

## Rwanda: Civil Society Report

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

7 November 2025

This is the executive summary of a civil society parallel report from November 2025 by Transparency International Rwanda<sup>1</sup> reviewing Rwanda's implementation and enforcement of selected articles in UN Convention against Corruption (UNCAC) Chapters II (Preventive Measures) and V (Asset Recovery). The report was supported by the Global Civil Society Coalition for the UNCAC<sup>2</sup> and is a contribution to the UNCAC peer review process of Rwanda covering those two chapters. The full report is available on the Coalition's website.<sup>3</sup>

Rwanda has established robust legal and institutional frameworks in recent years. However, challenges in enforcement, transparency, statistical reporting, verification of asset declarations, and protection for whistleblowers continue to pose obstacles to the effective implementation of key provisions under UNCAC Chapters II and V.

### Assessment of the Review Process

Did the government disclose information about the country focal point?	Yes	The Deputy Ombudsman in charge of Preventing and Fighting Corruption. <sup>4</sup>
Was the review schedule published somewhere/publicly known?	No	Only to concerned institutions and organizations, and later published on the UNODC website. <sup>5</sup>
Was civil society consulted in the preparation of the self-assessment checklist?	Yes	TI-Rwanda and the Rwanda Civil Society Platform were actively engaged throughout. Validation meetings took place on 11 March 2025 to review the self-assessment, and on 22 April and 3 June 2025 to validate additional information requested during direct dialogues with the reviewers.
Was the self-assessment checklist published online or provided to civil society?	Yes	Shared via email to concerned public institutions, private sector, and civil society. To this date, it has not been published on the UNODC website. <sup>6</sup>

<sup>1</sup> <https://www.tirwanda.org/>.

<sup>2</sup> Has been known as the UNCAC Coalition.

<sup>3</sup> UNCAC Coalition, Civil Society Parallel Report on Rwanda, <https://uncaccoalition.org/uncacparallelreportrwanda/>.

<sup>4</sup> Designated through a note verbal by the Ministry of Foreign Affairs.

<sup>5</sup> UNODC website, Country Profile Page: Rwanda, <https://www.unodc.org/corruption/en/country-profiles/data/RWA.html>, accessed on 4 November 2025.

<sup>6</sup> UNODC website, Country Profile Page: Rwanda, <https://www.unodc.org/corruption/en/country-profiles/data/RWA.html>, accessed on 4 September 2024.

Did the government agree to a country visit?	Yes	
Was a country visit undertaken?	Yes	23-25 April 2025 in Kigali, Rwanda. <sup>7</sup>
Was civil society invited to provide input to the official reviewers?	Yes	Three CSOs were invited and gave inputs on preventive anti-corruption policies and public participation.
Was the private sector invited to provide input to the official reviewers?	Yes	Private sector actors were invited to provide input on anti-corruption and corporate governance, accounting and auditing standards promoting transparency and integrity, and law enforcement cooperation.
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.

## Main Findings and Recommendations (R)

### Preventive Anti-Corruption Policies and Practices

Rwanda has adopted comprehensive laws to prevent corruption<sup>8</sup> and an anti-corruption policy in 2012.<sup>9</sup> Anti-corruption committees exist in public institutions, civil society, and private entities.

**R:** *Strengthen anti-corruption efforts through professional development, inclusive public education, and accessible, confidential reporting channels.*

### Preventive Anti-Corruption Body

The Office of the Ombudsman<sup>10</sup> oversees corruption prevention and investigation, verifies asset declarations, advises the government, conducts risk assessments, raises public awareness, and coordinates internationally. Despite its independence and powers, it has budget, staffing, and operational constraints that limit its effectiveness.

**R:** *Increase the Office's budget and staffing and strengthen its legal framework to ensure it can fully prevent, oversee, and combat corruption.*

### Public Sector Employment

Rwanda has legal and institutional frameworks for public servant recruitment, retention, and promotion, supported by tools like the Integrated Payroll System and Results-Based Performance Management. However, many institutions ignore recruitment laws, causing non-compliance and costly court cases.

**R:** *Strengthen oversight and provide ongoing training to ensure transparent, efficient, and accountable public sector employment.*

### Political Financing

<sup>7</sup> Ibid.

<sup>8</sup> Law on Fighting Corruption (2018), Law on the Protection of Whistleblowers (2017), Law on Declaration of Assets (2021).

<sup>9</sup> But remains under review.

<sup>10</sup> Established in 2003 and governed by Law n° 54/2021 of 29/08/2021.

Public funding of political organisations is regulated by law, and political organisations are required to submit annual financial reports. However, sanctions for violations are not clearly defined, and there are gaps in the clarification of the fate of illegally obtained funds.

*R: Amend the Organic Law on Political Organisations to specify sanctions for violations and determine the fate of illegally obtained funds.*

### **Codes of Conduct, Conflicts of Interest, and Asset Declarations**

Rwanda adopted a requirement for public officials to declare assets,<sup>11</sup> but verification remains limited due to human resources constraints at the Office of the Ombudsman. Few declarations are verified compared to those received, creating gaps in enforcement.

*R: Increase the verification of asset declarations, including through additional staffing of the Ombudsman Office, and strengthen enforcement.*

### **Reporting Mechanisms and Whistleblower Protection**

Rwanda adopted a whistleblower protection law in 2017,<sup>12</sup> but it does not allow for anonymous reporting. The Presidential Order to implement protection and rewards for whistleblowers has yet to be promulgated. Awareness in rural areas is limited, and whistleblower reports are scarce.

*R: Amend the whistleblower protection law to allow anonymous reporting, raise awareness in rural areas, and expedite the adoption of the Presidential Order on whistleblower protection.*

### **Public Procurement**

Public procurement is governed by law<sup>13</sup> and overseen by the Rwanda Public Procurement Authority,<sup>14</sup> which handles regulation, monitoring, and capacity building. The Umucyo E-Procurement Portal<sup>15</sup> supports transparency, competitive bidding, and public monitoring, including a list of banned companies. Challenges include insufficient qualified staff, a lack of standard documents, weak protections for casual laborers, poor-quality goods and services, and delays in contract execution and payments.

*R: Strengthen staff capacity and retention, standardize procedures, address legal gaps such as casual laborer protections, improve quality assurance, and ensure timely contract execution and payments.*

### **Management of Public Finances**

Rwanda has comprehensive laws and procedures guiding national budget preparation, adoption, and public financial management. Strengthening financial management and auditing, increasing public awareness, and promoting citizen participation remain priorities.

*R: Enhance public financial management by building institutional and audit capacity, increasing transparency in the defense budget, promoting citizen participation, and improving enforcement of audit and anti-corruption measures to ensure accountability and fiscal discipline.*

<sup>11</sup> Law n° 55/2021 on the Declaration of Assets.

<sup>12</sup> Law n° 19/2017 of 13/04/2017 on the Protection of Whistleblowers (Rwanda).

<sup>13</sup> Law n° 031/2022 of 26 August 2022 on Public Procurement (Rwanda).

<sup>14</sup> Rwanda Public Procurement Authority.

<sup>15</sup> Rwanda On-Line E-Procurement System, Umucyo Portal, <https://www.umucyo.rw>.

### **Access to Information and Participation of Society**

Rwanda's Law on Access to Information (ATI) guarantees public access to information from public institutions and certain private bodies, promoting transparency and press freedom. Information is available through e-government platforms, e-procurement systems, registries, and asset disclosures. Gaps include lacking penalties for non-compliance, unclear complaint or appeal mechanisms, and restricted access to sensitive information.

There are serious concerns about the backsliding of civic space in Rwanda following the enforcement of Law n° 058/2024 in June 2024, which restricts CSOs from operating independently without the Board's interference.

*R: Strengthen the ATI framework by introducing penalties for non-compliance, formal complaint and appeal procedures, and mechanisms enabling meaningful civil society participation in policy oversight. Amend Law no 058/2024 to clearly define the Board's mandate, safeguard CSOs' operational independence, and strengthen their ability to participate meaningfully in public life.*

### **Judiciary and Prosecution Services**

The judiciary and prosecution services have implemented reforms, including codes of conduct and integrity monitoring. Judges and prosecutors receive training, but capacity gaps remain in investigating and adjudicating money laundering and related offenses.

*R: Provide additional training to judges, prosecutors, and investigators to strengthen the handling of money laundering and corruption cases.*

### **Private Sector Transparency**

Since 2023, Rwanda requires beneficial ownership disclosure at company registration via an electronic central register. Access is limited, and owners often submit information late, reducing transparency and regulatory oversight.

*R: Ensure effective enforcement of beneficial ownership disclosure and expand transparency measures for private sector entities.*

### **Measures to Prevent Money-Laundering**

Law n° 001/2025 addresses money laundering, terrorist financing, and weapons of mass destruction proliferation. The Financial Intelligence Centre (FIC) leads prevention efforts, but effectiveness depends on foreign cooperation. Investigators, prosecutors, and judges need training to enforce the law effectively.

*R: Enhance anti-money laundering effectiveness by training relevant officials and improving transparency through regular publication of enforcement data.*

### **Anti-Money Laundering**

Rwanda strengthened anti-money laundering with the FIC establishment in 2021 and a new law in 2025.<sup>16</sup> However, it lacks sufficient capacity to operate effectively.

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<sup>16</sup> Law n° 001/2025 of 22 January 2025 on the Prevention and Punishment of Money Laundering, Terrorist Financing and the Financing of Proliferation of Weapons of Mass Destruction, Republic of Rwanda.

**R:** *Enhance the FIC's capacity and resources to ensure effective implementation of anti-money laundering measures.*

### **Asset recovery**

Rwanda has a solid legal framework for recovering offence-related assets<sup>17</sup>, institutions<sup>18</sup> and mechanisms to identify, trace, seize, freeze, and confiscate assets, including enforcing foreign and non-conviction-based orders, and a dedicated unit in the Ministry of Justice. Recovery remains challenging due to insolvent or deceased convicts, limited asset management mechanisms, a lack of consolidated data on confiscation activities and outcomes, and staff capacity constraints.

**R:** *Strengthen asset recovery by establishing clear mechanisms for managing seized assets, recovering property from insolvent or deceased convicts, and building staff capacity. Compile and publish statistics on confiscation requests, the value of assets confiscated, and amounts returned.*

### **International Cooperation for the Purpose of Confiscation**

Law n° 42/2014 governs cooperation with foreign states for recovering assets abroad and returning foreign assets within Rwanda. Rwanda's Civil Litigation Services coordinates international asset recovery with the Ministry of Foreign Affairs and the National Public Prosecution Authority. Between 2014 and March 2025, over Rwf 15 billion<sup>19</sup> was recovered. However, challenges include limited foreign cooperation in investigating and recovering diverted or hidden funds and poor compilation of statistics on confiscation requests, asset values, and amounts returned.

**R:** *Strengthen international cooperation and inter-agency coordination to improve investigation and confiscation of assets abroad. Enhance transparency by publishing information on the return and disposal of confiscated property and compile statistics on foreign confiscation requests and recovered assets.*

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<sup>17</sup> Under Law n° 42/2014, as amended in 2021.

<sup>18</sup> Key institutions involved include the Rwanda Investigation Bureau (RIB), the Financial Intelligence Center (FIC), the Ministry of Justice (MINIJUST), and the National Public Prosecution Authority (NPPA).

<sup>19</sup> 15 billion Rwf ≈ US\$10.26 million (at 1 USD = 1,461 RWF as of 4 November 2025), OANDA at <https://www.oanda.com/currency-converter/en>.