

2025



3. Anti-corruption regulations

The Arab Business Legislative Frameworks



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Economic and Social Commission for Western Asia

3. Anti-corruption regulations

The Arab Business Legislative Frameworks
(2025)

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The report encompasses legislative evaluations from the following 22 Arab countries:¹

High-income countries: Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates.

Middle-income countries: Algeria, Egypt, Jordan, Lebanon, Morocco and Tunisia.

Conflict-affected countries: Iraq, Libya, the State of Palestine, the Sudan, the Syrian Arab Republic and Yemen.

Low-income countries: the Comoros, Djibouti, Mauritania and Somalia.

Note: The conclusions of the report are based on ESCWA assessments of legislation available up to December 2025. ESCWA intends to regularly update the framework, indicators and outcomes of this study in the future.

Overview

Over the past two decades, the Arab region has witnessed significant changes in its business regulations, with the aim of strengthening markets and enhancing competitiveness to boost economic growth and advance national priorities. These priorities have varied across subregions, ranging from economic diversification in high-income countries to attracting foreign direct investment in middle-income countries and stimulating growth in low-income countries. Regular reforms to these business regulations extend beyond administrative adjustments; they contribute to market sustainability, competitiveness, employment and trade. For businesses, these reforms enable growth and innovation, fostering an environment in which private enterprises thrive and the public sector benefits from transparency and efficiency. Effective regulation, therefore, not only improves economic indicators but also contributes to the achievement of the Sustainable Development Goals.

In response to the pressing need to evaluate and strengthen business regulatory frameworks in the Arab region, ESCWA launched the Arab Business Legislative Frameworks (ABLF) report in 2021. This report provided the first comprehensive assessment of anti-corruption, consumer protection, competition and foreign direct investment laws in the region. It introduced indicators that were based on international standards and best practices, and were developed with experts and organizations. These indicators capture key regulatory aspects like legislation, clear definitions, enforcement, transparency and adherence to international norms and agreements. The report's methodology, indicators, scores and assessed legislation were compiled in the "[Arab Legislation Portal](#)" launched in 2021.

The report served as a reference for regional policymakers and researchers seeking to advance regulatory and legislative reforms, with a view to aligning the Arab region with international best practices. It highlighted the importance of establishing a clear, consistent and transparent business legislation system across several areas, including competition

and consumer protection. The report recommended strengthening awareness of business legislation and its objectives.

Between 2020 and 2025, legislative reforms addressed the COVID-19 pandemic, technological advances and growth in the digital market. ESCWA updated its Arab Business Legislative Frameworks in 2023 and 2025, refining the methodology² to better align with emerging regulatory needs. The emphasis on anti-corruption highlighted the importance of transparency in public budgeting and digital government systems, recognizing it as essential to strengthening integrity and accountability in post-pandemic governance.

One insight from the assessment reveals interlinkages among the five legislative fields of the Arab Business Legislative Frameworks Assessment, each of which plays a role in shaping the business landscape in the Arab region. Competition laws support innovation, consumer protection builds trust, foreign direct investment rules attract international capital, and anti-corruption initiatives promote ethical governance. Aligning these pillars is essential to fostering a dynamic and sustainable business ecosystem, as misalignments can lead to inefficiencies, erode trust and hinder progress.

The 2025 ABLF report is more than just a diagnostic tool; it is a road map for future action across multiple sectors. The findings are valuable for researchers, policymakers, investors and businesses, particularly small and medium-sized enterprises, as they offer a detailed guide to navigate the regulatory landscape. The assessment methodology and results, however, only reflect the legislative dimension of the selected fields, as captured in laws and regulatory documents. The scores and classifications do not show the extent to which this legislation is enforced. Business regulations can achieve meaningful impact only when they are effectively implemented and enforced. Future studies could therefore place greater emphasis on the practical implications of regulations, to explore their tangible impact on businesses and consumers.

Key messages



The region advanced from a “moderate” to a “developed” classification. High-income and middle-income countries achieved a “strong” classification, while low-income and conflict-affected countries achieved a “developed” classification.



Stronger laws have not consistently reduced corruption. While legislative assessment scores rose across the region, improvements in control of corruption were uneven, highlighting the importance of effective enforcement.



.....

The enforcement element improved, while the exemptions element fell. The enforcement element attained a “very strong” classification following the adoption of laws and sanctions. The exemptions element fell to a “moderate” classification.

.....



.....

Digital government scored the lowest. Many conflict-affected and low-income countries lack data protection laws or digital service standards, increasing corruption risks.

.....



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Conflict has not prevented legal reform. Several conflict-affected countries adopted anti-corruption laws, showing meaningful but fragile progress.



1



Anti- corruption regulatory frameworks of the Arab region

Corruption is a complex phenomenon that has numerous adverse effects on societies worldwide. It is commonly defined as the misuse of authority for personal benefit, and can take forms including bribery, embezzlement, extortion, vote-buying, fraud, cronyism, favouritism and nepotism.³ In societies severely affected by corruption, government officials and individuals in positions of power are more likely to exploit their authority for personal gain, leading to widespread mistrust of the Government and institutions, deterioration of the rule of law, and weak economic development.

Corruption increases the cost of doing business, making competition more challenging for companies. This discourages foreign investment, hinders economic growth and undermines the rule of law. The World Economic Forum estimates that the global cost of corruption is approximately \$3.6 trillion per year.⁴ Additionally, world leaders have frequently cited estimates suggesting that corruption represents around 5 per cent of global gross domestic product (GDP).⁵ The impacts of corruption disproportionately affect the most vulnerable people in society.

Combating corruption is possible and vitally important. Effective methods include strengthening institutions, increasing transparency, improving governance structures, enhancing accountability mechanisms, simplifying regulations, increasing competition, and improving public sector integrity through clear codes of conduct for public officials, robust anti-corruption laws and enforcement, and independent oversight bodies.

It is also crucial to engage citizens in the fight against corruption. Creating an environment in which citizens are encouraged to report instances of corruption, and are confident that their reports will be addressed appropriately, can make a significant difference. Education campaigns can also raise awareness of the negative effects of corruption and promote integrity among the public.

By establishing robust anti-corruption frameworks and fostering transparency, Governments not only strengthen public integrity but also create more predictable and equitable market conditions, paving the way for sustainable economic development and private sector growth.

In the Arab region, one of the most critical dimensions of governance reform is the development and effective implementation of anti-corruption regulations. These

regulations should encompass a comprehensive set of laws that address critical areas such as integrity in the public sector, anti-bribery measures, whistle-blower protections, budgeting, public expenditure, digital government promotion, open government initiatives, transparency and rigorous public procurement standards.

Despite significant progress recorded between 2020 and 2025, the Arab region faces considerable challenges in ensuring the effective implementation and enforcement of anti-corruption laws. A significant stumbling block arises from major exemptions that persist in some countries, which undermine the potency of anti-corruption legislation. Political instability has often thwarted efforts to eradicate such exemptions. This highlights the need for concerted efforts in combating corruption throughout the Arab region.

Several Arab countries have ratified international conventions, which take precedence over national legislation when ratified. The adoption of the United Nations Convention against Corruption (UNCAC) marked a shift from domestically driven integrity frameworks towards internationally benchmarked compliance models, often motivated by investment signalling, aid conditionality and post-crisis legitimacy concerns. It is the only legally binding universal anti-corruption instrument, and covers five main areas, namely preventive measures, criminalization and law enforcement, international cooperation, asset recovery, and technical assistance and information exchange. It encompasses a range of corruption-related activities, including bribery, trading in influence, abuse of function and various acts of corruption in the private sector. The vast majority of United Nations Member States are parties to the UNCAC, including all Arab countries except the Syrian Arab Republic, which has signed it but has not yet ratified it. Consequently, all Arab countries are subject to the implementation review mechanism set up by the Conference of the States Parties to the Convention, which aims to promote the effective implementation of the UNCAC. The first cycle of the review mechanism started in 2010 and covers the chapters of the Convention dealing with criminalization, law enforcement and international cooperation. The second cycle, which was launched in November 2015, covers the chapters on preventive measures and asset recovery.

Since the most recent anti-corruption assessment of Arab countries in 2020, several countries in the region have introduced laws aimed at strengthening anti-corruption frameworks. These laws address a range of areas, including

procurement processes, government budgeting, data and privacy, and other areas directly related to whistle-blowing, the protection of witnesses and victims, and broader

anti-corruption measures. These enactments elevated the region's overall anti-corruption assessment score from "moderate" to "developed".

Table 1. Recently introduced anti-corruption legislation, 2020 to 2025

Country	Law/Decree/Decision (year)
Algeria	Public Procurement Law No. 12–23 (2023)
Djibouti	Law on the Prevention and Fight Against Corruption and Related Offences No. 103/AN/24/9eme L (2024)
	Amendment of Finance Law No. 169 (2022)
	Finance Law No. 169/AN/22 (8th Legislature) (2022)
Jordan	Government Procurement Law No. 8 (2022)
	Personal Data Protection Law No. 24 (2023)
	Right of Access to Information Amending Law No. 3 (2024)
Iraq	Public Contracts Implementation Instructions No. 1 (2025)
Kuwait	Data Protection Regulation – Decision No. 42 (2021)
	Law No. 1 on the Prevention of Conflict of Interest (2023)
	Executive Regulations No. 181 of the <u>Conflict of Interest</u> Law (2023)
	Data Privacy Protection Regulation – Administrative Decision No. 26 (2024)
Lebanon	Public Procurement Law No. 244 (2021)
	Access to Information Amending Law No. 233 (2021)
	Recovering of Assets Resulting from Corruption Crimes Law No. 214 (2021)
Libya	Regulatory Regulations for Government Procurement – Decision No. 12 (2023)
	Executive Regulations of the National Anti-Corruption Commission – Decision No. 5 (2024)
	Administrative Contracts Regulation – Decision No. 600 (2024)
	Circular No. 1 on Protection and Confidentiality of Government/Personal Data (2024)
	Law No. 5 amending the provisions of the law establishing the National Anti-Corruption Commission (2024)
Mauritania	Fighting Corruption Law No. 021 (2025)
	Financial Transparency in Public Life Law No. 022 (2025)
Morocco	National Authority for Integrity and the Prevention and Fight Against Corruption – Law 46.19 (2021)
	Decree on public procurement No. 2.22.431 (2023)
Oman	Personal Data Protection Law – Royal Decree No. 6 (2022)
	State Contracts Framework – Royal Decree No. 59 (2024)
	Electronic Transactions Law – Royal Decree No. 39 (2025)
Qatar	Amending Law No. 17 (excluding National Cybersecurity Agency from Tenders Law) (2024)
	Law No. 5 Concerning the Protection of Victims, Witnesses and Persons of Similar Status, aimed at protecting whistleblowers (2022)
	Law No. 9 on the Regulation of the Right to Access Information (2022)
	Law Regulating Tenders and Auctions issued by Cabinet Resolution No. 16 of 2019, amended by Council of Ministers Decision No. 11 (2022)
Saudi Arabia	Regulations for Combating Bribery – Cabinet Resolution No. 255 (2021)
	Personal Data Protection Law – Royal Decree M/19 (2023)
	Oversight and Anti-Corruption Authority Law – Royal Decree M/25 (2024)
	Whistle-blower, Witness, Expert, and Victim Protection Law No. D/148 (2024)

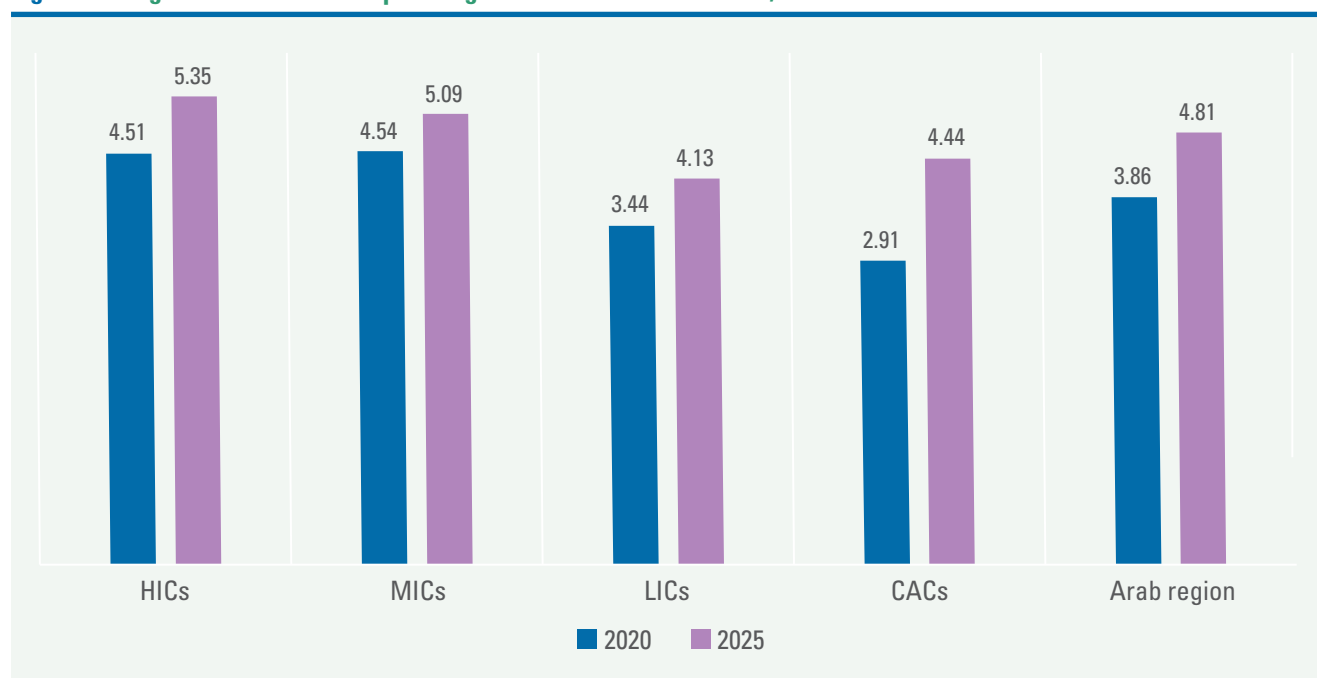
Country	Law/Decree/Decision (year)
Somalia	Data Protection Act – Law No. 005 (2023)
Sudan	Anti-Corruption Commission and Public Funds Recovery Commission Law (2021)
Syrian Arab Republic	Electronic Personal Data Protection Law No. 12 (2024)
United Arab Emirates	Penal code No. 31 (2021)
	Federal Personal Data Protection Law No. 45 (2021)
	Dubai Digital Services Law No. 9 (2022)
	Executive Regulations of the Federal Decree-Law on Human Resources in the Federal Government No. 49 (2022)
	Cabinet Resolution No. 48 (Executive Regulations of Federal Human Resources Decree-Law No. 49/2022) (2023)
	Public Procurement Law No. 11 (2023)
	Federal Decree-Law No. 50 Concerning the Regulations of Public Welfare Associations (2023)
	Federal Decree-Law No. 30 (“Know Your Customer”) (2024)
	Federal Decree-Law No. 56 (2023) Concerning the United Arab Emirates Accountability Authority

Source: ESCWA.

Table 1 maps the major amendments and enactments in anti-corruption regulation between 2020 and 2025. The Arab region has exhibited considerable progress in its anti-corruption regulatory assessment score (based on the ABLF assessment methodology),⁶ primarily due to the adoption of laws and an expanded assessment scheme that

incorporates a broader set of indicators. This region-wide advancement to the “developed” classification reflects a comprehensive, in-depth legislative approach to combating corruption and enhancing integrity across the public sector, signifying a greater commitment to bolstering transparency, accountability and regulatory mechanisms.

Figure 1. Progression of anti-corruption legislative assessment scores, 2020–2025



Source: ESCWA.

Note: Possible scores range from 0 to 7. Classifications between 0 and 1 are considered very weak, and those between 6 and 7 are considered very strong.

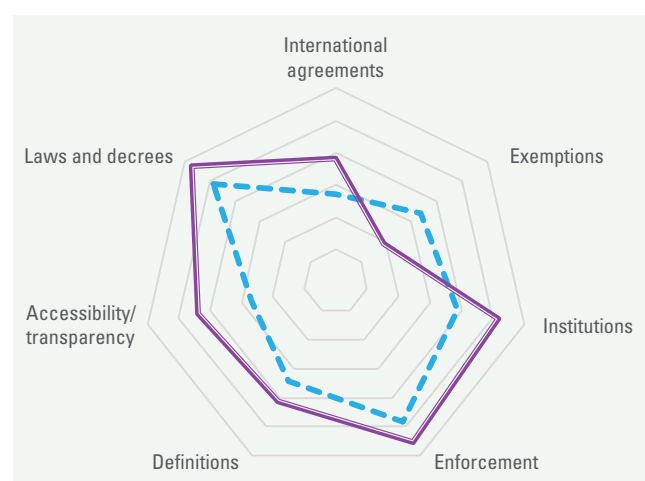
Figure 2. Progression of main anti-corruption headings, 2020–2025

Anti-bribery and whistle-blowing laws	4.00	4.59 ▲
Anti-corruption and integrity in the public sector	5.25	5.53 ▲
Budgeting and public expenditures	3.50	5.73 ▲
Digital government	2.23	3.18 ▲
Open government and transparency	2.63	3.98 ▲
Public procurement standards	3.43	5.01 ▲

● Very weak ● Weak ● Basic ● Moderate ● Developed ● Strong ● Very strong

Source: ESCWA.

Note: Possible scores range from 0 to 7. Classifications between 0 and 1 are considered very weak, and those between 6 and 7 are considered very strong.

Figure 3. Progression of anti-corruption scores by individual elements in the Arab region, 2020–2025

Source: ESCWA calculations.

Note: The score ranges from 0 to 7, where the classification between 0 and 1 is considered very weak and between 6 to 7 is considered very strong. Please check the methodology.

Figure 1 shows that each group within the Arab region made progress at varying levels. High-income and middle-income countries advanced to the “strong” classification, reflecting significant regulatory reforms undertaken in Algeria, Jordan, Kuwait, Lebanon, Morocco, Oman, Qatar, Saudi Arabia and the United Arab Emirates. Low-income countries progressed to the “developed” classification, although the advancement was modest and largely driven by the enactment of new laws in Djibouti, Mauritania and Somalia. Conflict-affected countries in the Arab region moved from

the “moderate” to the “developed” rating category, as new regulatory elements were introduced in Iraq, Libya, the Sudan and the Syrian Arab Republic.

Notable progress has been made in advancing anti-corruption regulations across all components of the assessment (box 2) in the Arab region; however, significant challenges persist. Figure 2 shows that regional legal frameworks demonstrate notable strengths in key components, including anti-corruption and integrity in the public sector, anti-bribery and whistle-blowing laws, and public procurement standards. In contrast, certain components, such as digital government, have only advanced to the “moderate” level of development, primarily due to amendments and new regulations in high-income countries. Additionally, while the budgeting and public expenditures component has been rated as “strong”, it also presents opportunities for further improvement. Consequently, notwithstanding the substantial progress achieved in strengthening anti-corruption legislation across the region, important gaps remain, highlighting the need to further develop and reinforce these essential legal frameworks.

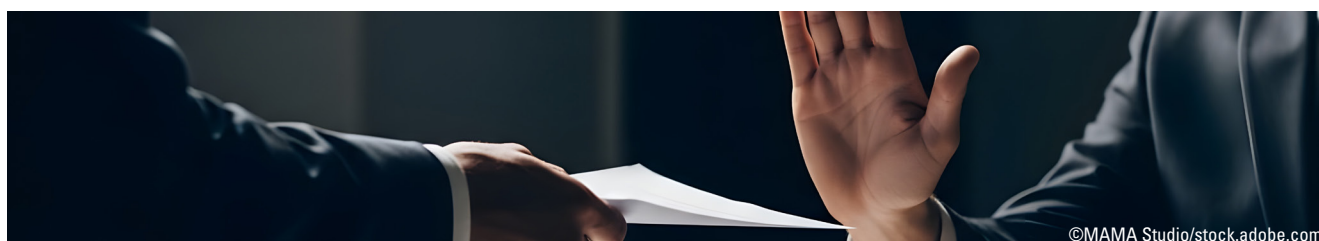
Figure 3 illustrates the changes recorded since the first assessment in 2020. A notable development is the advancement of regulatory enforcement measures to the “very strong” classification. Countries in the region have introduced additional laws and decrees related to corruption (table 1). Substantial progress has also been observed in the development of legal definitions

and institutional regulations, which have reached the “developed” and “strong” stages, respectively. This reflects an improved understanding and articulation of corruption and the institutional mechanisms needed to address it.

Despite these achievements, certain elements require more concentrated efforts. The “exemptions” element has declined to a “moderate” classification. This element is particularly significant, as limiting exceptions in anti-corruption laws is essential to ensuring equal accountability and comprehensive coverage of potential corruption scenarios. In conclusion, while the Arab region has made tangible progress in strengthening its anti-corruption

legislation elements, sustained efforts to enhance transparency in line with international agreements, and a comprehensive approach that minimizes exemptions will be critical to establishing a stronger anti-corruption framework.

At the national level, the period from 2020 to 2025 was characterized by a marked evolution in anti-corruption legislative frameworks across Arab countries. This evolution was driven by two factors: the introduction of new assessment indicators related to public sector integrity, reflecting the evolving global understanding of corruption control, and the proactive legislative measures adopted by several countries to strengthen their integrity and transparency mechanisms.



Box 1. Legislative strength vs. perceived control of corruption: an emerging implementation paradox

Although anti-corruption legislative frameworks in the Arab region were substantially strengthened between 2020 and 2025, the trajectory of the Control of Corruption (CC) indicator reflects a more complex and uneven pattern.

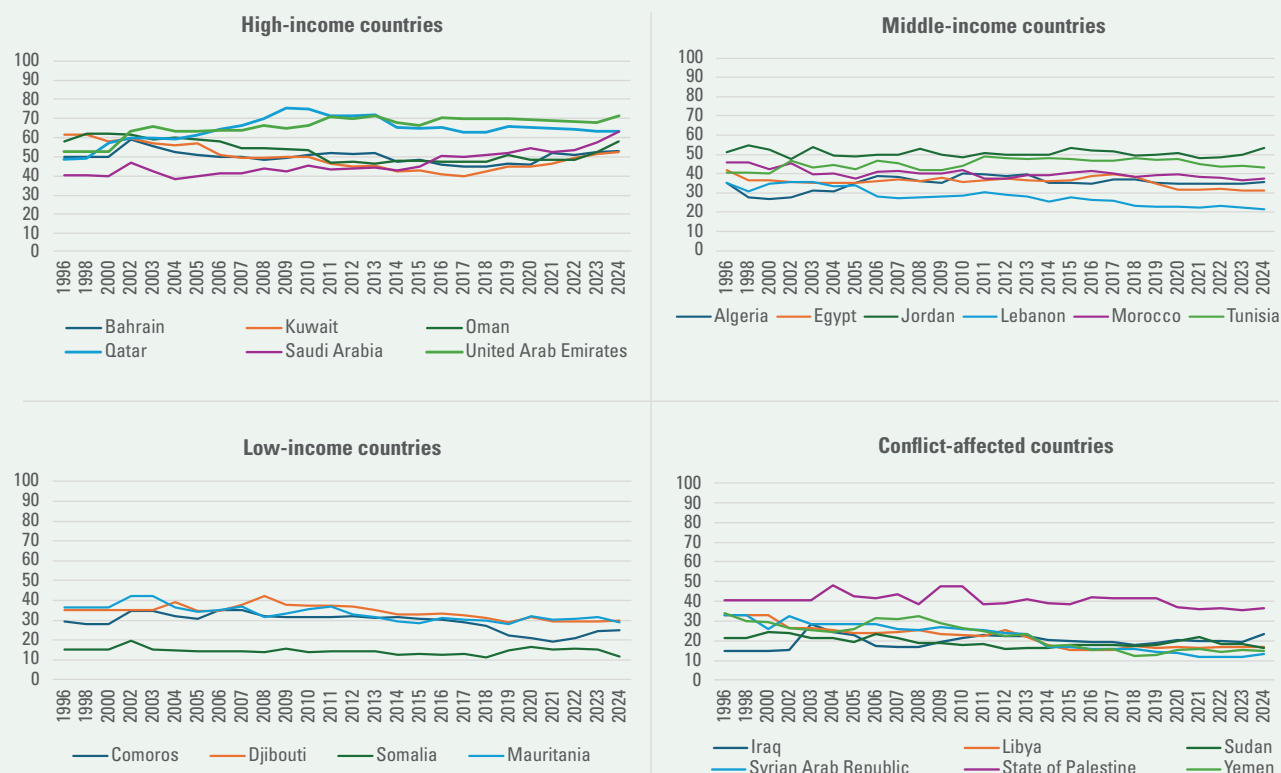
The indicator measures perceptions regarding the extent to which public power is exercised for private benefit, including petty and grand forms of corruption, as well as state capture by elites and private interests. Scores range from 0 to 100, with higher values indicating stronger perceived control.

An examination of subgroup deviations between 2020 and 2024 shows that improvements in legislative frameworks have not been uniformly accompanied by improvements in perceived corruption control:

- **High-income countries** recorded a positive deviation over the studied period, reflecting improved perceptions of control alongside strengthened legal frameworks.
- **Middle-income countries** exhibited negligible change, suggesting that legislative advancements have yet to materially shift enforcement perceptions.
- **Low-income countries** experienced a negative deviation, indicating weakened perceived control despite new regulatory enactments.
- **Conflict-affected countries** remained broadly stagnant, with fluctuations largely reflecting structural fragility rather than institutional consolidation.

The long-term Control of Corruption trends (1996–2024) further illustrate that perceptions of corruption control are deeply path-dependent and influenced by institutional stability, enforcement credibility, judicial independence, and political economy dynamics. In several contexts, the introduction of new anti-corruption laws coexists with limited prosecutorial follow-through, persistent exemptions, or conflict-related governance constraints.

Evolution of control of corruption across Arab income groups, 1996–2024



Source: ESCWA staff calculations based on World Governance Indicators, Control of Corruption (percentile rank), 1996–2024.

This divergence also reflects an important methodological boundary of regulatory assessment. The anti-corruption score evaluates the existence, scope and formal comprehensiveness of legislation across defined components and elements. It does not, by design, measure the effectiveness of enforcement, the operational readiness of institutions, or the administrative capacity required to translate legal provisions into practice.

Regulatory strength measures the existence of a legal framework, aligned definitions, established institutions, and codified enforcement. However, the existence of laws alone does not guarantee prosecutorial independence, investigative resources, inter-agency coordination, or judicial efficiency. Even formally established institutions may encounter constraints such as limited budgets, interference, procedural complexity, or lack of expertise.

The effectiveness of implementation depends on factors beyond the law, including the availability of human capital, digital infrastructure, the practical enforcement of whistle-blower protections, and credible sanctions. When these elements are underdeveloped, legislative improvements alone may not translate into enhanced governance or increased trust.

Enforcement capacity is also influenced by political and economic conditions such as exemptions, discretion, conflicts and elite capture, which can weaken legal frameworks. Progress in legal reform, as reflected in the assessment, may contrast with persistent corruption issues.

Although legislative progress from 2020 to 2025 is significant, sustainable corruption control also requires institutional strength, operational autonomy, and enforcement credibility.

Source: World Bank Group, *Worldwide Governance Indicators*, n.d.

Box 2. Anti-corruption assessment: components and elements

The anti-corruption score used in this assessment evaluates the strength and comprehensiveness of a country's legislation across six core components. The establishment of these components was based on best international practices, as mentioned in the assessment methodology document, which was informed by the [United Nations anti-corruption toolkit](#), [UNDP user's guide to measuring corruption and anti-corruption](#), and [the United Nations comprehensive self-assessment checklist](#). Based on these best practices, the assessment framework includes 37 indicators, organized under the following six components:

1. **Anti-corruption and integrity in the public sector:** examines legal and institutional measures to ensure ethical conduct, transparency and accountability of public officials.
2. **Anti-bribery and whistle-blowing laws:** assesses the criminalization of bribery and the presence of legal safeguards for whistle-blowers reporting corruption.
3. **Budgeting and public expenditures:** evaluates fiscal transparency, legal standards for budgeting processes, and oversight through independent audit institutions.
4. **Digital government:** reviews laws on digital services, data privacy and access to government-held information.
5. **Open government and transparency:** considers the presence of access to information laws, the clarity of transparency standards, and oversight mechanisms.
6. **Public procurement standards:** assesses procurement legislation, transparency in tendering, institutional oversight and enforcement mechanisms. Each component is evaluated using **seven elements** that ensure consistency across countries:
 - **Legislation:** whether a legal framework exists and aligns with international best practices.
 - **Definitions:** the clarity and comprehensiveness of legal terminology.
 - **Institutions:** the existence and effectiveness of enforcement bodies.
 - **International agreements:** whether relevant treaties and conventions have been ratified or aligned with.
 - **Enforcement mechanisms:** availability of sanctions, complaint channels and prosecutorial powers.
 - **Exemptions:** legal exceptions that could undermine effectiveness.
 - **Accessibility and transparency:** public availability of laws and data, and mechanisms that promote openness.

Together, these components and elements offer a holistic framework to assess anti-corruption legislation across the Arab region. They help identify strengths, gaps and opportunities for reform, supporting policymakers in designing more transparent, inclusive and accountable governance systems that align with regional goals and international standards.

Source: ESCWA, [Arab Business Legislative Frameworks: Methodology 2.0](#), 2023.



2

High-income countries

From 2020 to 2025, high-income Arab countries made considerable progress in their anti-corruption frameworks, supporting an overall upward reclassification trend in their collective classification from “developed” to “strong”. This progress reflects a deliberate and legally grounded commitment to enhancing transparency, accountability and integrity in the public sector. The momentum was led by countries such as Qatar, Saudi Arabia and the United Arab Emirates, which enacted key reforms that reshaped their anti-corruption landscape.

Saudi Arabia introduced Royal Decree No. M/25 on the Oversight and Anti-Corruption Authority, expanding the Authority’s investigative mandate and strengthening its powers to recover illicit gains. This was complemented by the Whistle-blower, Witness, Expert, and Victim Protection Law (No. D/148) and the Digital Government Authority Law No. 418, which institutionalized digital transformation through the establishment of technical standards and oversight mechanisms. The country also reinforced procurement governance through its Public Procurement Law No. M/128, which was amended to promote greater procurement transparency and increased participation of small and medium-sized enterprises (SMEs), while maintaining sector-specific exemptions.

Qatar mirrored this approach with the adoption of Law No. 5 of 2022, enhancing legal protections for whistle-blowers and enabling safe reporting channels. The Government also introduced a new Charter of Conduct (Decision No. 18 of 2020) for public officials, in line with its Vision 2030. Additionally, Law No. 9 of 2022 on the Right to Access Information and Cabinet Decision No. 11 of 2022 amending

procurement procedures represented a strategic effort to codify openness and transparency and strengthen financial integrity.

In the United Arab Emirates, the anti-corruption framework was strengthened through Federal Decree-Law No. 56 of 2023, which established the United Arab Emirates Accountability Authority and mandated it to detect financial fraud and oversee the management of public funds. The United Arab Emirates also issued the Personal Data Protection Law (No. 45 of 2021) and launched the United Arab Emirates Charter for the Development and Use of Artificial Intelligence (2024), reflecting a policy-led push towards ethically governed digital administration.

Despite these advancements, uneven challenges persist across high-income Arab countries. Legislative gaps remain in areas such as civil society oversight, full enforcement of budget transparency, and uniform application of whistleblower protections. Exemptions in procurement laws and inconsistencies in data disclosure frameworks across jurisdictions call for closer alignment with international best practices.

Nonetheless, the strong legislative momentum observed in high-income countries, combined with ongoing institutional innovation, signals a continued trajectory of regulatory reform towards more transparent and rules-based governance. With sustained political will and inter-agency coordination, the high-income countries group is well-positioned to strengthen its defences against corruption and, in selected institutional and regulatory areas, to serve as a benchmark for anti-corruption governance within the broader Arab region.



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Figure 4. Overall score of high-income countries across the six main components of the anti-corruption assessment

Source: ESCWA.

A. Anti-corruption and integrity in the public sector

The anti-corruption and integrity in the public sector component maintained consistently strong performance in 2025, reflecting robust legal frameworks supported by established institutional enforcement mechanisms. Kuwait, Saudi Arabia and the United Arab Emirates occupy the upper end of the performance spectrum, having established comprehensive statutory definitions of corruption alongside empowered oversight bodies. The Oversight and Anti-Corruption Authority Law (Royal Decree No. M/25) of Saudi Arabia expanded the Authority's investigative and asset recovery powers and reinforced cross-agency coordination,

while Anti-Corruption Law No. 2 of 2016, as amended, and Law No. 1 of 2023 in Kuwait explicitly criminalize conflicts of interest and expand the mandate of the Anti-Corruption Authority. In the United Arab Emirates, anti-corruption enforcement is supported by Penal Code provisions, complemented by the supervisory role of the United Arab Emirates Accountability Authority.

Bahrain, Oman and Qatar maintain coherent but comparatively less institutionalized frameworks. In Qatar, corruption offences are clearly criminalized under

the Penal Code, and the relevant legal provisions are enforced by the Administrative Control and Transparency Authority, supported by cooperation incentives embedded in the sanctions regime. Bahrain and Oman rely more heavily on Penal Code-based criminalization and traditional oversight mechanisms, with enforcement led

by specialized directorates or audit institutions. While these systems provide a clear legal basis for addressing corruption, the presence of exemption clauses and the lack of explicit regulation for certain corruption-related risks limit the depth and effectiveness of institutional frameworks.

B. Anti-bribery and whistle-blowing laws

High-income Arab countries recorded a clear improvement in the effectiveness of their anti-bribery and whistle-blower protection frameworks. In 2025, this component reached an overall “strong” classification, reflecting a significant improvement from its “developed” classification in 2020. The progress is driven by the adoption of strengthened legislative measures across much of the region. In Saudi Arabia, bribery is criminalized under Royal Decree M/36, with penalties extending to private sector employees. Whistle-blower protections were formally institutionalized under Royal Decree No. D/148, which ensures confidentiality and provides compensation. Kuwait relies on articles 35–40 of the amended Penal Code (No. 31 of 1970) and articles 37–43 of Law No. 2 of 2016, with further guarantees under Law No. 1 of 2023, which extends protections to whistle-blowers reporting a conflict of interest.

Qatar strengthened its framework through Law No. 5 of 2022, providing legal cover for whistle-blowers and enabling anonymous reporting channels through the Administrative Control and Transparency Authority and the Ministry of Interior. In the United Arab Emirates, protections are provided under Federal Law No. 14 of 2020 and supported by digital reporting platforms overseen by federal and emirate-level authorities, including the United Arab Emirates Accountability Authority. The Penal Code of Bahrain (article 202 of Law No. 15 of 1976) criminalizes bribery, while article 127 of the Criminal Procedures Code (Decree No. 46 of 2002) outlines procedural protections for individuals reporting offences. While legal coverage is expanding, implementation remains uneven in jurisdictions such as Oman, where a dedicated whistle-blower law has yet to be enacted.

C. Budgeting and public expenditures

The budgeting and public expenditures component recorded “very strong” performance across high-income Gulf Cooperation Council (GCC) countries, reflecting strengthened legal and institutional frameworks for public financial management, audit and oversight. In the United Arab Emirates, Federal Decree-Law No. 56 of 2023 mandates the United Arab Emirates Accountability Authority to oversee public funds and audit government accounts, supported by the regular publication of comprehensive annual budget reports. In Saudi Arabia, the General Court of Audit exercises systematic oversight over State revenues and expenditures under Royal Decrees No. M/9 and No. M/178, complemented by the disclosure of detailed fiscal

reports. The State Audit Bureau in Kuwait, established under Law No. 30 of 1964, audits all public entities and majority State-owned companies, with the annual budget published through official channels. Similarly, in Qatar, Law No. 11 of 2016 grants the State Audit Bureau comprehensive oversight of public revenues and expenditures, while in Oman, the State Audit Institution, established under Royal Decree No. 111 of 2011, is entrusted with broad financial and administrative audit functions. Overall, these arrangements demonstrate well-established external audit mechanisms and consistent public disclosure of budget information, supporting a high level of accountability and fiscal transparency.

D. Digital government

Digital government frameworks across high-income Arab countries have expanded significantly, with legislation increasingly focused on data protection, secure electronic

transactions, and the regulation of digital public services. Early reforms emphasized efficiency and service delivery, while more recent laws reflect a shift towards

legally grounded digital governance, including privacy safeguards and institutional oversight. Bahrain enacted a Personal Data Protection Law (Law No. 30 of 2018), establishing binding rules for the processing of personal data. In contrast, Kuwait relies on a set of sectoral and administrative instruments, such as the Data Protection Regulation (Decision No. 42 of 2021, amended by Decision No. 26 of 2024), without a comprehensive, unified digital governance framework.

This component improved to a “very strong” classification in 2025, driven by countries integrating data protection, digital service regulation, and emerging artificial intelligence (AI) governance standards. Saudi Arabia established a comprehensive legal framework through the Digital Government Authority Law (Cabinet Resolution No. 418/2021) and the Personal Data Protection Law (Royal Decree No. M/19/2023), complemented by AI governance initiatives

led by the Saudi Data and Artificial Intelligence Authority. Oman strengthened its framework through the Personal Data Protection Law (Royal Decree No. 6 of 2022) and the Electronic Transactions Law (Royal Decree No. 39 of 2025), which regulate digital services and limit the processing of sensitive data. Qatar combines digital access and integrity obligations through Law No. 13 of 2016 on personal data privacy protection, Law No. 9 of 2022 on access to information, and binding conduct rules for public officials. In the United Arab Emirates, digital governance is grounded in the federal Personal Data Protection Law (Federal Decree-Law No. 45 of 2021), the Electronic Transactions and Trust Services Law (Federal Decree-Law No. 46 of 2021), and emirate-level digital service regulation, notably Dubai Law No. 9 of 2022. While legal alignment with international digital governance norms is evident, implementation remains uneven, particularly in jurisdictions where digital standards are fragmented or primarily administrative in nature.

Box 3. Enhancing financial governance in Oman: from preventive legislation to corrective enforcement

In 2024, Oman operationalized a comprehensive financial integrity framework that integrates preventive legislative controls with corrective forensic auditing. This dual-track approach is anchored in two key procedural mechanisms:

1. Preventive control: the “financial appropriation” pre-requisite. The issuance of Royal Decree No. 59 of 2024, which promulgated the System for Signing Contracts and Financial Commitments, introduced strict preventive control. Replacing the 1976 legal framework, the new decree explicitly prohibits government units from entering any contract or incurring any financial obligation unless “financial appropriations” (budget allocations) are pre-secured. Procedurally, this shifts the risk to the administrative authority; any contract signed without confirmed budget availability is legally null and void, and the State bears no financial liability. This mechanism effectively eliminates the accumulation of “off-book” arrears and unauthorized extra-budgetary spending.

2. Corrective enforcement: the “Community Brief” and forensic audit cycle.^a Complementing the legislative preventive measures, the State Audit Institution used its mandate under Royal Decree No. 111 of 2011 to conduct a rigorous “post-audit” cycle. In the 2024 reporting period, the State Audit Institution processed 1,378 complaints and whistle-blowing reports, achieving a 90 per cent completion rate in investigating these leads.

This intelligence-led approach allowed the State Audit Institution to target high-risk infrastructure and service contracts. The procedural review focused on identifying payments for incomplete works and uncollected sovereign dues. The outcome of these procedures was published in the “2024 Community Brief”, a transparency mechanism designed to institutionalize public accountability. The brief confirmed the recovery of 58 million Omani rials (\$151 million) to the State Treasury and the referral of 25 criminal cases, involving embezzlement, forgery and abuse of office, to the Public Prosecution for legal action.

Source: Official Gazette of Oman (Royal Decree 59/2024); State Audit Institution, Annual Community Brief 2024, October 2025.

^a Oman News Agency, [State Audit Institution recovers RO 58 million in 2024 financial oversight](#), 2025.

E. Open government and transparency

Classified as “developed” in 2025, the open government and transparency component reflects the steady institutionalization of transparency principles. In Oman, these principles are articulated at the policy level, notably under principle 5 of the National Integrity Promotion Plan, while Royal Decree No. 40 of 2014 mandates the disclosure of official statistics and establishes penalties for non-compliance within the statistical system. In Qatar, Law No. 9 of 2022 institutionalizes the right of access to information and reinforces disclosure obligations for public bodies, including

in tenders and auctions. Although Saudi Arabia does not have a law on the right of access to information, Law No. M/25 aims to protect integrity, promote transparency, and combat financial and administrative corruption, while the Code of Conduct (Resolution No. 555/1437 AH) operationalizes transparency standards within the public sector. In contrast, Bahrain continues to rely primarily on international conventions, rather than a dedicated national access-to-information law, to guide transparency practices, highlighting legal asymmetries across the region.

Box 4. Kuwait: digitization of financial disclosures and index improvement

Kuwait strengthened its preventive framework by implementing the Law on the Prevention of Conflict of Interest (No. 1 of 2023) and the Executive Regulations of the Law on the Right to Access Information. These statutes mandate the comprehensive disclosure of financial assets by senior public officials to the Anti-Corruption Authority (Nazaha).

Procedural implementation and results: To enforce compliance, the Kuwait Anti-Corruption Authority (Nazaha) deployed a digital “asset declaration system” linked to the national civil information database, allowing for automated verification of wealth. In the 2023–2024 reporting cycle, Nazaha achieved a compliance rate exceeding 99 per cent for submitted financial declarations.

This systematic enforcement translated into measurable international progress. In the 2023 Corruption Perceptions Index (CPI) released in early 2024, Kuwait recorded its most significant improvement to date, jumping 14 positions globally (from rank 77 to 63). The report cited the effective implementation of the Kuwait Integrity and Anti-Corruption Strategy and the conflict-of-interest law as the primary drivers of this positive reclassification.^a

Source: Kuwait Anti-Corruption Authority (Nazaha) Annual Report 2023–2024; Transparency International CPI 2023.

^a United Nations Development Programme, [Kuwait launches new integrity and anti-corruption strategy phase](#), 2025.



F. Public procurement standards

High-income countries now receive an overall classification of “strong”, reflecting reforms aimed at enhancing competition, strengthening transparency, and promoting the inclusion of SMEs. In Qatar, Law No. 24 of 2015, as amended by Council of Ministers Decision No. 11 of 2022, introduces clearer procurement procedures and timelines, with measures supporting SME participation. In Saudi Arabia, Law No. M/128 mandates the establishment of electronic procurement portals, contract evaluation mechanisms and supplier audits, while regulating the use of exemptions through defined procedural controls. In Oman, public procurement is governed by the Tender Board Law (Royal Decree No. 36 of 2008) and complemented

by the State Contracts Framework (Royal Decree No. 59 of 2024), which provides for decentralized authority in lower-value tenders and centralized oversight for major contracts. The procurement framework (Law No. 49 of 2016, amended by Law No. 1 of 2024) in Kuwait promotes digital bidding procedures and formal appeal mechanisms. However, challenges persist in consistently enforcing anti-collusion clauses and managing exemptions transparently. Additionally, the formal involvement of specialized anti-corruption authorities and non-government stakeholders in procurement monitoring and oversight remains limited or not expressly mandated in certain jurisdictions.

G. Conclusions and recommendations

In the aftermath of substantial legal and institutional reforms between 2020 and 2025, high-income Arab countries have demonstrated a strong commitment to combating corruption and strengthening good governance. Yet, despite marked progress, reflected in an overall improvement in the country’s group classification to “strong”, challenges persist. Corruption remains a systemic risk that can undermine public trust and erode economic sustainability. Addressing it requires not only sustained political will, but a recalibrated strategy that is nuanced, legally robust, and adapted to today’s digital governance realities.

Several cross-cutting recommendations emerge. First, countries such as Bahrain, Kuwait and the United Arab Emirates would benefit from further codifying transparency-related concepts, particularly access to information, disclosure obligations and procedural safeguards, more explicitly in national legislation, in line with international standards.

Institutional independence is another critical area. Anti-corruption authorities and audit bodies should operate autonomously, with clear mandates and protection from



executive interference. The models adopted in Saudi Arabia and Qatar, where oversight agencies have been granted investigative powers and access to financial data within defined institutional frameworks, offer replicable elements for strengthening oversight. To complement these frameworks, capacity-building for civil servants, especially those in procurement, must be prioritized across all high-income countries.

Technological advancement, particularly in digital governance and AI, presents both opportunities and regulatory challenges. Countries such as Saudi Arabia and the United Arab Emirates, and to a more limited extent Oman, have issued AI governance frameworks and personal data protection laws, but ethical oversight and regulatory enforcement remain uneven. Expanding ethical use guidelines, institutional checks and public

consultations on AI applications in public administration is now critical.

Lastly, public procurement needs targeted reform. This includes reducing legal exemptions, standardizing evaluation criteria, and ensuring real-time transparency through centralized digital portals. Enabling civil society and independent monitors to observe and audit procurement processes would further enhance credibility.

Taken together, these measures represent the next phase in the region's efforts to strengthen anti-corruption frameworks. While the legal foundations have been established, effective implementation, broader inclusivity and stronger cross-sectoral engagement are needed to build systems that are not only accountable but also resilient and adaptable to emerging challenges.

An aerial photograph of a coastal city, likely Beirut, Lebanon, showing a dense urban landscape with numerous high-rise apartment buildings. A prominent green semi-transparent overlay covers the right half of the image. The city is situated along a coastline with a blue sea and a paved promenade with palm trees in the foreground.

3

Middle-income countries

Between 2021 and 2025, Arab middle-income countries, namely Algeria, Egypt, Jordan, Lebanon, Morocco and Tunisia, continued their upward trajectory in anti-corruption reform by introducing new legislation and updating regulatory frameworks. These developments led to a tangible improvement in the subgroup's overall score, bringing it close to the "strong" threshold, with a score of 5.09 in 2025. The most significant improvements were recorded in transparency, public procurement and whistleblower protection.

Jordan enacted the Government Procurement Law No. 8 of 2022, which introduced competitive procedures, oversight committees, and the power to cancel contracts in cases of suspected collusion. The country also passed the Personal Data Protection Law No. 24 of 2023, establishing criminal liability for misuse of sensitive data, and amended its Law on the Right of Access to Information through Law No. 3 of 2024, enhancing the public's right to access government-held data. These legal shifts reinforced the standing of Jordan in digital governance and transparency, both of which recorded notable score increases.

Lebanon made substantial strides with the entry into force of the Public Procurement Law No. 244 of 2021, which established new regulatory bodies, transparency requirements and formal appeals mechanisms. The Law on Access to Information was amended by Law No. 233 of 2021, which widened its scope, while the illicit enrichment and asset recovery framework was reinforced by the activation of the National Anti-Corruption Commission and the

enforcement of Law No. 175 of 2020, Law No. 189 of 2020, and Law No. 214 of 2021. These updates helped Lebanon significantly improve in the areas of open government and procurement standards.

In Algeria, amendments to the anti-corruption law were complemented by the adoption of the Public Procurement Law No. 12–23 (2023), which aimed to strengthen transparency, asset recovery and inter-agency coordination. Meanwhile, Egypt focused on implementation and regulation, issuing guidelines under its Data Protection Law No. 151 of 2020 and expanding institutional coordination within the scope of its Unified Procurement Law No. 182 of 2018. Tunisia focused primarily on consolidating its already comprehensive legal framework through institutional practice. Morocco advanced implementation through new procurement regulations and the operationalization of Law No. 46.19, which contributed to score stabilization and targeted improvement.

Figure 5 shows notable progress across the six core anti-corruption components, capturing shifts in regulatory maturity across middle-income countries. From stronger whistle-blower protections to improved transparency mechanisms, the subgroup's advancement reflects a deeper institutionalization of anti-corruption efforts. While implementation challenges remain, the reforms introduced between 2021 and 2025 have laid a stronger legal foundation. The following sections provide a detailed examination of performance under each component, highlighting areas of improvement and areas that still require targeted attention.



Figure 5. Overall score of the middle-income countries subgroup across the six main components of the anti-corruption assessment



Source: ESCWA.

A. Anti-corruption and integrity in the public sector

This component remained at a “strong” classification between 2020 and 2025, reflecting the consolidation rather than expansion of core legal and institutional frameworks across Arab middle-income countries. Progress during this period was driven primarily by strengthened investigative mandates and refined legal definitions, rather than the introduction of entirely new institutional models. Lebanon stands out with Law No. 175 of 2020, aimed at establishing the National Anti-Corruption Commission as an independent authority mandated to receive complaints,

conduct investigations, and refer cases for judicial action, reinforcing institutional oversight despite ongoing operational constraints. The Integrity and Anti-Corruption Commission in Jordan, operating under Law No. 13 of 2016, remains one of the region’s most powerful models, combining investigative authority, asset recovery functions, and enforcement coordination.

Algeria reinforced its framework through amendments to Law No. 06–01, notably Law No. 08–22, which clarified

corruption offences, expanded provisions on illicit enrichment and asset recovery, and strengthened inter-agency coordination, although implementation remains affected by institutional fragmentation. Across the subgroup, the principal strength lies in clear criminalization

frameworks and designated enforcement bodies. However, persistent gaps remain in operational autonomy, cross-institutional coordination, and the protection of integrity institutions from political influence, particularly in cases involving economic corruption and high-level officials.

B. Anti-bribery and whistle-blowing laws

Middle-income countries maintained a “strong” classification between 2020 and 2025, reflecting consolidation of existing criminalization and enforcement frameworks rather than advancement to a higher tier. Jordan updated Regulation No. 62 of 2014 to strengthen internal mechanisms for whistle-blower protection within the Integrity and Anti-Corruption Commission, reflecting continued regulatory development in this area. The legal framework of Lebanon includes Law No. 83 of 2018, amended by Law No. 182 of 2020, which allows direct reporting to public prosecutors and provides judicially

mediated protection measures through the public prosecution system. Egypt criminalizes bribery under its Penal Code (articles 103–111) and imposes disclosure obligations under the Illicit Gains Law No. 62 of 1975, although it does not yet provide a dedicated, cross-sector whistle-blower protection framework. Across the subgroup, progress remains uneven in terms of operational independence, enforcement capacity and public trust, with several countries yet to establish institutionalized whistle-blower protection mechanisms, particularly in procurement and administrative sectors.

Box 5. Morocco: the “Green Line” for flagrant corruption

While the National Authority for Probity, Prevention and Fight against Corruption (INPPLC) in Morocco sets strategic policy under Law No. 46.19, operational enforcement has been strengthened through the Public Prosecution (the Presidency of the Public Ministry). Particular emphasis has been placed on enforcing article 248 of the Penal Code regarding bribery in flagrante delicto (caught in the act).

The Public Prosecution activated the “Ligne Directe” (Green Line), a toll-free number for reporting bribery in real time. Procedurally, once a citizen reports a bribe demand, the judicial police, under the prosecutor’s supervision, set up a “sting operation” to catch the official receiving the bribe. This mechanism bypasses bureaucratic delays and provides immediate material evidence.

In its latest annual activity report (presented in 2024), the Public Prosecution confirmed that the Green Line has led to 243 successful sting operations since its inception, with a sustained rate of approximately one intervention per week in 2023–2024. This mechanism has proven particularly effective in local administration and security sectors, creating a tangible deterrence effect that complements the strategic reports of INPPLC.

Source: National Authority for Probity, Prevention and Fight against Corruption Annual Report 2023.



C. Budgeting and public expenditures

The classification of middle-income countries for the budgeting and public expenditures component improved from “strong” to “very strong” in 2025, reflecting the robustness and effective implementation of existing legal and institutional frameworks governing budgeting and public expenditure oversight, rather than the adoption of new legislation. While audit bodies like the Court of Audit in Lebanon (Law No. 9 of 1954) and the Audit Bureau in Jordan continue to function effectively, most countries do not have a legal requirement to publish pre-budget statements or engage citizens in the budget planning process. Egypt

has made notable progress with the Budget Transparency Portal and simplified budget communications. Similarly, the Court of Accounts in Tunisia provides robust auditing but does not mandate public input or disclosure prior to parliamentary debate.

Despite regular reporting and oversight, the budgeting process in many middle-income countries remains opaque prior to approval. The challenge is not institutional capacity, but the absence of binding legal provisions that ensure transparency prior to budget approval.

D. Digital government

Digital governance remained “developed” between 2020 and 2025, indicating that while digital infrastructure and platforms were in place, regulatory frameworks continued to lag behind. Jordan led in the area of data protection with its Personal Data Protection Law No. 24 of 2023, which governs domestic and cross-border data processing and establishes penalties for misuse. The Law on Electronic Transactions and Personal Data (No. 81 of 2018) in Lebanon laid the foundational standards for online transactions and data privacy. Tunisia and Egypt have expanded digital platforms for administrative service delivery, but are yet to establish a comprehensive, unified digital governance

framework that regulates service quality, access, accountability and data protection across the public sector.

Most middle-income countries do not have legislation that mandates service delivery standards or regulates the ethical use of AI in the public sector, leaving a regulatory gap with the expansion of automated and data-driven decision-making. Digital access exists but remains insufficiently governed in key areas. Establishing AI codes of conduct, service standards, and dedicated enforcement or oversight mechanisms will be essential for the next phase of digital transformation.

E. Open government and transparency

This component recorded a notable improvement from “weak” to “developed” in 2025, driven primarily by the expansion of access-to-information legislation and the establishment of oversight mechanisms in several middle-income countries. The Law on Access to Information (No. 28 of 2017, amended by Law No. 233 of 2021) enables any natural or legal person to request public records without justification and mandates the proactive publication of administrative decisions. Amended Law No. 3 of 2024 in Jordan strengthens transparency guarantees by introducing administrative court oversight and penalties for unjustified refusals. Law No. 22 of 2016 in Tunisia ensures the right to public information and is enforced by the Access to Information Authority, which holds legal powers to mediate disputes and impose sanctions. Law No. 31.13 in Morocco similarly guarantees access to public information and establishes a dedicated commission to monitor compliance.

In contrast, Algeria and Egypt do not have comprehensive frameworks regarding access to information, relying instead on sectoral disclosure provisions and administrative practices, which constrain the uniform application of transparency standards across the subgroup. Moreover, while laws on access to information have expanded, the concept of “transparency” itself is rarely defined in national legislation, creating interpretative gaps regarding the scope of disclosure, permissible exemptions, and enforcement obligations. As a result, implementation remains largely reactive and complaint-driven, rather than proactive. Progress towards a “strong” classification will require clearer legal definitions, narrower exemptions, and the integration of transparency obligations across administrative procedures.

F. Public procurement standards

Procurement frameworks advanced to a “developed” classification in 2025, reflecting a region-wide shift towards more structured bidding procedures and institutional oversight. In Lebanon, the Law on Public Procurement No. 244 of 2021 established a strong foundation by mandating open bidding, formal appeal rights, and centralized oversight through a newly created Public Procurement Authority. In Jordan, Government Procurement Law No. 8 of 2022 establishes a procurement committee which can cancel tenders, reject unqualified bidders, and refer suspected violations to the Integrity and Anti-Corruption Commission. The procurement framework in Tunisia, governed by Decree No. 2014–1039, assigns oversight responsibilities to the High Authority for Public Procurement and promotes e-bidding and equal access, although

enforcement capacity remains constrained. Egypt relies on Unified Procurement Law No. 182 of 2018, which establishes national preference rules and competitive bidding requirements, but allows broad executive discretion through exemptions and negotiated procedures overseen by the General Authority for Government Services.

Despite these advances, gaps persist in public monitoring, civil society engagement, and the consistent enforcement of anti-collusion rules. Broad exemptions for defence, urgent contracts, or “public interest” considerations continue to undermine otherwise sound procurement frameworks. Advancing this component’s classification will require stronger real-time transparency mechanisms and conflict-of-interest screening throughout the procurement lifecycle.

Box 6. Jordan: fiscal safeguards through automated procurement

Government Procurement Law No. 8 of 2022 in Jordan introduced a unified regulatory framework designed to minimize human intervention in the bidding process. This legislation mandated the use of the Jordan Online E-Procurement System (JONEPS) for all public entities to enhance transparency and competition while reducing the risk of bid rigging.

In the 2023 reporting period, the Integrity and Anti-Corruption Commission leveraged these digital audit trails to monitor public expenditure. The commission’s 2023 Annual Report highlighted that those procedural interventions and pre-emptive investigations successfully recovered or prevented the loss of 141 million Jordanian dinars (approximately \$198 million).

Source: Jordan Integrity and Anti-Corruption Commission Annual Report 2023, 2023; Ministry of Digital Economy and Entrepreneurship.



G. Conclusions and recommendations

Arab middle-income countries have collectively advanced their anti-corruption landscapes, with the subgroup's overall performance improving significantly to the "strong" classification, and the average score rising to 5.09 in 2025. This progress stems from the expansion of legal frameworks, enhanced transparency mechanisms, and new institutional arrangements across countries including Jordan, Lebanon, Morocco and Tunisia. However, structural and operational challenges persist. The following recommendations present a strategic path to further institutionalize integrity, transparency and accountability in public governance.

Clarifying core legal concepts is essential. Countries such as Algeria, Lebanon and Tunisia should further codify fundamental governance principles, including "transparency" and "public interest", within their administrative, access-to-information, and procurement frameworks to enhance legal certainty and consistency in enforcement.

The codification of objective standards for detecting and evaluating corruption must be further pursued. While

Jordan and Morocco have introduced guidance and institutional practices to classify corruption offences, most middle-income countries lack clear legislative thresholds or criteria to guide detection, investigation and prosecution. Establishing such criteria will help ensure fair investigations, reduce politicization, and strengthen prosecutorial outcomes.

Continued efforts to strengthen legal provisions on fiscal disclosure, audit oversight, and the regular publication of budget information would enhance accountability and transparency. Public procurement continues to be a high-risk area for integrity. Although Jordan and Lebanon have adopted modern procurement laws, enforcement remains uneven. Key reforms include training procurement officers, enhancing e-procurement platforms, and limiting exemptions and direct awards. Tunisia, in particular, may benefit from streamlining procurement oversight mechanisms and strengthening coordination between central and local levels to reduce procedural bottlenecks and enhance accountability.



Public engagement and awareness-raising continue to be underutilized instruments within the integrity systems of middle-income countries. Egypt, Jordan and Morocco should expand anti-corruption education campaigns, foster collaboration with civil society, and promote whistle-blower protections to strengthen societal oversight.

All countries must focus on the enforcement and visibility of anti-corruption efforts. In Lebanon, where a strong legal framework exists, weak implementation hinders results. Public reporting on enforcement

actions, asset recovery, and institutional performance can serve both as a deterrent to corruption and as a confidence-building measure.

While the path ahead is complex, Arab middle-income countries are well-positioned to build on recent progress. By advancing legal precision, institutional independence, public participation, and enforcement mechanisms, these countries can further entrench a culture of integrity and accountability, laying the foundation for sustainable development and social justice.

The background image shows a scene of significant destruction. On the left, a large concrete structure, possibly a bridge or overpass, is partially collapsed, with debris and exposed rebar visible. In the center and right, there is a large pile of rubble, including broken concrete slabs and bricks. In the background, a multi-story building has been reduced to its skeletal frame, with missing walls and windows. The sky is clear and blue. A large green semi-transparent rectangle is overlaid on the right side of the image, containing the number '4' and the text 'Conflict-affected countries'.

4

Conflict-affected countries

Conflict-affected countries in the Arab region face additional challenges in achieving strong governance, stability and prosperity. A robust and functional anti-corruption framework is thus essential in supporting these efforts. Corruption has direct implications for the sociopolitical landscape, institutional integrity, and the overall health of a country's economic ecosystem. Internal disruption and ongoing conflict further complicate the task of dismantling deeply entrenched corrupt practices.

Despite the instability and systemic challenges that several conflict-affected countries in the Arab region are facing, namely Iraq, Libya, the State of Palestine, the Sudan, the Syrian Arab Republic and Yemen, recent years have witnessed a series of legal and institutional reforms aimed at strengthening anti-corruption systems. These reforms reflect a growing recognition of the corrosive effects of corruption on public trust, service delivery and long-term State legitimacy. Amid ongoing recovery and transitional governance processes, anti-corruption has become an increasingly strategic priority for several countries.

Between 2020 and 2025, the conflict-affected countries subgroup improved its average anti-corruption score from 2.91 to 4.44, moving from a “basic” to a “developed” classification. Countries such as Libya and the Sudan have enacted foundational legislation to establish anti-corruption commissions with broader mandates. Other countries such as Iraq and the State of Palestine have strengthened procurement oversight and whistle-

blower protections, albeit unevenly. The most significant component-level improvement was observed in budgeting and public expenditures, which moved from a “basic” to a “developed” classification, while anti-corruption and integrity in the public sector showed notable progress, with several countries reaching a “strong” classification in terms of the regulation assessment. However, digital government remains notably underdeveloped across all six countries.

New legislation introduced between 2021 and 2025 played a pivotal role in shaping these shifts. In the Sudan, the 2021 Anti-Corruption and Public Funds Recovery Law established an independent commission and removed immunity for public officials implicated in corruption. Libya adopted Decision No. 5 of 2024, strengthening anti-corruption oversight procedures and introducing formal reporting and protection mechanisms. In the Syrian Arab Republic, Law No. 12 of 2024 introduced the country's first personal data protection framework. Meanwhile, Iraq and the State of Palestine have reinforced their procurement and auditing regimes. Yemen continues to rely on a longstanding legal framework broadly aligned with international standards, with implementation constrained by fragile institutional capacity and protracted conflict.

These advances, though uneven, indicate a renewed effort to address corruption across fragile governance environments. Yet substantial gaps persist in enforcement, public participation, digital standards and transparency.



Figure 6. Overall score of the conflict-affected countries subgroup across the six main components of the anti-corruption assessment



Source: ESCWA.

A. Anti-corruption and integrity in the public sector

This component saw the most substantial improvement, with conflict-affected countries advancing from a “strong” to a “very strong” classification in 2025. The score gains were driven mainly by institutional reforms and stronger oversight mandates. In the Sudan, the 2021 Anti-Corruption and Public Funds Recovery Law established an independent anti-corruption commission with investigative powers, and provided functional immunity for commissioners to safeguard independence. In Libya, the National Anti-Corruption Commission, established under Law No. 11 of

2014 and amended through Decision No. 5 of 2024, was further strengthened with expanded oversight powers over public contracts, including the authority to review and intervene in procurement processes that violate anti-corruption rules. Similarly, the Integrity Commission in Iraq (Law No. 30 of 2011, amended in 2019) leads investigations, promotes integrity programmes, and drafts related legislation. These cases reflect a regional trend towards stronger institutional mandates and legal definitions of corruption.

However, implementation gaps persist. In the Syrian Arab Republic, although laws against bribery and embezzlement exist, the absence of a comprehensive anti-corruption framework and the partial implementation

of the UNCAC indicate limited enforcement capacity. Nonetheless, the upward classification represents a critical step towards institutionalizing public integrity norms.

B. Anti-bribery and whistle-blowing laws

Between 2020 and 2025, conflict-affected countries collectively advanced from a “moderate” to a “developed” classification in the area of anti-bribery and whistle-blower protections. This shift is driven by the introduction of new legislation and dedicated mechanisms to detect and penalize bribery. For example, the Penal Code (articles 307–314) of Iraq sets out sanctions for both the person who offers or gives a bribe and the public official who solicits or accepts it, while Law No. 58 of 2017 provides a legal basis for protecting whistle-blowers, informants and witnesses, primarily through confidentiality guarantees and protection from retaliation, although implementation challenges remain. In Libya, the 2024 executive regulations (Decision No. 5 of 2024) formalize reporting procedures

and introduce procedural protection mechanisms for whistle-blowers within the anti-corruption system, rather than establishing a standalone protection regime. The 2021 Anti-Corruption Law of the Sudan similarly provides for whistle-blower protection under article 21, although it does not clearly define procedures for submitting complaints. Meanwhile, countries such as the Syrian Arab Republic and Yemen have yet to adopt comprehensive whistle-blower laws, relying instead on general penal provisions or fragmented administrative measures. In summary, while legal frameworks in conflict-affected countries have strengthened, enforcement remains uneven, and whistle-blower protections often lack clear operational procedures or institutional safeguards.

C. Budgeting and public expenditure

The budgeting and public expenditures component improved from “basic” to “developed” across conflict-affected countries, indicating tangible yet fragile gains. This improvement is driven by stronger post-expenditure audit mechanisms and the gradual formalization of oversight mandates, rather than the introduction of comprehensive fiscal transparency laws. In Iraq, the Federal Financial Monitoring Bureau Law (No. 31 of 2011) mandates independent audits of government accounts, while the Federal Board of Supreme Audit publishes results through official channels.

Libya and Yemen both have functioning audit bureaus (established under Law No. 19 of 2013 and Law No. 39 of 1992, respectively). In Yemen, the Central Organization for Control and Auditing is legally mandated to audit public expenditures and report its findings, yet budget documents remain largely inaccessible to the public prior to approval, and no law requires participatory budget mechanisms. The audit framework of Libya similarly emphasizes ex-post control, with limited legal provisions governing fiscal disclosure or public engagement in budgetary decision-making.



In the Sudan, the Anti-Corruption Commission and Public Funds Recovery Commission Law of 2021 mandates that the Anti-Corruption Commission submit a draft budget to parliament, adding transparency and oversight to public fund allocation. Article 8(o) of the law requires parliamentary approval of the commission's budget, while article 7(b) explicitly links financial oversight to transparency and good governance objectives. However,

budget-related transparency across all six conflict-affected countries remains partial and inconsistently implemented. Most countries do not have laws requiring public participation or the publication of detailed, citizen-friendly budget documents. Consequently, although audit institutions are generally established and operational, fiscal transparency remains focused at the oversight stage rather than integrated across the entire budget cycle.

D. Digital government

Despite a slight increase in the average score, the digital government classification remains “very weak”, unchanged since 2020. This reflects the absence of comprehensive legal and regulatory frameworks governing the delivery of digital services, data protection, and the ethical use of digital technologies in conflict-affected settings. Most conflict-affected countries have not enacted laws establishing digital service standards or frameworks for the ethical use of digital technologies. In 2022, Iraq introduced a draft data classification policy, but it remains unratified, and the country has yet to adopt formal privacy legislation. As a result, data governance in Iraq continues to rely on fragmented administrative practices rather than enforceable legal safeguards. The Syrian Arab Republic represents a partial exception, having adopted Law No. 12 of 2024 on personal data protection, which introduced

basic safeguards and established a Personal Data Protection Authority. However, the law's scope remains limited to data protection and is not complemented by broader legislation regulating digital public services or automated decision-making.

Libya has issued circulars regulating the handling of sensitive data in citizen services (e.g., Circular No. 1 of 2024), but these circulars lack binding legal authority. The Sudan and Yemen continue to lag, with no substantive legal instruments to support digital governance. The overall stagnation in this component reflects both institutional constraints and limited technical infrastructure. Without clear regulatory frameworks, digital transformation in conflict-affected countries remains fragmented and susceptible to misuse.

E. Open government and transparency

The open government and transparency score improved from “basic” to “moderate”, reflecting increased legislative attention but limited implementation. This improvement is driven primarily by the adoption or partial activation of laws on access to information rather than the establishment of comprehensive open government frameworks. The State of

Palestine stands out for drafting a comprehensive Right to Information Law as early as 2005 (No. 188 of 2005), though it has yet to be approved; thus, access to information continues to rely on constitutional principles, sectoral regulations, and administrative practices rather than an enforceable statutory right. The Sudan has made modest



progress with the adoption of the Access to Information Act (2015); however, transparency still lacks a formal legal definition. While the law establishes a general right to request information, it provides broad exemptions and does not establish a strong, independent oversight body to ensure compliance. Libya and Yemen recognize access to information through general provisions but have not codified detailed enforcement mechanisms.

In Yemen, Law No. 13 of 2012 on the Right to Information formally recognizes access to information as a fundamental

right and establishes the Office of the Commissioner General of Information, but implementation remains weak due to limited institutional capacity and public awareness. In Libya, access to information is addressed indirectly through administrative regulations and sectoral decisions without a dedicated right-to-information law or standardized procedures. The component's improvement to "moderate" indicates rising policy awareness but highlights the need for stronger implementation, institutional anchoring, and public engagement strategies.

F. Public procurement standards

Various approaches to public procurement are applied across Arab conflict-affected countries. This component witnessed a notable rise from "basic" to "developed" by 2025, driven by legal reforms that seek to enhance fairness, transparency and oversight. The procurement framework in Iraq (Law No. 2 of 2014) requires the mandatory publication of tenders across multiple platforms and imposes penalties for non-compliance. The law also establishes review committees and administrative sanctions; however, procurement decisions remain vulnerable to political influence and exemptions invoked on emergency grounds. The 2024 Administrative Contracts Regulation in Libya established clear procurement guidelines, cancellation

mechanisms, and dedicated procurement committees. In Yemen, the 2007 procurement law established standards and oversight bodies, such as the Supreme Authority for Tender Control. The 2010 Procurement Act in the Sudan remains the cornerstone of the country's procurement framework, while the 2021 Anti-Corruption Law expanded the oversight role of the National Anti-Corruption Commission. Although these laws appear well-designed on paper, implementation challenges remain widespread. Procurement data is rarely disclosed publicly in accessible formats, and monitoring processes often exclude civil society. Capacity-building and institutional training also remain limited across the region.

G. Conclusions and recommendations

The conflict-affected countries of the Arab region have collectively progressed from a "basic" to a "developed" classification in 2025, with an average score of 4.44. This improvement is particularly notable given the persistence of armed conflict, political fragmentation, and weakened State capacity across several conflict-affected countries. Progress has been most visible in public sector integrity, public procurement and anti-bribery legislation. Yet significant structural constraints, legal ambiguities, and fragile institutional environments continue to limit the effective implementation of reforms. The following recommendations identify priority areas to help consolidate recent gains and support the development of more accountable and transparent governance systems.

Greater legal clarity around key anti-corruption concepts is needed. Countries such as Libya and the Syrian Arab Republic do not have precise definitions of terms like

"transparency" within their legal frameworks. The absence of unified definitions undermines enforceability, weakens judicial interpretation, and limits the operational effectiveness of integrity-related provisions. These definitions should be codified across anti-corruption, procurement, and access-to-information legislation.

Institutional independence and authority must be reinforced. In several conflict-affected countries, including the Sudan and the Syrian Arab Republic, anti-corruption entities remain vulnerable to political interference or lack sufficient enforcement powers. Although legal mandates exist, institutional safeguards, such as protected tenure, budgetary autonomy, and prosecutorial access, are not yet fully embedded. Iraq and Libya have taken steps to strengthen institutional mandates, but further guarantees of autonomy, prosecutorial access, and transparency in appointments are needed to ensure credibility.

The development of whistle-blower protection regimes remains a critical gap. While countries like Iraq and Libya have introduced initial protection measures, legal frameworks across conflict-affected countries generally lack operational procedures for reporting, investigation and protection against retaliation. In most cases, protections remain declaratory rather than actionable, with no clear reporting channels, confidentiality guarantees or remedies. Formalizing these mechanisms and promoting public awareness can help foster a culture of reporting and civic accountability.

While progress has been made in strengthening public procurement integrity, important challenges remain. Although Libya and the State of Palestine have introduced detailed procurement laws with oversight structures, enforcement and monitoring remain inconsistent. In contrast, the Sudan and Yemen have not fully established transparent procurement processes. Across all conflict-affected countries, exemptions for emergency procurement, direct awards, and security-related contracts remain overly broad and weakly supervised. Reforms should focus on limiting direct awards, expanding e-procurement systems, and ensuring independent monitoring of contract execution.

Digital government and data governance continue to lag. Only the Syrian Arab Republic has enacted a personal data protection law, and no country has adopted clear standards for the delivery of digital services or for the ethical use of technology. The absence of digital governance frameworks exposes conflict-affected countries to data misuse, opaque automation, and new forms of digital corruption. Establishing national digital governance frameworks is essential to enhancing service efficiency, protecting personal data, and preventing digital corruption risks.

Citizen participation and open government require further institutionalization. While a few countries, such as the State of Palestine and the Sudan, have introduced legislation on access to information, enforcement remains weak, and transparency is not clearly defined in most legal texts. Oversight institutions often lack sanctioning powers, and proactive disclosure obligations are rarely enforced. Conflict-affected countries should prioritize adopting right-to-information laws, establishing centralized data portals, and enabling civil society participation in oversight processes.



Budget transparency and fiscal accountability need to be strengthened. Introducing citizen-friendly budgeting tools, participatory mechanisms, and open budget data can significantly improve budget transparency and reduce opportunities for misappropriation.

By targeting these reforms, conflict-affected countries can convert fragile progress into institutional resilience. Advancing legal clarity, operational safeguards, public engagement, and digital modernization is essential for embedding integrity and accountability within public systems, regardless of political context or conflict dynamics.



5

Low-
income
countries

Arab low-income countries, namely the Comoros, Djibouti, Mauritania and Somalia, have taken incremental yet significant steps to advance their anti-corruption frameworks between 2021 and 2025. While overall progress remains uneven across components, the group's average classification improved from "moderate" in 2020 to "developed" in 2025. Reform momentum was driven by new legal developments and modest institutional gains aimed at addressing systemic corruption and inefficiencies in public governance. Across the subgroup, progress has been most visible in strengthening legal definitions, creating or restructuring oversight bodies, and formalizing procurement rules, while digital government and open government mechanisms remain the weakest dimensions.

Recent reforms across low-income countries reveal divergent trajectories in the development of anti-corruption frameworks, reflecting differences in institutional maturity, reform momentum, and implementation capacity. Djibouti adopted Law No. 103/AN/24/9ème L (2024) on the Prevention and Fight against Corruption and Related Offences, which clarified corruption-related offences, introduced structured whistle-blower protections, and established an independent national commission, contributing to measurable progress in public-sector integrity, anti-bribery measures and transparency. Djibouti also adopted Finance Law No. 169/AN/22/8ème L (2022), reinforcing fiscal transparency

and expanding the scope of public financial oversight. In Somalia, the establishment of a dedicated data protection authority under the Data Protection Act (Law No. 005 of 2023) represented an important step towards strengthening privacy and digital governance, despite underdeveloped broader digital standards. In the Comoros, the legal framework continued to be anchored by Law No. 08–013/AU (2008) and Penal Code No. 20–038/AU (2021), which criminalize corruption-related offences and empower the National Commission for the Prevention and Fight against Corruption to investigate reports and recommend reforms. Mauritania recorded a major legislative leap in 2025 through Law No. 021 on Fighting Corruption, Law No. 023, which established the National Authority for the Fight against Corruption, and Law No. 022 on Financial Transparency in Public Life, strengthening enforcement architecture and internal accountability despite persistent gaps in access-to-information and digital governance legislation.

Although these legal strides provide a strong foundation, they are not yet complemented by full implementation or institutional maturity. The following section presents a detailed analysis of the six core anti-corruption components assessed in this report, examining the evolution of legal reforms, institutional practices, and transparency measures across Arab low-income countries between 2020 and 2025.

Table 2. Anti-corruption regulatory framework in Arab low-income countries

Comoros	Law No. 08–013/AU (2008) on transparency in public, economic and financial activities Penal Code No. 20–038/AU (2021), criminalizing bribery, embezzlement, abuse of office, and related corruption offences
Djibouti	Penal Code (articles 200–214), criminalizing corruption Law No. 103/AN/24/9ème L (2024) on the Prevention and Fight against Corruption and Related Offences, establishing an independent national anti-corruption commission Finance Law No. 169/AN/22/8ème L (2022), strengthening public financial oversight
Mauritania	Law No. 021 of 2025 on Fighting Corruption, defining corruption offences and reporting obligations Law No. 023 of 2025, establishing the National Authority for the Fight against Corruption Law No. 022 of 2025 on Financial Transparency in Public Life Organic Law No. 032 of 2018, relating to the Court of Accounts Ratification of the United Nations Convention against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption
Somalia	Penal Code provisions, addressing corruption Public Procurement Law Financial Institution Law Data Protection Act (Law No. 005 of 2023), establishing a data protection authority

Source: ESCWA.

Figure 7. Overall score of the low-income countries subgroup across the six main components of the anti-corruption assessment



Source: ESCWA.

A. Anti-corruption and integrity in the public sector

In 2025, the anti-corruption and integrity frameworks in Arab low-income countries were upgraded to a “strong” classification, reflecting expanded criminal provisions and formalized institutional mandates. In Mauritania, Law No. 021 of 2025 defines offences including bribery, embezzlement of public funds, illicit enrichment, and abuse of position; introduces reporting obligations for public officials; and establishes penalties, including fines and imprisonment. Law No. 023 of 2025 establishes

a national authority for the fight against corruption, mandated to assess corruption risks and evaluate the implementation of anti-corruption legislation. Law No. 103/AN/24/9ème L in Djibouti clarifies the concept of corruption, organizes offences already recognized in the Penal Code, and establishes an independent national commission responsible for evaluation, institutional assessment, and oversight of the national anti-corruption strategy. The Comoros criminalizes corruption-related offences under

articles 526 to 536 of its Penal Code and establishes the National Commission for the Prevention and Fight against Corruption, which investigates reports, identifies legal and administrative vulnerabilities, and proposes preventive measures, including conditional exemptions for voluntary reporting.

In Somalia, articles 240 to 262 of the Penal Code criminalize bribery, embezzlement, abuse of power, and related offences, and prescribe penalties for each offence, including fines and imprisonment. Article 111C of the

Provisional Constitution provides for the establishment of an independent anti-corruption commission mandated to investigate public sector corruption and recover assets. However, the National Anti-Corruption Commission was dissolved in 2022 and has not yet been reconstituted. In summary, the “strong” classification of the anti-corruption and integrity in the public sector component is grounded in defined offences, established sanctions, and the formal creation of anti-corruption institutions within national legal frameworks as at December 2025.

B. Anti-bribery and whistle-blowing laws

Anti-bribery and whistle-blowing frameworks in Arab low-income countries were classified as “moderate” in 2025, driven by the formal criminalization of bribery, with differing levels of institutional and procedural protection for reporting persons. In the Comoros, articles 513 and 514 of Penal Code No. 20–038/AU of 2021 criminalize the acceptance of undue advantages by public employees, while Law No. 08–013/AU of 2008 on Transparency in Public, Economic and Financial Activities provides protection to whistle-blowers against threats or retaliation through the National Commission for the Prevention and Fight against Corruption. In Djibouti, the Law on the Prevention and Fight against Corruption and Related Offences (Law No. 103/AN/24/9ème L) criminalizes bribery under article 39, introduces a limited exception for low-value

gifts under article 54, establishes whistle-blower protection under article 14, and reinforces investigative capacity through specialized judicial mechanisms. In Mauritania, articles 3, 4 and 5 of the Law on Fighting Corruption (Law No. 021 of 2025) define bribery offences, while Law No. 023 of 2025 R.J. on the National Authority for the Fight against Corruption mandates the receipt of reports and the establishment of protection systems, complemented by article 22 of Law No. 021 of 2025, which penalizes retaliation against whistle-blowers. In Somalia, bribery offences are addressed under articles 240 to 262 of the Penal Code (Law No. 5 of 1962). Although the country is a signatory of the Arab Anti-Corruption Convention, no dedicated whistle-blower protection legislation has been enacted yet.

Box 7. Mauritania: the “Ain” platform and mandatory response times

In January 2025, the Mauritanian Council of Ministers approved the draft law establishing the “National Anti-Corruption Authority”, replacing the previous fragmented oversight bodies. The new legislation (Law No. 021 of 2025) introduced a “mandatory administrative response” clause that legally requires public institutions to respond to citizen complaints within a fixed timeframe.

To operate this, the Government launched the “Ain” (the eye) Platform in October 2024. Unlike previous hotlines, “Ain” is integrated with the “Houwiyeti” (my identity) digital system, which verifies the whistleblower’s identity while cryptographically protecting their anonymity from the accused official.

The primary best practice here is the “10-day rule”. The platform’s procedural code automatically escalates any complaint that does not receive an administrative response within 10 days directly to the State Inspectorate. This digital escalation mechanism removes middle managers’ discretion to ignore reports. In its first operational quarter of 2025, the Ministry of Digital Transformation reported that this mechanism successfully cleared a backlog of legacy land-dispute complaints that had been stalled in paper archives for years.

Source: 2025 Investment Climate Statement: Mauritania (US State Dept, Bureau of Economic Affairs); Council of Ministers Statement (Nouakchott, Jan 16, 2025).

C. Budgeting and public expenditures

The budgeting and public expenditure frameworks in Arab low-income countries were classified as “developed” in 2025, anchored in formal legal provisions governing revenue presentation, expenditure oversight, and audit mandates, although public-facing transparency tools remain limited. In Somalia, article 12 of the Budget Law requires gross presentation of all estimated State revenues and expenditures; article 18 mandates full disclosure of estimated revenues; articles 28 and 30 assign the Accountant-General the responsibility of managing and auditing State accounts, complemented by the mandate of the Office of the Auditor General under Law No. 2 of 29 December 1961 (Financial and Accounting Procedure of the State) and Law No. 34 of 14 April 1972 (Magistrate of Accounts). In Mauritania,

Organic Law No. 032 of 2018 relating to the Court of Accounts entrusts the Court with monitoring public funds (article 2), overseeing the accuracy of revenue and expenditure in public budgets (article 17), and enhancing the efficiency of public spending (article 18). In Djibouti, the Amending Finance Law 2022 (Law No. 169/AN/22/8ème L) regulates revenue and expenditure structures, requires publication in the official gazette (article 24), and operates alongside the Court of Accounts established under Law No. 140/AN/16/7ème L. In the Comoros, Decree No. 19–001/PR (2019 Budget) sets out revenue procedures and presents budget balances under article 19. Across these frameworks, no specific legislation mandates pre-budget statements or citizen-friendly budget documents.

D. Digital government

Digital government in Arab low-income countries remains classified as “very weak”, reflecting the near absence of comprehensive legal frameworks governing digital administration, data use, and technology-driven public services. Somalia is a partial exception, having enacted the Data Protection Act (Law No. 005 of 2023), which established a national data protection authority and introduced basic safeguards for the collection and processing of personal data. Djibouti adopted the Law on Cybersecurity and the Fight against Cybercrime (No. 66/AN/14/7ème L), which focuses on protecting electronic

communications and combating cybercrime, but does not regulate digital public service delivery, data governance, or administrative interoperability. In the Comoros and Mauritania, no dedicated legislation has been identified addressing digital government, data protection, or digital service standards. Across the low-income countries group, no country has enacted laws mandating digital service delivery standards, regulating automated decision-making, or establishing ethical oversight of digital technologies, leaving digital transformation fragmented, weakly governed, and vulnerable to misuse.

E. Open government and transparency

Open government and transparency in Arab low-income countries improved to a “moderate” classification, reflecting incremental legal recognition of transparency principles, though with limited operational depth and enforceability. Djibouti and the Comoros reference transparency obligations within their anti-corruption and public integrity frameworks, most notably through the recent anti-corruption legislation in Djibouti and Law No. 08–013/AU in the Comoros. However, neither country provides a clear legal definition of “transparency”, nor establishes enforceable rights of public access to information. Mauritania has introduced asset declaration requirements under Law No. 022 of 2025 on Financial Transparency in Public Life, strengthening internal accountability mechanisms; however, strict confidentiality

provisions significantly constrain public access, limiting the law’s contribution to open government. Somalia remains the most constrained case, as transparency is not legally defined, and neither a right-to-information law nor a proactive disclosure regime exists, leaving access to Government-held information largely discretionary. While ratification of the United Nations Convention against Corruption has reinforced political commitments to openness across low-income countries, the absence of laws on access to information, proactive disclosure obligations, and independent oversight bodies continues to restrict meaningful public participation and civic oversight, preventing transparency from translating into an operational pillar of governance.

F. Public procurement standards

The public procurement standards component in low-income countries in the Arab region was classified as “developed” in 2025. Law No. 53/AN/09/6ème L in Djibouti establishes equal access to procurement, transparency obligations, and institutional oversight through a national procurement commission. The Comoros applies a structured two-tier system under Law No. 11–027/AU of 2012, combining ex ante control by the National Directorate for Market Control with regulatory oversight by an independent procurement authority. In Mauritania, Law No. 024 of 2021 strengthens procedural transparency by requiring

publication of procurement decisions and providing bidders with formal appeal mechanisms. In Somalia, the Public Procurement, Concessions and Disposal Act of 2015 explicitly prohibits fraud, collusion and corruption, and establishes both a procurement authority and an independent review panel. While enforcement capacity and public disclosure practices vary across countries, all low-income countries possess foundational procurement regimes with defined institutions, review mechanisms and integrity safeguards, marking a clear shift from fragmented rules towards more systematized procurement governance.

G. Conclusions and recommendations

Between 2020 and 2025, Arab low-income countries, namely Djibouti, the Comoros, Mauritania and Somalia, recorded measurable progress in their anti-corruption frameworks, elevating the subgroup’s overall classification from “moderate” to “developed”. This improvement reflects incremental yet meaningful legal and institutional developments, including the expansion of public procurement frameworks, the establishment or strengthening of national audit institutions, and closer alignment with international anti-corruption conventions. Nevertheless, progress remains uneven and largely procedural, with persistent structural constraints and implementation gaps continuing to limit the effective institutionalization of transparency and accountability.

Clarifying and operationalizing transparency as a legal principle is a key priority. While several low-income countries reference transparency within anti-corruption or financial legislation, the concept is rarely defined or accompanied by enforceable disclosure obligations. In some cases, confidentiality provisions, such as those governing asset declarations in Mauritania, further restrict public oversight. Codifying clear transparency standards and guaranteeing access to public information are therefore critical to strengthening accountability.

Whistle-blower protection remains another systemic weakness. Although Djibouti and the Comoros have introduced protective provisions, enforcement mechanisms remain limited. Meanwhile, Somalia does not have a dedicated legal framework in this regard. Comprehensive whistle-blower laws covering secure reporting channels,

institutional safeguards, and sanctions against retaliation are essential to fostering detection and civic trust.

Digital governance continues to lag significantly across low-income countries. With the partial exception of the 2023 Data Protection Act in Somalia, most countries do not have legislation regulating digital service delivery, data protection or the ethical use of emerging technologies. These gaps constrain administrative modernization and increase exposure to misuse and corruption risks.

Strengthening legal provisions on fiscal disclosure, audit mandates, and the regular publication of budget information would further reinforce accountability and oversight of public finances.

Although public procurement systems have advanced to a “developed” classification, enforcement remains inconsistent. All low-income countries now operate procurement laws grounded in competition and transparency; however, capacity constraints, uneven training, and limited independent oversight continue to weaken implementation.

To consolidate recent gains, Arab low-income countries need to prioritize institutional independence, enforceability, and public accessibility across their anti-corruption regimes. Sustained progress will depend not only on legislation, but on practical implementation, inter-agency coordination, civic engagement, and regional cooperation, which are key foundations for moving beyond a “developed” classification towards more resilient governance systems.

Endnotes

1. The classifications used in this report are those of the World Bank income groupings, effective as of December 2025. Source: World Bank, [World Bank Country and Lending Groups](#). Previous versions of this report relied on the income classification valid at the time of their publication.
2. ESCWA, [Arab Business Legislative Frameworks: Methodology 2.0](#), 2023.
3. United Nations Office on Drugs and Crime, [What Is Corruption and Why Should We Care?](#).
4. World Economic Forum, Corruption is costing the global economy \$3.6 trillion dollars every year, 2018.
5. World Bank, [What are the costs of corruption?](#), 2022.
6. ESCWA, [Arab Business Legislative Frameworks: Methodology 2.0](#), 2023.



Corruption carries far-reaching costs for societies and economies, as it distorts markets, deters investment, and undermines public trust. The third series of the Arab Business Legislative Frameworks (ABLF 2025) assesses anti-corruption regulatory frameworks in 22 Arab countries against 37 indicators covering six core components, namely anti-corruption and integrity in the public sector, anti-bribery and whistle-blowing laws, budgeting and public expenditures, digital government, open government and transparency, and public procurement standards.

Between 2020 and 2025, the Arab region advanced from an overall classification of “moderate” to “developed”. High-income and middle-income countries attained a “strong” classification, supported by significant legislative reforms in Jordan, Lebanon, Morocco, Qatar, Saudi Arabia and the United Arab Emirates. Progress was more limited in conflict-affected and low-income countries, constrained by institutional fragility and implementation capacity. The assessment points to a growing divergence between legislative strength and perceived control of corruption. Improvements in formal legal frameworks have not been consistently accompanied by stronger enforcement or institutional credibility, highlighting the need for sustained investment in operational capacity alongside continued legislative reform.

