

## Cameroon: Civil Society Report

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

7 November 2025

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

Despite progress in developing an anti-corruption legal and policy framework, Cameroon struggles with weak implementation of key provisions. Civic engagement in anti-corruption efforts has declined significantly, with concerns about limited access to information.

### Assessment of the Review Process

Did the government disclose information about the country focal point?	yes	The focal point is on the governmental experts list on UNODC's website. <sup>4</sup>
Was the review schedule published somewhere/publicly known?	no	The government did not widely publish the schedule, and public access remains limited. Information was shared through official channels and UNODC reports, requiring direct requests from stakeholders.
Was civil society consulted in the preparation of the self-assessment checklist?	unclear	While Cameroon's UNODC country profile states "other stakeholders" were consulted, there is no evidence of CSOs involvement in the preparation of the self-assessment checklist. However, the focal point assured that civil society representatives in the governmental experts' list were consulted in the review. <sup>5</sup>

<sup>1</sup> <https://www.igi-cameroon.com/>.

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

<sup>3</sup> Global Civil Society Coalition for the UNCAC, Civil Society Parallel Report on Cameroon, <https://uncaccoalition.org/uncacparallelreportcameroon/>, accessed on 22 September 2025.

<sup>4</sup> United Nations Office on Drugs and Crime (UNODC). (n.d.). List of government experts – Second cycle review: Cameroon. Retrieved from [https://www.unodc.org/documents/treaties/UNCAC/IRG-Experts/English/SecondCycle/Cameroun\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/IRG-Experts/English/SecondCycle/Cameroun_E.pdf), accessed on February 17, 2025.

<sup>5</sup> The above is based on the explanation provided during an interview with the UNCAC focal point that the civil society representatives and actors included in the governmental experts' list were consulted in the UNCAC review process.

Was the self-assessment checklist published online or provided to civil society?	no	The self-assessment checklist was not published online and was not widely provided to civil society.
Did the government agree to a country visit?	yes	–
Was a country visit undertaken?	yes	A country visit was undertaken from February 25 to 27, 2019.
Was civil society invited to provide input to the official reviewers?	unclear	Some individuals from civil society were part of the government's expert team reviewing other countries. There is no concrete evidence that CSOs were consulted during the review.
Was the private sector invited to provide input to the official reviewers?	unclear	The government's submission references GICAM <sup>6</sup> and the Chamber of Commerce only on the governmental expert list and does not confirm private sector engagement in the country review.
Has the government committed to publishing the full country report?	no	The report is not publicly available – it seems to be in progress. The government has not committed to publishing the complete findings.

## Main Findings and Recommendations (R)

### Preventive Anti-Corruption Policies and Practices

Cameroon has a legal and policy framework addressing corruption but lacks a standalone anti-corruption law. Policy and regulatory measures include the National Anti-Corruption Strategy (NACS), which emphasizes prevention, education, and sanctions but lacks binding legal force.<sup>7</sup>

**R:** *Adopt a comprehensive National Anti-Corruption Policy. Strengthen Cameroon's National Anti-Corruption Strategy, ensuring measurable targets, independent monitoring, and enforcement mechanisms.*

### Preventive Anti-Corruption Body or Bodies

The National Anti-Corruption Commission (CONAC) monitors anti-corruption strategies, investigates complaints, and raises awareness, but lacks prosecutorial powers, and its reports rarely lead to indictments.<sup>8</sup> The National Anti-Corruption Coalition (CNLCC), a civil society initiative launched by CONAC, advocates for transparency but lacks full legal and financial autonomy. Anti-corruption bodies face political interference, weak enforcement, and financial dependence on the executive.

**R:** *Enhance CONAC's independence and effectiveness, granting autonomous investigative and prosecutorial powers. Enhance CONAC's engagement with civil society, granting greater consultative powers to involve non-governmental stakeholders in anti-corruption efforts.*

<sup>6</sup> Stands for *Groupeement Inter-patronal du Cameroun*.

<sup>7</sup> National Anti-Corruption Commission (CONAC). (2022). National Anti-Corruption Strategy (2022–2026). Retrieved from <https://conac.cm/en/wp-content/uploads/sites/2/2025/01/NACS-2022-2026-English-version.pdf>, accessed on 14 February 2025.

<sup>8</sup> Decree No. 2006/088 of 11 March 2006 on the setting up, organisation and functioning of the National Anti-Corruption Commission. Retrieved from <https://conac.cm/en/wp-content/uploads/sites/2/2018/04/Presidential-decree-creating-NACC-English.pdf>, accessed on 13 February 2025.

### **Public Sector Employment**

Legal frameworks govern civil servant recruitment and promotion to ensure fairness, transparency and accountability. There are competitive exams to enter the public service and ethical codes of conduct. Nevertheless, political patronage and nepotism undermine merit-based hiring. The absence of effective monitoring and disciplinary mechanisms against corrupt officials contributes to a culture of impunity and erodes trust in public institutions.

***R:** Ensure transparency and fairness in recruitment processes, and apply disciplinary measures to public officials who have engaged in corrupt practices.*

### **Political Financing**

Legislation governing political financing stipulates electoral campaign disclosure requirements. Campaign financing is subject to spending limits and political parties must report funding sources and how they spend allocated public funds. However, parties submit reports inconsistently and oversight mechanisms are not fully enforced, allowing political party financing to occur through opaque channels unchecked. Electoral processes are reportedly influenced by corporate donors, foreign entities, and illicit funds.

***R:** Strengthen reporting obligations and conduct independent auditing of political party accounts and campaigns.*

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

The legal framework prevents conflicts of interest and promotes ethical conduct among public officials, including a Code of Ethics for Public Servants and a Law on Asset Declarations. Specific government employees and senior public officials must declare assets when assuming and leaving office. However, compliance is low, and the absence of legal sanctions for non-compliance is a challenge. The National Agency for Financial Investigation's mandate does not cover asset declaration oversight, leaving accountability gaps.

***R:** Ensure compliance and verification of asset declarations, imposing sanctions for non-compliance and strengthening enforcement of conflict-of-interest rules for public servants.*

### **Whistleblower Protection**

There is no whistleblower protection law, leaving individuals reporting corruption vulnerable to retaliation. However, reporting mechanisms have been developed to facilitate reporting. The National Anti-Corruption Commission (CONAC) operates a whistleblowing platform, including an online portal and procedural guidelines for submitting reports. However, public confidence in such mechanisms remains low, with many fearing retaliation and a lack of follow-up on reports.

***R:** Adopt a comprehensive whistleblower protection law, ensure independent oversight of reporting mechanisms and guarantee reporting persons' confidentiality.*

### **Public Procurement**

The Public Contracts Code mandates competitive bidding for contracts exceeding a threshold, and the Cameroon Online E-Procurement System (COLEPS) was launched in 2018. The Public Contracts Regulatory Agency (ARMP) has improved its oversight. However, bid rigging, favoritism, and weak enforcement persist. Oversight of contract implementation is insufficient.

**R:** *Strengthen the ARMP's autonomy, systematically use the e-procurement system and apply sanctions for non-compliance. Enhance public oversight and ensure adequate training of procurement officials.*

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

Without a Freedom of Information law, transparency and access to public information are limited. Implementation of transparency measures is inconsistent, and no legal provisions require authorities to disclose information upon request, weakening institutional accountability and public oversight. Despite the Freedom of Association Law, organizations face bureaucratic hurdles, restrictive administrative controls, and limited engagement in policymaking. While CONAC has established structures such as the National Anti-Corruption Coalition, civil society organizations report a significant decline in participation.

**R:** *Adopt and implement a Freedom of Information Law enabling unrestricted public access to information. Institutionalize mandatory public consultations in anti-corruption policymaking to improve engagement with CSOs, the media, and academia.*

### **Judiciary and prosecution services**

Cameroon has adopted legislation to strengthen the judiciary and prosecution services, including amendments to the Penal Code expanding offences such as bribery, misappropriation, and abuse of function. To support the Special Criminal Court (SCC), the Specialised Officers of the Police was established. The court has prosecuted some high-profile corruption cases, however several cases remain unresolved, and the SCC faces allegations of selective prosecution.

**R:** *Remove executive control over judicial appointments and ensure effective prosecution of corruption cases by strengthening the SCC.*

### **Private Sector Transparency**

Whilst Cameroon has improved private sector transparency, particularly regarding state-owned enterprises (SOEs), enforcement of legislation remains weak, and gaps persist in financial disclosure, corporate accountability, and compliance with transparency standards.<sup>9</sup> SOEs are not required to publicly disclose audited financial statements resulting in most SOEs' failure to publish annual reports, limiting oversight and transparency. Fraud and misuse of corporate assets is criminalised, but weak enforcement and regulatory inefficiencies undermine compliance.

**R:** *Strengthen and enforce corporate anti-corruption compliance measures, ensuring mandatory internal controls and reporting obligations. Enforce beneficial ownership transparency and require high-risk sector companies to disclose real owners.*

### **Anti-Money Laundering**

Whilst Cameroon has taken steps to combat money laundering and financial crime through legal reforms, sectors such as real estate, mobile money services, and the extractives industries pose money-laundering risks, with poor regulation. The National Agency for Financial Investigation has dedicated correspondents within key financial institutions to monitor transactions and report suspicious activity. However, there is weak oversight of politically exposed persons (PEPs), limited asset confiscation enforcement, and gaps in financial intelligence-sharing mechanisms.

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<sup>9</sup> The Uniform Act on Commercial Companies, adopted by OHADA, sets unified rules for the creation, operation, and governance of companies in 17 African countries, including Cameroon, promoting legal certainty and cross-border business. <https://www.ohada.org/>, accessed on 13 February 2025.

***R:** Ensure compliance with anti-money laundering laws, increasing penalties for financial institutions failing to report suspicious transactions and increase oversight of PEPs.*

### **Asset Recovery**

Domestic asset recovery efforts have improved but remain insufficient. Cameroon has signed asset recovery agreements with several countries, but bureaucratic and diplomatic obstacles delay stolen asset repatriation. Cameroon faces procedural delays in legal proceedings to recover illicit wealth abroad. The lack of bilateral repatriation agreements hampers the return of stolen assets, while bank secrecy laws and a lack of whistleblower protection undermine enforcement and deter insider cooperation.

***R:** Improve institutional collaboration and reporting mechanisms, and enforce financial crime regulations. Establish an independent asset recovery agency to manage the tracing, freezing, confiscation, and return of stolen assets.*