundering investigations.*

Asset recovery

Sri Lanka's Financial Intelligence Unit (FIU), housed within the Central Bank, plays a central role in enforcing anti-money laundering and counter-financing of terrorism rules, including due diligence, record-keeping, and reporting suspicious transactions; however, there is a need for more effective monitoring. The long-awaited Proceeds of Crime Law, called for in the 2022 Aragalaya protests,¹³ has yet to be enacted, leaving critical gaps in Sri Lanka's asset recovery regime. Upcoming reviews, including Sri Lanka's 3rd FATF Evaluation in 2026, for which the FIU is consulting stakeholders, present an opportunity to close these gaps and align the country's AML efforts with global standards.

***R:** Digitize and integrate the police criminal record database into a secure centralized system accessible to the FIU and other law enforcement authorities, thus enhancing the FIU's ability to effectively cross-reference STRs.*

¹¹ EconomyNext, Supreme Court issues interim order on appointment of Sri Lanka's police chief: report, <https://economynext.com/supreme-court-issues-interim-order-on-appointment-of-sri-lankas-police-chief-report-173553/>, accessed on 8 September 2025.

¹² The Sunday Times, Third Petition Filed Challenging Appointment of CIABOC DG, <https://www.sundaytimes.lk/240512/news/third-petition-filed-challenging-appointment-of-ciaboc-dg-557080.html>, accessed 8 September 2025.

¹³ The Asia Foundation, Notes from the Field: Sri Lanka's Revolutionary "Aragalaya", <https://asiafoundation.org/notes-from-the-field-sri-lankas-revolutionary-aragalaya/>, accessed on 8 September 2025.