

Article 13. Participation of society

1. Each State Party shall take appropriate measures, within its means and in accordance with fundamental principles of its domestic law, to promote the active participation of individuals and groups, outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and the fight against corruption and to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption. This participation should be strengthened by such measures as:

- (a) Enhancing the transparency of and promoting the contribution of the public to decision-making processes;
- (b) Ensuring that the public has effective access to information;
- (c) Undertaking public information activities that contribute to non-tolerance of corruption, as well as public education programmes, including school and university curricula;
- (d) Respecting, promoting and protecting the freedom to seek, receive, publish and disseminate information concerning corruption. That freedom may only be such as are provided for

CIVIL SOCIETY REPORT

on the implementation of

Chapter II (Prevention) & Chapter V (Asset Recovery) of the

UNITED NATIONS CONVENTION AGAINST CORRUPTION

IN RWANDA

by Transparency International Rwanda

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The findings in this report are those of the authors but do not necessarily reflect the views of the UNCAC Coalition and the donors who have made this report possible.

Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of 26th May 2025.

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Transparency International Rwanda is a non-profit making organisation, dedicated to fight corruption and related offenses as well as promoting good governance. Our mission is to contribute to fighting against corruption and promoting good governance through enhancing integrity in the Rwanda society.

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Abbreviations

APNAC	African Parliamentarians Network against Corruption
AUABC	African Union Advisory Board on Corruption
BO	Beneficial Ownership
CLS	Civil Litigation Services
EAAACA	East African Association of Anti-Corruption Authorities
EU	European Union
DNFBPs	Designated Non-Financial Businesses and Professions
FIC	Financial Intelligence Centre
GOPAC	Global Organization of Parliamentarians against Corruption
ICU	International Crimes Unit
IECMS	Integrated Electronic Case Management System
IRP	Independent Review Panel
MIFOTRA	Ministry of Public Service and Labour
MINECOFIN	Ministry of Economic Planning and Finance
MINIJUST	Ministry of Justice
MoFA	Ministry of Foreign Affairs and International
NACACI	National Advisory Council for the fight against Corruption and Injustice
NFPO	National Consultative Forum of Political Organisations
NPSC	The National Public Service Commission
NPPA	National Public Prosecution Authority
OAG	Office of the Auditor General
OL	Organic Law
RBM	Results-Based Performance Management
RDB	Rwanda Development Board
RGB	Rwanda Governance Board
RIB	Rwanda Investigation Bureau
RMC	Rwanda Media Commission
PFM	Public Financial Management
RPPA	Rwanda Public Procurement Authority
SBD	Standard Bidding Document
TI-Rwanda	Transparency International Rwanda
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime

List of Persons Consulted

Name	Job title	Affiliation	Date of interview
Fred Mukombozi	Director- general for Budget Management and Reporting	Ministry of Economic Planning and Finance (MINICOFIN)	05 May 2025
Mutabazi Harrison	Inspector of Court, Judge of the High Court Spokesperson	Judiciary	30 April 2025
Kizito Jean Pierre	Senior State Attorney International Justice and Judicial Cooperation	Ministry of Justice (MINIJUST)	15 May 2025
Jijuka Zephyrin	Program and Partnership Coordinator	National Consultative Forum of Political Organisations (NFPO)	29 April 2025
Anatole Mulindwa	Acting Head of Research and HGS Department	Rwanda Governance Board (RGB)	07 May 2025
Jules Marius Ntete	Inspector General	National Public Prosecution Authority (NPPA)	19 May 2025
Jean Claude Munyanturire	Assistant Auditor General	Office of the Auditor General (OAG)	09 May 2025
Anonymous	Anonymous	Financial Intelligence Centre (FIC)	12 May 2025
Nirere Madeleine	Chief Ombudsman	Office of the Ombudsman	22 May 2025
Mukama Abbas	Deputy Ombudsman		
Birasa Jacques Fiscal	Acting Division Manager in charge of Preventing and Fighting Corruption		
Sibomana Celestin	Ag Division Manager for Research, Capacity Development and Monitoring	Rwanda Public Procurement Authority (RPPA)	06 May 2025
Fabien Mberabagabo	Legal analyst/Team leader	Ministry of Public Service and Labour (MIFOTRA)	22 May 2025
Kayigi Kajuga Leon	Division Manager/ Business Facilitation	Rwanda Development Board (RDB)	23 May 2025

I. Introduction

Rwanda signed the United Nations Convention against Corruption (UNCAC) on 30 November 2004, ratified it by Presidential Order n° 56/01 of 27 December 2005 and deposited its instrument of ratification with the Secretary-General on 4 October 2006.

This report reviews Rwanda's implementation of selected articles of Chapter II (Preventive measures) and Chapter V (Asset recovery) of the UNCAC. The report is intended as a contribution to the UNCAC implementation review process currently underway covering these chapters. Rwanda was selected by the UNCAC Implementation Review Group in 2019, and it is at the stage of the Country Visit (Direct Dialogue) conducted from 23 to 25 April 2025.

1.1 Scope. The UNCAC articles and topics that receive particular attention in this report are those covering preventive anti-corruption policies and practices (Article 5), preventive anti-corruption bodies (Article 6), public sector employment (Article 7.1), political financing (Article 7.3), codes of conduct, conflicts of interest and asset declarations (Articles 7, 8 and 12), reporting mechanisms and whistleblower protection (Articles 8.4 and 13.2), public procurement (Article 9.1), the management of public finances (Article 9.2), access to information and the participation of society (Articles 10 and 13.1), judiciary and prosecution service (Article 11), private sector transparency (Article 12), and measures to prevent money laundering (Art. 14) under Chapter II. Under Chapter V, the UNCAC articles and topics that receive particular attention in this report are those covering anti-money laundering (Articles 52 and 58), measures for direct recovery of property (Articles 53 and 56), confiscation tools (Article 54), international cooperation for the purpose of confiscation (Articles 51, 54, 55, 56 and 59) and the return and disposal of confiscated property (Article 57).

1.2 Structure. The report begins with an executive summary, including the condensed findings, conclusions and recommendations about the review process, the availability of information, as well as the implementation and enforcement of selected UNCAC articles. The following part covers the findings of the review process in Rwanda as well as access to information issues in more detail. Subsequently, the implementation of the Convention is reviewed and examples of good practices and deficiencies are provided. Then, recent developments are discussed and lastly, recommendations for priority actions to improve the implementation of the UNCAC are given.

1.3 Methodology. The report was prepared by TI-Rwanda with technical and financial support from the UNCAC Coalition. The group made efforts to obtain information for the reports from government offices and to engage in dialogue with government officials.

The report was prepared using guidelines and a report template designed by the UNCAC Coalition and Transparency International for use by civil society organizations. These tools reflected but simplified the United Nations Office on Drugs and Crime (UNODC)'s checklist and called for relatively short assessments as compared to the detailed official self-assessment checklist. The report template included a set of questions about the review process and, in the section on implementation, asked for examples of good practice and areas in need of improvement in articles of UNCAC Chapter II on prevention and Chapter V on asset recovery.

II. Executive Summary

This report reviews Rwanda's implementation of selected articles of Chapter II (Preventive measures) and Chapter V (Asset recovery) of the UNCAC. The report is intended as a contribution to the UNCAC implementation review process for these chapters.

Under chapter II, the analysis covers preventive anti-corruption policies and practices, preventive anti-corruption bodies, public sector employment, political financing, codes of conduct, conflicts of interest and asset declarations, reporting mechanisms and whistleblower protection, public procurement, the management of public finances, access to information and the participation of society, judiciary and prosecution service, private sector transparency, and measures to prevent money laundering. Under Chapter V, the focus is on anti-money laundering, measures for direct recovery of property, confiscation tools, international cooperation for the purpose of confiscation and the return and disposal of confiscated property.

This executive summary presents the key findings on the implementation of laws and practices, highlighting both good practices and deficiencies, as follows.

2.1 Description of the Official Review Process

The second cycle review for Rwanda began on 10 July 2020. The review focused on the implementation of UNCAC Chapter II (Preventive Measures) and Chapter V (Asset Recovery) and was conducted by Morocco and Yemen. The self-assessment checklist completed by the government was submitted to UNODC on 29 October 2021. Civil society organizations, notably TI-Rwanda and Rwanda Civil Society Platform (RCSP), were consulted at all stages by the government during the UNCAC review process. A country visit took place on 23-25 April 2025, in hybrid format, with the participation of civil society, including TI Rwanda. At the time of writing this report, the review is still ongoing.¹

2.2 Availability of Information

In preparing this report, TI-Rwanda was able to access all the necessary information legal, policy and institutional frameworks. Information on the implementation of different laws and policies was also accessible, although there were delays in obtaining some statistical data. Regarding asset recovery, information was obtained on confiscation procedures based on court orders, the value of frozen and confiscated assets, amounts returned and other related data.

TI-Rwanda engaged with twelve public institutions whose functions are related to the implementation of preventive measures and asset recovery matters. Questionnaires were tailored and sent to each institution before the physical meeting for interviews.

¹ UNODC Country Profile page for Rwanda, available at: <https://www.unodc.org/corruption/en/country-profiles/data/RWA.html>, accessed on 10 August 2025.

2.3 Implementation in Law and in Practice

Preventive anti-corruption policies and practices (Article 5): Rwanda adopted comprehensive laws on anti-corruption. These include the Law n° 54/2018 of 13/8/2018 on fighting against corruption, Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistleblowers, Law n° 55/2021 of 29/08/2021 on declaration of assets and other laws on public servants' ethics, political parties, election, etc. Mechanisms such as the use of electronic services and E-governance tools, as well as the declaration of assets, contribute to the prevention of corruption. Anti-corruption committees have been established in all public, private and civil society in accordance with the Office of the Ombudsman's guiding standards for putting in place institutional anti-corruption strategies issued in 2021.

Preventive anti-corruption body or bodies (Article 6): The Office of the Ombudsman was established as an independent public institution in 2003, with the primary responsibility of preventing and combating injustice and corruption. The Office of the Ombudsman, as a preventive anti-corruption body in Rwanda, has implemented a system requiring public officials to declare their assets, enhancing transparency and helping detect unexplained wealth, illicit enrichment or potential corruption. It has raised awareness on the harms of corruption through dialogues and TV/Radio programmes and conducts corruption risk assessments.

Public sector employment (Article 7.1): Rwanda has established comprehensive policy, legal and institutional frameworks governing the recruitment, retention, and promotion of public servants. These frameworks ensure transparency, accountability and professionalism within the public service. Mechanisms such as the Integrated Payroll and Personnel Information System (with various modules such as e-recruitment) and Results-Based Performance Management (RBM) have been established to increase transparency and integrity. Though there is a robust legal and institutional framework, more improvements are progressively being made for better management of public servants from entry to exit while ensuring transparency and efficiency.

Political financing (Article 7.3): Public funding of political organisations is established by Law. Each financial year, the Government allocates grants equally to registered political organisations through the authority in charge, the Rwanda Governance Board, according to the State's financial resources. Political organisations may use their funds in election campaigns, administrative and operational costs, capacity building and policy formulation-related activities. They are required to disclose their source of funding through asset and financial declarations. Political parties are prohibited from accepting funds from foreign individuals or organisations, in order to reduce external influence on national politics. However, the Law on Political Organisations does not determine the fate of funds obtained through unlawful means (i.e., seizure, confiscation, etc.).

Codes of conduct, conflicts of interest and asset declarations (Articles 7, 8 and 12): There are clear and adequate laws on codes of conduct and asset declarations for public officials. Adequate criteria are in place for disqualifying individuals standing as candidates for elected public office, and all candidates are required to demonstrate the absence of potential conflicts of interest with the position sought or to disclose relevant interests as a precondition

for candidacy. Furthermore, the elected candidates are obliged to file asset declarations upon entry into office. The Office of the Ombudsman receives annual asset declarations from different officials and all staff managing public funds and assets, with a compliance rate close to 100%. It also receives them from political parties, with 11 parties submitting annually. However, the number of verified asset declarations is still low compared to the number of those received. Meanwhile, officials and staff of the Office of the Ombudsman submit their own asset declarations to the Senate.

Reporting mechanisms and whistleblower protection (Articles 8.4 and 13.2): In Rwanda, there is a legal framework regarding the reporting and protection of whistleblowers. It covers all kinds of offences, wrongdoings and harms to the public interest. Platforms and online portals from the Office of the Ombudsman and the Rwanda Investigation Bureau (RIB) allow citizens to report anonymously and securely. This digital access increases the usability and accessibility of reporting mechanisms. However, some citizens, especially in rural areas, are not aware of their rights as whistleblowers or the available reporting mechanisms. Furthermore, the law does not allow a person who discloses information to do so anonymously, preventing some individuals from reporting for fear of retaliation. The modalities for the implementation of this law to protect and reward whistleblowers are yet to be adopted.

Public procurement (Article 9.1): Public procurement is governed by Law n° 031/2022 and its implementing orders/regulations. The Rwanda Public Procurement Authority (RPPA) has been established to focus on public procurement regulatory measures, monitoring and building capacity in public entities. An E-Procurement Portal (*Umucyo*) has been established and clear procedures are used for determining conditions for participation in a tender, including selection and award criteria. Generally, there are mechanisms in place to ensure transparency in procurement and reduce bureaucratic red tape. Provisions are in place for procurement processes to be announced and published, enabling interested bidders to learn about a tender and providing them with sufficient time to prepare and submit an offer. There are adequate thresholds requiring competitive and open bidding procedures. Except in the cases of single-source procurement, force account, or community participation, some degree of competition exists across the other procurement methods, although it varies.

Procurement procedures are conducted electronically, using e-procurement platforms, unless otherwise specified by law. Media and civil society can also track and monitor which goods or services state bodies purchase from which entity, including the price, as well as key terms and conditions. Furthermore, the list of banned companies is publicly accessible. However, there are still some deficiencies in the system, such as insufficient staff with appropriate professional qualifications, lack of standard documents, loopholes in the legal framework for the protection of casual laborers, poor quality of goods, services and works purchased, delays in the execution of contracts and in the payment of suppliers/contractors, among others.

Management of public finances (Article 9.2): Rwanda has established comprehensive laws and procedures governing the preparation and adoption of national budgets. A clear legal and policy framework guides the entire Public Financial Management (PFM) process. It encompasses the mechanisms through which public resources are collected, allocated, spent and accounted for. There is a need to strengthen capacity in specific areas of financial

management and auditing, as well as to enhance public awareness and promote citizen participation in national planning and budgeting.

Access to information and the participation of society (Articles 10 and 13.1): Rwanda has enacted a Law on Access to Information, which allows individuals to obtain information from public institutions. The Office of the Ombudsman handles cases related to violations of the right to information. Civil society and the media are given access to information in cases of corruption and related offenses, except where such cases are “classified” or where disclosure could adversely affect an ongoing investigation process or the right to a fair trial.

Judiciary and prosecution services (Article 11): The constitutional and legal frameworks ensure the independence and integrity of the judiciary and of the National Public Prosecution Authority (NPPA). Rwanda's Judiciary is constitutionally established as an independent branch of government, with financial and administrative autonomy. The judiciary has control over its own budget and administrative matters, ensuring it is not unduly influenced by other branches of government, according to the Rwandan Judiciary. While the President approves judicial appointments, including those to the Supreme Court and High Courts, Senate confirmation is also required, which provides a degree of oversight. Furthermore, in practice, the independence of NPPA is limited because it can receive injunctions from the Minister of Justice.

Private sector transparency (Article 12): Rwanda has implemented measures to promote transparency among private entities, including the publication of the identities of both legal and natural persons involved in the establishment and management of corporate entities, as well as beneficial ownership. Any person can request such information from the Registrar General of the Rwanda Development Board (RDB). However, some company owners only file the information after receiving multiple reminders from the Registrar General. Though sanctions for non-compliance exist, the enforcement mechanisms for ensuring timely disclosure by private entities need to be improved.

Measures to prevent money-laundering (Article 14): Rwanda passed Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. Moreover, the Financial Intelligence Centre (FIC) was established as a specialized agency with the primary mission of conducting financial intelligence in order to prevent and counter money laundering. Internationally, its success in countering money laundering is dependent to some extent on the willingness of foreign countries to cooperate. Domestically, all investigators, prosecutors, and especially judges must undergo training on money laundering.

Anti-money laundering (Art. 52 and 58): The Financial Intelligence Centre (FIC) issues advisories/notices to high-risk jurisdictions, transactions that need more scrutiny and targeted financial sanctions. However, there are still weaknesses in the quality of investigations, prosecutions, adjudications, and asset forfeitures. Additionally, there are still loopholes in regulating the Designated Non-Financial Businesses and Professions (DNFBPs) sector and foreign currency exchange bureaus (known as Forex Bureaus) within the financial sector.

Measures for direct recovery of property (Articles 53 and 56): Legislation allowing for asset recovery by foreign authorities is in place. In 2025, Law n° 42/2014 of 27/01/2015 governing

the recovery of offence-related assets was enacted and amended in 2021. The recovery of proceeds of corruption is conducted through the Civil Litigation Services Directorate within the Ministry of Justice and a dedicated unit was established. However, the recovery of property is challenging because most convicted persons are insolvent and do not have properties to be auctioned for recovery.

Confiscation tools (Article 54): Rwanda has measures in place to identify, trace, evaluate, seize, freeze and confiscate assets. Foreign requests and orders can be enforced in Rwanda. Moreover, foreign non-conviction-based confiscation orders can be enforced domestically provided they fulfil the conditions required. Rwanda, to a limited extent, pursues confiscation of proceeds, instrumentalities of crime and property of corresponding value as a policy objective. The competent authorities involved in the asset recovery process include RIB, FIC, MINIJUST and NPPA.

International cooperation for the purpose of confiscation (Articles 51, 54, 55, 56 and 59): The Civil Litigation Services (CLS) is a Directorate General within the Ministry of Justice, a dedicated single department coordinating international asset recovery cases. In the execution of requests related to international asset recovery, CLS collaborates with the Ministry of Foreign Affairs and International Cooperation through the unit in charge of records management and the National Public Prosecution Authority through the International Crimes Unit (ICU) within the International Crimes Department. For a period of more than 10 years, since 2014 up to the end of March 2025, the Ministry of Justice was able to recover Rwf 14 982,643,944 (equivalent to US\$10,312,599.00) and materials with a total value of Rwf 100,994,000 (equivalent to US\$69,514.50).² However, there is weak collaboration of foreign countries in conducting investigations on cases involving public funds that were diverted or converted into other assets and hidden abroad.

The return and disposal of confiscated property (Article 57): Law n° 42/2014 of 27/01/2015 governing the recovery of offence-related assets provides for the cooperation with foreign States in both recovering assets located abroad, as well as returning foreign assets found within its territory. However, there are poorly compiled statistics about the number of requests received for confiscation orders from another country, the value of confiscated assets and the amounts returned.

Table 1: Implementation and enforcement summary

UNCAC articles	Status of implementation in law	Status of implementation and enforcement in practice
Art. 5 – Preventive anti-corruption policies and practices	Full implemented	Good
Art. 6 – Preventive anti-corruption body or bodies	Fully implemented	Good

² Rwf 1,439.38 corresponded to 1 US\$ throughout the report as per the currency converter site oanda.com, on 22/08/2025.

Art. 7.1 – Public sector employment	Largely implemented	Moderate
Art. 7.3 – Political financing	Largely implemented	Moderate
Art. 7, 8 and 12 – Codes of conduct, conflicts of interest and asset declarations	Fully implemented	Good
Art. 8.4 and 13.2 – Reporting mechanism and whistleblower protection	Largely implemented	Moderate
Art. 9.1 – Public procurement	Largely implemented	Moderate
Art. 9.2 – Management of public finances	Largely implemented	Moderate
Art. 10 and 13.1 – Access to information and the participation of society	Largely implemented	Moderate
Art. 11 – Judiciary and prosecution services	Fully implemented	Good
Art. 12 – Private sector transparency	Largely implemented	Moderate
Art. 14 – Measures to prevent money-laundering	Fully implemented	Moderate
Art. 52 and 58 – Anti-money laundering	Fully implemented	Moderate
Art. 53 and 56 – Measures for direct recovery of property	Fully implemented	Moderate
Art. 54 – Confiscation tools	Fully implemented	Moderate
Art. 51, 54, 55, 56 and 59 – International cooperation for the purpose of confiscation	Fully implemented	Moderate
Art. 57 – The return and disposal of confiscated property	Fully implemented	Moderate

Table 2: Performance of selected key institutions

Name of institution	Performance in relation to responsibilities covered by the report	Brief comment on performance (for example, inadequate resources, lack of independence, strong expertise)
Office of the Ombudsman	Good	The office is very well equipped but faces challenges in the verification of asset declarations.
Ministry of Justice	Good	The Ministry of Justice has a strong expertise but still faces challenges in the assistance of foreign countries in conducting investigations on cases involving public funds which were

		diverted or converted into other assets and hidden abroad.
National Public Prosecution Authority	Good	Prosecutors need more training on how to investigate and prosecute money laundering and predicate offenses.
Financial Intelligence Centre	Good	FIC is still young, but has strong expertise.
Rwanda Governance Board	Good	RGB is equipped with strong expertise.
Rwanda Public Procurement Authority	Good	There is a high turnover of procurement staff, which affects continuity and institutional capacity
Judiciary	Good	Judges need training on how to adjudicate money laundering and predicate offenses.
Rwanda Investigation Bureau	Good	There is a strong legal regime but investigators need training on how to investigate money laundering and predicate offenses.

2.4 Recommendations for Priority Actions

1. **Improve the verification of asset declarations** by increasing staff in charge of the verification of asset declarations, which would help to improve the verification of a larger number of declarations compared to the number of received declarations.
2. **Improve public procurement** by reviewing the retention policy to avoid frequent change of jobs by procurement staff and elaborating standard documents such as the Standard Bidding Document (SBD) for non-consulting services and a framework contract to facilitate the work of procurement staff.
3. **Organise trainings of investigators, prosecutors and judges on money laundering:** trainings are still needed for investigators, prosecutors and judges to master the complexities of money laundering.
4. **Enhance international cooperation for the purpose of confiscation:** Improve the assistance of foreign countries in conducting investigations on cases involving public funds which were diverted or converted into other assets and hidden abroad.
5. **Establishment of a coordination team between MINIJUST, FIC, NPPA and RIB** on asset recovery, confiscation, international cooperation for the purpose of confiscation and the return and disposal of confiscated Property.
6. **Provide sufficient financial and human resources to oversight bodies** such as the Office of the Ombudsman, the Rwanda Public Procurement Authority, and the Financial Intelligence Centre to enable them to carry out their mandates effectively.
7. **Improve protection of whistleblowers:** Speed up the process of promulgation of the Presidential Order to fix the modalities for the implementation of protection and reward to whistleblowers.
8. **Codes of conduct, conflicts of interest and asset declarations:** Establish focal points or units within the executive and legislative branch responsible for setting out standards on ethical behaviour.

9. **Access to information and appeals mechanism:** Include in the Access to Information Law a provision establishing a dedicated institution for appeals, with the authority to compel institutions to respect the right to information for journalists, civil society actors, and other stakeholders.
10. **Civil society engagement:** Maintain consultations with CSOs on the new law N° 058/2024 of 20/06/2024, and review provisions that may affect their independence and mandate as accountability bodies.

III. Assessment of Review Process for Rwanda

TI-Rwanda has been included as a governmental expert of Rwanda’s UNCAC review and has been actively involved in the review process. During our regular meetings between government institutions and agencies, as well as CSOs, each concerned institution/organization was requested to provide information related to the topic.

Civil society organizations, notably TI-Rwanda and the Rwanda Civil Society Platform (RCSP), were consulted at all stages by the government during the UNCAC review process. On the 11th of March, 2025, a validation meeting of the self-assessment checklist was held, after which additional information was requested from civil society. On the 22nd of April, another meeting was held to validate the additional information. Furthermore, after direct dialogue with governmental reviewers, the government consulted again and invited TI Rwanda for a meeting on the 3rd of June to validate information before sharing it with the reviewers.

3.1 Report on the Review Process

Table 3: Transparency of the government and CSO participation in the UNCAC review process

Did the government disclose information about the country focal point?	Yes	Yes, the country focal point is known. The Deputy Ombudsman in charge of Preventing and Fighting Corruption, Hon. Mukama Abbas, was designated through a note verbal by the Ministry of Foreign Affairs.
Was the review schedule published somewhere/publicly known?	No	The review schedule was communicated to concerned institutions and organizations, and published on the UNODC website. The country review was scheduled to take place on 23, 24 and 25 April 2025 and the time was respected.
Was civil society consulted in the preparation of the self-assessment checklist?	Yes	<input checked="" type="checkbox"/> Anti-corruption and access to information CSOs <input checked="" type="checkbox"/> CSOs working on other issues <input type="checkbox"/> Academia <input type="checkbox"/> Trade unions <input type="checkbox"/> Other (please list) Civil society organizations notably TI-Rwanda and the Rwanda Civil Society Platform (RCSP) were actively involved and consulted at all stages. On 11 March 2025, a validation meeting of the self-assessment check list was held after which additional information was requested. Additionally, on 22 April 2025, another meeting was held to validate the additional information. meeting. Furthermore, after direct dialogue, with reviewers who requested further information, we were again consulted for a meeting on 3 June to validate additional information before sharing them with reviewers.

Was the self-assessment checklist published online or provided to civil society?	Yes	Yes, the self-assessment checklist was shared through email to concerned public institutions as well as civil societies and the private sector.
Did the government agree to a country visit?	Yes	Yes, the government of Rwanda agreed to a country visit.
Was a country visit undertaken?	Yes	Yes, the country visit took place on 23, 24 and 25 April 2025 at Lemigo Hotel in Kigali, Rwanda.
Was civil society invited to provide input to the official reviewers?	Yes	<input checked="" type="checkbox"/> Anti-corruption and access to information CSOs <input checked="" type="checkbox"/> CSOs working on other issues <input type="checkbox"/> Academia <input type="checkbox"/> Trade unions <input checked="" type="checkbox"/> Other (please list) Three CSOs were invited: Rwanda Civil Society Platform, Transparency International Rwanda and Interfaith Council Rwanda. They gave inputs on Preventive anti-corruption policies and practices as well as on the participation of society.
Was the private sector invited to provide input to the official reviewers?	Yes	Yes, the private sector was invited for their inputs. The actors invited were: <ul style="list-style-type: none"> - Private Sector Federation - Rwanda Bankers Association - Rwanda Association of Microfinance Institutions in Rwanda - Rwanda Insurers Association They were requested to give inputs on: Standards and procedures designed to prevent corruption in the private sector, such as anti-corruption and corporate governance related laws, regulations, policies, procedures and guidance, internal controls, codes of conduct and corporate manuals. Accounting and auditing standards for the private sector which promotes transparency, compliance, integrity in business transactions and the detection of misconduct Mechanisms and procedures used by law enforcement to strengthen cooperation with the private sector.
Has the government committed to publishing the full country report?	Yes	The government committed to publish the full country report, as it did for the first cycle.

3.2 Access to Information

TI-Rwanda did not encounter any difficulties in accessing information, except for delays in receiving replies to the questionnaire shared with government officials. All referenced laws, regulations and policies are accessible online, either on the websites of the respective institutions or on the website of the Ministry of Justice.

To access other information, mainly on the implementation of specific provisions of UNCAC, TI Rwanda used a tailored questionnaire sent to each institution with competencies in implementing such UNCAC provisions. Twelve public institutions answered the questionnaires.

The main obstacle was access to statistical data. Several components of the report could not be supported with statistics because the relevant institutions had not compiled the necessary information. For example, statistics on money laundering were largely unavailable, except for a few numbers of cases prosecuted in the court and some assets recovered by the Ministry of Justice.

IV. Assessment of Implementation of Chapter II and Chapter V Provisions

4.1 Chapter II

4.1.1 Article 5 – Preventive Anti-Corruption Policies and Practices

Legal and Institutional Framework

Rwanda has adopted comprehensive laws on anti-corruption. These include Law n° 54/2018 of 13/8/2018 on fighting against corruption,³ Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistleblowers,⁴ Law n° 55/2021 of 29/08/2021 on declaration of assets⁵ and laws on public servants' ethics,⁶ political parties,⁷ election,⁸ among others. An anti-corruption policy was adopted in 2012 and is under review. The National Advisory Council for the against Corruption and Injustice (NACACI) has technically approved the new anti-corruption policy, which has been submitted to competent bodies for adoption.⁹ The legal framework and anti-corruption policy reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability. They are being implemented through different structures such as the Office of the Ombudsman, the National Advisory Council for the fight against Injustice and Corruption, Anti-Corruption Committees established at the level of each public institution, NGOs and business companies.

Some evaluations of the effectiveness of measures to prevent and detect corruption have been conducted, such as by the Rwanda Governance Board (RGB) through *Citizen Report Card* and the *Rwanda Governance Scorecard*¹⁰ and Transparency International Rwanda. Citizen Report Card 2024 shows that Citizens indicate that corruption is highest in local government at a rate of 41.6% despite preventive measures in place¹¹. Rwanda Governance Scorecard

³ Law n° 54/2018 of 13/8/2018 on fighting against corruption, in *Official Gazette*, n° Special of 20/09/2018. All laws can be downloaded at <https://www.minijust.gov.rw/official-gazette>.

⁴ Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, in *Official Gazette*, n° 41 of 09/10/2017.

⁵ Law n° 55/2021 of 29/08/2021 on declaration of assets, in *Official Gazette*, n° 32 ter of 30/08/2021.

⁶ Presidential Order n° 021/01 of 24/02/2021 determining professional ethics for public servants, in *Official Gazette*, n° Special of 25/02/2021.

⁷ Organic Law n° 10/2013/01 of 11/07/2013 governing political organizations and politicians, in *Official Gazette*, n° Special of 12/07/2013, as amended by Organic Law n° 005/2018.OL of 30/08/2018 modifying Organic Law n° 10/2013/OL of 11/07/2013 governing political organisations and politicians, in *Official Gazette*, n° 37 of 10/09/2018.

⁸ Organic Law n° 001/2019.OL of 29/07/2019 governing elections, in *Official Gazette*, n° 29 of 29/07/2019.

⁹ Interview with the Office of Ombudsman on 22/05/2025.

¹⁰ Rwanda Governance Board, "Citizen Report Card", Report, June 2024, available at <https://www.rgb.rw/publications/citizen-report-card>, accessed on 22/05/2025. See also Rwanda Governance Board, "Rwanda: The State of Governance in Rwanda-Rwanda Governance Scorecard", 11th Edition, 2024, available at <https://www.rgb.rw/publications/governance-scorecard>, accessed on 22/05/2025.

¹¹ Rwanda Governance Board, "Citizen Report Card", Report, June 2024, p. 146.

2024 also indicates that the control of corruption is still at the rate of 75.93% while the target is 92.56%.¹²

Transparency International Rwanda's Bribery Index 2024 indicates that the main challenge in preventing corruption is the low level of corruption reporting. In 2024, data on corruption reporting reveals that only 8% of individuals reported instances of corruption, while a staggering 92% did not report any corrupt activities. This stark difference suggests that the huge majority of people are either unwilling or unable to report corruption. The reasons why individuals did not report corruption in 2024 are varied and reflect significant barriers to effective anti-corruption efforts. The most common reason was fear of self-incrimination, which was 24.7% of respondents.¹³

At the international level, Rwanda is a member of relevant initiatives and networks that address anti-corruption such as the Global Organization of Parliamentarians against Corruption (GOPAC), African Parliamentarians Network against Corruption (APNAC), East African Association of Anti-Corruption Authorities (EAAACA), Commonwealth Conference of Heads of Anti-corruption Agencies in Africa. It also collaborates with the United Nations Office on Drugs and Crime (UNODC) and the African Union Advisory Board on Corruption (AUABC). The government of Rwanda does an adequate follow-up on the recommendations, outputs and agreed actions arising out of those organisations, initiatives and networks. The resolutions/recommendations taken by States Parties are implemented and the execution status is presented in the following UNCAC Conference of the States Parties (recommendations are related to capacity building on anti-corruption, property and staff management, etc.).¹⁴

Implementation in Practice

The Office of the Ombudsman is the main organ designated to implement the preventive anti-corruption policies mentioned above. It reviews systems of public and private institutions and assesses the implementation of government projects or programs. The aim of these reviews is to analyze how those institutions accomplish their duties, identifying possible irregularities in their functioning and integrity loopholes.¹⁵

For example, in 2022/2023, the Office of the Ombudsman conducted an audit of activities related to the exploration and mining of minerals and quarries through the Rwanda Mining Board (RMB) in 10 Districts by visiting 97 mines.¹⁶ A similar audit was conducted in three hospitals, focusing on service delivery, human resource management, equipment and

¹² Rwanda Governance Board, "Rwanda: The State of Governance in Rwanda-Rwanda Governance Scorecard", 11th Edition, 2024, p. 48.

¹³ See Transparency International Rwanda, "Rwanda Bribery Index 2024", pp. 47-49, available at <https://www.tirwanda.org/>, accessed on 19/08/2029.

¹⁴ Interview with the Office of the Ombudsman on 22/05/2025.

¹⁵ Office of the Ombudsman, "Preventing and fighting corruption division", available at <https://www.ombudsman.gov.rw/en/about-us/units/corruption-prevention-unit>, accessed on 12/07/2025.

¹⁶ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2022-2023", Kigali, September 2023, pp. 40-50.

financial management.¹⁷ In 2023/2024, the Office of the Ombudsman conducted audits on activities at the National Agricultural Export Development Board and five health consultants' cooperatives.¹⁸ These audits help to identify improvements made, deficiencies and formulate recommendations.

The Office of the Ombudsman also utilizes various channels to raise awareness about the negative effects of corruption and its role in preventing and combating it. Some of the channels include the organization of an annual anti-corruption week each year in December, training sessions for different groups of citizens, street billboards, public announcements on the radio and television, talk shows, and the establishment of anti-corruption committees and anti-corruption youth clubs.¹⁹

The Office of the Ombudsman conducts annual trainings and awareness-raising sessions on anti-corruption values and behaviors. In 2021/2022, 36,422 persons - including journalists, high school students, youth groups, members of the Advisory Council to fight injustice and corruption at the Sector level (administrative entity), mediators, land notaries at the sector level, district employees responsible for building inspections, and members of Anti-Corruption Committees in institutions were trained on topics such as forms of corruption and how to prevent them, causes and consequences of corruption, and loopholes where corruption can creep into their daily work.²⁰ In 2023/2024, the same trainings were conducted, benefiting 33,270 students from 62 high schools in 10 districts and 42,511 youths from Anti-Corruption Clubs.²¹

Good practices

- Audits are conducted by the Office of the Ombudsman to ensure accountability;
- Strong collaboration through the Advisory Council to fight against injustice and corruption at the national level and at decentralized entities;
- Online declaration of assets and physical verification of assets for senior government officials and other officers involved in public finance management;
- Elaboration of guiding standards for putting in place institutional anti-corruption strategies and the establishment of anti-corruption committees in all public, private, civil society and international organisations;
- Regular trainings, sensitization sessions and annual anti-corruption week.

Deficiencies

- The capacity and effectiveness of anti-corruption committees is inadequate and needs to be strengthened through ongoing training and support;

¹⁷ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2022-2023", Kigali, September 2023, pp. 50-53.

¹⁸ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2023-2024", Kigali, September 2023, pp.60-72

¹⁹ Office of the Ombudsman, "Preventing and fighting corruption division", available at <https://www.ombudsman.gov.rw/en/about-us/units/corruption-prevention-unit>, accessed on 12/07/2025.

²⁰ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2021-2022", Kigali, September 2022, pp. 7-8.

²¹ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2023-2024", Kigali, September 2024, pp. 10-15.

- Lack of educational material for people with a limited level of education;
- Low citizen reporting of corruption.

4.1.2 Article 6 – Preventive Anti-Corruption Body or Bodies

Legal and Institutional Framework

The Office of the Ombudsman was established as an independent public institution in 2003²² under Article 182 of the Constitution of the Republic of Rwanda of 04/06/2003.²³ In 2015, it was reestablished as a “specialized organ”,²⁴ with its mission, organization and functioning governed by specific legislation.²⁵ The current legal framework is defined by Law n° 54/2021 of 29 August 2021, which replaced Law n° 76/2013 of 11 September 2013.

The Office has the responsibilities to prevent and fight injustice and corruption; instill the Rwandans values that consist of resisting, preventing, avoiding, and fighting injustice and corruption; review and decide on injustice and corruption complaints that are not resolved by relevant organs; receive and verify asset declarations; advise the Government on the establishment and promotion of policies and strategies to prevent, fight and punish injustice and corruption; monitor the implementation of policies and strategies aimed at preventing and fighting injustice and corruption; establish contacts and cooperate with regional and international institutions having similar responsibilities and carry out other responsibilities assigned by Law.²⁶

The Office is independent and enjoys administrative and financial autonomy. However, its annual budget is insufficient to effectively cover its responsibilities and there is a shortage of staff.²⁷

In terms of accountability, the Office of the Ombudsman submits its activity report for the previous fiscal year and the action plan for the following fiscal year to the President of the Republic and both Chambers of Parliament. A copy of the report and of the action plan are submitted to the President of the Supreme Court and the Prime Minister. Furthermore, the Staff of the Office of the Ombudsman are subject to a Presidential Order²⁸ that determines professional ethics for public servants.

The legal framework in Rwanda directs relevant agencies to provide assistance to the Office of the Ombudsman. In this regard, the Office has the powers to request documents,

²² Article 182 of the Constitution of the Republic of Rwanda of 04/06/2003, as revised, in *Official Gazette*, n° special of June 04, 2003.

²³ Constitution of the Republic of Rwanda of 04/06/2003, as revised, in *Official Gazette*, n° special of June 04, 2003.

²⁴ Article 139 of the 2015 Constitution.

²⁵ Initial Law on the Office of the Ombudsman (2013).

²⁶ Mandate of the Office of the Ombudsman, available at <https://www.ombudsman.gov.rw/en/about-us/mandate>, accessed on 1 July 2025.

²⁷ Article 2 of the 2021 Law on the Office of the Ombudsman.

²⁸ Presidential Order n° 021/01 of 24/02/2021 determining professional ethics of public servant, in *Official Gazette*, n° Special of 25/02/2021.

testimonies and explanations necessary for its investigations from all public, parastatals, private bodies and non-government organizations, even if the document is confidential.²⁹

Implementation in Practice

The Office of the Ombudsman maintains contact with several international organizations and networks, including the United Nations Development Programme (UNDP), the European Union (EU), the Commonwealth Africa Anti-Corruption Centre (CAACC), and the Eastern Africa Association of Anti-Corruption Authorities (EAAACA), among others. Interaction and cooperation with these international and regional institutions facilitated knowledge sharing as well as projects supporting the development of specific institutional and legal standards.³⁰ For example, in 2023/2024, the staff of the Office of the Ombudsman participated in different trainings conducted by the International Association of Anti-Corruption Authorities (IAACA), the Commonwealth Africa Anti-Corruption Centre, among others.³¹

The Office of the Ombudsman raises awareness on the harms of corruption through public dialogues and TV and radios programmes, and has created and coordinated youth anti-corruption clubs.³²

The Office has a budget equivalent to 1,782,480,560 Rwf (equivalent to US\$ 1,226,887.00) for the year 2023/2024.³³ However, the budget allocated to the activities of the Office of Ombudsman is insufficient compared to its responsibilities.³⁴

Moreover, in its responsibilities of receiving and verifying asset declarations, the Office of the Ombudsman has a limited number of staff in charge of verifying declarations. The Unit in Charge of Asset Declarations has only nine staff members who are responsible for nearly a thousand asset declarations each, which may be difficult to handle effectively.

The Office also reported that the building where the Office of the Ombudsman operates is old, affecting the efficiency and safety of staff and equipment.³⁵

Good practices

- Asset declarations and verification: The Office of the Ombudsman receives and verifies asset declarations of public officials;
- The Office of the Ombudsman raises awareness on the harms of corruption through dialogues and TV and radios programmes. It has also created and coordinated youth anti-corruption clubs;

²⁹ Article 5, 4°, of the 2021 Law on Office of the Ombudsman.

³⁰ Interview with the Office of the Ombudsman on 22/05/2025.

³¹ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2023-2024", Kigali, September 2024, pp. 106-108.

³² Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2023-2024", Kigali, September 2024, pp. 10-19.

³³ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman-2023-2024", Kigali, September 2024, p. 108.

³⁴ *Idem*, p. 113.

³⁵ *Idem*, p. 113.

- The Office of the Ombudsman conducts corruption risk assessments;
- Establishment and functioning of anti-corruption committees in public, private institutions, civil society and international organisations;
- International cooperation, strong institutional powers, and accountability mechanisms.

Deficiencies

- Some studies have identified challenges related to financial constraints, insufficient resources, staffing limitations, and weaknesses in legal frameworks;³⁶
- Insufficient resources for the Office of the Ombudsman.

4.1.3 Article 7.1 – Public Sector Employment

Legal and Institutional Framework

Rwanda has established comprehensive policies, legal and institutional frameworks governing the recruitment, retention, and promotion of public servants.³⁷ These frameworks ensure transparency, accountability and professionalism within the public service. The Legal framework includes mainly Law n° 017/2020 of 07/10/2020 establishing the general statute governing public servants, Law n° 18/2017 of 28/04/2017 governing results-based performance management in branches of Government, Presidential Order n° 128/01 of 03/12/2020 relating to the recruitment of public servants and the he induction program and Presidential order n° 021/01 of 24/02/2021 determining professional ethics for public servants.

The Institutional frameworks consist of the Ministry of Public Service and Labour (MIFOTRA),³⁸ the Ministry of Finance and Economic Planning³⁹ and the National Public Service Commission.⁴⁰

Implementation in practice

To ensure that principles of efficiency, transparency and objectivity of criteria for human resource management are applied, the following mechanisms have been put in place:⁴¹

³⁶ Office of the Ombudsman, “The Role of Assets Declaration in Preventing and Fighting Corruption and Promoting Integrity in Rwanda”, Kigali, December 2021, pp. 71-74.

³⁷ See the Law n° 017/2020 of 07/10/2020 establishing the general statute governing public servants, in *Official Gazette*, n° Special of 08/10/2020 as modified by Law n° 052/2024 of 07/06/2024 amending Law n° 017/2020 of 07/10/2020 establishing the general statute governing public servants, in *Official Gazette*, n° Special of 19/06/2024; Law n° 18/2017 of 28/04/2017 governing results-based performance management in branches of Government, in *Official Gazette*, n° 20 bis of 15/05/2017; Presidential order n° 128/01 of 03/12/2020 relating to recruitment of public servants and induction programme, in *Official Gazette*, n° Special of 04/12/2020; Presidential order n° 021/01 of 24/02/2021 determining professional ethics for public servants, in *Official Gazette*, n° Special of 25/02/2021.

³⁸ It is accessible at its website at <https://www.mifotra.gov.rw/>

³⁹ More information about this ministry is available on their website at <https://www.minecofin.gov.rw/>

⁴⁰ More information about the National Public Service Commission can be found at their website at <https://www.npsc.gov.rw/>.

⁴¹ Interview of MIFOTRA with TI-Rwanda, Kigali, on 22 May 2025.

- An e-recruitment system has been established to ensure transparency. The recruitment in public service is conducted through a digital e-recruitment platform managed by MIFOTRA. All open jobs are published on this platform. This reduces administrative delays and costs while improving accessibility and consistency.
- Clear Timelines & Procedures: Recruitment and promotion processes follow strict procedural timelines and steps outlined in relevant legal instruments.
- Advertisement of Vacancies: All job openings are publicly advertised through e-recruitment to ensure equal access.
- Independent Oversight by NPSC: The National Public Service Commission reviews and validates recruitment processes and has the authority to intervene if fairness is compromised.
- Merit-Based Scoring System: Objective scoring is used for written exams, interviews, and qualifications, with results determining advancement or appointment.
- Appeals Process: Applicants can appeal decisions through formal administrative procedures, which are reviewed independently by the NPSC.

Furthermore, Rwanda has established comprehensive safeguards to ensure the transparency, fairness, and integrity in its public sector recruitment processes. These measures are embedded in the legal framework and are overseen by the NPSC. They include:

- E-Recruitment System: To ensure transparency, the recruitment in public service is conducted through a digital e-recruitment platform managed by MIFOTRA. This reduces administrative delays and costs while improving accessibility and consistency.
- Psychometric Testing: Candidates undergo online psychometric tests tailored to the specific job position. A minimum score of 50% is required to proceed to the next stage.
- Online shortlisting and online written examination to streamline and enhance the efficiency and fairness. A candidate is allowed to go for oral interview if he or she scores at least 70% in the written exam.
- Clear Timelines & Procedures: Recruitment and promotion processes follow strict procedural timelines and steps outlined in legal instruments.
- Advertisement of vacancies: All job openings are publicly advertised through e-recruitment to ensure equal access.
- Independent Oversight by NPSC: The National Public Service Commission reviews and validates recruitment processes and has the authority to intervene if fairness is compromised.
- Merit-Based Scoring System: Objective scoring is used for written exams, interviews, and qualifications, with results determining advancement or appointment.
- Structured Oral Interviews: Oral interviews are conducted by panels of at least three qualified members. These sessions are recorded audio visually to ensure accountability.
- Appeals Process: Applicants can appeal decisions through formal administrative procedures, which are reviewed independently by the NPSC.

Furthermore, Rwanda has established the mechanisms to file a complaint or appeal against a human resource decision, including in relation to a recruitment process or decision. They include:

- a) First-Level Appeal: Any candidate dissatisfied with a recruitment decision submits a written appeal to the institution that made the decision.
- b) Second-Level Appeal: If a candidate is unsatisfied with the first-level response, the candidate can escalate the appeal to the National Public Service Commission and the Court of law, if not satisfied by the decision of NPSC.

For example, in 2023/2024, NPSC received and analysed 201 recruitment reports from 87 Government institutions and discovered that 27 of them (13.4% of all reports received) had some irregularities. These included successful candidates without the required degree, lack of equivalence of their degrees, candidates who had not completed three years in their positions in public service, candidates who had recommendations (To Whom It May Concern) issued before ending their studies, candidates who had not the required experience, among others.⁴²

In 2023/2024, the NPSC also conducted post-recruitment assessment in 68 public institutions among 87 that had submitted their recruitment reports. During the post-recruitment assessment, the Commission found that all 68 institutions did not comply with the Presidential Order n°128/01 of 03/12/2020 relating to recruitment of public servants and induction programme. Thus, there is a persistent non-compliance found in a significant share of recruitment reports and during post-recruitment assessments.⁴³

Furthermore, the NPSC conducted Human Resource audits in hospitals in order to verify if they comply with the laws and regulations related to the recruitment and placement of employees. The audit found that some hospitals had placed employees in positions that did not comply with the law.⁴⁴

In handling appeals and providing advisory services, in 2023/2024 the NPSC received 9,857 appeals. Among them, 9,500 appeals were related to the recruitment and appointment in public institutions whereas 357 were related to human resource management. At the end of the year 2024, around 9,770 (99.1%) appeals had been assessed whereas 87 (0.8%) appeals were still under investigation. Among 9,770 appeals assessed, 2,651 (27.1%) were considered valid, and 7,119 (72.8%) appeals were invalid. Advisory service was provided to 11 public institutions and to 371 public servants.⁴⁵

In 2022/2023, the NPSC assessed the government loss due to illegal decisions made against public servants. The assessment consisted of highlighting cases of public institutions that have been brought to the courts by their staff, cases lost by public institutions in court, the reasons

⁴² National Public Service Commission, "Report on the activities of the year 2023-2024", Kigali, September 2024, pp. 15-21.

⁴³ National Public Service Commission, "Report on the activities of the year 2023-2024", Kigali, September 2024, pp. 24-25.

⁴⁴ Ibid, pp. 28-29.

⁴⁵ Ibid, pp. 25-26.

why they have lost those court cases and the laws not respected. The assessment found that 19 public institutions have been brought to courts by 28 employees in 36 court cases. The Government of Rwanda lost 6 cases and was charged 6,541,293 Rwf (equivalent to US\$4,502.39) while public institutions won 22 Cases and were paid 10,644,725 Rwf (US\$ equivalent to 7,326.80).⁴⁶

NPSC mentioned that some recruiting institutions are still ignoring the recruiting laws and advice provided by the NPSC. This leads to court cases that cost the government a lot money. For example, in 2021/2022, the government of Rwanda paid 45,397,834 Rwf (equivalent to US\$ 31,247.50) in damages for the non-respect of recruiting laws, and in 2021/2022 it paid 38,804,878 Rwf (equivalent to US\$ 26,709.50) for the same reasons.⁴⁷

However, the NPSC conducts awareness-raising initiatives on professionalism and ethical behaviour among public servants. From 2021 to 2024, it held sessions in 59 public institutions and in higher learning institutions for job seekers, and produced and broadcasted 30 radio programs on Human Resource Management laws and regulations through the Rwanda Broadcasting Agency (RBA).⁴⁸

Good practices

- Integrated payroll and personnel information system with various modules such as e-recruitment;
- Results-based performance management (RBM);
- Regular monitoring by the NPSC;
- Digital e-recruitment platform managed by MIFOTRA, with psychometric testing, online shortlisting, and merit-based scoring;
- Structured oral interviews recorded for accountability;
- Functioning appeals process for recruitment decisions, including NPSC review and possible escalation to courts;
- NPSC awareness-raising on professionalism and ethical behaviour through trainings and media broadcasts.

Deficiencies

- Some recruiting institutions are still ignoring the recruiting laws and advice provided by the NPSC, leading to court cases that cost the government a lot money;
- Low levels of professionalism, human resource management and accountability within the public service;
- Persistent non-compliance was found in a significant share of recruitment reports and during post-recruitment assessments;
- Court cases arising from illegal recruitment decisions have led to measurable financial losses for the government.

⁴⁶ National Public Service Commission, “Report on the activities of the year 2023-2024”, Kigali, September 2024, pp. 80-88.

⁴⁷ *Idem*, p. 55.

⁴⁸ National Public Service Commission, “Report on the activities of the year 2023-2024”, Kigali, September 2024, pp. 43-45.

4.1.4 Article 7.3 – Political Financing

Legal and Institutional Framework

The funding of political parties is established by Law.⁴⁹ Article 23 of Organic Law n° 10/2013/OL of 11/07/2013 on political organizations and politicians, as amended to date, enumerates the sources of the property of the political organization, such as contributions from its members, donations and bequests, its activities, and State grants.

Each financial year, the Government provides registered political parties with grants through the authority responsible for their registration (the Rwanda Governance Board), subject to the State's financial resources. This prevents dependence of political parties on external donors as well as granting equality of opportunities among political organizations⁵⁰. During electoral campaigns, the government provides an electoral campaign grant to political parties or independent candidates that have scored at least 5% of the votes cast.⁵¹

Political organisations may use their funds for the following activities:

- Election campaign activities, including rallies, voter outreach, campaign materials;
- Administrative and operational costs such as meetings, transport, staff salary, and office rent;
- Capacity building;
- Policy development activities.

Article 25 of the same law⁵² prohibits political organisations and politicians to give or receive contributions, donations, and bequests that are likely to undermine the independence and integrity of the country. In addition, Article 28 stipulates that State assets cannot be used for activities or interests of any political organisation.

With regard to transparency, political organisations are required to disclose their sources of funding through asset and financial declarations. Article 26 of the Organic Law states that political organisations shall always keep their books of accounts and carry out an inventory of movable and immovable assets. A political organisation shall submit its accounting documents, not later than 30 September of the following fiscal year, to the authority in charge of the registration of political organizations, along with its financial statements, with a copy to the Office of the Ombudsman.

⁴⁹ Organic Law n°10/2013/OL of 11/07/2013 governing Political Organizations and Politicians regulates the funding of political parties, in *Official Gazette*, n° Special of 12/07/2013 as modified by the Organic Law n° 005/2018.OL of 30/08/2018 modifying the Organic Law n° 10/2013/OL of 11/07/2013 governing political organisations and politicians, in *Official Gazette*, n° 37 of 10/09/2018.

⁵⁰ Interview of NFPO with TI-Rwanda, Kigali, on 29 April 2025.

⁵¹ Interview of RGB with TI-Rwanda, Kigali, on 7 May 2025. See also Article 28 of Organic Law n° 10/2013/01 of 11/07/2013 governing political organizations and politicians, as amended to date.

⁵² Organic Law n° 10/2013/OL of 11/07/2013 governing Political Organizations and Politicians, in *Official Gazette*, n° Special of 12/07/2013, as amended by the Organic Law n° 005/2018.OL of 30/08/2018 modifying the Organic Law n° 10/2013/OL of 11/07/2013 governing political organisations and politicians, in *Official Gazette*, n° 37 of 10/09/2018

Preventive measures are in place to detect and prevent money laundering in political funding. These include mandatory donor disclosure and timely financial reporting. Political organisations are required to disclose the sources of their funding, including donor identities and donation amounts according to deadlines as mandated by law. Article 24 states that political organisations or politicians may receive donations and bequests. When the donations or bequests are valued at least Rwf 1,000,000 (estimated to US\$ 688.30), a political organisation or a politician must notify in writing the authority responsible for registering political organisations within 30 days of receipt. The notification must indicate the donor's identity, the type and value of the donation, and a copy must be sent to the Office of the Ombudsman.

Concerning penalties, in the case of non-compliance, a political organization that fails to submit a declaration of its books of account commits an administrative fault and can be sanctioned by a suspension for a period of one year.⁵³

However, this law does not determine the fate of funds obtained illegally. There should be a provision that clarifies the fate of the illegal funds (i.e. seizure, confiscation, etc.). Moreover, it does not require officials of the political organisations to declare their assets. For example, the officials of political parties (chairpersons and deputies).

Implementation in Practice

As of 2020,⁵⁴ the 11 political parties registered in the country were compliant with the requirements to declare their assets. In 2019, the Office of Ombudsman received and verified asset declarations of 11 registered political organizations, namely the Green Party, Rwanda Patriotic Front (RPF), Centrist Democratic Party (PDC), Ideal Democratic Party (PDI), Liberal Party (PL), Party for Democracy and Concord (PPC), Social Democratic Party (PSD), Social Party Imberakuri, Party for Solidarity and Progress (PSP), Rwanda's Labor Party (PSR) and Democratic Union of the Rwandan People (UDPRO). The objective was to verify the origin of their assets and their use.⁵⁵

The verification process outlined that five political organisations, namely Green Party, PDC, PL, PS Imberakuri and UDPR, complied with the laws and regulations on asset declarations. It was also noted that the recommendations provided by the Office of the Ombudsman in the previous year (2017-2018) were implemented, except for PSR, which did not comply with the recommendation to prepare its financial books as required by law in 2018-2019.

In 2019, the following irregularities were identified:

- Unexplained origin of funds (PDI);
- Incomplete documents related to how the money was utilized (PPC, PSD, PSP);

⁵³ Article 18 of the 2021 Law on declaration of assets.

⁵⁴ Office of the Ombudsman, "Report on Annual Activities-2019/2020", September 2020.

⁵⁵ Office of the Ombudsman, "Report on the activities of the Office of the Ombudsman of the year 2018/2019", pp. 97-98.

- Irregularities in financial books: for example, an amount not recorded in the proper accounting period (PSD, RPF).

The report does not mention which sanctions were imposed on non-compliant political organizations at that time.

In addition to the above regulations relating to political parties' funding, the National Consultative Platform of Political Organisations (NFPO) was established, bringing together political organisations for the purposes of political dialogue, building consensus and national cohesion. It has put in place the Code of Conduct for political organisations and their members, thus enhancing measures to ensure transparency and integrity in political funding.⁵⁶

Good practices

- Equal opportunities for all registered political organizations to get public funds;
- Political organisations may receive funds by public and voluntary contributions made by individuals subject to the respect of the rules on transparency, such as keeping their books of accounts, the control of those books and measures to prevent money laundering;
- Establishment of the National Consultative Platform of Political Organizations (NFPO);
- Existence of a Legal Framework on Transparency in political parties' funding;
- The prohibition on Foreign Donations, which prevents political parties from accepting funds from foreign individuals or organizations, reducing external influence on national politics.
- Mandatory Disclosure of large donations.

Deficiencies

- The Organic Law n°10/2013/OL does not determine the fate of funds obtained illegally;
- The Law does not require officials of the political organisations to declare their assets; For example, the officials of political parties (chairpersons and deputies).

4.1.5 Articles 7, 8 and 12 – Codes of Conduct, Conflicts of Interest and Asset Declarations

Legal and Institutional Framework

There are clear and adequate criteria in place for disqualifying a person from presenting a candidacy for election to hold elected public office, such as a previous criminal conviction or other offences. Among the requirements to be elected for positions, a candidate must “not have been definitively sentenced to a term of imprisonment equal to or exceeding six months,”⁵⁷ and every candidate has the obligation to provide a valid criminal record.⁵⁸

⁵⁶ See NFPO, “Publication”, available at <https://www.forumfp.org.rw/publication/laws>, accessed on 22/08/2025.

⁵⁷ Article 2, 1o^o (d) of Organic Law n° 001/2019.OL of 29/07/2019 governing elections, in Official Gazette, n° 29 of 29/07/2019.

⁵⁸ Article 74 (3^o) of Organic Law n° 001/2019.OL of 29/07/2019 governing elections.

All candidates for elected public office must demonstrate the absence of a potential conflict of interest with the position sought or disclose relevant interests as a condition of their candidacy.⁵⁹ Furthermore, candidates for elected public office are obliged to file asset declarations upon entering office. The deadline for submitting the declaration of assets is 30 days from the date the Office of the Ombudsman provides the electronic link for the declaration. An asset declaration certificate is issued, provided the candidate is among those required to declare assets. This certificate is one of the requirements for candidates in the election. However, the public officials' declarations of interests, assets and income are not publicly accessible, and can only be accessed upon request and in the interest of justice.

Implementation in Practice

Available evidence suggests that the sanctions for presenting false or incomplete information in the declarations are applied in a fair and transparent manner. Different faults provided for by the law governing the declaration of assets, such as the submission of a partial or false declaration of assets by a person/a political party, and failure to submit a declaration of assets by a person/ a political party, have been sanctioned.⁶⁰

For example, in 2023-2024, 12 individuals failed to submit a declaration of assets and were sanctioned with a one-month suspension without pay. For inaccurate declarations, the Office of the Ombudsman verifies and analyzes the information, then submits the file to the competent criminal investigation authority to carry out an investigation.

The statistics below suggest that there is general compliance with the obligation to submit declarations and with the declarations themselves. However, despite high compliance with the obligation to submit declarations, the proportion of verified declarations remains low. For example, in 2021–2022, only 19.88% of declarations were verified, in 2022–2023, the figure was 18.84%, and in 2023–2024, it rose to 30.82%.

Table 4: Status of asset declaration from 2021-2024⁶¹

Year	The number of people who had to declare assets	The number of people who declared their assets		The number of people who did not declare their assets		The number of people who were verified, percentage verified out of total submitted	
		Number	%	Number	%	Number	%
2021-2022	16,274	16,191	99,5	83	0,5	3,218	19,88

⁵⁹ Article 10, 6°, of Presidential Order N° 021/01 of 24/02/2021 determining professional ethics for public servants provides that a public servant must avoid any conflict of interest.

⁶⁰ Interview of the Office of Ombudsman with TI-Rwanda, Kigali, 22/05/2025.

⁶¹ These statistics were provided by the Office of the Ombudsman during the interview with the Office of the Ombudsman, conducted on 22/05/2025.

2022-2023	17,695	17,687	99,95	8	0,05	3,333	18,84
2023-2024	18,581	18,569	99,94	12	0,06	5,724	30,82

The Office of the Ombudsman annually receives declarations of assets from different officials and staff who manage public funds and assets. On the other hand, declarations of assets for the Office of the Ombudsman’s officials and staff are submitted to the Senate. In addition, the Office of the Ombudsman receives declarations from political parties (11 political parties declare their assets annually). However, the number of verified asset declarations is still low compared to the number of received declarations. The verification of asset declarations is still a challenge given the limited number of staff in charge of their verification. The Unit in Charge of Asset Declarations has only eight staff members, each responsible for verifying nearly 1,000 declarations, posing a challenge to effective oversight.⁶²

The declaration helps prevent corruption by promoting a culture of integrity and by enabling investigations into illicit enrichment and money laundering. The Office of the Ombudsman uses an online Declaration of Assets System (ODAS) for both declarers and staff responsible for asset declarations. This system includes a declaration form and related reports. The Office also uses a secure intranet system to manage files and workflow across all departments. Each staff member has a dedicated computer and individual sign-on credentials that grant access only to their specific unit’s files. This setup ensures the security and confidentiality of reports, which is particularly important for investigations into discrepancies in asset declarations and other forms of misconduct.

Good practices

- Strong collaboration through the Advisory Council to fight against injustice and corruption at the national level and within decentralized entities;
- Online declaration of assets and physical verification of senior government officials and other officers involved in public finance management;
- Available evidence suggests that the sanctions for presenting false or incomplete information are applied in a fair and transparent manner;
- There is general compliance with the obligation to submit declarations.

Deficiencies

- There are no focal points or units within the executive and legislative branches responsible for setting out standards on ethical behaviour and giving guidance to parliamentarians, ministers and other officials on matters of ethical behaviour and corruption risks. This gap makes it more difficult to effectively implement codes of conduct, conflicts of interest, and ensure compliance with requirements for declaration of assets and interests;⁶³
- Limited staff capacity for the effective verification of asset declarations.

⁶² Office of the Ombudsman, “The Role of Assets Declaration in Preventing and Fighting Corruption and Promoting Integrity in Rwanda”, Kigali, December 2021, p. 72.

⁶³ Interview of the Office of the Ombudsman with TI-Rwanda, Kigali, on 22/05/2025.

4.1.6 Articles 8.4 and 13.2 – Reporting Mechanisms and Whistleblower Protection

Legal and Institutional Framework

In Rwanda, there is a robust legal framework regarding the reporting and protection of whistleblowers. It covers all kinds of offences, wrongdoings or harms to the public interest. Since 2017, Rwanda enacted a new law on the protection of whistleblowers, introduced five years after the adoption of the repealed Law n°35/2012 of 19/09/2012 on the same subject.⁶⁴

Under this law, an individual is considered a whistleblower if they disclose information in their possession or brought to their attention that is related to offenses, illegal acts or misconduct.⁶⁵ The term “illegal act or behavior” is further defined as any act that violates the code of conduct or professional ethics committed by authorities or employees in public or private institutions,⁶⁶ whereas “offense” is an act or omission infringing public order and punishable by law.⁶⁷

Article 5 of Law n° 44 bis/2017 of 06/09/2017 obliges whistleblowers to only disclose information that is genuine. It stipulates that “a whistleblower is prohibited from:

- a. Providing false information aimed at his/her personal interest or based on grounds of hatred, jealousy or potential conflict between the whistleblower and the person subject to whistleblowing or other persons with any relationship with the person subject to whistleblowing.
- b. providing information in the interest of a person he/she seeks to protect or with intent to defame and dishonour an individual or an entity subject to whistleblowing.”

Article 9 of the Law⁶⁸ places a general and imprecise obligation on the state to establish strategies meant to ensure the security and protection of individuals who make disclosures. The same provision further provides for the protection and rewards for those whose disclosures lead to the recovery of property or the safeguarding of the public interest. A Presidential Order is expected to determine the modalities for implementing these protection and reward measures.

The law does not allow a person who discloses information to do so anonymously.⁶⁹ However, in a bid to protect the identities of whistleblowers who do not report anonymously, all disclosures are received in secret and encrypted.

⁶⁴ Law n°35/2012 of 19/09/2012 relating to the protection of whistleblowers, in Official Gazette, n°45 of 05/11/2012.

⁶⁵ Article 2, 5° of Law n°44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

⁶⁶ Article 2, 1° of the Law n°44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

⁶⁷ Article 2, 2° of the Law n°44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

⁶⁸ Article 9 of the Law n°44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

⁶⁹ Article 4 § 2 of Law n°44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

As previously mentioned, the law on the protection of whistleblowers requires every institution to appoint one or more staff members with suitable competence and integrity to receive disclosures.⁷⁰ This is very useful in channeling and keeping the secrecy of disclosures received.

In addition to Law n° 44bis/2017 of 06/09/2017, other laws contain provisions that protect whistleblowers.

a. Law n° 54/2018 of 13/08/2018 on fighting against corruption

Article 19 of Law n° 54/2018 of 13/08/2018 on fighting against corruption⁷¹ provides an exemption from criminal liability for corruption offenses to any person who offers or receives an illegal benefit and informs the judicial authorities before the act occurs, thereby helping justice organs obtain evidence of the offense. The same exemption applies to a person who gives or receives an illegal benefit and reports it to the justice authority before the commencement of the criminal investigation, by providing information and evidence.

b. Law n° 66/2018 of 30/08/2018 regulating labor in Rwanda

Article 8 of the law on labor in Rwanda protects employees who have reported or testified to sexual harassment committed by their supervisor from retaliation. It adds that “if there is enough evidence that an employee has resigned due to sexual harassment committed against him/her by his/her supervisor, his/ her resignation is considered as unfair dismissal”.⁷²

a. Law n° 54/2021 of 29/08/2021 governing the Office of the Ombudsman

Among the missions of the office of the Ombudsman is to raise public awareness and encourage people to report bad practices related to injustice, corruption and related offenses.⁷³ In this way, the office supports the role of whistleblowers and can receive reports from them.

Implementation in Practice

The law on the protection of whistleblowers provides mechanisms to protect members of the public who report acts of corruption. These include physical protection and safeguards against workplace or other forms of retaliation.⁷⁴ Although the Presidential Order on the protection and rewarding of whistleblowers is still under preparation, the Office of the Ombudsman has already received 3 cases. According to the Office, these cases were investigated and the recommendations were implemented by the institutions concerned.⁷⁵

⁷⁰ Article 8 of Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistle blowers, O.G n° 41 of 09/10/2017.

⁷¹ Article 19 of Law n° 54/2018 of 13/08/2018 on fighting against corruption, O. G n° special of 20/09/2018.

⁷² Article 8 of Law n° 66/2018 of 30/08/2018 regulating labor in Rwanda, O.G n° Special of 06/09/2018.

⁷³ Article 4, 2° of Law n° 54/2021 of 29/08/2021 governing the Office of the Ombudsman.

⁷⁴ Articles 12, 16 and 17 of Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistle blowers.

⁷⁵ Interview of the Office of the Ombudsman with TI-Rwanda, Kigali, on 22/05/2025.

An interview with the Office of the Ombudsman revealed that channels are in place for reporting violations of codes of conduct or standards by public officials, including measures for whistleblower protection. These channels include SMS, phone calls and email. Everyone who has knowledge of a corruption offence has a legal obligation to report it.⁷⁶ However, there is no study on how these channels provide the potential whistleblower with ample protection from exposure and consequential risks.

Some studies show that current laws protecting whistleblowers is not fully effective. For example, few institutions have officially appointed a focal point in charge of receiving disclosures, as most of them forward whistleblowers to some staff whose work attributions may match the types of disclosures received, or simply to the head of the institution.⁷⁷

The absence of officially appointed employees responsible for receiving disclosures is discouraging, as whistleblowers do not know which door to knock on. If there is no official appointment, there is suspicion on the capacity to maintain the confidentiality of disclosures, the quality of the process and the awareness of the law. This is echoed in research assessing the level of reporting in Rwanda, namely the Rwanda Bribery Index produced by Transparency International Rwanda. Among the reasons for not reporting, 55% of reported cases did not see any actions, which is one of the main reasons for the low reporting of the law in Rwanda (only 14.2% reported encountering corruption cases in 2019).⁷⁸

Good practices

- Use of Technology: Platforms and online portals from the Office of the Ombudsman and the RIB allow citizens to report anonymously and securely. This digital access increases the usability and accessibility of reporting mechanisms.

Deficiencies

- Limited Awareness: Some citizens, especially in rural areas, are not aware of their rights as whistleblowers or the available reporting mechanisms. The law exists, but civic awareness and education on its application are limited.
- The law does not allow a person who discloses information to do so anonymously, and this may prevent some individuals from reporting for fear of retaliation.
- There is no Presidential Order that establishes the modalities for implementing this protection and reward.
- A major challenge is the low level of reporting on corruption cases, despite widespread awareness of their existence. This suggests a lack of trust in reporting mechanisms or fear of reprisal, hindering the effectiveness of preventative measures.
- Few institutions have officially appointed a focal point in charge of receiving disclosures.

4.1.7 Article 9.1 – Public Procurement

⁷⁶ Article 3 of Law n° 44bis/2017 of 06/09/2017 relating to the protection of whistle blowers

⁷⁷ Transparency International Rwanda, “Comprehensive study on the status of implementation of the law on whistleblowers”, Report, August 2020, pp. 16-17.

⁷⁸ Rwanda Bribery Index 2019. TI-Rwanda, available at https://www.tirwanda.org/IMG/pdf/designed_report_-_rbi_2024.pdf

Legal and Institutional Framework

In Rwanda, public procurement is governed by Law n° 031/2022 of 21/11/2022⁷⁹ and its implementing orders and regulations, such as the Ministerial Order n° 001/23/10/TC of 10/10/2023, which establishes regulations governing public procurement.⁸⁰ The Rwanda Public Procurement Authority (RPPA)⁸¹ has been established⁸² to oversee public procurement. Its mandate includes setting regulatory measures, monitoring compliance and building capacity within public procuring entities. RPPA is the main body mandated to supervise compliance with the rules governing the award and execution of public procurement contracts.

Clear procedures are used to determine the conditions for participation in a tender, including selection and award criteria, as evidenced in *Umucyo (E-Procurement Portal)*⁸³ for any eligible bidder to participate. Provisions are in place to ensure that procurement processes are announced and published in a manner that allows interested bidders to learn about a tender, providing them with sufficient time to prepare and submit an offer.⁸⁴

There are adequate thresholds requiring competitive and open bidding procedures. Except in cases of single-source procurement, force account or community participation, the remaining procurement methods involve some form of competition, although the level and scope may vary. The threshold is a key factor for some procurement methods (single source, request for quotation and simplified method) and the basis for distinguishing a national tender versus an international tender in the case of open competition.

Bidders are required to provide information on their beneficial owners. Article 25 (12°) of Law n° 031/2022 of 21/11/2022⁸⁵ requires beneficial ownership disclosure in the tender document and Article 47 clarifies that, during the bidding process, the bidder is required to submit the beneficial ownership disclosure form to the procuring entity.

Rules and procedures are in place for reviewing the procurement process, including an appeals system and available legal recourse or remedies. When a bidder is not satisfied with any act by the procuring entity, they must report to the responsible procuring entity. If the

⁷⁹ Law n° 031/2022 of 21/11/2022 governing public procurement, in *Official Gazette*, n° Special of 22/11/2022.

⁸⁰ Ministerial Order n° 001/23/10/ TC of 10/10/2023 establishing regulations governing public procurement, *Official Gazette*, n° Special of 10/10/2023.

⁸¹ RPPA, “Historical Background”, available at <https://www.rppa.gov.rw/about>, accessed on 07/05/2025: The Rwanda Public Procurement Authority (RPPA) is a public body established on February 20, 2008 by Law n° 63/2007 of 30/12/2007. It was created to replace the National Tender Board during a reform process in Public financial management launched by the Government of Rwanda (GoR), in which public procurement reform was one of the most important components.

⁸² Articles 27 – 30 of Law n° 031/2022 of 21/11/2022 governing public procurement; see also articles 69 – 100 of Ministerial Order n° 001/23/10/ TC of 10/10/2023 establishing regulations governing public procurement.

⁸³ UMUCYO is E-procurement system for Rwanda. is a single channel, portal and point of access for Rwanda procuring entities allowing to negotiate better contract terms and to realize savings and achieve value for money. It provides suppliers with increased access to markets without additional marketing efforts and a faster and more efficient method for quoting and increased order accuracy through receipt of electronic orders. See RPPA, “What is UMUCYO?”, available at <https://umucyo.gov.rw/>, accessed on 07/05/2025.

⁸⁴ Interview with RPPA on 06/05/2025.

⁸⁵ Article 25 (12°) of Law n° 031/2022 of 21/11/2022 governing public procurement.

decision thereto is not satisfactory, there is an Independent Review Panel for appeal.⁸⁶ Adequate procedures and practices are in place to promote integrity in procurement, such as debarment procedures,⁸⁷ selection of personnel involved to avoid potential conflicts in particular cases,⁸⁸ screening procedures⁸⁹ and training requirements.⁹⁰

Procurement procedures are conducted electronically, using e-procurement platforms,⁹¹ except in case the procurement method provided by the law is not yet catered for in the e-Procurement, where a tender whose value does not exceed Rwf 30,000,000 (equivalent to US\$ 20,649.10) when procured through single source method in case the bidder is not registered in e-procurement (this is applicable to the same bidder only once), when tenders are awarded through force account or executed through community participation by the beneficiary community and in case of single source procurement due to urgency to save life of the people.⁹²

With e-procurement, information is available to the entire public, including tender announcements, details of the successful bidder, and contract award information. Some of this information may be confidential to concerned parties.⁹³ In general, implementation and follow-up information on execution is accessible by default on an e-procurement platform.

Media and civil society can also track and monitor the goods or services purchased by state bodies from specific entities, including the price, key terms, and conditions. The information made available online is in data formats that facilitate analysis and further use, in particular by using a standardized, structured and easily reusable format.⁹⁴

Furthermore, the list of banned companies is publicly accessible.⁹⁵ Normally, when using national procedures and an ordinary budget, RPPA considers the list published by RPPA, but it is a good indicator to know which bidder RPPA is dealing with. For donor-funded projects, RPPA must consider its procedures primarily through the financing agreement.

Some government and external assessments regarding the effectiveness of the public procurement system and the extent to which it is based on transparency, competition and objective criteria in decision-making are also available, such as the Methodology for Assessing

⁸⁶ Article 47 – 50 of Law n° 031/2022 of 21/11/2022 governing public procurement.

⁸⁷ Articles 145-155 of Law n° 031/2022 of 21/11/2022 governing public procurement.

⁸⁸ Articles 80-81 of Law n° 031/2022 of 21/11/2022 governing public procurement.

⁸⁹ Articles 23 and 64 of Law n° 031/2022 of 21/11/2022 governing public procurement.

⁹⁰ Article 93 (b) of Ministerial Order n° 001/23/10/ TC of 10/10/2023 establishing regulations governing public procurement.

⁹¹ Article 4 of Law n° 031/2022 of 21/11/2022 governing public procurement.

⁹² Article 3 of Ministerial Order n° 001/23/10/ TC of 10/10/2023 establishing regulations governing public procurement.

⁹³ Interview of RPPA with TI-Rwanda, Kigali, on 06/05/2025.

⁹⁴ Interview of RPPA with TI-Rwanda, Kigali, on 06/05/2025.

⁹⁵ It can be found at RPPA's website (www.rppa.gov.rw).

Procurement Systems (MAPS)⁹⁶ and Public Expenditure and Financial Accountability Assessment (PEFA).⁹⁷

Some initiatives to promote public procurement transparency and integrity have been implemented. For example, the use of e-procurement has increased both transparency and integrity by making all needed information available not only to bidders and procuring entities' staff members, but also to the entire public (for instance, it is no longer easy to use forged documents). Furthermore, on the issue of integrity, the Association of Procurement Professionals has been established by law, with the law (already in Parliament) being changed to transform the body into an Institute of Procurement Professionals. The existence of specific standards for procurement officials, such as codes of conduct and conflict-of-interest policies, mitigates the risks related to the specificities of the public procurement process.⁹⁸

Implementation in Practice

In the year 2022-2023, the total number of awarded tenders through Umucyo system (online tenders) were 5,510⁹⁹. In terms of methods used to award the tenders in that year, 61.7% of online tenders were awarded through open competition at both national and international level, while 34.7% were awarded through a single source method. Restricted tendering methods and the request for quotations method represent 2.35% and 2.1% respectively.¹⁰⁰ In the same year, tenders awarded offline amounted to 1,944.

In terms of staff management, RPPA recognizes the challenges associated with staff turnover. During the year 2022-2023, of the 1,082 staff in public procurement, 684 (63%) received training on various topics related to public procurement, while 398 (37%) did not.

RPPA conducts investigations and debarment for companies that do not comply with public procurement rules. During the year 2022-2023, 28 requests for debarment from participation in public procurement were received. A total of 38 cases were handled during the year, including 10 carried over from the previous year. Among these cases, 12 bidders were sanctioned while 15 were acquitted. Among the sanctioned, four were debarred for forgery and providing false information, while eight were sanctioned for poor or nonperformance of contracts.¹⁰¹

Some examples of good practices and deficiencies related to public procurement in general have also been identified:¹⁰²

⁹⁶ Duthaluri, Nagaraju; Dinka, Mulugeta and Mukanyiligira Sissi, Dimitrie, "Rwanda: Assessment of the Public Procurement System : Methodology for Assessing Procurement Systems (MAPS), (Vol. 1 of 4) : Main Report (English), Washington, D.C., World Bank Group, available at <http://documents.worldbank.org/curated/en/381201592448468674>, accessed on 08/05/2025. See also RPPA, "RRPA annual activity report 2020-2021", pp. 24-25

⁹⁷ Government of Rwanda, "Public Expenditure and Financial Accountability Assessment (PEFA)" Central Government", Final Report, 8 September 2022,

⁹⁸ Interview of RPPA with TI-Rwanda, Kigali, on 06/05/2025.

⁹⁹ Rwanda Public Procurement Authority, "RPPA annual activity report- 2022/2023", p. 7.

¹⁰⁰ Ibid, p. 8.

¹⁰¹ Ibid, p. 17-18.

¹⁰² Interview of RPPA with TI-Rwanda, Kigali, on 6 May 2025.

Good practices

- Mandatory beneficial ownership disclosure in procurement processes;
- Use of e-procurement system to enhance transparency and public access to procurement data;
- Transparency in procurement and fighting red tape;
- Processing and tracking information on public procurement spending;
- Promoting the participation of SMEs;
- Internal and external controls;
- Engagement and collaboration with different stakeholders.

Deficiencies

- Lack of sufficient staff with sufficient professional qualifications;
- Frequent change of jobs by the procurement staff;
- Lack of standard documents (e.g. Standard Bidding Document (SBD) for non-consulting services, framework contract, etc.);
- Loopholes in the legal framework (protection of casual laborers, powers of the Independent Review Panel (IRP), etc.);
- Poor quality of goods, services and works procured, technical specifications/ToRs;
- Delays in contractual execution and in payments to government suppliers and contractors by some procuring entities.

4.1.8 Article 9.2 – Management of Public Finance

Legal and Institutional Framework

Rwanda has established comprehensive laws and procedures governing the preparation and adoption of national budgets. Article 163 (1) of the Constitution of the Republic of Rwanda states that “every financial year, the Chamber of Deputies considers the relevance of the draft law determining State finances and adopts it”.

The Organic Law n° 002/2022.OL of 12/12/2022 on public finance management outlines the legal framework for state finances and property, detailing the responsibilities of various stakeholders in budget preparation and execution.¹⁰³ The Ministerial Order n°001/16/10/TC of 26/01/2016 provides detailed financial regulations, including the budget calendar, which stipulates timelines for the issuance of budget call circulars, submission of budget proposals, and approval processes by the Cabinet and Parliament.¹⁰⁴

Furthermore, Rwanda has established laws and regulations governing accounting and auditing standards. Law n° 002/2022.OL of 12/12/2022 mandates the application of

¹⁰³ Organic Law n° 002/2022.OL of 12/12/2022 on public finance management, in *Official Gazette* n° 50 of 12/12/2022.

¹⁰⁴ Ministerial Order n°001/16/10/TC of 26/01/2016 relating to financial regulations, in *Official Gazette*, n° Special of 03/02/2016.

International Public Sector Accounting Standards (IPSAS) for public entities.¹⁰⁵ The Ministerial Order further elaborates on accounting procedures, requiring public entities to maintain proper books of accounts and submit regular financial statements.¹⁰⁶ The Office of the Auditor General (OAG) conducts audits to ensure compliance and transparency.¹⁰⁷

Adequate mechanisms are in place for recording, storing and preserving the integrity of accounting books, records, financial statements and other related documents. Rwanda uses the Integrated Financial Management Information System (IFMIS), which digitizes accounting processes¹⁰⁸ and the E-Procurement System,¹⁰⁹ enhancing transparency in public spending. The use of IFMIS also improves real-time monitoring capabilities.

Budget proceedings in Rwanda are made public to a significant extent. The budget framework paper and budget call circulars are published, and the approved budget and the Citizens' guide are made available to the public through official channels, including the MINECOFIN website and dissemination to the districts.¹¹⁰ There are opportunities for public input and debate on proposed national budgets. The budget preparation process includes consultations with stakeholders, and public hearings are conducted by parliamentary committees to gather feedback from citizens and civil society organizations.¹¹¹

Information on the adopted budget, its implementation, collected revenues, major sources of income, and an independent audit is publicly accessible in a timely manner through the MINECOFIN website.¹¹² However, there are aspects of the budget that are not disclosed. Unlike budgets for other ministries, the budget for the Ministry of Defense is not made public.¹¹³

Some measures are in place to ensure fiscal transparency.¹¹⁴ They include publishing budget documents such as the Citizen Budget Guide, conducting regular financial reporting, holding planning and budget consultations during budget preparation, and conducting audits by the OAG. These practices foster accountability and public trust in financial management.¹¹⁵

¹⁰⁵ Articles 73-79 of the Organic Law n° 002/2022.OL of 12/12/2022 on public finance management.

¹⁰⁶ Articles 96-113 of the Ministerial Order n°001/16/10/TC of 26/01/2016 relating to financial regulations.

¹⁰⁷ Articles 80-81 of the Organic Law n° 002/2022.OL of 12/12/2022 on public finance management.

¹⁰⁸ Article 100 of the Ministerial Order n°001/16/10/TC of 26/01/2016 relating to financial regulations.

¹⁰⁹ RPPA, "What is UMUCYO?", available at <https://umucyo.gov.rw/>, accessed on 07/05/2025.

¹¹⁰ MINECOFIN, "Publication: Reports", available at https://www.minecofin.gov.rw/1/publications/reports?tx_filelist_filelist%5Baction%5D=list&tx_filelist_filelist%5Bcontroller%5D=File&tx_filelist_filelist%5Bpath%5D=%2Fuser_upload%2Fminecofin%2Fpublications%2FREPORTS%2FNational_Budget%2F&cHash=1374d0a77bfb51b83ec423064c61ff81, accessed on 20/05/2025.

¹¹¹ Interview of MINECOFIN with TI-Rwanda, Kigali, on 5 May 2025.

¹¹² MINECOFIN, "Publications: Reports", available at <https://www.minecofin.gov.rw/1/publications/reports>, accessed on 30/06/2025.

¹¹³ Interview of MINECOFIN with TI-Rwanda, Kigali, on 5 May 2025.

¹¹⁴ The Citizen Budget Guide is a simplified, user-friendly version of the national budget, designed to present essential information in a way that is easily understood by the public. It aims to enhance citizens' understanding of national planning and budgeting processes, thereby promoting their active participation in both the planning and implementation of selected projects. See MINECOFIN, "Citizens Urged to Actively Participate in Planning and Budgeting Processes", available at <https://www.minecofin.gov.rw/news-detail/citizens-urged-to-actively-participate-in-planning-and-budgeting-processes>, accessed on 14/07/2025.

¹¹⁵ Interview of MINECOFIN with TI-Rwanda, Kigali, on 5 May 2025.

There are consequences for failing to comply with the applicable laws, regulations and procedures, including those regarding publication. The above-mentioned Organic Law¹¹⁶ and Ministerial Order¹¹⁷ outline disciplinary measures for financial misconduct, including investigations and potential sanctions for public officials who violate financial management procedures.

Implementation in Practice

Despite progress, corruption remains a concern, with instances of public funds embezzlement and fraudulent procurement practices continuing to occur. The Office of the Auditor General (OAG) provides independent oversight of public finances, auditing financial statements and reporting to Parliament.

According to the reports of the Office of the Auditor General, during the 2023-2024 audit, different cases of unlawful expenditure totaling Rwf 2.04 billion (equivalent to US\$ 1,404,138.00) were noted.¹¹⁸ The audits also noted new cases of financial losses amounting to Rwf 913,312,965 (equivalent to US\$ 628,636.00) are likely to be recovered.¹¹⁹ The losses resulted from contracts that were not properly designed, inadequate monitoring of construction projects and review of invoices before payment. These included duplicated or inflated items in ongoing contracts, as well as amounts overpaid to contractors.¹²⁰

In the year 2021/2022, the National Public Prosecution Authority (NPPA) reported that it opened criminal cases against 137 persons for fiscal fraud and embezzlement, and the accused accepted returning the money. NPPA recovered Rwf 171,268,572 (equivalent to US\$ 117,885.00) through negotiations with the accused.¹²¹

During the interview with MINECOFIN, it was revealed that there is still a need for continuous capacity building in certain areas of financial management and auditing, and raising awareness and public participation in national planning and budgeting by ordinary citizens.¹²²

Good practices

- Having a clear legal framework guides the whole Public Financial Management (PFM) process;

¹¹⁶ Articles 82-85 of Organic Law n° 002/2022.OL of 12/12/2022 on public finance management.

¹¹⁷ Articles 128-129 of Ministerial Order n° 001/16/10/TC of 26/01/2016 relating to financial regulations.

¹¹⁸ Office of the Auditor general, "Report of the Auditor General of State Finances-Year ended 30 June 2024", p. 20.

¹¹⁹ Office of the Auditor general, "Report of the Auditor General of State Finances-Year ended 30 June 2024", p. 20.

¹²⁰ Office of the Auditor general, "Report of the Auditor General of State Finances-Year ended 30 June 2024", pp. 20-21.

¹²¹ National Public Prosecution Authority (NPPA), "Activities carried out by the NPPA in the year 2021-2022", Report, June 2022, p. 24.

¹²² Interview of MINECOFIN with TI-Rwanda, Kigali, on 5 May 2025.

- Use of IFMIS in planning budgeting, monitoring, accounting and reporting for efficient financial management.;
- Instances of public participation and consultation in budget preparations;
- Regular publication of the comprehensive budget, its expenditure, and audit reports (quarterly and annually).

Deficiencies

- Limited capacity building in certain areas of financial management and auditing;
- Limited awareness and public participation in national planning and budgeting by ordinary citizens;
- Lack of transparency in the defense budget, which is not disclosed to the public, unlike other ministerial budgets;
- Significant financial losses and unlawful expenditures highlighted in audit reports;
- Corruption remains a concern, with instances of embezzlement of public funds and fraudulent procurement practices occurring continuously.

4.1.9 Articles 10 and 13.1 – Access to Information and the Participation of Society

Legal and Institutional Framework

Rwanda has enacted its Law on Access to Information, which allows all persons to obtain information from public institutions.¹²³ Freedom of the press, of expression, and of access to information are recognized and guaranteed by the State.¹²⁴ The law provides for the right of access to information held by public institutions and private entities. It also provides for the public interest to disclose the information to ensure that any public authority with a regulatory mission properly discharges its functions.¹²⁵

Civil society and the media in Rwanda have access to information in cases of corruption and related offenses, given that the dissemination of such information does not adversely affect the investigation process and the rights to a fair trial. Government institutions in Rwanda cooperate with civil society and the media. Transparency International Rwanda publishes reports on corruption, such as the Rwanda Bribery Index, whereby the index ranks institutions most prone to corruption and the prevalence of bribery.¹²⁶ This index is an annual survey that has been conducted since 2010. High officials are invited to the restitution of the index findings and are very supportive in terms of the implementation of the survey recommendations. The media also disseminates the findings on corruption.

¹²³ Articles 3 and 6 of Law n° 04/2003 of 08/02/2013 relating to access to information, Official Gazette, n° 10 of 11 March 2013.

¹²⁴ Article 38 of the Constitution of the Republic of Rwanda, in *Official Gazette n° Special of 04/08/2023*.

¹²⁵ Articles 3 and 6 of Law n° 04/2003 of 08/02/2013 relating to access to information.

¹²⁶ TI-Rwanda, “Research and publications”, available at <https://tirwanda.org/spip.php?rubrique6>, accessed on 11/04/2025.

Civil society is a member of the National Anti-corruption Advisory Council, which establishes strategies to fight against corruption and injustice, among other things. Through this platform, civil society participates in the elaboration of anti-corruption strategies and policies.¹²⁷

Information relevant to combating corruption is proactively made available to the public through various official channels. Additionally, the RIB regularly announces suspects under investigation for corruption, ensuring the public is kept informed even before court proceedings conclude. This is often complemented by media coverage, which plays a critical role in disseminating updates on corruption cases, ongoing investigations, and judicial outcomes.¹²⁸

As a matter of fact, below are some specific tools and mechanisms established to release information relevant to combating corruption:

a) E-Government Services: Rwanda has developed an extensive e-government infrastructure, with online platforms like Irembo¹²⁹ that allow citizens to access public services. These platforms contribute to reducing the potential for corruption by digitizing processes and reducing direct interaction with public officials while meeting the requirements for each service.

b) E-Procurement Portal: Rwanda established the RPPA e-procurement platform, which aims to enhance transparency in government procurement processes by allowing citizens and companies to track public procurement processes, reducing opportunities for corrupt practices in the allocation of public contracts and access to published tenders.

c) Public Registry of Companies: Rwanda has a publicly accessible registry of businesses and legal entities through the RDB. This registry provides greater visibility and accountability into company ownership, which is crucial for addressing corruption in both the public and private sectors.

d) Beneficial Ownership Registry: As part of its anti-corruption measures, Rwanda has been working toward ensuring that the beneficial owners of companies are identified and made publicly known. This helps to address opaque ownership structures often used to hide illicit financial flows and corruption.

e) Disclosure of Public Officials' Income and Assets: Rwanda has implemented a system where public officials are required to disclose their income, assets and liabilities. This is intended to prevent conflicts of interest and to ensure that public servants do not use their positions for personal enrichment.

¹²⁷ Article 3-4 of Presidential Order n° 64/01 of 12/02/2014 determining the responsibilities, organisation and functioning of the Advisory Council to fight against corruption and injustice, Official Gazette n° Special of 27/02/2014.

¹²⁸ The New Times, "Rwanda mines board officials arrested over corruption", available at <https://www.newtimes.co.rw/article/25989/news/crime/rwanda-mines-board-officials-arrested-over-corruption>, accessed on 26/04/2025; ICK, "Over 9,200 Individuals Investigated for Corruption in the Last Five Years", published on February 10, 2025, available at <https://ickjournalism.com/over-9200-individuals-investigated-for-corruption-in-the-last-five-years/>, accessed on 26/04/2025.

¹²⁹ Irembo at https://irembo.gov.rw/home/citizen/all_services.

f) Political Party Financing: Information on the financing of political parties is available to the public in Rwanda. Political parties are required to disclose their sources of funding, which enhances transparency and reduces the risk of corruption within the political system. Also, the declarations of political parties are regularly verified.

Furthermore, the government of Rwanda publishes reports assessing corruption risks in public administration. Each institution conducts corruption risk assessment within it, through established Anti-Corruption Committees, and reports to the Office of the Ombudsman on the activities achieved. In addition, the RGB publishes the annual Rwanda Governance Scorecard¹³⁰ reports, whose data are often sourced from public institutions upon request. These reports highlight areas of strong governance as well as weaknesses (e.g., service delivery gaps, citizen participation), sparking debate in the media and parliament.

Implementation in Practice

Though Rwanda has adopted access to information laws, there are some shortcomings in the law and still some issues lying in the implementation of these laws.

For example, one of the major shortcomings of Rwanda's Access to Information Law no 04/2003 of 08/02/2013 is the absence of penalties for non-compliance. If one requests the information and the provider refuses to release it, the law is silent on sanctioning.

Furthermore, the law lacks a clear mechanism for complaints (dedicated institution) or appeals for individuals whose information requests are denied or only partially granted, though it simply mentions that “the Office of the Ombudsman shall particularly monitor the enforcement of this Law”¹³¹. On the contrary, Law n° 54/2021 of 29/08/2021 governing the Office of the Ombudsman does not mention such responsibilities.¹³²

In brief, it is difficult to assess how the legal framework relating to access to information is being implemented in practice.

Another shortcoming is that the right to access to information shall not prejudice public order, good morals, the protection of the youth and children, the right of every citizen to honor and dignity and the protection of personal and family privacy.

Moreover, the Ministerial Order n°005/07.01/13 of 19/12/2013 contains restrictions on the information that can be obtained. For example, information categorized as top secret, secret, confidential and restricted is not accessible.¹³³

¹³⁰ RGB, “Rwanda Governance Scorecard”, available at <https://www.rgb.rw/publications/governance-scorecard>, accessed on 12/07/2025.

¹³¹ Article 17 of Law no 04/2003 of 08/02/2013 relating to access to information.

¹³² Law n° 54/2021 of 29/08/2021 governing the Office of the Ombudsman, *Official Gazette*, n° 32 ter of 30/08/2021.

¹³³ Articles 7-10 and 18 of Ministerial Order n°005/07.01/13 of 19/12/2013 determining which information could destabilize national security, in *Official Gazette*, n° 02 of 13/01/2014.

Regarding the participation of society in the fight against corruption, TI-Rwanda is on board at the national, district and sector anti-corruption advisory councils. We were consulted by the government for the work we do on organizing awareness campaigns on fighting against corruption, outreach programs and different activities during anti-corruption week. All the needed information was requested and collected by the office of the ombudsman during our plenary meetings.

Government institutions also recognize the work of civil society (for example, the work of the TI-Rwanda is recognized in the National Leadership Retreat; the Legal Aid Form and Rwanda Investigation Bureau are partnering to improve service delivery in the criminal justice system by implementing the principles of human rights; the Legal Aid Form organizes the Legal Aid Week in partnership with the Ministry of Justice and Rwanda Bar Association).

The Rwanda Media Commission (RMC) was established as an autonomous media self-regulatory body in response to the growing need for an independent, professional, and accountable media landscape in Rwanda. The RMC's establishment is grounded in legal and constitutional provisions that guarantee press freedom, access to information, and human rights.

Nevertheless, there are great concerns about the backsliding civic space in Rwanda regarding the new Law n° 058/2024 of 20/06/2024 governing non-governmental organisations, which restricts CSOs from operating independently without the interference of the Rwanda Governance Board (RGB). National CSOs in Rwanda have expressed serious concerns about various provisions of this law.

Below are some examples of good practices and deficiencies related to access to information and the participation of civil society include:¹³⁴

Good practices

- Civil society is a member of the National Anti-Corruption Advisory Council, which establishes strategies to combat corruption and injustice, among other things;
- Civil society organizations work together with the government to help raise public awareness and reporting on corruption;
- Some civil society groups are invited to government meetings and vice versa;
- Sometimes, recommendations from civil society are taken into account and implemented by the government;
- The Law on Access to Information allows the media to obtain information from public institutions;
- Government institutions recognize the work of civil society and they partner to co-organize some events;

¹³⁴ Interview of RGB with TI-Rwanda, Kigali, on 07 May 2025.

- The Rwanda Media Commission (RMC) was established as an autonomous media self-regulatory body;
- E-Government and Online Platforms facilitate access to information;
- Involvement in Policy Development: Civil society actors in Rwanda are involved in the early stages of policy formulation through consultations, especially in different sectors.

Deficiencies

- The right to access to information knows some limitations such as public order, good morals, secret, confidential and restricted information, etc.;
- Rwanda's Access to Information law lacks provisions on penalties for non-compliance;
- The Access to Information law provides a clear mechanism for complaints or appeals for individuals whose information requests are denied or only partially granted;
- There is a serious concern about backsliding civic space in Rwanda following the new Law n° 058/2024 of 20/06/2024, which grants the Rwanda Governance Board unlimited powers over CSOs' operations and management.

4.1.10 Article 11 – Judiciary and Prosecution Services

Legal and Institutional Framework

Judiciary Services

The present constitutional and legal frameworks ensure the independence and integrity of the judiciary. This is stipulated in Article 151 of the Constitution of the Republic of Rwanda, which states that “the Judiciary is independent and exercises financial and administrative autonomy”.

There are also various laws that talk about the independence of the Judiciary and the integrity of the judicial officers, namely:

- Law n° 12/2018 of 04/04/2018, determining the organization and the functioning of the Judiciary (Article 4);¹³⁵
- Law n° 014/2021 of 03/03/2021 determining statute of judges and judicial personnel (article 44 provides for independence of judges);¹³⁶
- The Law n° 09/2004 of 29/4/2004 relating to the code of ethics for the judiciary provides for the principles governing the conduct of the judges such as judicial independence, integrity, diligence, impartiality, professional secrecy and probity (Article 4-17).¹³⁷

¹³⁵ Law n°012/2018 of 04/04/2018 determining the organization and functioning of the Judiciary, in *Official Gazette*, n° Special of 30/05/2018.

¹³⁶ Law n° 014/2021 of 03/03/2021 determining statute of judges and judicial personnel, in *Official Gazette*, n° 08 of 08/03/2021.

¹³⁷ Law n° 09/2004 of 29/04/2004 relating to the code of ethics for the judiciary, in *Official Gazette*, n° 11, of 1st June 2004.

The evaluation of the independence of Rwanda's Judiciary is based on various reports published by credible research firms and civil society (such as TI-Rwanda). However, the inspectorate department does the analysis through feedback from Judicial officers, particularly Judges, on what they think about their independence while executing their jobs, as well as if they encountered any pressure that might jeopardize their independence. The Inspectorate Department of Courts also follows up on all reports and any information pertaining to the independence of the Judiciary. Above all, the Chief Justice guarantees the independence of all the judicial officers.¹³⁸

There are units within the judicial branch responsible for providing guidelines to judges on ethical behavior, corruption risks, etc. The Department of Inspectorate has a dedicated unit that oversees the unethical behavior of judicial officers. The Judiciary of Rwanda has an Anti-Corruption Committee that follows up on corruption and corruption tendencies. Furthermore, the High Council of the Judiciary is also responsible for providing guidelines to judicial officials regarding their ethics and integrity.

There are also adequate measures in place to increase and ensure transparency and accountability in the selection, recruitment, training, performance management and removal of members of the judiciary. Law n° 014/2021 of 03/03/2021 on the statute of judges and judicial personnel, provides the legal framework to ensure these principles are upheld.¹³⁹ In addition, the Judiciary has also adopted the use of the Judicial Performance Management System (JPMS), especially in the process of appraisals, whereas the process of selection, recruitment and management of judicial officers is overseen by the High Council of the Judiciary headed by the Hon. Chief Justice.¹⁴⁰

There is an adequate standard or process for determining a potential conflict of interest for a judge and for the steps required to address that conflict. Articles 18 to 22 of the Law n° 09/2004 of 29/4/2004 on the code of ethics for the judiciary¹⁴¹ provide for incompatibilities and interdictions. Law n° 22/2018 of 29/04/2018 on civil, commercial, labour and administrative procedures as amended to date¹⁴² (article 104) provides for Voluntary withdrawal from a case by a Judge when there is a potential conflict of interest.

Furthermore, judges are required to declare their assets and interests. Law n° 55/2021 of 29/08/2021 on the declaration of assets obliges judges to declare their assets.¹⁴³ In addition, Article 17 of Law n° 09/2004 of 29/4/2004 on the code of ethics for the judiciary provides that "every career judge shall, upon assuming office and at all times as required by laws, declare his or her assets and liabilities to the Office of the Ombudsman".

¹³⁸ Interview of the Judiciary with TI-Rwanda, Kigali, on 30 April 2025.

¹³⁹ Articles 90-91; 121; 149-156 of Law n° 014/2021 of 03/03/2021 determining statute of judges and judicial personnel, in *Official Gazette*, n° 08 of 08/03/2021.

¹⁴⁰ Interview with the Judiciary, conducted on 30 April 2025.

¹⁴¹ Law n° 09/2004 of 29/4/2004 relating to the code of ethics for the judiciary, in *Official Gazette*, n° 11 of 01/06/2004.

¹⁴² Law no 22/2018 of 29/04/2018 relating to the civil, commercial, labour and administrative procedure, in *Official Gazette*, n° Special of 29/04/2018, as amended by Law amending Law no 22/2018 of 29/04/2018 relating to the civil, commercial, labour and administrative procedure, in *Official Gazette*, n° 18 of 17/05/2021

¹⁴³ Article 2, 5°; article 3, 2° and article 3, 5° of Law n° 55/2021 of 29/08/2021 on declaration of assets.

There are measures in place aimed at guaranteeing transparency in the court process, for example, by allowing the public and media to access court proceedings and by facilitating access to court judgements. Law n° 22/2018 of 29/04/2018 relating to the civil, commercial, labour and administrative procedures, as amended to date¹⁴⁴, and Law n° 027/2019 of 19/09/2019 on Criminal Procedure, provide that such hearings are conducted in public.¹⁴⁵ However, the court may conduct the hearing in camera if it believes it could harm public order or morals, or whenever the judge deems it necessary. Additionally, article 71 of Law n° 22/2018, of 29/04/2018, establishes requirements for audiovisual coverage of court proceedings. Most court judgments are posted on the website of the Judiciary for public use.¹⁴⁶

There are adequate procedures in place governing the assignment and distribution of cases to safeguard against undue interference. The President of each Court is entrusted with assigning and distributing cases to Judges, safeguarding judicial officers from any undue interference.

Furthermore, the Integrated Electronic Case Management System (IECMS) has been established and offers numerous benefits, primarily improving access to justice, streamlining case processing, and enhancing citizen-centered justice. Key advantages include online case filing, improved case tracking, and reduced delays and costs associated with the judicial process.¹⁴⁷

Prosecution Services

Constitutional and legal frameworks ensure the independence and integrity of the National Public Prosecution Authority (NPPA). Article 146 (4) of the Constitution of the Republic of Rwanda provides that “prosecutors are independent from parties and judges”. Moreover, article 42, paragraph 1, of Law n° 014/2018 of 04/04/2018 determining the organization, functioning and competence of the National Public Prosecution Authority and of the Military Prosecution Department¹⁴⁸ provides that “in the prosecution, the Public Prosecution acts under the principle of discretion in the exercise of its function. Whenever it decides to prosecute, it prepares the case file and prosecutes in a competent Court”.

The NPPA has a department of inspection headed by the Inspector General, who is responsible for conducting regular evaluations of how prosecutors and other staff perform in their daily service delivery, including adherence to the principle of independence. The

¹⁴⁴ Article 70 of Law no 22/2018 of 29/04/2018 relating to the civil, commercial, labour and administrative procedure, as amended.

¹⁴⁵ Article 131 of Law n° 027/2019 of 19/09/2019 relating to criminal proceedings, in *Official Gazette*, n° Special of 08/11/2019, as amended by the Law n° 058/2023 of 04/12/2023 amending Law n° 027/2019 of 19/09/2019 relating to the criminal procedure, in *Official Gazette*, n° Special of 05/12/2023

¹⁴⁶ See the Judiciary “Case Law”, available at <https://decisia.lexum.com/rlr/kn/nav.do>, accessed on 05/05/2025.

¹⁴⁷ Interview with the Judiciary, conducted on 30 April 2025.

¹⁴⁸ Article 42 para 1 of Law n° 014/2018 of 04/04/2018 determining the organization, functioning and competence of the National Public Prosecution Authority and of the Military Prosecution Department, in *Official Gazette*, n° Special of 30/05/2018].

assignment and distribution of cases to prosecutors are carried out transparently through the IECMS system, which safeguards against undue interference.¹⁴⁹

However, the independence of NPPA, in some circumstances, is not absolute, as follows:¹⁵⁰

- The independence of the National Public Prosecution Authority is limited: the Minister in charge of Justice may, for public interest, issue written instructions to the Prosecutor General to undertake or drop a prosecution case. He or she may also, in cases of urgency and in the public interest, issue written instructions to any prosecutor to initiate or drop a prosecution and must inform the Prosecutor General accordingly, as provided for by Article 146 of the Rwandan Constitution and Article 25 of the Law determining the organization, functioning, and competence of the National Public Prosecution Authority and the Military Prosecution Department.
- The limited independence is also evidenced by the process of appointing or dismissing employees of the National Public Prosecution Authority, which the Minister of Justice carries out through the cabinet, although the initial proposal thereof comes from the High Council of Prosecution.

Members of the NPPA are governed by a special statute and are disciplined administratively in accordance with the provisions of that special statute¹⁵¹ and the law establishing the High Council of Prosecution as the competent disciplinary authority.¹⁵² The High Council of the National Public Prosecution Authority has the mission to provide general policy guidelines and to ensure the smooth functioning of the prosecution services throughout the country.

There are adequate measures in place to increase and ensure transparency and accountability in the selection, recruitment, training, performance management and removal of members of the NPPA.¹⁵³ Though prosecutors are required to declare their assets and interests, the process for determining a prosecutor's potential conflict of interest, as well as the steps that are required to be taken to address such conflict, are not clear. According to NPPA, a draft law on the ethics of NPPA staff is in the pipeline to address this issue. Article 3 of this law prohibits prosecutors from proceeding with cases where they may have a draft law on the

¹⁴⁹ Interview of NPPA with TI-Rwanda, Kigali, on 19 May 2025.

¹⁵⁰ Interview of NPPA with TI-Rwanda, Kigali, on 19 May 2025.

¹⁵¹ Law n°44 bis/2011 of 26/11/2011 governing the statute of the prosecutors and other staff of the National Public Prosecution Authority, in *Official Gazette* n°14 of 02/04/2012 as amended by Law n°12/2016 of 02/05/2016 modifying and completing Law n°44 bis/2011 of 26/11/2011 governing the statute of the prosecutors and other staff of the National Public Prosecution Authority, in *Official Gazette*, n°21 of 23/05/2016 and Law n°060/2016 of 11/01/2017 modifying and completing Law n°44 bis/2011 of 26/11/2011 governing the statute of the prosecutors and other staff of the National Public Prosecution Authority as modified and complemented to date, in *Official Gazette*, n° 04 of 23/01/2017.

¹⁵² Law n° 013/2018 of 04/04/2018 determining the organization, powers and functioning of the High Council of the National High Council of the National Public Prosecution Authority, in *Official Gazette*, n°16 of 16/04/2018.

¹⁵³ Articles 18 (4°), and 21, of Law n° 013/2018 of 04/04/2018 determining the organization, powers and functioning of the High Council of the National High Council of the National Public Prosecution Authority and articles 40-44 Law n°44 bis/2011 of 26/11/2011 governing the statute of the prosecutors and other staff of the National Public Prosecution Authority as modified and complemented to date.

ethics of NPPA staff in the pipeline to address this issue. Article 3 of this law prohibits prosecutors from proceeding with cases where they may have a conflict of interest.¹⁵⁴

Ensuring access to justice is a fundamental principle upheld by the prosecution service. Citizens have the right to be informed about the status and progress of their cases. Through both direct engagement with prosecutors and the use of the Integrated Electronic Case Management System (IECMS), individuals are guaranteed timely and accurate access to information, thereby promoting transparency, accountability, and public trust in the justice system. For example, Article 42 (paragraph 2) of Law n° 014/2018 of 04/04/2018 determining the organization, functioning and competence of the National Public Prosecution Authority and of the Military Prosecution Department, stipulates that “whenever the Public Prosecution decides not to prosecute, it closes the case file and informs the accused and the victim within a period not exceeding thirty (30) days”. In addition, the current version of the IECMS allows parties to a case to be automatically informed about the status of their case by receiving an automated message on their mobile phones.

Implementation in practice

Available evidence suggests that the codes of conduct and disciplinary mechanisms applicable to members of the judiciary are applied in practice and have resulted in disciplinary measures being taken. For example, from 2019 to 2025, three judges and two Court registrars were convicted of corruption and sentenced to imprisonment. They were dismissed indefinitely from the Judiciary by the High Council of the Judiciary. Furthermore, there is one judge and one Court registrar who are in custody over corruption. Their cases are still pending. From 2005 to 2025, 22 Judges and 30 court registrars were dismissed due to corruption and other related misconduct.¹⁵⁵

Furthermore, available evidence suggests that the disciplinary mechanisms applicable to members of the prosecution service are applied in practice and have resulted in disciplinary measures being taken. For example, eight staff members of the prosecution service were permanently dismissed as a disciplinary measure due to acts of corruption.¹⁵⁶

Good practices

- The use of the Integrated Electronic Case Management System (IECMS) to manage court cases and prosecution cases;
- The use of the Judicial Performance Management System (JPMS) in process of appraisals;
- Codes of conduct and disciplinary mechanisms for members of the judiciary and prosecution are in place, resulting in dismissals and convictions for corruption.

Deficiencies

- Though prosecutors are required to declare their assets and interests, the process for determining a prosecutor’s potential conflict of interest, as well as the steps that

¹⁵⁴ Interview of NPPA with TI-Rwanda, Kigali, on 19 May 2025.

¹⁵⁵ Interview with the Judiciary, conducted on 30 April 2025.

¹⁵⁶ Interview of NPPA with TI-Rwanda, Kigali, on 19 May 2025.

are required to be taken to address such conflict, are not clear. There is a draft law in the pipeline on the ethics of NPPA staff which will solve this problem;

- The independence of the National Public Prosecution Authority is limited.

4.1.11 Article 12 – Private Sector Transparency

Legal and Institutional Framework

Rwanda has put measures in place aimed at promoting transparency among private entities, including the publication of the identities of legal and natural persons involved in the establishment and management of corporate entities. Any person can request information from the Registrar General of the RDB at any time and receive information about the identities of legal and natural persons involved in the establishment and management of corporate entities.¹⁵⁷

Transparency requirements for beneficial ownership of legal entities are in place, ensuring the availability and accessibility of beneficial ownership information to relevant stakeholders and the public.¹⁵⁸ The Registrar General maintains a register of beneficial owner (B.O.) information for legal entities and companies.

However, beneficial ownership information is not available to the public. Such information is limited to the specific stakeholders as provided by the 3rd row of the annex to the ministerial order n° 03/09/ MINICOM of 08/05/2009, determining fees for the registration of companies' business activities.¹⁵⁹ There is an electronic registry (central register) of BO information, accessible only by those in accordance with Article 9 of Law n° 019/2023 of 30/03/2023, amending Law n° 007/2021 of 05/02/2021 governing companies.¹⁶⁰

Directors, representatives and direct owners of enterprises, as well as key data points on legal entities (for example, the date of establishment, company ID, address of registration, historical data of previous owners and directors, etc.) are accessible upon request to the Registrar General and after payment of Rwf 5,000 (US\$ 3.40).¹⁶¹

The law put in place mechanisms to ensure that the information included in the beneficial ownership registry is adequate, accurate, and updated. This includes the beneficial owner's

¹⁵⁷ Interview of RDB with TI-Rwanda, Kigali, on 23/05/2025.

¹⁵⁸ Article 116 (as amended) of Law n° 007/2021 of 05/02/2021 governing companies as amended by Law n° 019/2023 of 30/03/2023 amending Law n° 007/2021 of 05/02/2021 governing companies, in *Official Gazette*, n° Special *Bis* of 30/03/2023; articles 6-9 of Law n° 008/2021 of 16/02/2021 governing Partnerships as amended by Law n° 018/2023 of 30/03/2023; see also article 86 of Law n° 063/2021 of 14/10/2021 governing trust. See also RDB, "Registrar General Guidelines for identification of beneficial owners of legal persons and arrangements", October 2023.

¹⁵⁹ Interview of RDB with TI-Rwanda, Kigali, on 23/05/2025. See also the ministerial order no 03/09/ MINICOM of 08/05/2009 determining fees for Registration of Companies Business Activities, in *J.O*, n° Special of 08/05/2009: Searching the information in the trade register costs 5,000 Rwf.

¹⁶⁰ Article 9 provides that "Competent authorities have access to the central register of beneficial owners", but they are not defined who they are.

¹⁶¹ RDB, "Registrar General Guidelines for identification of beneficial owners of legal persons and arrangements", p. 37, para. 97.

information to be included in the internal register, recording any changes in beneficial ownership, and verifying the accuracy of the beneficial owners' information submitted by companies.¹⁶²

The laws governing private entities require the maintenance of books and records, the disclosure of financial statements, and adherence to accounting and auditing standards. They forbid:¹⁶³

- a) Off-the-books accounts;
- b) Making off-the-books or inadequately identified transactions;
- c) Recording non-existent expenditure;
- d) Entering liabilities with incorrect identification of their objects;
- e) Using false documents;
- f) Intentionally destroying bookkeeping documents earlier than foreseen by law.

Sanctions are imposed on private entities for failure to comply with relevant rules of the law.¹⁶⁴

Implementation in Practice

According to the RDB Report, from 2019 to 2023, around 83,800 domestic companies were registered; 241,324 individual enterprises were registered and 282 foreign companies were registered.¹⁶⁵ In 2024, the number of registered businesses increased by 23.8%, from 91,878 in 2023 to 113,748.¹⁶⁶

In October 2023, RDB issued the Guidelines for the identification of beneficial owners of legal persons and arrangements.¹⁶⁷ Being a new mechanism in trials, there are no official data on the status of the implementation of these guidelines.

When there are suspicions about beneficial owners or any fraud in the registration process, RDB collaborates with the Rwanda Investigation Bureau (RIB), which helps to investigate any suspicious corruption cases.¹⁶⁸

Good practices

- Clear legislation and guidelines on the declaration of BO information;

¹⁶² Articles 6-9 of Law n° 019/2023 of 30/03/2023 amending Law n° 007/2021 of 05/02/2021 governing companies.

¹⁶³ Article 111 of Law no 007/2021 of 05/02/2021 Governing Companies as amended by article 4 of Law n° 019/2023 of 30/03/2023 amending Law n° 007/2021 of 05/02/2021 governing companies; see also, Article 4 of Law n° 0082021 of 16/02/2021 Governing Partnerships.

¹⁶⁴ Chapter XVI, XVII of Law No 007/2021 of 05/02/2021 Governing Companies as amended.

¹⁶⁵ Rwanda Development Board, "RDB Annual Report 2023", p. 21, available at <https://rdb.rw/media/#publications>, accessed on 15/07/2025.

¹⁶⁶ Rwanda Development Board, "RDB Annual Report 2024", p. 15.

¹⁶⁷ RDB, "Registrar General Guidelines for identification of beneficial owners of legal persons and arrangements", October 2023.

¹⁶⁸ Interview of RDB with TI-Rwanda, Kigali, on 23/05/2025.

- Existence of mechanisms for updating and filing companies' information to the Registrar General;
- Collaboration with the Rwanda Investigation Bureau (RIB) in the investigation of any suspicious corruption case.

Deficiencies

- Despite maintaining an electronic central register of beneficial ownership information, it has controlled access for relevant stakeholders;
- Some company owners only comply with filing obligations after receiving multiple reminders from the Registrar General;
- There are recurring delays in compliance with legal requirements for filing company information.

4.1.12 Article 14 – Measures to Prevent Money-Laundering

Rwanda passed Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.¹⁶⁹ Rwanda also established the FIC as a specialized organ with the principal mission of conducting financial intelligence to prevent and counter money laundering, among other objectives.¹⁷⁰ In addition, there are other departments dealing with money laundering within the RIB, NPPA and the Office of the Ombudsman.¹⁷¹

Some examples of preventive measures in place include:

- a) Prohibition of fictitious banks and anonymous accounts¹⁷²
- b) Customer Identification¹⁷³
- c) Beneficial ownership¹⁷⁴
- d) Monitoring of suspicious transactions¹⁷⁵
- e) Record keeping¹⁷⁶
- f) Reporting persons¹⁷⁷
- g) Non-compliance with secrecy in money laundering cases¹⁷⁸

¹⁶⁹ Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction, in *Official Gazette*, n° Special Bis of 22/01/2025

¹⁷⁰ Law n° 74/2019 of 29/01/2020 establishing Financial Intelligence Centre, in *Official Gazette*, n° 06 of 17/02/2020, and Law no 045/2021 of 18/08/2021 governing the Financial Intelligence Centre, in *Official Gazette*, n° Special of 20/08/2021, amended by Law n° 002/2025 of 22/01/2025 amending Law n° 045/2021 of 18/08/2021 governing the Financial Intelligence Centre, in *Official Gazette*, n° Special *ter* of 22/01/2025.

¹⁷¹ Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction, in *Official Gazette*, n° Special Bis of 22/01/2025. This Law replaced Law n° 028/2023 of 19/05/2023 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.

¹⁷² Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction, Article 11.

¹⁷³ *Ibid*, Articles 12-13.

¹⁷⁴ *Ibid*, Article 35.

¹⁷⁵ *Ibid*, Article 32.

¹⁷⁶ *Ibid*, Article 21.

¹⁷⁷ *Ibid*, Article 8.

¹⁷⁸ *Ibid*, Article 10.

Implementation in Practice

Rwanda has strong legal and institutional frameworks for preventing money laundering. However, an FIC assessment found that some sectors need to improve their detection and preventive measures. This has been measured by the number of predicate offenses per level of risk. The ranking of predicate offences per risk was based on the amount of proceeds and prevalence. Based on the amount of proceeds, embezzlement tops the list, followed by fraud in 2nd place, then tax crime and cybercrime in 3rd and 4th place, respectively, which pose a high risk. Considering their prevalence in convictions, embezzlement, fraud, drugs and cyber-crimes were assessed as high risk. The other predicate offences assessed include corruption, human trafficking, environment and natural resources crimes, and terrorist financing due to their nature and impact on the national economy, security and citizens' lives.¹⁷⁹

According to FIC, over the past five fiscal years (July 2019 to June 2024), 44 money laundering cases were detected and investigated and 42 were prosecuted with nine convictions and confiscations totaling Rwf 780,934,906 (US\$ 537,520.00).¹⁸⁰ Other statistics related to money laundering cases are reflected in the tables below:

Table 5: Cases related to money laundering received between 2021-2024¹⁸¹

Year	Received cases	Number of accused			Number of prosecutions	Number of abandoned cases	Total	Pending	%
		Female	Male	Total					
2021 - 2022	7	2	9	11	3	1	4	3	57.1
2022 - 2023	8	0	13	13	6	2	8	0	100
2023 - 2024	12	8	13	21	11	0	11	1	91.7

Table 6: Status of convictions in cases related to money laundering between 2022 and 2024

Year	All cases	Number of accused			Number of convictions	Number of acquittals	Rate of convictions (%)
		Female	Male	Total			

¹⁷⁹ Financial Intelligence Centre, "National money laundering and terrorism financing risk assessment", Report, 2024, pp. 19-20.

¹⁸⁰ Ibid, p. 20.

¹⁸¹ The statistics available at the NPPA on money laundering cases and shared during the Interview with NPPA, Kigali, on 19 May 2025.

2021-2022	4	2	3	5	3	1	75
2022-2023	4	2	9	11	4	0	100
2023-2024	2	0	3	3	2	0	100

Some examples of good practices and deficiencies in the implementation of preventive anti-money laundering measures, detection and transfer of proceeds of the crime of money laundering are:¹⁸²

Good practices

- Establishment of FIC as a specialized organ to combat money laundering;
- Comprehensive legal framework on money laundering, including Law n° 001/2025;
- Rwanda has sent Mutual Legal Assistance requests to foreign countries to support investigations of money laundering.

Deficiencies

- Limited knowledge of investigators, prosecutors, and judges to ensure effective supervision and enforcement of anti-money laundering measures;
- Statistics on enforcement activity against money laundering are not published and thus not easily accessible in Rwanda due to the lack of a legal requirement.

¹⁸² Interview with NPPA, Kigali, on 19 May 2025.

4.2 Chapter V

4.2.1 Articles 52 and 58 – Anti-Money Laundering

Legal and Institutional Framework

As mentioned above, Rwanda established the FIC as a specialized body with the principal mission of conducting financial intelligence to prevent and counter money laundering.¹⁸³

In addition to preventive measures mentioned above, FIC issues advisories and notices on high-risk jurisdictions, transactions that need more scrutiny and targeted financial sanctions.¹⁸⁴ A reporting person must maintain all necessary records of transactions, both domestic and international, for at least 10 years following the completion of each transaction.¹⁸⁵

Implementation in Practice

Though there is a comprehensive legal framework on the prevention and punishment of money laundering, and the FIC serves as a specialized organ on the matter, there are still some deficiencies. Over the last five fiscal years (July 2019 to June 2024), 44 money laundering cases were investigated and 42 were prosecuted, leading to nine convictions with confiscations totaling Rwf 780, 934,906 (US\$ 537,520.00).¹⁸⁶

The report on the national money laundering and terrorism financing risk assessment identifies deficiencies in the DNFBP sector and the Forex Bureau within the financial sector. Additionally, there are still weaknesses in the quality of investigations, prosecutions, adjudications, and asset forfeitures.¹⁸⁷

According to this report, criminal investigations are well-coordinated with distinct roles of RIB, NPPA, and the Judiciary. However, challenges include insufficient training in handling money laundering cases, gaps in operating standards procedures for money laundering investigation and prosecution, limited investigative tools (particularly for cryptocurrency-

¹⁸³ Law n° 74/2019 of 29/01/2020 establishing Financial Intelligence Centre, in *Official Gazette*, n° 06 of 17/02/2020, and Law no 045/2021 of 18/08/2021 governing the Financial Intelligence Centre, in *Official Gazette*, n° Special of 20/08/2021, amended by Law n° 002/2025 of 22/01/2025 amending Law n° 045/2021 of 18/08/2021 governing the Financial Intelligence Centre, in *Official Gazette* n° Special *ter* of 22/01/2025.

¹⁸⁴ Financial Intelligence Centre, “Public notice », available at <https://www.fic.gov.rw/updates/public-notice>, accessed on 20/05/2025.

¹⁸⁵ Articles 20 (1) and 43 (f) of Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.

¹⁸⁶ Financial Intelligence Centre, “National money laundering and terrorism financing risk assessment”, Report, 2024, p. 20, available at https://www.fic.gov.rw/publications?tx_filelist_filelist%5Baction%5D=list&tx_filelist_filelist%5Bcontroller%5D=File&tx_filelist_filelist%5Bpath%5D=%2Fuser_upload%2FFIC%2FPublications%2FReports%2F&cHash=ffc6c46b0f69fce839754431035997c0, accessed on 20/05/2025.

¹⁸⁷ *Ibid*, p. 26.

related crimes) and insufficient skills to conduct parallel financial investigations of offenses linked to criminal proceeds.¹⁸⁸

Good practices

- Establishment of Financial Intelligence Centre (FIC) as a specialized organ;
- Well-coordinated criminal investigations with clear roles for RIB, NPPA, and the Judiciary;
- A strong legal regime that provides for robust preventive measures.

Deficiencies

- Weaknesses in the quality of investigations, prosecutions, adjudications, and asset forfeitures;
- Insufficient training, gaps in standard operating procedures, limited investigative tools, and lack of skills in financial investigations, especially for emerging crime types like cryptocurrency;
- Loopholes in regulating the Designated Non-Financial Businesses and Professions (DNFBPs) sector and the Forex Bureau within the financial sector.

4.2.2 Articles 53 and 56 – Measures for Direct Recovery of Property

Legal and Institutional Framework

Rwanda has legislation allowing for asset recovery by foreign authorities. In 2025, Law n° 42/2014 of 27/01/2015 governing the recovery of offence-related assets was enacted¹⁸⁹ and amended by Law n° 037/2021 of 28/07/2021,¹⁹⁰ with the purpose of determining the framework for cooperation between Rwanda and foreign States for the recovery of assets and benefits.¹⁹¹ This law provides for cooperation between Rwanda and foreign states in recovering Rwandan assets located abroad, returning assets of foreign states found in Rwanda, and facilitating the return of assets to a foreign country.¹⁹²

Rwanda established a specialist/dedicated unit for the recovery of the proceeds of corruption, known as the Civil Litigation Services Directorate (CLS). CLS is a Directorate General in the Ministry of Justice created by the Prime Minister's Order n° 061/03 of 01/06/2020, determining the mission, responsibilities, and organizational structure of the Ministry of Justice / Office of the Attorney General, salaries and fringe benefits of its employees.¹⁹³

¹⁸⁸ Financial Intelligence Centre, "National money laundering and terrorism financing risk assessment", Report, 2024, p. 30.

¹⁸⁹ Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets, in *Official Gazette*, n° 07 of 16 February 2015.

¹⁹⁰ Law n° 037/2021 of 28/07/2021 amending Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets, in *Official Gazette*, n° Special of 30/07/2021.

¹⁹¹ Article 1 (3°) of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

¹⁹² Article 18 and 19 of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

¹⁹³ Annex I of Prime Minister's Order n° 061/03 of 01/06/2020 determining mission, responsibilities, organizational structure of the Ministry of Justice / Office of the Attorney General, salaries and fringe benefits of its employees, in *Official Gazette*, n° Special of 21/02/2020.

It is headed by the Director General and Senior State Attorney. It staffs civil litigation analysts, senior state attorneys and civil litigation assistants/State Attorneys. The CLS assists the Attorney General in his major role as a representative of the Government in disputes of any kind to which it is party, be it national or international. It also assists in the recovery of court-ordered civil penalties, fines, damages, proceeds of corruption, embezzlements and court fees where the Government or its agencies are beneficiaries. The National Public Prosecution Authority transfers to the Ministry of Justice all final court judgments related to corruption and embezzlement that need enforcement for the purpose of asset recovery.

In the process of recovering government assets, the Ministry of Justice publishes a general list of those who owe the government money and have been convicted of various crimes, including corruption, on its website.¹⁹⁴

The States Parties to the UNCAC and their legal representatives are permitted to initiate legal proceedings in Rwandan courts and take legal actions. For States Parties and their legal representatives to do so, there is a mandatory security deposit as provided for by article 91 of Law no 22/2018 of 29/04/2018, which governs civil, commercial, labour and administrative procedure as amended. This general rule has two main exceptions:

1. In case there are existing bilateral agreements between foreign states and Rwanda that exempt their nationals from depositing such security;
2. Another exception applies in cases where the claimant files a claim with respect to their property (goods) of which they have been deprived, and after providing sufficient evidence thereof, foreign nationals are exempt from this security deposit.

There is a procedure to notify the concerned State Party of its right to stand and prove its claim. Under the mutual legal assistance framework, when a foreign state is identified as having a legitimate interest in a criminal matter such as asset recovery, Rwandan authorities notify the concerned state through diplomatic channels. This notification informs the state of its right to participate in the proceedings and to present its claim.¹⁹⁵

Rwanda also recognizes the right for victims from the States Parties to seek or recover compensation or damages under the conditions set out by article 91 of Law no 22/2018 of 29/04/2018, as long as they fulfill the requirement of the security deposit.

Rwanda's legal framework permits States Parties to seek various forms of damages, provided they can establish a direct and causal link between the harm suffered and the criminal conduct in question.¹⁹⁶

Types of Damages:

¹⁹⁴ The latest published list of people who owe the government debts arising from cases they lost at the final level can be found at MINIJUST, "Publication: Urutonde rw'abasabwa kwishyura Leta umwenda ukomoka ku manza batsinzwe", available at https://www.minijust.gov.rw/publications?tx_filelist_filelist%5Baction%5D=list&tx_filelist_filelist%5Bcontrolle r%5D=File&tx_filelist_filelist%5Bpath%5D=%2Fuser_upload%2FMinijust%2FPublications%2FAbabereyemo_Let a_umwenda_Ukomoka_ku_manza%2F&cHash=1ad27b53cb6dfe05a9cb0d82836a0c57, accessed on 20/2025.

¹⁹⁵ Article 22-23 of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

¹⁹⁶ Interview with MINIJUST, conducted on 15 May 2025.

- Loss or damage to property;
- Economic losses directly resulting from the offense;
- Costs incurred for medical or psychological treatment;
- Expenses related to necessary transportation and accommodation due to the offense;
- Loss of profit.

Implementation in Practice

Though there is the Law governing recovery of offence related assets and a dedicated unit for the recovery of the proceeds of corruption (Civil Litigation Services Directorate), the assessment carried out by the Financial Intelligence Centre identified the following gaps in relation to asset recovery: *“Competent authorities do not efficiently pursue provisional measures and the confiscation of proceeds and property, lack clear guidance on managing seized assets, and the insufficient human resource responsible for asset seizure. While pursuing confiscation for domestic offenses, property of corresponding value has not been seized, and there is no focus on recovering proceeds moved abroad”*.¹⁹⁷

An amount of money equivalent to more than Rwf 9 billion (approximately US\$ 6,194,727.00) is considered non-refundable due to different reasons. For example, most convicted persons are insolvent and do not have any property to be auctioned. Some may have properties, but they are pending in banks as collateral, and the banks have the privilege to be paid first. For some convicts, it is very difficult to trace the properties of foreigners when they are convicted, but their properties are not in Rwanda, and some convicted persons died before recovering their debt to the government.¹⁹⁸

Some examples of good practices and deficiencies related to the measures for direct recovery of property have been identified. They include:¹⁹⁹

Good practices

- Adoption of a dedicated legal framework and establishment of a specialized unit to support recovery efforts;
- Victims from States Parties may seek compensation or damages under Rwandan law, including for loss of property, economic losses, medical or psychological treatment costs, and other directly linked harms, provided they fulfil the security deposit requirement.

Deficiencies

- A large amount of money is considered non-refundable due to the insolvency of convicts, untraceable properties of convicted foreigners or convicts who died before the government recovers its debt;

¹⁹⁷ Financial Intelligence Centre, “National money laundering and terrorism financing risk assessment”, Report, 2024, p. 31.

¹⁹⁸ Interview with MINIJUST, conducted on 15 May 2025.

¹⁹⁹ Interview with MINIJUST, conducted on 15 May 2025.

- Limited efficiency in pursuing provisional measures and confiscation, a lack of clear guidelines on managing seized assets and insufficient human resources responsible for asset seizure.

4.2.3 Article 54 – Confiscation Tools

Legal and Institutional Framework

There are tools to secure the assets. Rwanda has measures in place to identify, trace, evaluate, seize, freeze and confiscate the following, without prejudicing the rights of bona fide third parties:²⁰⁰

- Property laundered;
- Proceeds from, or instrumentalities used in or intended for use in money laundering or predicate offences;
- Property that is the proceeds of, or used in, or intended or allocated for use in, the financing of terrorism, terrorist acts or terrorist organizations, or;
- Property of corresponding value.

Certain conditions apply to the enforcement of foreign requests and orders in Rwanda. The power to enforce foreign judgments in Rwanda is vested in the High Court, which executes these judgments when:

- The foreign judgment does not contradict public order or basic legal tenets of Rwandan public law;
- If the case was finally heard and determined in accordance with the laws of the country of origin;
- If a copy of the judgment is by all means authentic in accordance with laws of that country and final (it must be notarized by the Embassy of the requesting country and the Rwandan Embassy in the requesting Country and then verified by the Foreign Ministry of Rwanda);
- If the right of defense was respected.

Rwanda recognises orders issued under different legal traditions on the principles of comity and reciprocity (free will or mutual trust).²⁰¹ Moreover, foreign non-conviction-based confiscation orders can be enforced domestically provided they fulfil the conditions required.²⁰²

Implementation in Practice

From 2019 to 2024, Rwanda sent 16 requests for confiscation to foreign countries while it received one request.²⁰³ However, MINIJUST did not provide details about the cases.

²⁰⁰ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²⁰¹ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²⁰² See article 11 of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

²⁰³ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

In general, the statistics on enforcement of confiscation tools such as the number of freezing procedures (based on a court order), the number of confiscation procedures, the number of requests received for freezing orders from another country, the value of frozen assets, the number of requests received for confiscation orders from another country, the value of confiscated assets and the amounts returned are not well documented by MINIJUST.

Good practices

- Existence of a comprehensive legal framework for asset confiscation.

Deficiencies

- Lack of compiled statistics on the enforcement of confiscation.

4.2.4 Articles 51, 54, 55, 56 and 59 – International Cooperation for the Purpose of Confiscation

Legal and Institutional Framework

As mentioned above, the CLS Directorate General is a dedicated single department within the Ministry of Justice mandated to coordinate international asset recovery cases. This Directorate General is equipped with adequate staff and resources to fulfill its mandate effectively. In the execution of requests related to international asset recovery, CLS collaborates with the Ministry of Foreign Affairs and International Cooperation through the Unit in charge of Records Management, and the National Public Prosecution Authority through the International Crimes Unit (ICU) within the International Crimes Department.

In the absence of a bilateral agreement on mutual legal assistance, Rwanda may use UNCAC as the treaty basis for mutual legal assistance for confiscation purposes, depending on the nature of the requests.²⁰⁴ Furthermore, the Law n° 42/2014 of 27/01/2015 provides for the seizure of property upon foreign requests, and the enforcement of foreign seizure and confiscation orders (articles 27-28).

Rwanda uses the Ministry in charge of Foreign Affairs as the Central Authority in the transmission and execution of requests for MLA, which it transmits to the National Public Prosecution Authority as the competent authority and the Ministry of Justice for noting²⁰⁵.

Rwanda has engaged in both bilateral and multilateral agreements to enhance international cooperation in asset recovery. These agreements provide a framework for cooperation in criminal matters, including asset recovery, by facilitating the exchange of information and assistance in investigations and prosecutions.²⁰⁶

Bilateral agreements: Rwanda has signed bilateral agreements to facilitate mutual legal assistance and asset recovery with nine countries, namely; Angola (2022), Ethiopia (2017),

²⁰⁴ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²⁰⁵ See articles 6- 7 of Law n° 005/2021 of 05/02/2021 governing mutual legal assistance, in *Official Gazette*, n° 04 bis of 08/02/2021.

²⁰⁶ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

Guinea (2024), Kenya (1990), Mali (2024); Morocco (2019), Mozambique (2022), Uganda (2023) and Zimbabwe (2021).

Multilateral agreements: Rwanda has committed to several multilateral initiatives to bolster international cooperation in asset recovery, as follows:

- **United Nations Convention Against Corruption (UNCAC):** As a signatory, Rwanda adheres to the provisions of UNCAC, which include measures for asset recovery and international cooperation in criminal matters;
- **Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG):** Rwanda is a member of ESAAMLG, a regional body that promotes effective implementation of international standards against money laundering and the financing of terrorism, facilitating cooperation among member states in asset recovery efforts;
- **Financial Action Task Force (FATF):** Rwanda's participation in FATF's mutual evaluation process reflects its commitment to implementing international standards in combating money laundering and terrorist financing, which are crucial for effective asset recovery.

Implementation in Practice

From 2019 to 2024, Rwanda sent 16 confiscation requests to foreign countries while it received one request.²⁰⁷ However, MINIJUST did not provide details about the cases.

For a period of more than 10 years, since 2014 up to the end of March 2025, the Ministry of Justice was able to recover Rwf 14,982,643,944 (=US\$ 10,312,599.0) and materials with a total value of Rwf 100,994,000(=US\$ 69,480.10).²⁰⁸

Some examples of good practices and deficiencies related to international cooperation for the purpose of confiscation have been identified. They include:²⁰⁹

Good practices

- Engagement on bilateral and multilateral agreements;
- Strong legal framework (Law on asset recovery of 2015, amended in 2021);
- Existing coordination among mandated institutions, such as the judiciary, FIC, CLS at MINIJUST, ICU at NPPA, and the Ministry of Foreign Affairs and International Cooperation.

Deficiencies

- There is a weak cooperation and assistance of foreign countries in conducting investigations into cases involving public funds that were diverted or converted into other assets and hidden abroad.

4.2.5 Article 57 – The Return and Disposal of Confiscated Property

²⁰⁷ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²⁰⁸ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²⁰⁹ Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

Legal and Institutional Framework

Law n° 42/2014 of 27/01/2015 governing the recovery of offence-related assets provides for cooperation between Rwanda and foreign States in recovering its assets in foreign countries, returning assets of foreign States on its territory, and returning assets to a foreign country.²¹⁰ This Law also provides for the allocation of confiscated assets. The decision of the court ruling on criminal matters involving seized assets shall determine the allocation of the confiscated assets. Such allocation may be as follows:²¹¹

- 1° to be deposited with the public treasury;
- 2° to be transferred to a public entity;
- 3° to be transferred to any other organ;
- 4° such other allocation as may be determined.

Implementation in Practice

However, during the interview with the MINIJUST, little information was provided on the implementation of these legal provisions. For example, there is no information about the amount returned, though it was indicated that MINIJUST received one request for freezing orders from another country. Furthermore, there is no information related to the disposal of confiscated property. The fate of confiscated properties remains unclear. With the lack of this information, it is difficult to assess the implementation of Article 57 of UNCAC in Rwanda.

MINIJUST mentioned though that there are capacity building initiatives of the employees of the Judiciary, RIB, NPPA, MINIJUST, FIC and the Ministry of Foreign Affairs and International Cooperation (MoFA) and a coordination team from these institutions has been established to facilitate the sharing of information asset recovery, confiscation, international cooperation for the purpose of confiscation and the return and disposal of confiscated Property.²¹²

Some examples of good practices and deficiencies related to the international cooperation for the purpose of confiscation have been identified. They include:²¹³

Good practices

- Strong legal framework (Law on asset recovery of 2015 amended in 2021);
- Institutions have been strengthened (Judiciary, RIB, NPPA, MoFA, MINIJUST, FIC);
- Capacity building initiatives and inter-institutional coordination for asset recovery and confiscation.

²¹⁰ Article 18 and 19 of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

²¹¹ Article 9 of Law n° 42/2014 of 27/01/2015 governing recovery of offence-related assets.

²¹² Interview of MINIJUST with TI-Rwanda, Kigali, on 15 May 2025.

²¹³ Interview with MINIJUST, conducted on 15 May 2025.

Deficiencies

- Lack of publicly available information on the implementation of legal provisions regarding the return and disposal of confiscated property;
- Lack of compiled statistics about the number of requests received for confiscation orders from another country, the value of confiscated assets, and the amounts returned.

4.3 Statistics²¹⁴

4.3.1 Money Laundering

Reporting/Intelligence Phase	Year: 2021	Year: 2022	Year: 2023
Number of Suspicious Transaction Reports (STRs) filed by each category of obliged entities: - Banks and financial institutions - Non-financial businesses and professions (NFBPs)	n/a	n/a	789 ²¹⁵
Number of postponement orders adopted on reported transactions	n/a	n/a	n/a ²¹⁶
Number of money laundering investigations carried out independently by law enforcement agencies (without a prior STR)	162	125	150
Number of suspicious cash activities at the border reported to the FIU (including those based on declarations and smuggling)	0	0	0 ²¹⁷

²¹⁴ The tables below follow the format in Eurostat report “Money laundering in Europe” (2013), available at: <http://ec.europa.eu/eurostat/documents/3888793/5856465/KS-TC-13-007-EN.PDF/69cde077-3bd9-4d0d-8c19-a6fe3608c2cd>, accessed on 1 July 2025.

²¹⁵ 2021/22 and 2022/23, the FIC received 789 STRs, of which 84% came from banks, distantly followed Money Value Transfers Services (MVTs) providers, whose reports accounted for 15% of total reports received over the period. It is not specified the number of STRs received in each year that is why we use “n/a” in 2022 and 2021. Most of the reporting institutions, including DNFBPs, have not submitted STRs. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 48, no 154.

²¹⁶ Though it is reported that FIC received 789 STRs, it is not reported whether FIC adopted postponement orders on reported transactions.

²¹⁷ From 2021-2023, the FIC received 1,630 declarations related to cash activities at the border. However, no suspicious cash activities were reported. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 49, no 158.

Number of STRs sent to law enforcement and on which further analysis was made	0	0	40 ²¹⁸
Number of staff dedicated full-time (or full-time equivalent) to money laundering in the FIU	9	9	9

Investigation Phase	Year: 2021	Year: 2022	Year: 2023
Number of cases initiated by law enforcement agencies on the basis of STRs sent by the FIU	0	0	26
Number of staff dedicated full-time (or full-time equivalent) to money laundering in law enforcement agencies	24	24	24
Number of cases brought to prosecution: originating from STRs, CTRs and independent law enforcement investigations	0	0	5

Judicial Phase	Year: 2021	Year: 2022	Year: 2023
Number of staff dedicated full-time (or full-time equivalent) to investigating money laundering in the judiciary	0	0	0 ²¹⁹
Number of persons/legal entities convicted for money laundering offences	1	1	0
Number of convictions for laundering proceeds of crimes committed abroad	0	0	0
Number of convictions for crimes other than money laundering originating from STRs	0	0	0
Number of sentences by type for money laundering offences	1 (self ML)	1 (standalone ML)	0
Number of unsuspended custodial sentences by length (as principal offence, as predicate offence)	0	0	0

²¹⁸ From 2021 to 2023, RIB accesses 40 financial intelligence reports and other financial information from FIC. However, the number of reports is not specific for each year. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 47, no 152.

²¹⁹ The Judiciary does not do investigation in Rwanda. The investigation is done by RIB and NPPA.

4.3.2 Asset Recovery

Judicial Phase	Year: 2021	Year: 2022	Year: 2023
Number of freezing procedures (based on a court order)	0	0	0
Number of confiscation procedures	20	22	18 ²²⁰
Number of requests received for freezing orders from another country	1	0	0
Value of frozen assets	USD 3,140,726.00 ²²¹	USD 1,514,085.00	0
Number of requests received for confiscation orders from another country	0	0	0
Value of confiscated assets	USD 225,728.00	USD 195,589.00 ²²²	0
Amounts recovered from assets	Rwf 3,348,701,564 (USD 2,304,921.00)	Rwf 1,780,324,311 (USD 1,225,403.00)	Rwf 2,855,911,049 (USD 1,965,732.00)
Amounts returned	0	0	0

4.4 Short analysis

In 2021/22 and 2022/23, FIC received 789 Suspicious Transaction Reports (STRs), of which 84% came from banks, distantly followed by Money Value Transfers Services (MVTs) providers, whose reports accounted for 15% of total reports received over the period. The number of STRs received in each year is not specified; that is why all the STRs were indicated in 2023 and “n/a” in 2022 and 2021. Most of the reporting institutions, including DNFBPs, have not submitted STRs. It is not clear whether DNFBPs have never reported STRs. Furthermore, although it is reported

²²⁰ From 2021-2023, the information accessed by RIB from Rwanda Revenue Authority led to 42 confiscation procedures. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 47, no 152.

²²¹ According to FIC, it froze EUR 28,391 and USD 313,425.59 in 2021 and RIB froze USD 232 180.41 and USD 201 179.92 in 2021 and 2022 respectively basing on the information obtained from Rwanda Revenue Authority. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 47, no 149-152.

²²² The information accessed by RIB from Rwanda Revenue Authority led to confiscation of assets worth USD 225,728 and USD 195,589 in 2021 and 2022 respectively. See Eastern and Southern Africa Anti-Money Laundering Group, “Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report”, July 2024, p. 47, no 152.

that FIC received 789 STRs, it is not reported whether FIC issued postponement orders for those transactions.

The FIC has only nine officers in the Analysis Department, including the Head of Department, one IT person dedicated to the department, and one officer dedicated to Strategic Analysis, which currently supports its mandate adequately. However, given the number of reports FIC receives, they may not be able to handle their workload effectively.

The Judiciary does not have staff dedicated full-time to investigating money laundering in the judiciary. However, each Intermediate Court has a specialized chamber that handles money laundering cases.

The Ministry of Justice reported the amounts recovered, but no information on asset recovery cases could be obtained for this report.

In general, the statistics on enforcement of anti-money laundering measures show that there are still deficiencies related to the reporting and compilation of data. TI-Rwanda contacted NPPA, MINIJUST, and FIC as the main institutions holding such data, and it was somehow difficult to get the information needed, mainly due to a lack of compiled reports. Some data were obtained through the interviews (ie, MINIJUST) and others, TI-Rwanda had to consult reports from other institutions that conducted similar research. For example, all statistics on FIC's work were obtained from a Mutual Evaluation Report, published by the Eastern and Southern Africa Anti-Money Laundering Group,²²³ after consultations with FIC on the use of that report. FIC confirmed that the data could be used as they were published, to avoid discrepancies between the data they hold today and the data published.

There should be a coordination team that coordinates the work of MINIJUST, FIC, NPPA and RIB on asset recovery, confiscation, international cooperation for the purpose of confiscation and the return and disposal of confiscated Property. This team could regularly compile the data on the number of freezing procedures (based on a court order), the number of confiscation procedures, the number of requests received for freezing orders from another country, the value of frozen assets, the number of requests received for confiscation orders from another country, the value of confiscated assets and the amounts returned in a harmonized way to avoid contradictions between MINIJUST, NPPA and FIC.

No information on asset recovery cases has been found.

²²³ See Eastern and Southern Africa Anti-Money Laundering Group, "Anti-Money Laundering and counter terrorist financing measures Rwanda: Mutual Evaluation Report", July 2024.

V. Recent Developments

In the implementation of Chapters II and V, Rwanda has made some progress, including the following:

- In 2021, the Office of the Ombudsman issued guiding standards for putting in place institutional anti-corruption measures, including the **establishment of anti-corruption committees in all public and private institutions and NGOs**. While these committees have been widely established, their effectiveness depends on resources, training and independence.
- **The Rwanda anti-corruption policy adopted in 2012 is under review** and has already been technically approved by NACACI. The revised policy is expected to update preventive measures to reflect current corruption trends.
- A new law governing the Office of the Ombudsman was promulgated in 2021 (Law n° 54/2021 of 29/08/2021). This **law deprived the Office of the Ombudsman of the powers of investigation and prosecution**. It is debatable whether it is progressive or regressive because a part of the Office would now function primarily as a mediator or advisory body, focused on resolving disputes and providing guidance rather than taking punitive action.
- Since 2021, there has been a **specific Law on asset declarations** (Law n° 55/2021 of 29/08/2021). This Law provides the details on the mechanisms of asset declaration.
- **Public procurement** has also undergone legal reforms including the promulgation of the Law n° 031/2022 of 21/11/2022 and its implementing orders/regulations, such as the Ministerial Order n° 001/23/10/ TC of 10/10/2023 and e-procurement was upgraded and launched as UMUCYO. The new law also introduced mandatory beneficial ownership disclosure in procurement processes.
- In the field of **private sector transparency**, improvements have been made in the implementation of measures to promote transparency among private entities since 2023, such as the mandatory requirement of beneficial ownership for both legal and natural persons involved in the establishment and management of corporate entities at the time of registration of a company.
- **To prevent and combat money-laundering efficiently**, a new law was published in 2025 (the Law n° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing, and the financing of proliferation of weapons of mass destruction), and since 2021, Rwanda has established the Financial Intelligence Centre (FIC).

The Office of the Ombudsman has broadened its role by carrying out audits between 2022 and 2024 in sectors such as mining, healthcare and agricultural exports. These exercises pointed to irregularities in areas including service delivery, financial management and compliance. In parallel, the Office has continued awareness-raising through annual anti-corruption weeks, training programmes and outreach to schools and youth clubs.

Asset recovery work has proceeded under Law n° 42/2014 of 27/01/2015, as amended by Law n° 037/2021 of 28/07/2021. The Civil Litigation Services Directorate within MINIJUST is in charge of these cases. According to government figures, between 2014 and March 2025, about Rwf 14.98

billion (approximately USD 10.3 million) in assets and Rwf 101 million (approximately USD 70,000) in cash were recovered. To strengthen coordination, a team bringing together MINIJUST, NPPA, RIB and the FIC has been established.

Several recommendations from the first and second UNCAC review cycles have been acted upon, such as the adoption of a law on asset declarations, reforms to the procurement framework and the establishment of the FIC. Others remain pending, including the need to strengthen whistleblower protection, to improve verification of asset declarations, to clarify sanctions in political financing and to enhance cooperation with foreign jurisdictions on asset recovery.

VI. Recommendations

To strengthen the implementation of the UNCAC Chapters II and V in Rwanda, it is crucial to enhance integrity in the public sector, reinforce law enforcement, and improve financial transparency, anti-money laundering mechanisms, and asset recovery. Accordingly, we recommend the following measures:

1. Preventive Anti-Corruption Policies and Practices

- Strengthen the capacity and effectiveness of anti-corruption committees through continuous professional development, technical support.
- Develop and disseminate tailored educational materials designed to reach individuals with limited literacy or formal education, ensuring inclusivity and broader public awareness.
- Empower citizen engagement and reporting mechanisms by promoting accessible, confidential, and user-friendly channels for reporting suspected corruption.

2. Preventive Anti-Corruption Body or Bodies

- Increase the budget and human resource capacity dedicated to the Office of Ombudsman to enable the office to carry out its mandate effectively.
- Amend Law n° 54/2021 of 29/08/2021 governing the Office of the Ombudsman to ensure that the institution has adequate authority and resources to effectively fulfil its anti-corruption mandate, including in prevention, oversight and enforcement.

3. Public Sector Employment

- Encourage recruiting institutions to comply with recruiting laws and to adhere to the NPSC's guidance to avoid court cases that result in significant financial costs to the government.
- Strengthen capacity-building initiatives and training on professionalism, human resource management and accountability within the public service.
- Empower the NPSC to audit all post-recruitment reports submitted by institutions, ensuring compliance with established recruitment procedures and standards.

4. Political Financing

- Amend Organic Law n°10/2013/OL of 11/07/2013 governing Political Organizations and Politicians to determine the fate of funds that have been received illegally. The amendment should include clear provisions outlining the legal consequences and procedures for handling the fate of such funds, including seizure, confiscation, and restitution.

- Introduce a requirement for senior officials of political organizations (such as chairpersons and deputies) to declare their assets, in line with transparency and accountability standards applied to other public officials.

5. Codes of Conduct, Conflicts of Interest and Asset Declarations

- Improve the implementation of codes of conduct and conflict of interest policies, and ensure compliance with requirements for the declaration of assets and interests by establishing focal points or units within the executive and legislative branches responsible for setting standards for ethical behaviour.
- Increase the number of staff of the Office of the Ombudsman in charge of asset declarations for the effective verification of asset declarations.

6. Reporting Mechanisms and Whistleblower Protection:

- Increase awareness among rural citizens of their rights as whistleblowers and the available reporting mechanisms.
- Amend the law on whistleblowers to allow individuals to disclose information anonymously, encouraging reporting without fear of retaliation.
- Adopt a Presidential Order that establishes the modalities for implementing protection and reward.
- Encourage all institutions (public and private) to officially appoint a focal point to receive disclosures.

7. Public Procurement

- Increase the number of RPPA staff with sufficient professional qualifications.
- Put in place mechanisms to minimize the frequency of job changes among procurement staff.
- Put in place the standard documents for non-consulting services, framework contract.
- Amend the legal framework to include the protection of casual laborers and the powers of the IRP, among others.
- Strengthen quality assurance by providing technical training and developing clear technical specifications and Terms of Reference as means to avoid the delivery of poor quality goods.
- Put in place the mechanisms to prevent delays in contractual execution and in the payment of government suppliers and contractors by procuring entities.

8. Management of Public Finances

- Increase capacity building in financial management and auditing across public institutions to enhance accountability and fiscal discipline.

- Promote greater awareness and public participation in national planning and budgeting processes to ensure citizen inclusivity.
- Enhance transparency in the defense budget by ensuring financial information is disclosed in line with the standards applied to other ministries.
- Strengthen the enforcement and expertise of audit recommendations and establish clear accountability mechanisms to ensure the proper execution of public finances and promptly address irregular and unlawful expenditures.
- Improve the implementation of anti-corruption measures to effectively prevent and deter embezzlement of public funds and fraudulent procurement practices.

9. Access to Information and the Participation of Society

- Amend Law no 04/2003 of 08/02/2013 relating to access to information to include clear definitions of key terms such as *public order*, *good morals*, *secret*, *confidential* and *restricted information* within the context of the right to access to information. The amendment should also introduce provisions on penalties for non-compliance, as well as establish clear mechanisms for individuals whose information requests are denied or only partially granted to file complaints or appeals.
- Hold inclusive consultations with civil society organizations to review Law no 058/2024 of 20/06/2024 governing non-governmental organisations and amend it as needed to clearly define the Board's mandate, safeguard CSOs' operational independence, and strengthen their ability to participate meaningfully in public life.

10. Judiciary and Prosecution Services

- Speed up the adoption of the law on the ethics of NPPA staff to address the process for determining a prosecutor's potential conflict of interest, as well as the steps that are required to be taken to address such a conflict.
- Improve the independence of the National Public Prosecution Authority, which is constrained by the Minister of Justice's injunctions on whether to prosecute or drop the case.

11. Private Sector Transparency

- Increase awareness among company owners of the mechanism of beneficial ownership and the need to comply with the legal requirement to file company information.
- Ensure systematic enforcement of beneficial ownership disclosure requirements across both company registration and public procurement processes, and implement effective sanctions for delays or refusals to submit information.

12. Measures to Prevent Money-Laundering

- Organize capacity building trainings for investigators, prosecutors, and judges to ensure effective supervision and enforcement of anti-money laundering measures.

- Publish statistics on enforcement activity related to money laundering and make them accessible to the public.

13. Anti-Money Laundering

- Improve the quality of investigations, prosecutions, adjudications, and asset forfeitures.
- Increase training in financial investigations, especially for emerging crime types such as cryptocurrency.
- Improve the regulation of the Designated Non-Financial Businesses and Professions (DNFBPs) sector and the Forex Bureau within the financial sector.

14. Measures for Direct Recovery of Property

- Establish clear mechanisms on how to recover assets from insolvent convicts, convicted foreigners or convicts who died before the government recovers its debt.
- Put in place clear guidelines on the management of seized assets.
- Increase staffing, train personnel responsible for asset seizure and recovery and develop clear standard operating procedures to improve efficiency.

15. Confiscation Tools

- Compile and publish statistics and reports about the number of requests received for confiscation orders from another country, the value of confiscated assets and amounts returned.

15. International Cooperation for the Purpose of Confiscation

- Improve assistance from foreign countries in conducting investigations into cases involving public funds that were diverted or converted into other assets and hidden abroad.
- Establishment of a coordination team between MINIJUST, FIC, NPPA and RIB to coordinate the work on asset recovery, confiscation, international cooperation for the purpose of confiscation and the return and disposal of confiscated property.
- Enhance international cooperation and ensure that MINIJUST systematically compiles and publishes detailed statistics on international confiscation requests and outcomes.

17. The Return and Disposal of Confiscated Property

- Ensure transparency by regularly publishing detailed information on the implementation of legal provisions regarding the return and disposal of confiscated property, including how assets are allocated or disposed of.
- Compile and make publicly available statistics on confiscation requests from foreign countries, the value of confiscated assets, and amounts returned.

18. Oversight Institutions

- Provide sufficient financial and human resources to oversight bodies such as the Office of the Ombudsman, the Rwanda Public Procurement Authority, and the Financial Intelligence Centre to enable them to carry out their mandates effectively.

VII. Annex

7.1 Table on Freedom of Information Requests

Identification number	Institution	Date of request	Date of answer	Information requested	Information provided
N° O1.S/04/2025/cn/TI-RW	NPPA	24 April 2025	14 May 2025	Status, successes, challenges and lessons learnt of the investigation and prosecution of money laundering in Rwanda	Statistics on money laundering cases were provided
N° O1.S/04/2025/cn/TI-RW	FIC	24 April 2025	8 May 2025	Status, successes, challenges and lessons learnt on the prevention, detection and investigation of money laundering offences and existing mechanisms	Requested information was provided, excluding statistics
N° O1.S/04/2025/cn/TI-RW	Judiciary	24 April 2025	30 April 2025	Status, successes, challenges and lessons learnt on measures to strengthen integrity and to prevent opportunities for corruption among members of the judiciary	Requested information was provided
N° O1.S/04/2025/cn/TI-RW	MIFOTRA	24 April 2025	15 May 2025	Status, successes, challenges and lessons learnt on integrity, transparency and accountability in the public sector employment.	Requested information was provided

N° O1.S/04/2025/cn/TI- RW	MINECOFIN	24 April 2025	5 May 2025	Status, successes, challenges and lessons learnt on the management of public finance	Requested information was provided
N° O1.S/04/2025/cn/TI- RW	MINIJUST	24 April 2025	15 May 2025	Status, successes, challenges and lessons learnt on assets recovery and international cooperation for the offenses related to corruption and money laundering	Requested information was provided
N° O1.S/04/2025/cn/TI- RW	Office of the Ombudsman	24 April 2025	22 May 2025	status, successes, challenges and lessons learnt on the Implementation of preventive anti- corruption policies and practices	Requested information was provided
N° O1.S/04/2025/cn/TI- RW	RDB	24 April 2025	22 May 2025	Status, successes, challenges and lessons learnt on transparency in the private sector and other preventive anti- corruption policies and practices	Requested information was provided
N° O1.S/04/2025/cn/TI- RW	RGB	24 April 2025	7 May 2025	Status, successes, challenges and lessons learnt on transparency in pollical funding and existing mechanisms of detection and prevention of	Requested information was provided

				corruption in political funding	
N° O1.S/04/2025/cn/TI-RW	RPPA	24 April 2025	5 May 2025	Status, successes, challenges and lessons learnt on the public procurement transparency and integrity in Rwanda	Requested information was provided
N° O1.S/04/2025/cn/TI-RW	NFPO	24 April 2025	29 April 2025	status, successes, challenges and lessons learnt on transparency in political funding and existing mechanisms of detection and prevention in political funding	Requested information was provided
N° O1.S/04/2025/cn/TI-RW	OAG	24 April 2025	8 May 2025	Status, successes, challenges and lessons learnt on the management of public finance	Requested information was provided

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